

Catherine Mukai

From: Brian Beveridge <brian.woeip@gmail.com>
Sent: Monday, September 30, 2019 1:10 PM
To: Catherine Mukai
Cc: Margaret Gordon; Jhamere Howard; Meg Prier; Lina Ghanem; Lily Maciver; Richard Grow
Subject: [EXTERNAL] Eagle Rock scoping comments

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Ms. Mukai

Please accept these comments regarding the EIR Scoping for the proposed Eagle Rock aggregate project as submitted on behalf of the West Oakland Environmental Indicators Project.

Our concerns include air quality, water quality, truck and rail traffic, job opportunities, and shore side electrification.

AIR QUALITY

According to the CEQA overview document for the project, Eagle Rock could hold up to 250,000 tons of aggregate on site in open piles exposed to wind and rain. We are concerned that watering for dust control is not an adequate method and will result in significant off site distribution of particulate. Recent regulations from the Bay Area Air Quality Management District make all particulate emissions which cross the property line unlawful. Routine enforcement of this rule for this type of operation will be very difficult and manpower intensive.

We understand the aggregate will be brought to the site by powered barges and that these type of vessels are not designed to use the shore side electric power provided at the Port of Oakland. This means that the barge diesel emissions will be unregulated and will add to the over burden of black carbon pollution already present in West Oakland. This is contrary to the goals of the Port Seaport Air Quality Plan and the West Oakland Air Quality Action Plan.

We also understand that the aggregate product will be transferred to local and regional concrete mixing facilities by truck. Lacking accurate calculations we can only speculate, but surely this will mean thousands of additional truck trips per month traveling around and through our community. We note that a concrete mixing plant operates on Peralta St, within a few blocks of residential property.

There is the added problem that the manufacture of Portland cement represents between 6% and 9% of total CO₂ production globally, yet other methods are available. This ancillary green house gas emissions cannot be separated from Eagle Rock's business, despite the need for concrete in our expanding economy. To put these numbers in context, global trucking activity represents approximately 7% of global GHG production.

WATER

Dust control for the Eagle Rock facility will require millions of gallons of water annually. If this is potable water it represents a tremendous cost in a critical local resource considering the constant threat of drought in our region. If recycled water is used we must be concerned about the health hazard potential of water vapor drifting from the site. Recycled water, intended for distribution via irrigation systems is not recommended for human contact.

The last water concern is the SF Bay. Rain water management will be a significant challenge for a facility with large open piles of dusty material. On site storm water processing will be critical to protecting our Bay from toxic runoff combining aggregate dust with diesel spot and road dust emissions.

JOBS

We understand that this operation will provide few if any job opportunities. This is not in keeping with the Port's stated goals of being a job creator and the "economic engine of the Bay Area." We have too many jobless industries coming to West Oakland already.

TRUCKING

Besides the aforementioned significant increase in truck traffic volume, the Eagle Rock terminal will displace approximately 20 acres of truck parking facilities. The Port of Oakland has yet to devise a comprehensive and permanent solution to the truck parking crisis. Where will the trucks now parking at the former Ports America terminal go? We believe that many will end up back in West Oakland truck yards; adding dangerous traffic and pollution to our neighborhoods. Others will add to the already overloaded local freeways as they commute to San Leandro, Richmond or Vallejo. The Port's own stated goals for expansion into new rail service are intended to reduce truck traffic, not increase it.

In summary, the Eagle Rock project seems inappropriate for the Port of Oakland on nearly all fronts and we recommend a deep analysis of its potential impacts, if not an outright rejection no of the proposal.

Sincerely Brian Beveridge