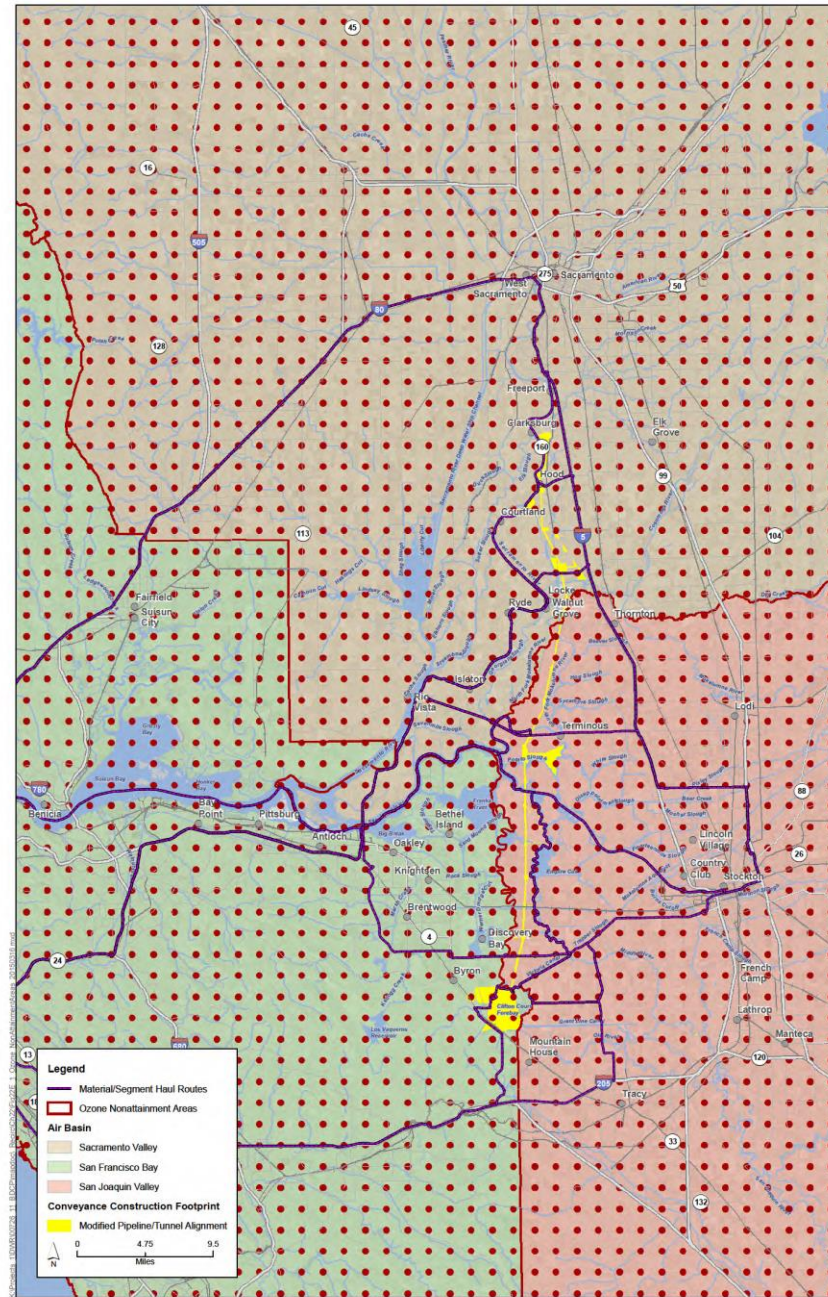


Judith Lamare Testimony

Air Basins of California



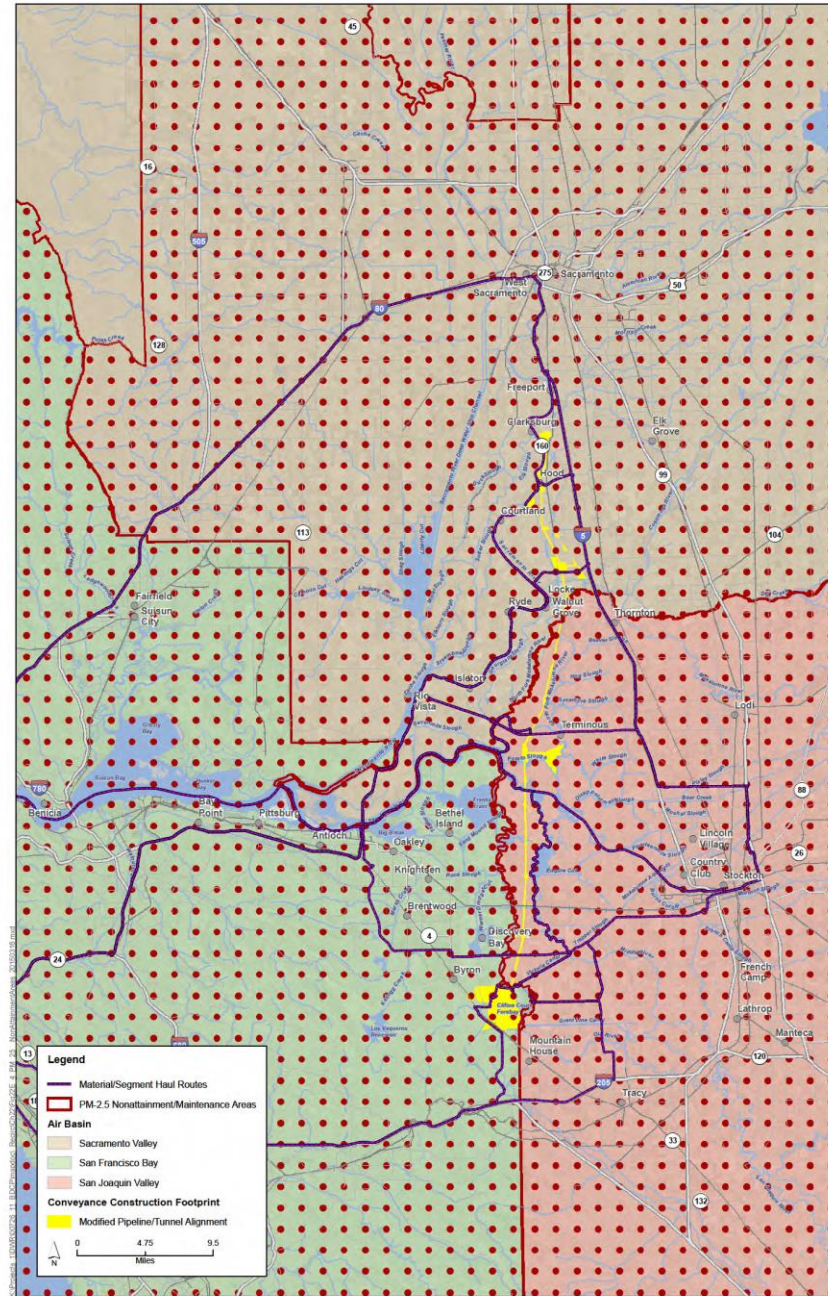
Ozone Nonattainment - All Districts



Source: Plan Area, ICF 2012; Area of Additional Analysis, ICF 2012; RDA, SARC 2010; Nonattainment/Maintenance Areas, EPA 2013; Air Basins, CARB 2004; Constructability (Rev 10), GHCCP DWR 2012; Constructability (Rev 30), GHCCP DWR 2012; Constructability (Rev 40), GHCCP DWR 2014.

Figure Z2E-1
Ozone Nonattainment Areas

PM 2.5 Nonattainment And Maintenance Areas



Source: Plan Area, ICF 2012; Area of Additional Analysis, ICF 2012; RDA, SARC 2010; Nonattainment/Maintenance Areas, EPA 2013; Air Basins, CARB 2006; Constructability (Rev 10), GHCCP DWR 2012; Constructability (Rev 30), GHCCP DWR 2012; Constructability (Rev 40), GHCCP DWR 2014

Figure 22E-4
PM - 2.5 Nonattainment and Maintenance Areas

**Table 22E-9. Project Features Located in the YSAQMD, SMAQMD, BAAQMD, and SJVAPCD
(Alternative 4/4A)**

Project Feature	YSAQMD	SMAQMD	BAAQMD	SJVAPCD
Geotechnical Investigations		X	X	X
Temporary Utilities		X		X
Equipment and Material Delivery	X	X	X	X
Tunnel Reach 7/Combined Pumping Plant			X	
Tunnel Reaches 1, 2, 3		X		
Tunnel Reach 4		X		
Tunnel Reach 6				X
Tunnel Reach 5				X
Intakes		X		
Clifton Court Forebay			X	
Intermediate Forebay		X		
Permeant Utilities			X	X

SMAQMD = Sacramento Metropolitan Air Quality Management District.

YSAQMD = Yolo-Solano Air Quality Management District.

BAAQMD = Bay Area Air Quality Management District.

Table 22-9. Federal *de minimis* Thresholds by Air Basin (tons per year)

Pollutant	SFNA	SJVAB	SFBAAB
NO _x ^a	25	10	100
VOC/ROG ^b	25	10	100
CO	100	100	100
PM10	100	100	-
PM2.5	100	100	100
SO ₂ ^c	100	100	100

^a NO_x is a precursor ozone and PM. NO_x emissions in excess of 100 tons per year within federally designated PM10 or PM2.5 nonattainment or maintenance areas trigger a secondary PM threshold.

