



**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

June 8, 2020

Kristin Pollot, Planning Manager
City of Pittsburg
65 Civic Avenue
Pittsburg, CA 94565

RE: Pittsburg Technology Center – Notice of Preparation and Initial Study

Dear Ms. Pollot,

Bay Area Air Quality Management District (Air District) staff has reviewed the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) and the Initial Study for the Pittsburg Technology Center (Project). The Project applicant, Energy Delivery Systems, proposes to construct a data center campus encompassing 4.5 million square feet of floor space in up to 26 buildings at the former Delta View Golf Course in Pittsburg. The Project’s estimated peak electric power demand is estimated to be up to 500 megawatts (MW).

The Air District has worked for many years to improve air quality and health in the Pittsburg-Bay Point area and continues to do so today. Since the Pittsburg community has long been disproportionately impacted by air pollution and is identified as a priority community through our Community Air Risk Evaluation (CARE) program, by the State of California as a Senate Bill (SB) 535 disadvantaged community, and, more recently, through our Community Health Protection Program per Assembly Bill (AB) 617, the Air District is concerned about the potential for any increase in emissions that could result from the Project. Specifically, the Air District is concerned about the diesel-fired backup generators associated with powering the 500 MW data center. The Air District highly recommends that the City consider using the cleanest available technologies such as solar battery power or fuel cells.

Air District staff recommends the EIR include the following information and analysis:

- **The greenhouse gas (GHG) impact analysis should include an evaluation of the Project’s consistency with the most recent draft of the AB 32 Scoping Plan by the California Air Resources Board and with the State’s 2030, 2045, and 2050 climate goals.** The current recommended GHG thresholds in the Air District’s 2017 CEQA Guidelines are based on the State’s 2020 GHG targets, which are now superseded by the 2030 GHG targets established in SB 32. The EIR should demonstrate how the Project will be consistent with the Scoping

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Plan as well as the State's long-term climate goals. This includes an evaluation and discussion of how the GHG emissions associated with the electricity used by the data center and diesel fuel combusted by the back-up power generators are consistent with the State's goal of carbon neutrality no later than 2045.

- **The EIR should estimate and evaluate the potential health risk to existing and future sensitive populations within and near the Project area from toxic air contaminants (TAC) and fine particulate matter (PM_{2.5}) as a result of the Project's construction and operation.** Air District staff recommends that the EIR evaluate potential cumulative health risk impacts of TAC and PM_{2.5} emissions on sensitive receptors within and near the Project area.

- **The EIR should evaluate all feasible mitigation measures, both onsite and offsite, for air quality and GHG impacts.** The EIR should prioritize onsite mitigation measures, followed by offsite mitigation measures, within the Project area. Examples of potential emission reduction measures that should be evaluated and considered include, but are not limited to:
 - Prohibiting or minimizing the use of diesel fuel, consistent with the Air District's Diesel Free By '33 initiative (<http://dieselfree33.baaqmd.gov/>) and the County Board of Supervisor's commitment to meet this goal.
 - Implementing green infrastructure and fossil fuel alternatives in the development and operation of the Project, such as solar photovoltaic (PV) panels, renewable diesel, electric heat pump water heaters, and fuel cells or solar PV back-up generators with battery storage capacity.
 - Procuring 100 percent renewable energy or carbon-free electricity from Island Energy.
 - Implementing best available industry energy efficiency practices to achieve a power usage effectiveness (PUE) rating of 1.2 or lower.
 - Requiring construction vehicles to operate with the highest tier engines commercially available.
 - Creating a construction phase traffic management plan that reduces diesel equipment idling.
 - Creating a Transportation Demand Management Program that includes funding for zero-emission transportation projects, including a neighborhood electric vehicle program, community shuttle/van services and car sharing, and enhancement of active transportation initiatives, among others.
 - Procuring carbon offsets after implementation of all feasible onsite mitigation measures, in order to eliminate remaining GHG emissions associated with construction and operation of the Project.

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- **The EIR should evaluate the Project's consistency with the Air District's 2017 Clean Air Plan (2017 CAP).** The EIR should discuss 2017 CAP measures relevant to the Project and show the Project's consistency with the measures. The 2017 CAP can be found on the Air District's website:
<http://www.baaqmd.gov/plans-and-climate/air-quality-plans/current-plans>.
 - **The Air District's CEQA website contains several tools and resources to assist lead agencies in analyzing air quality and GHG impacts.** These tools include guidance on quantifying local emissions and exposure impacts. The tools can be found on the Air District's website:
<http://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/ceqa-tools>.
If the Project requires a site-specific analysis, please contact Air District staff to obtain more recent data.
 - **Certain aspects of the Project may require a permit from the Air District (for example, back-up diesel generators).** Please contact Barry Young, Senior Advanced Projects Advisor, at (415) 749-4721, or byoung@baaqmd.gov to discuss permit requirements. Any applicable permit requirements should be discussed in the EIR.
 - **The Project may require a Small Power Plant Exemption (SPPE) from the California Energy Commission (CEC).** Please contact the CEC to discuss potential SPPE applicability.

We encourage the City to contact Air District staff with any questions and/or to request assistance during the environmental review process. If you have any questions or would like to discuss Air District recommendations further, please contact Josephine Fong, Environmental Planner, at (415) 749-8637, or jfong@baaqmd.gov, or Jakub Zielkiewicz, Advanced Projects Advisor, at (415) 749-8429, or jzielkiewicz@baaqmd.gov.

Sincerely,



Greg Nudd
Deputy Air Pollution Control Officer

cc: BAAQMD Director John Gioia
BAAQMD Director David Hudson
BAAQMD Secretary Karen Mitchoff
BAAQMD Director Mark Ross