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December 16, 2021

Khamly Chuop
Associate Environmental Planner/Scientist
Environmental Programs and Planning Division
Port of Oakland
530 Water Street
Oakland, CA 94607

RE: Eagle Rock Aggregates – Oakland Terminal Project FINAL Supplemental Environmental Impact Report (FSEIR)

Dear Ms. Chuop,

Bay Area Air Quality Management District (Air District) staff have reviewed the Final Supplemental Environmental Impact Report (FSEIR) for the Eagle Rock Aggregates – Oakland Terminal Project (Project). The proposed project includes the construction and operation of an aggregates import, storage, and distribution terminal estimated to process 2,500,000 tons per year (tpy) of construction aggregates. The Project would occupy Berth 22 for vessel and barge operations and approximately 18 acres for construction aggregates stockpiling and distribution on the backlands of Berths 20, 21, and 22, all within the Outer Harbor Terminal in the Port's Oakland Army Base (OAB) Redevelopment Plan Area in Oakland.

The Air District would like to commend the project for its commitment to electrifying mobile equipment at the site (e.g., hybrid-electric front loaders, electric sweeper, skid steer loader), including a truck washing station to reduce fugitive dust, and using four electric trucks for trips between the Central Concrete site in West Oakland. However, the Air District is concerned with the significant and unavoidable NOx and PM impacts and recommends the Project more fully address Air District comments on the [DRAFT Supplemental Environmental Impact Report](#).

The Air District does not support the addition to Mitigation Measure ERA AQ-1 that includes the use of Emission Reduction Credits to offset the NOx emissions. Such banked emissions credits may have resulted from past and/or non-local sources, and do not reduce current local impacts on the West Oakland community. The use of Emission Reduction Credits is allowed in the Air District's New Source Review program, which is intended for no net emission increase in the whole Bay Area air basin. As CEQA mitigation for a specific project, the order of priority for mitigations to reduce impacts should be: 1) onsite to the maximum extent possible; 2) within the Port area; 3) off-site within West Oakland; 4) off-site beyond West Oakland. If no other mitigations are available/feasible then Emissions Reduction Credits may be considered. Note, however, that the proposed NOx offsets – if ultimately used –

would not address PM emissions, so Air District staff continues to urge more comprehensive mitigations on or near the Project site.

The Air District recommends the Port commit to the following best practices to minimize air quality impacts to the West Oakland community:

- Require Shore power or an equivalent abatement system for the bulk vessels
- Require that 50% of Ocean-going Vessels (OGV) meet at least Tier 2 engine standards at the start of operations and require by year 12 of the lease that all of the OGV fleet meet a mix of at least Tier 2 or Tier 3 engines
- Reduce OGV speeds while entering and exiting the Bay
- Require tugboats assisting the OGVs use Tier 4 engines
- Conduct the proposed “pilot emissions recovery system study” prior to construction with results implemented by the time the facility begins operation
- Fully enclose the aggregate stockpiles to reduce fugitive dust
- Require electric or zero-emission haul trucks for truck trips between batch plants/facilities within West Oakland by Year 1, facilities within 5 miles of the Port by 2026; facilities within 15 miles of the Port by 2028; and by 2030 all trucks be electric or zero-emissions
- Fund zero emission yard trucks and other cargo handling equipment at the Port
- Fund Tier 4 switcher locomotives at railyards near the Port

Air District staff is available to assist the Port in addressing these comments. If you have any questions or would like to discuss Air District recommendations further, please contact Matthew Hanson, Environmental Planner, at (415) 749-8733 or mhanson@baaqmd.gov.

Sincerely,



Greg Nudd
Deputy Air Pollution Control Officer – Policy

Cc: BAAQMD Secretary John J. Bauters
BAAQMD Director David Hudson
BAAQMD Director Pauline Russo Cutter
BAAQMD Director Nate Miley