

Khamly Chuop

From: Oakland Seaport <wordpress@oaklandseaport.com>
Sent: Monday, December 18, 2023 2:27 PM
To: Turning Basins
Subject: [EXTERNAL] Turning Basins Project Comment Form Submit

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From: Jack Fleck

Email: lucerofleck@gmail.com

Message Body:

Date: December 16, 2023

To: Port of Oakland,
Environmental Programs and Planning Division
Ms. Khamly Chuop
530 Water Street
Oakland, CA 94607

From: 350 East Bay and 360 Oakland Hub

Re: Widening of Turning Basins

As Oakland residents, we are writing to express our concern about the Port of Oakland's Draft Environmental Impact Report on the Project to widen the turning basins in the Oakland Harbor. We believe the Project fails to comply with City of Oakland climate and environmental justice policies as well as numerous other CEQA requirements.

The City of Oakland has declared a climate emergency and has a goal to equitably reduce climate emissions by 56% by 2030. Oakland's Equitable Climate Action Plan–2030 (ECAP) lists criteria for its strategies, the first of which is to "maximize benefits and minimize burdens on frontline communities" and notes that ocean-going vessels and trucks serving the Port of Oakland "bring high levels of diesel pollution and fine particulate matter to West Oakland and communities living along the 880 freeway corridor, increasing the incidence of cancer and asthma in these populations." (Oakland Equitable Climate Action Plan–2020) All foreseeable consequences of this project that may increase exposure to diesel pollution and other fine particulate matter and NOX must be fully addressed and mitigated.

The turning basin project is intended to enable more megaship (ULCV) calls on the Port of Oakland and is part of broader efforts to increase Port capacity. Whereas the DEIR claims that landside constraints will prevent an increase in Port throughput, the Port is pursuing and has been awarded federal and state grants to remove those constraints, including a \$102 million from CalSTA to allow new ULCV berth capacity, terminal expansion, and increased container handling capacity. Thus increased container throughput is apparently not only a reasonably foreseeable consequence of the project, but an intended outcome. The DEIR must therefore acknowledge the overall increase in throughput and address the resulting increases in greenhouse gas and other pollutant emissions from ships, drayage vehicles, trains, and trucks. The DEIR cannot confine itself to the construction phase.

In addition, at any given overall rate of container throughput, at other ports surges in TEU delivery by ULCVs have been shown to cause increased congestion, which results in increased GHG, NOx, and particulate matter emissions. ULCV calls should be expected to do the same here. The DEIR must address emissions impacts due to likely impacts such as:
more ship idling as other ships are backed up behind ULCVs out of reach of shore electricity
more truck idling within the Port
more truck and general traffic congestion in West Oakland
more stop-and-go traffic on Interstate 80 as it traverses disproportionately low-income communities and communities of color within and beyond Oakland.

In addition to ignoring the environmental justice principles of the ECAP, the DEIR fails to address the ECAP's specific Port Actions: P-1, "Reduce Emissions from Port Vehicles and Equipment" and P-2, "By 2023, Port of Oakland should procure 100% carbon-free and nuclear-free electricity for Port operations and all electricity supplied to tenants or other end users." Indeed, increasing container throughput before completely electrifying Port vehicles and equipment will likely increase rather than reduce their emissions, and the plan to "mitigate" energy supply effects by switching dredging operations from electric to diesel during (P-1) grid shortage periods directly contradicts P-2.

We urge you to redo the analysis and recirculate a new Draft Environmental Impact Report that fully analyzes and specifies mitigation measures for the negative impacts of this proposed expansion of Port activity on our region and the health and well-being of West Oakland residents in particular and all Oakland and East Bay residents in general.

Sincerely,

Jack Lucero Fleck
On behalf of the 350 Bay Area Oakland hub

Attachment:

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