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November 22, 2019

Via email to [jcashman@stocktonport.com](mailto:jcashman@stocktonport.com)

Re: The October 2019 Lehigh Southwest Stockton Terminal Project Notice of Preparation and Initial Study

The Delta Sierra Group has reviewed the October 2019 Lehigh Southwest Stockton Terminal Project Notice of Preparation and Initial Study and has the following comments for your consideration as the Draft Environmental Impact Report (DEIR) is being prepared.

The adoption of the City of Stockton Envision 2040 General Plan increased outreach efforts at the urging of community organizations. As a city we have recognized that certain members of our community do not have the same level of services and accommodations, Boggs Tract is one of those communities. Boggs Tract is the residential area adjacent to the Port of Stockton. This Notice of Preparation and Initial Study was found on a state clearinghouse website<sup>1</sup> not on the Port's website (see attachment). A workshop should be held to hear the concerns of the community before the DEIR is prepared and briefing notices provided so that the community can be informed and knowledgeable when reviewing the DEIR.

The Lehigh Southwest Stockton Terminal is located at 205 Port Road 1, Berth 2. The proposed project includes an upgraded dock, new ship unloader with greater reach to service longer and wider vessels, as well as a lease modification to increase the leasehold from 6.24 to 8.08 acres with larger storage facilities. The current facility was reportedly converted in 1996 to handle cementitious materials and the abandoned fertilizer handling equipment left on site. Is the location of the fertilizer handling equipment the source of the additional acreage? The figures within the Notice of Preparation and Initial Study are shown below:



<sup>1</sup> <https://ceqanet.opr.ca.gov/2019100510/2> - accessed 11.16.19



The location of the additional acreage was not shown on the map. Please provide an updated map showing the location of the additional acreage and the site's current use. The environmental setting stated that there are commodities stockpiled on site at the Port but did not describe the commodities nor the sizes of the stockpiles. Please provide a summary of the volumes and types of materials stored at the Port in stockpiles.

The description of existing dock and unloader facilities stated that the existing dock and ship unloader were originally designed to handle 35,000 tons deadweight (DWT) vessels as was the existing berth capacity and channel depth. The typical dimensions of these vessels were not described. A 1991 tanker stability study<sup>2</sup> described a typical tanker as having dimensions of length 638 feet, berth 89 feet, and depth 46.75 feet. Please describe the size of the larger and wider vessels that Lehigh charters. Also, please describe how the existing channel depths will be redesigned to handle these larger vessels and how the project's necessity for deeper channel depths will affect the benefit/cost ratio for the deepening of the navigation channels to Stockton.

The tonnage of cement, ground granulated blast furnace slag waste from the steel industry, and fly ash from the burning of coal is expected to increase greatly as described in Table 1 from the Initial Study (below). The statement regarding future commodity status was not clear, was the reference to slag or fly ash? Please describe any health hazards associated with the transport, storage, and distribution of these waste materials as well as fully disclose the air quality monitoring performed by Port of Stockton staff. Please also describe the relative proportions of cement, ground granulated blast furnace slag cement with fly ash that are handled currently and what is the proposed proportions of these cementitious materials.

Lehigh's current operations of cementitious material receiving and distributing were described on an annual basis because "activity at a terminal can vary month to month over the course of a year due to normal market forces, throughput activity is generally calculated over the preceding 12 months or a calendar year." The terminal's existing Permit to Operate (Facility Number N-153), issued by San Joaquin Valley Air Pollution Control District (SJVAPCD) was not referenced nor was it located on either Lehigh's website: <https://www.lehighhanson.com/home> or the SJVAPCD's website: <https://www.valleyair.org/Home.htm>. Please provide a copy of the permit as it was referenced in the Initial Study. The Initial Study stated that the current permit for the existing terminal operations allow for a truck and rail shipping capacity of 6,000 tons of cementitious materials per day, any combination of a maximum of approximately 200 trucks per day or 18 rail cars per day, and that the facility is permitted to receive 2.628 million tons per year via ship or rail. The existing operation received approximately 20 bulk cargo vessel calls in 2018. The unit "tons" was used when

<sup>2</sup> <https://www.nap.edu/read/1621/chapter/13> accessed 11.11.19

describing product, but the term “metric ton” was used when describing the increased storage planned as part of the proposed project. Please use one unit of measure to describe tonnage.

**Table 1  
Expected Maximum Proposed Project Throughput Compared to Existing Levels (Annual)**

	Baseline (2018)		Project Year 10 (Expected Maximum)	
	Mode (annual moves)	Tons of Product	Mode (annual moves)	Tons of Product
Truck <sup>1</sup>	16,730	459,484	42,000	1,100,000
Rail Cars	534	56,057	4,700	500,000
Rail Trips <sup>2</sup>	27	--	300	--
Ships Calls	20	287,907	50	1,700,000
Barges Calls	0	0	40	200,000
Total Tons	--	803,448	--	3,500,000

Notes:

1. Truck calls are expressed in one-way moves.
2. Assumes an average of 20 cars per train
3. Current throughput permitted by the SJVAPCD is 2,628,000 tons per day receiving into and 6,000 tons per day shipping out of the terminal.

