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Bay Area Air District:



September 30, 2019

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

RE: Eagle Rock Aggregates - Oakland Terminal Project – Notice of Preparation of a Draft Supplemental Environmental Impact Report

Dear Ms. Mukai,

Bay Area Air Quality Management District (Air District) staff has reviewed the Notice of Preparation (NOP) for the Eagle Rock Aggregates – Oakland Terminal Project (Project) Draft Supplemental Environmental Impact Report (DSEIR). The Project proposes to install electrical infrastructure, a receiving hopper and overhead conveyor system, truck scales, and a scale house (two double-wide trailers); make site entrance improvements; operate a bulk marine terminal for sand and aggregates; receive up to 48 ocean-going vessel calls per year and up to 2.5 million tons of sand and aggregate per year; and maintain sand and aggregate stockpiles of up to 25 feet in height with a maximum total storage capacity of 250,000 tons.

The Project is located with West Oakland, a community disproportionately impacted by air pollution, especially diesel particulate matter, a toxic air contaminant. The Air District has worked for many years to improve air quality and health in West Oakland. West Oakland was identified as a priority community through our Community Air Risk Evaluation (CARE) program and more recently through our Community Health Protection Program pursuant to AB 617. The Air District partnered with West Oakland Environmental Indicators Project and a Steering Committee of local stakeholders, including the Port of Oakland, to develop *Owning Our Air: The West Oakland Community Action Plan* (Plan) to identify strategies to continue to improve air quality in West Oakland. Accordingly, increased emissions in West Oakland or activities that would make it more challenging to achieving the Plan's air quality goals and targets would be extremely concerning.

To that end, the Air District strongly recommends that the Port of Oakland conduct a robust analysis of potential air quality impacts and include the following information and analysis in the DSEIR:

1. Provide baseline information on the San Francisco Bay Area Air Basin's attainment status for all criteria pollutants and the implications for the region if the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) are not attained or maintained by statutory deadlines.
2. Provide baseline information regarding existing sources of air pollution and air pollution concentrations in the West Oakland community.
3. Quantify and characterize the Project's potential construction and operational impacts to local and regional air quality, including greenhouse gases. The analysis should evaluate whether the project will have a cumulatively considerable net increase for construction and/or operational emissions.
4. Include a discussion of the current health effects of exposure to air pollutants occurring in West Oakland.
5. Estimate and evaluate the potential health risk to existing and future sensitive populations adjacent to and downwind of the Project area from toxic air contaminants (TAC) and fine particulate matter (PM<sub>2.5</sub>) as a result of the Project's construction and operations, including changes in operations outside of the Project area due to displacement of current truck staging on site.
6. Include all feasible measures to be implemented onsite and offsite to minimize air quality and GHG impacts. Zero emissions equipment should be prioritized for all operations at the site. The DSEIR should prioritize onsite measures, followed by offsite measures within the West Oakland community and near the proposed Project.
7. Evaluate the Project's consistency with the Air District's 2017 Clean Air Plan (2017 CAP) and with the West Oakland Community Action Plan (WOCAP). Many WOCAP measures address port-related activity. The DSEIR should discuss how this Project will implement all applicable measures. The 2017 CAP and West Oakland Community Action Plan can be found on the Air District's website at [www.baaqmd.gov](http://www.baaqmd.gov).
8. Include all appendices or technical documents relating to the air quality, toxic air contaminant and GHG analysis, such as emissions assessment calculation and the health risk assessment files. Without all the supporting air quality documentation, the public may be unable to effectively review the air quality and GHG analyses in a timely manner.
9. The Project may require Air District permits for demolitions/renovations, internal combustion engines > 50 horsepower, boilers, and other stationary equipment that may cause air pollution. The DEIR should disclose all potential stationary sources of air pollution and disclose daily and annual emissions from these sources. The following type of permits may be required:
  - a. Authority to Construct: Issued before construction and after Air District engineers review project to ensure it will comply with air quality laws. To apply online use the following link <http://www.baaqmd.gov/permits/apply-for-a-permits>

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- b. Authority to Operate: Issue after project is built and compliance is demonstrated. Must be renewed annually. To apply online use the following link <http://www.baaqmd.gov/permits/apply-for-a-permits>

We encourage the Port of Oakland, applicant and DSEIR consultants to meet with Air District staff to discuss the air quality analysis 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](mailto:aflores@baaqmd.gov).

Sincerely,



Henry Hilken  
Director of Planning and Climate Protection

cc: BAAQMD Director John J. Bauters  
BAAQMD Director Pauline Russo Cutter  
BAAQMD Director Scott Haggerty  
BAAQMD Director Nate Miley  
Ms. Margaret Gordon, WOEIP  
Brian Beveridge, WOEIP