



December 18, 2023

Port of Oakland  
530 Water St.  
Oakland, CA 94607  
Attn: Ms. Khamly Chuop  
Environmental Programs and Planning Division  
Delivered via email to: [turningbasins@portoakland.com](mailto:turningbasins@portoakland.com)

Re: Draft Environmental Impact Report (DEIR) Oakland Harbor Turning Basins Widening Project

On behalf of the undersigned organizations, we respectfully offer these comments on the Draft Environmental Impact Report (DEIR) for the Oakland Harbor Turning Basins Widening Project.

The Turning Basins widening project will significantly enhance navigational safety and reduce the risk of maritime casualties, increase supply chain efficiency, enhance economic competitiveness, sustain growth at marine terminals within their existing infrastructure thresholds, and continuously improve the environment by reducing emissions – both total emissions and the rate of growth of emissions per container – from and reduce GHG emissions by avoiding cargo diversion.

The existing channel and turning basins were designed for Panamax-era container vessels, which were state-of-the-art 25 years ago and have a carrying capacity of roughly 1/3 the capacity of today's ultra-large container vessels. While larger ships have been able to be accommodated, these vessels are not operating at maximum efficiency and have little to no margin for error upon their approach or departure within the turning basin. These current limitations on the Port of Oakland stem directly from

the size and dimensions of the current turning basins, not from the balance of the channels, which continue to be maintained at the depths authorized by the -50 Foot Project.

#### Significant Impacts and Mitigation Measures

In our estimation, the DEIR adequately considers all of the potentially significant impacts and mitigation measures related to this project.

The DEIR considers and evaluates the environmental benefits of lowering emissions per ton and emissions per container, which are endemic to the usage of larger and more efficient vessels. Larger vessels are also the newest vessels which are more likely to have newer tier engines, alternative-fueled engines, and overall lower environmental impacts. And, most importantly, the use of larger vessels requires that fewer vessels will be required to call upon Oakland in order to move cargo, and this tautology is applicable no matter which cargo volumes are forecast or used as a baseline for the CEQA analysis.

The DEIR properly notes that the project objectives include enhancement of the safety of the Port's navigational access channels and competitiveness of the Port of Oakland. Maintaining competitiveness for import and export cargoes is imperative for the Port's future, otherwise, it cannot grow its revenues, which in turn support and maintains its commitment to an environmental improvement program which requires accelerated investments in non-revenue infrastructure and equipment. In short, if the Port of Oakland can no longer physically accommodate the largest vessels plying the Pacific trade lanes, it will suffer from less access to vessel traffic and a significant limitation on the Port's ability to maintain both its current volumes and current revenues, which will in turn starve its ability to fund its laudable but aggressive environmental commitments and goals, including those Zero Emissions goals included in its "2020 and Beyond" planning efforts.

The DEIR also considers and acknowledges that vessel movements and subsequent container movements are separate and distinct from one another. The latter in the case of the movement of containers facilitated by the expansion of the turning basin, which is limited by marine terminal capacity and throughput parameters. To the extent that the movement of containers off of a vessel and then through the Port ecosystem and infrastructure is facilitated, it is facilitated by a marine terminal. These activities are already accounted for under CEQA under the environmental clearances adopted by the Port of Oakland at the time of the approval – and subsequent construction and lease-up – of a marine terminal development project.

CEQA does not require other tangential projects (in this case, the turning basin expansion) to re-mitigate again the impacts already accounted for in another project. Thus, the DEIR does not need to re-evaluate the potential impacts that result from marine terminal operations at the Port because the marine terminals have already been environmentally cleared for providing this service, and the volumes to be handled at those facilities are already accounted for within those approvals.

Moreover, we agree with the DEIR finding that this project will benefit from the utilization of electric dredges in order to reduce the potential cumulative impacts of additional diesel particulate matter on the surrounding community. As you may be aware, every component of the intermodal supply chain at California ports has been successfully employing aggressive measures for many years to significantly

reduce the emissions of diesel toxics. As a result of these efforts, this project is actually occurring in the context of improved air quality in the communities and regions surrounding our freight hubs. These are the result of significant investments and remarkable progress made by ocean-going vessels and marine terminal operators. We welcome the project joining in these efforts and agree with the DEIR that the additional emissions associated with the turning basin expansions are truly “minor” and fully mitigated by the use of the electric dredging equipment.

#### Environmentally Superior Alternative

With respect to air quality and to water quality risks as the result of a potential vessel allision or lack of removal of soil contaminants, we respectfully suggest that the project as proposed is the environmentally superior alternative. Because the environmental benefits of the project outweigh the environmental impacts of not proceeding with this project, the DEIR cannot conclude that the “No Project Alternative” is environmentally superior.

As noted in the DEIR, the “No Project Alternative” would result in up to a 13% increase in lifetime operational air emissions – because, without the turning basin expansion project, more vessel traffic will be required in order to accommodate the same cargo volume, and at higher emissions rates per TEU for smaller ships than they are for larger ships. These lifetime and ongoing emissions benefits are more substantial and likely dwarf any one-time impacts from construction, especially given the usage of the electric dredge as a mitigation measure. And as further noted by the DEIR, the “No Project Alternative” also is less beneficial because it is without any of the benefits of potential removal of contaminated soils. We would also note that the DEIR analysis of the “No Project Alternative” does not attempt to quantify the environmental costs of not addressing the safety issues of the current turning basin and does not quantify the benefit of eliminating safety risks associated with the project. These alone, if one considers the potential ecological and economic costs of an oil spill or other outcome of an accidental allision by an ocean-going vessel, would compel the project to be viewed Environmentally Superior to the “No Project Alternative.”

In sum, the DEIR for the Turning Basins Expansion project describes the project as one that will facilitate safety, accessibility, and improvements in environmental quality. These include the benefits to air quality which will result from reductions in emissions per unit of cargo by allowing for the newest and most advanced vessels to call on the Port of Oakland.

Thank you for affording the public the opportunity to comment on this important DEIR and to support this project which will improve the safety, economic vitality, and environmental footprint of vessel operations through the expansions of the Inner Harbor and Outer Harbor turning basins.

Sincerely,

Oakland Maritime, Access, Sustainability, and Trade Coalition  
Customs Brokers and Forwarders Association of Northern California  
Dreisbach Enterprises  
GSC Logistics  
ILWU Local 10  
Marine Engineers' Beneficial Association

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Marine Firemen's Union  
Pacific Maritime Shipping Association  
Propeller Club of Northern California  
San Francisco Bar Pilots  
SSA Marine