The installation of the new dock is expected to require dredging of less than 500 cubic yards which is allowed under the Port’s existing permit. Please provide a copy of the Port’s dredging permit. The depth of excavation to accommodate the dock and bunker construction is stated to include ground disturbances up to 80 feet below the surface along the dock and beneath the proposed dome, as well as 40 feet below the sediment within the dock area. Native sediments may contain intact archaeological resources that are also tribal cultural resources.

No additional stormwater impacts were proposed, yet additional areas will be paved. Please describe the stormwater plan for the proposed facilities and provide a copy of the Port’s stormwater management plan and permit.

The project includes the installation of a new bunker to store cementitious materials replacing existing bunker 7. Below is a comparison of the two structures:

Bunker	Existing Bunker 7	New Bunker
Diameter- feet	130	120
Height - feet	58	132
Capacity – Metric Tons	8,000	40,000

When performing the analysis of potential aesthetic impacts please make sure that all directions are evaluated.

The Initial Study stated that in 2016 the Port has developed and implemented a *Renewable Portfolio Standard Procurement Plan*. “In the plan’s most recent iteration, the Port determined the most efficient and cost-effective approach to meeting these standards is through continued purchase of sufficient state-approved renewable energy products from the active California market.” Yet the Initial Study stated that the terminal is served by Pacific Gas and Electric. Some years ago, the Port of Stockton built a transmission voltage

substation on the Pacific Gas and Electric system in an effort to lower the price of electricity to the Port. The Port of Stockton resells the electricity purchased thru the substation to Port tenants. Please describe more fully the source of energy for the energy that flows through the Port of Stockton and that will supply Lehigh.

The Port of Stockton has the smallest Publicly Owned Utility in the State of California. The Port announced a mobile power source<sup>3</sup>:

The port of Stockton will be the first in the state to use a so-called “mobile power station,” made by a company called Dannar. The company’s website shows the power stations, on wheels, can be used to move heavy items themselves and can also charge other clean-energy vehicles using its battery storage. The high-tech help comes a few years after an old coal power plant at the Port of Stockton also switched to renewable fuel. Now there is another new power supply.

Please describe how the Port will be meeting renewable energy goals with the proposed increased operations as well as the City of Stockton’s Climate Action Plan 29% reduction by 2020. Please also provide a copy of the Port’s *Renewable Portfolio Standard Procurement Plan 2016 Update*.

Hazards associated with increased truck and rail transport of cementitious materials in addition to air quality concerns such as those associated with the safe movement of bicycles and pedestrian in the Port area should be addressed. Also, hazards associated with spills as well as anticipated truck and rail accidents should be based on actual port data, California Highway Patrol data, and/or other regional transportation data sources.

Thank you for considering our comments on the October 2019 Lehigh Southwest Stockton Terminal Project Notice of Preparation and Initial Study. We look forward to obtaining and reviewing the additional information requested. The Delta Sierra Group welcomes opportunities to discuss the Port of Stockton’s public outreach efforts related to this project and to the Port of Stockton’s public information dissemination.

Sincerely,



Mary Elizabeth M.S., R.E.H.S.  
Delta-Sierra Group Conservation Chair  
Sierra Club

Attachment: Port CEQA website 11.11.19

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<sup>3</sup> <https://www.portofstockton.com/port-of-stockton-rolling-out-power-on-wheels>

## CEQA DOCUMENTS

The Port of Stockton is committed to environmental stewardship and enhancement of the Delta and surrounding communities. The Port is currently unveiling and implementing a program that identifies opportunities the Port could engage to enhance the Delta. The Delta provides drinking water for two-thirds of the state of California and acts as a habitat for more than 70 fish species and abundant wildlife. The Delta provides a key resting or wintering spot along the Pacific Flyway for migrating bird species. The Port understands the importance of maintaining this delicate environment and providing a habitat for wildlife within an ever-growing population.

The Port of Stockton is committed to improving the region's quality of life by balancing environmental enhancement with the economic benefits of Port activity. This commitment is reflected in the Port's Delta Environmental Enhancement Program which aims to enhance air quality, water quality, and wildlife habitats in the Delta and surrounding communities.

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### Documents:

[Cyber security technology consolidation-enhancement remediation NOE 2015-9-22](#)

[Sanguinetti property NOE 2015-9-22](#)

[San Joaquin International Gateway Project NOE 3-17-14](#)

[Calamco NOE 12-18-13](#)

[Forward Command Post NOE 8-20-13](#)

[Dock 14-15 2013 NOE 6-26-13](#)

[Dock 4-11 2013 NOE 6-17-13](#)

### Endicott:

[Endicott NOD 2-4-14](#)

[Endicott IS-MND Draft 10-15-2013](#)

