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Governor's Office of Planning & Research

SEP 30 2019

Making Conservation a California Way of Life.



September 30, 2019

Catherine Mukai, Associate Environmental Planner/Scientist Port of Oakland Environmental Programs and Planning Division 530 Water Street Oakland, CA 94607 SCH #2001082058 GTS # 04-ALA-2019-00456 GTS ID: 16878 ALA-880-PM 1.25

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

Dear Catherine Mukai:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for this project. In tandem with the Metropolitan Transportation Commission's (MTC) Sustainable Communities Strategy (SCS), Caltrans' mission signals our continuing approach to evaluate and mitigate impacts to the State's multimodal transportation network. Our comments are based on the August 2019 Notice of Preparation (NOP).

Project Understanding

The applicant (Eagle Rock Aggregates) proposes to:

- Install electrical infrastructure;
- Construct and install a receiving hopper and overhead conveyor system;
- Install truck scales;
- Install a scale house (two double-wide trailers);
- Make site entrance improvements;
- Operate a bulk marine terminal for sand and aggregates; receiving up to 48 ocean-going vessel calls per year and up to 2,500,000 total tons of sand and aggregates 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.

Regional access is provided from Interstate (I-) 880 from the Maritime Street/West Grand Avenue exit approximately 0.7 miles away.

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Freight

Please include a discussion and analysis of the amount of truck traffic projected to be generated now and in the future by the proposed Eagle Rock Aggregates - Oakland Terminal Project. Analysis should, at minimum, measure the Average Annual Daily Truck Trips (AADTT) entering and exiting the proposed facility and the potential impacts to the I-80, I-580, I-880, and I-980 freeways as well as surrounding local streets and roads in the West Oakland community and the greater City of Oakland. An analysis of proposed truck weights, types, configurations should also be considered.

All analyses should measure the impacts of trucks both entering and exiting the proposed terminal facility during both the construction phase of the proposed project and during current and future facility operating conditions. Due to a shortage in truck parking options, especially in Alameda County and the greater San Francisco Bay Area, Caltrans is working to better understand the needs of truck drivers and find better ways to accommodate them to improve roadways conditions, reduce congestion and increase safety for both truck drivers and the traveling public.

The San Francisco Bay Area is also a non-attainment area for PM 2.5 which is primarily generated through the combustion of diesel fuel from trucks and other heavy-duty equipment. Due to these overall concerns, we request considerations for on-site short and long-term truck parking, on-site truck maintenance and on-site electric truck charging stations to improve safety, reduce pollution and emissions.

Additionally, a Class 1 railroad is located near the proposed Eagle Rock Aggregates - Oakland Terminal Project. Therefore, this project proposal has an opportunity to perform a freight rail transport analysis. The costs, benefits and potential for using rail should be considered.

Lastly, any considerations on how the proposed facility can help improve freight sustainability, safety and efficiency in California is welcomed. Caltrans is dedicated to moving freight on a modern, safe, integrated, and resilient system that supports the economy, jobs, and healthy, livable communities. In the Caltrans Strategic Management Plan (2015-2020), Caltrans has established an objective to improve economic prosperity of the State and local communities through a resilient and integrated transportation system. Freight system competitiveness, transportation system efficiency, and a return on transportation investments are key performance measures established for freight in support of the Caltrans Strategic Management Plan.

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Sea Level Rise

The effects of sea level rise may have impacts on transportation facilities located in the project area. Executive Order (EO) S-13-08 directs State agencies planning construction projects in areas vulnerable to sea level rise to begin planning for potential impacts by considering a range of sea level rise scenarios for years 2050 and 2100. Higher water levels may increase erosion rates, change environmental characteristics that affect material durability, lead to increased groundwater levels and change sediment movement along shores and at estuaries and river mouths, as well as affect soil pore pressure at dikes and levees on which transportation facilities are constructed. All these factors must be addressed through geotechnical and hydrological studies conducted in coordination with Caltrans.

Lead Agency

As the Lead Agency, the Port of Oakland is responsible for all project mitigation, including any needed improvements to the State Transportation Network (STN.) The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Andrew Chan at 510-622-5433 or andrew.chan@dot.ca.gov.

Sincerely,

Mark Leong

District Branch Chief

Local Development - Intergovernmental Review

c: State Clearinghouse