



**BAY AREA
AIR QUALITY
MANAGEMENT**

DISTRICT

ALAMEDA COUNTY

John J. Bauters
(Secretary)
Pauline Russo Cutter
Nate Miley
VACANT

CONTRA COSTA COUNTY

John Gioia
David Hudson
Karen Mitchoff
(Vice Chair)
Mark Ross

MARIN COUNTY

Katie Rice

NAPA COUNTY

Brad Wagenknecht

SAN FRANCISCO COUNTY

VACANT
Shamann Walton
Tyronne Jue
(SF Mayor's Appointee)

SAN MATEO COUNTY

David J. Canepa
Carole Groom
Davina Hurt

SANTA CLARA COUNTY

Margaret Abe-Koga
Cindy Chavez
(Chair)
Rich Constantine
Rod G. Sinks

SOLANO COUNTY

Erin Hannigan
Lori Wilson

SONOMA COUNTY

Teresa Barrett
Lynda Hopkins

Jack P. Broadbent
EXECUTIVE OFFICER/APCO

Connect with the
Bay Area Air District:



January 8, 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 DRAFT Supplemental Environmental Impact Report (DSEIR)

Dear Ms. Chuop,

Bay Area Air Quality Management District (Air District) staff have reviewed the DRAFT Supplemental Environmental Impact Report (DSEIR) 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.

Staff acknowledges the Project's efforts to be consistent with the Air District's West Oakland Community Action Plan (WOCAP) and 2017 Clean Air Plan, which includes a commitment to use all electric trucks for its operations between the Project site and Central Concrete in West Oakland and restricting all idling of trucks on-site. However, staff is concerned that the Project's particulate matter (PM) emissions from stockpiles, trucks, and ocean-going vessels (OGV) hinder progress in meeting the WOCAP's goals and targets of reducing residential neighborhood exposure to fine particulate matter (PM_{2.5}) concentrations to 1.7 micrograms per cubic meter (ug/m³) by 2025. The Air District has worked for many years to improve air quality and health in West Oakland, a community identified as disproportionately impacted by poor environmental and socioeconomic conditions. Because additional exposure to fine particulate can cause serious health impacts, staff firmly recommends that the Port require the maximum feasible controls of the stockpiles. This should go beyond watering as currently proposed.

Staff also recommends the Port to incorporate additional PM_{2.5} reduction measures such as:

- Require additional vegetative and/or physical barriers to reduce wind speeds within the facility;

- Require all stationary equipment to be completely zero-emission, to the maximum extent feasible.
- Ensure that the project applicant purchases the lowest emitting mobile equipment available, such as hybrid front loaders and electric sweepers, prior to issuance of occupancy;
- Include shorepower as feasible in the Project plans to ensure PM emissions from ship hoteling exhaust are reduced;
- Require all ocean-going vessels (OGV) calls to meet a minimum of Tier 3 emission engine standard or better by 2025 and/or use the contracted Tier 4 OGV to the maximum extent possible.
- Require in the lease agreement that the Port have dedicated barges and tugs that meet Tier 3 engine emission standards prior to start of Project operations;
- Show compliance with District PM Regulation 6, Rule 1: General Requirements and Regulation 6, Rule 6: Prohibition of Trackout; and
- Require all trucks be covered and the use of other fugitive dust controls such as watering down trucks or a trackout device before leaving the facility to reduce fugitive dust from operations.

Health Risk Assessment Methodology

Air District staff appreciate the Project's efforts to address air quality and health impacts, however staff is concerned that the Health Risk Assessment (HRA) does not disclose quantified cumulative impacts from existing sources, in addition to that of the Project, that could potentially result in a cumulatively considerable impact to nearby residents or workers on-site. Staff recommends the cumulative impacts be quantitatively evaluated to determine significance and to maintain transparency between the Project and community members.

Truck Related Emissions

The Project's transportation analysis states that 16 percent of Project trips would travel through local right-of-ways via W. Grand Avenue through West Oakland. Staff is concerned that the Project's analysis does not properly evaluate the possible increase of truck emission impacts within West Oakland and the potential increase of trucks on local roads. Staff recommends that the air quality and traffic analysis state the strategies to mitigate the truck trips and traffic impacts from the Central Concrete facility within West Oakland. The analysis should also demonstrate how it will be consistent with the City of Oakland and Port of Oakland's Truck Management Plan 2019.

The Project Description also states that impacts from inadequate parking capacity or the increase in incidences of large vehicles parking within surrounding communities are less-than-significant due to the existing 40 acres of parking within the Port. Staff is concerned this analysis is in conflict with plans to eliminate approximately 25 acres of parking at Howard Terminal within the project life, reducing parking to only 15 acres at the Roundhouse parking area. Staff is concerned that this leaves inadequate levels of truck parking which may impact the surrounding community.

Staff recommends the Project evaluate a scenario that involves removing 25 acres of parking at Howard Terminal.

In addition, on September 23, 2020, Governor Gavin Newsom signed Executive Order N-79-20 calling for all medium-and heavy-duty vehicles in the State to be zero-emission by 2045 for all operations, where feasible, and by 2035 for drayage trucks. The Executive Order intends to protect public health from adverse air quality and greenhouse gas impacts in the transportation sector. Staff recommends that prior to the start of Project operations, all heavy-duty trucks entering or on the Project site to be model year 2014 or later with the goal to be fully zero-emission beginning in 2030.

Greenhouse Gas (GHG) Analysis

The Project's GHG analysis used the Air District's current thresholds to determine the Project's GHG emissions would be less than significant. The GHG thresholds in the Air District's 2017 CEQA Guidelines are based on the State's 2020 GHG targets however, those targets are now superseded by the 2030 GHG targets established in SB 32. Staff recommends the DSEIR demonstrate how the Project will be consistent with SB 32 and the California Air Resources Board's most recent draft of the AB 32 Scoping Plan.

We encourage the Port 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 Matthew Hanson, Environmental Planner at 415-749-8733 mhanson@baaqmd.gov, or Areana Flores, Environmental Planner, 415-749-4616 aflores@baaqmd.gov.

Sincerely,



Greg Nudd
Deputy Air Pollution Control Officer

cc: BAAQMD Secretary John J. Bauters
BAAQMD Director Pauline Russo Cutter
BAAQMD Director Nate Miley
CARB Executive Officer Richard Corey

cc: (via email)
Stanley Armstrong
Air Pollution Specialist
California Air Resources Board

Matthew O'Donnell
Manager
California Air Resources Board

Abigail Blodgett
Deputy Attorney General
Bureau of Environmental Justice
California Attorney General's Office

Linda Scourtis
Manager
San Francisco Bay Conservation and Development Commission

Ms. Margaret Gordon
Co-Director
West Oakland Environmental Indicators Project

Brian Beveridge
Co-Director
West Oakland Environmental Indicators Project