



**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

May 19, 2020

Syd Sotoodeh, Planner II
Contra Costa County
Department of Conservation & Development
30 Muir Road
Martinez, CA 94553

RE: Powerdrive Oil and Gas Company Wells Project - Negative Declaration

Dear Syd Sotoodeh,

Bay Area Air Quality Management District (Air District) staff has reviewed the Negative Declaration (ND) for Powerdrive Oil and Gas Company Wells Project (Project). The Project proposes a Land Use Permit change to allow the establishment of a gas and oil well pad on an agriculturally zoned parcel. The project will first establish if there are commercial quantities of petroleum products under the premises through exploratory drilling. If found, further development of the site will include a permanent gas & oil well pad and a 3-inch (diameter) natural gas pipeline. The proposed wellsite will be 60,000 square feet and located approximately in the northeast corner of the parcel. The total length of the pipeline will be approximately 3,350 linear feet and will stretch into the city limits of Antioch.

Air District staff appreciates the Project's efforts to address air quality and health risk impacts and for referencing best management practices during construction. However, Air District staff recommends that the Project identify the specific best management practices that will be incorporated during construction in order to demonstrate that all feasible best practices are being included and to support implementation. Specific best management practices for operationally-related impacts should likewise be identified and incorporated into the project design.

In addition, Air District staff is concerned that the assessment does not quantitatively assess and disclose the potential health risks for existing and future residential communities near the Project area nor does it address regional pollutants or greenhouse gas (GHG) emissions generated during construction or operations. As part of the environmental review process, Air District staff recommends the Project quantitatively assess the impacts from the following two scenarios:

- I. The exploration phase
- II. The subsequent development/production phase

This will better evaluate air quality and GHG impacts as well as potential health risks to workers and surrounding residents from toxic air contaminants (TAC) and fine particulate matter (PM2.5).

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Furthermore, Air District staff appreciates the Project's efforts to align its practices with Contra Costa County's Climate Action Plan (CAP). However, natural gas and oil production and distribution can indirectly produce GHGs and limiting these pollutants is essential to meeting the State's 2030 and 2050 climate goals. The ND has not evaluated, disclosed, or discussed the Project's consistency with State policies requiring long-term reductions in emissions of GHGs, including the direction in Executive Orders B-55-18 and S-3-05 to respectively achieve carbon neutrality by 2045 and to achieve GHG emissions reductions equivalent to 80 percent below 1990 levels by 2050. See *Cleveland Nat'l Forest Foundation v. San Diego Ass'n of Governments* (2017) 3 Cal.5th 497, 516 (CEQA analysis should "compare the [project's] projected greenhouse gas emissions ... from 2020 through 2050 with the Executive Order's goal of reducing emissions to 80 percent below 1990 levels by 2050."). To address the Project's long-term impacts on GHG emissions, Air District staff recommends that the Project's CEQA analysis augment its GHG discussion to include an evaluation, disclosure, and discussion of whether the project will be consistent with these State policies.

Based on these shortcomings in the air quality and GHG analyses, Air District staff believes that this document as currently written does not adequately evaluate potential air quality and GHG impacts and thus does not support a finding of no significant impact.

As mentioned in the ND, certain aspects of the Project will require a permit from the Air District. To apply for an Authority to Construct/Permit to Operate please visit <https://www.baaqmd.gov/permits/apply-for-a-permit> or contact Barry Young, Senior Advanced Projects Advisor, at (415) 749-4721 or byoung@baaqmd.gov to discuss permit requirements.

We encourage the County 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, or would like to schedule a meeting, please contact Areana Flores, Environmental Planner, at (415) 749-4616 or aflores@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