^b ROG is a precursor ozone.

^c SO₂ is a precursor to PM2.5.

Air Quality and Greenhouse Gases

1 **Table 22-110. Criteria Pollutant Emissions from Construction and Operation of Alternative 4 in**
 2 **Nonattainment and Maintenance Areas of the SFNA, SJVAB, and SFBAAB (tons/year)**

Year	Sacramento Federal Nonattainment Area					
	ROG	NO _x ^a	CO ^b	PM10 ^c	PM2.5	SO ₂
2016	<1	3	<1	<1	<1	<1
2017	<1	4	<1	1	1	<1
2018	1	9	1	9	3	<1
2019	5	<u>45</u>	1	21	5	<1
2020	6	<u>64</u>	1	30	5	<1
2021	10	<u>87</u>	3	40	7	<1
2022	11	<u>82</u>	3	40	7	1
2023	10	<u>73</u>	2	38	6	<1
2024	11	<u>83</u>	3	36	7	1
2025	14	<u>106^d</u>	6	41	8	1
2026	13	<u>90</u>	1	34	6	1
2027	11	<u>79</u>	<1	33	6	<1
2028	3	20	<1	19	3	<1
2029	3	19	<1	13	2	<1
ELT	0.13	0.80	1.65	0.27	0.08	<0.01
LLT	0.11	0.68	1.58	0.26	0.07	<0.01
<i>De Minimis</i>	25	25	100	100	100	100

San Joaquin Valley Air Basin

Year	ROG	NO _x ^a	CO ^b	PM10	PM2.5	SO ₂
2016	<1	4	0	<1	<1	<1
2017	1	5	0	1	1	<1
2018	3	<u>20</u>	0	9	3	<1
2019	6	<u>42</u>	0	27	5	<1
2020	<u>12</u>	<u>95</u>	4	48	7	2
2021	<u>14</u>	<u>104</u>	7	47	7	3
2022	<u>16</u>	<u>112</u>	13	47	8	6
2023	<u>14</u>	<u>92</u>	13	35	6	6
2024	<u>12</u>	<u>74</u>	13	24	5	6
2025	<u>10</u>	<u>62</u>	8	19	4	4
2026	6	<u>39</u>	0	15	2	<1
2027	4	<u>27</u>	0	14	2	<1
2028	2	<u>10</u>	0	7	1	<1
2029	0	0	0	0	0	0
ELT	0.01	0.08	0.14	0.02	0.01	0.00
LLT	0.01	0.07	0.13	0.02	0.01	0.00
<i>De Minimis</i>	<i>10</i>	<i>10</i>	<i>100</i>	<i>100</i>	<i>100</i>	<i>100</i>

San Francisco Bay Area Air Basin

Year	ROG	NO _x ^a	CO ^b	PM10 ^c	PM2.5	SO ₂
2016	<1	1	<1	-	<1	<1
2017	<1	1	<1	-	<1	<1
2018	3	20	1	-	2	<1
2019	2	19	0	-	2	<1
2020	5	46	17	-	5	7
2021	8	72	31	-	7	12
2022	10	98	49	-	9	19
2023	10	99	49	-	9	19
2024	15	<u>129</u>	49	-	11	20
2025	19	<u>148</u>	32	-	11	13
2026	10	67	2	-	6	1
2027	9	58	2	-	6	1
2028	6	40	1	-	4	1
2029	<1	1	<1	-	1	<1
ELT	0.19	1.15	2.42	-	0.11	0.01
LLT	0.16	0.97	2.33	-	0.10	0.01
<i>De Minimis</i>	<i>100</i>	<i>100</i>	<i>100</i>	<i>-</i>	<i>100</i>	<i>100</i>

“With respect to pollutant transport among air districts; all mass emissions thresholds adopted by the Plan Area air districts account for expected criteria air pollutant contributions from downwind air basins. Accordingly, use of the Plan Area air district thresholds to evaluate construction and operational impacts associated with the project is appropriate Project-level ozone transport or dispersion modeling is not required.”

(SWRCB-102, FEIR/S, Comments and Responses to Comments, Letter 2622, p. 97).

Project Harmful to Health in San Joaquin Valley

- Emission Impacts Not Fully Disclosed nor Mitigated
- Mitigation Should Occur in Northern San Joaquin Valley
- Mitigation Measures Vague and Speculative, Guarantees Minimal
- Water Board Can Improve Mitigation Guarantees Through Permit Conditions