



**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

December 16, 2022

Mr. Marcus Yee
Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236-0001

RE: Draft Environmental Impact Report for the Delta Conveyance Project

Dear Mr. Yee:

The Bay Area Air Quality Management District (Air District) reviewed the Department of Water Resources (DWR) Draft Environmental Impact Report (DEIR) for the Delta Conveyance Project (Project). The Project includes the construction, operation, and maintenance of new State Water Project (SWP) water diversion and conveyance facilities in the Delta that operate in coordination with the existing SWP facilities. The proposed new water conveyance facilities would divert up to 6,000 cubic feet per second (cfs) of water from two new north Delta intakes and convey it via a single tunnel on an eastern alignment directly to a new pumping plant and aqueduct complex between Byron Highway and Mountain House Road near Mountain House in the south Delta, discharging it to the Bethany Reservoir for delivery to existing SWP export facilities. The Bethany Reservoir (Bethany Complex) is the preferred alignment (Alternative 5) located within the Bay Area air basin. The Project has a construction schedule of approximately 12 to 14 years.

Air Quality Impacts

Impact AQ-3 states that during construction, the Project will result in a significant impact due to emissions of fine particulate matter (PM2.5), coarse particulate matter (PM10) and oxides of nitrogen (NOx) exceeding Air District thresholds.

According to the DEIR, the DWR will implement best management practices (BMPs), a dust control plan and use Tier 4 engines and newer on-road and marine engines to reduce exhaust related emissions from construction. Exceedances of Air District thresholds would still occur with the Bethany Complex alternative however, resulting in a significant impact on regional air quality.

DWR is therefore proposing to implement an off-site mitigation program (Mitigation Measure AQ-3) to mitigate construction emissions. Air District staff strongly recommend the implementation of all available on-site emission reduction measures before relying on an off-site mitigation measure program. Please include additional on-site mitigation language in the DEIR to ensure every effort is made by

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DWR to exhaust all on-site options before implementing an off-site mitigation program to reduce construction emissions.

Additional mitigation measures to reduce construction emissions include the following:

1. Require construction vehicles to operate with zero-emission engines as commercially available
2. Require or incentivize zero emission trucks for facility operations to the greatest degree feasible
3. Use grid power for construction activities whenever possible; if grid power is not available, use alternative power such as battery storage, hydrogen fuel cells, or renewable fuels. If no other options are available, use Final Tier 4 diesel generators
4. Prohibit trucks from idling for more than two minutes or prohibit idling altogether
5. Require electric forklifts and install associated charging stations

Impact AQ-6 states that Project construction would expose sensitive receptors to substantial toxic air contaminant (TAC) emissions. As you may know, the inhalation of TACs from construction emissions has the potential to create serious health risks. Although sensitive receptor TAC exposure for the Bethany Complex was determined to be less than significant and impacts are not predicted to exceed Air District thresholds, we encourage DWR to facilitate, through its proposed online procurement program, the purchase and distribution of Minimum Efficiency Reporting Value (MERV) 15 air filters for Bethany Complex receptors as needed for the duration of Project construction as an additional measure to protect public health.

The Project is consistent with the State's goal of reducing greenhouse gas (GHG) emissions to 40 percent below 1990 levels by 2030 and carbon neutrality by 2045 (Executive Orders (EO) B-30-15 and B-55-18), and DWR's Climate Action Plan Phase 1: Greenhouse Gas Emissions Reduction Plan Update 2020 (CAP Update 2020). The CAP Update 2020 assesses energy use and GHG emissions from the Project's operation and includes measures for GHG reduction consistent with long-term state climate targets. Project construction is not covered by DWR's CAP Update 2020 and therefore the DEIR evaluates project construction emissions and displaced purchased of electricity against a net zero threshold.

The DEIR states the Project would not impede DWR's ability to achieve GHG mid and long-term reduction goals of at least 60 percent below 1990 levels by 2030 and supply 100 percent of electricity load with zero-carbon resources and achieve carbon neutrality by 2045.

As stated in Impact AQ-9, total net additional estimated GHG emissions generated by Project construction and operation are 495,442 and 1,633,134 respectively for the Bethany Complex (Alignment 5). The DWR expects however that planned GHG emissions reduction measures, such as the use of renewable energy to operate the SWP and the increased efficiency of SWP pumps

and generators through replacement and refurbishment that will be implemented as part of the CAP Update 2020, would reduce elevated GHG emissions below the 2045 target.

As implementation of the CAP Update 2020 progresses and DWR begins oversight of Project activities and monitoring of measures to achieve its GHG reduction goals, Air District staff recommends semi-annual rather than annual assessments of GHGs be performed to determine progress toward the 2030 and 2045 targets to ensure adjustments can be made including the adoption of new or additional measures.

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 DEIR.

We encourage DWR to contact Air District staff with any questions and/or to request assistance during the environmental review process. If you have any questions regarding these comments, please contact Andrea Gordon, Senior Environmental Planner at (415) 749-4940, or agordon@baaqmd.gov.

Sincerely,



Greg Nudd
Deputy Air Pollution Control Officer

Cc: BAAQMD Board Chairperson John J. Bauters
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