



*Delta-Sierra Group*  
*Mother Lode Chapter*  
*P.O. Box 9258*  
*Stockton CA 95208*

Jason Cashman  
Port of Stockton Environmental and Regulatory Affairs Manager  
2201 West Washington Street  
Stockton, California 95203

January 28, 2020

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

Re: December 2019 NuStar Marine Oil Terminal Engineering and Maintenance Standards (MOTEMS) Development and Vessel Service Project Draft Environmental Impact Report; State Clearinghouse Number:2019060229.

The Delta Sierra Group of the Sierra Club respectfully submit comments on the December 2019 Draft Environmental Impact Report for the NuStar Marine Oil Terminal proposed project.

The NuStar Marine Oil Terminal Draft Environmental Impact Report included three project alternatives.

1) Proposed Project:

- Upgrade existing dock 10/11 to meet safety regulations to receive vessels importing renewable diesel from unknown sources;
- Connect existing NuStar facilities via pipelines (3,400 feet of underground 12-inch piping) to enable receipt of imported renewable diesel arriving by vessel.
- Increased truck trips (17,011 to 21,249 truck calls) related to increased throughput of fuels.

2) No Project:

- Existing operations continues - NuStar operates a liquid bulk terminal at the Port serving a variety of products including ethanol, gasoline, aviation fuel, naphtha, diesel, renewable diesel, biofuels, and lubricants via pipeline, rail and truck. The proposed project only involves changes to the diesel product mix and operations at the NuStar facility; therefore, the level of ultra-low sulfur diesel (ULSD) and renewable diesel in 2018 was considered as the baseline. In 2018, the facility received and transferred 3.147 million barrels of ULSD and had 17,011 truck calls. The existing facilities according to NuStar<sup>1</sup> includes 33 tanks that can hold 878,000 barrels ranging in size from 4,200 to 88,000-barrel capacities. There are eight truck loading bays at the north and south truck racks. Rail operation area has three tracks with a combined 16 unloading locations
- Currently served by pipeline, which was not described in DEIR, nor were the current volumes of domestic renewable diesel.

3) Reduced Project:

- same buildout as the proposed project with reduced numbers of vessel calls at the terminal; reduced 12 vessels to 8 vessels, annually.

The Delta Sierra Group comments are presented in six sections: Public Participation, Air Quality, Greenhouse Gas Emissions, Hazards, Transportation, and Cumulative Impacts. The Delta-Sierra Group recommends that the Port of Stockton begin preparation of a cumulative risk assessment to determine whether public health can be protected with increased Port throughput and what Port mitigation measures are needed for continued operational growth.

**Public Participation**

The DEIR stated:

Public participation is an integral part of the CEQA process. Public participation facilitates two-way communication between the public and the lead agency (the Port) decision makers, ensuring that public concerns and input are considered in the final decision. The Port's public participation process ensures that interested persons are informed about discretionary decisions and have the opportunity to provide input.

---

<sup>1</sup> Accessed 1.20.2020. [http://www.nustarenergy.com/Business/AssetSheets?assetid=TR\\_STN\\_CA&assettype=Storage](http://www.nustarenergy.com/Business/AssetSheets?assetid=TR_STN_CA&assettype=Storage)

The Port also consults with public agencies in a variety of ways when developing CEQA documents, including direct agency outreach and distribution of documents.

The June 25, 2019 Notice of Preparation was not posted on the Port of Stockton website nor was the comment period ending on July 24, 2019 announced during the Port of Stockton Commission meeting which is a public meeting held by the lead agency decision makers. The December 2019 Draft Environmental Impact report was not located on the Port's website nor was the DEIR's circulation and comment period announced during the December 2, 2019 Port of Stockton Commission meeting.

The adoption of the City of Stockton Envision 2040 General Plan calls for 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.

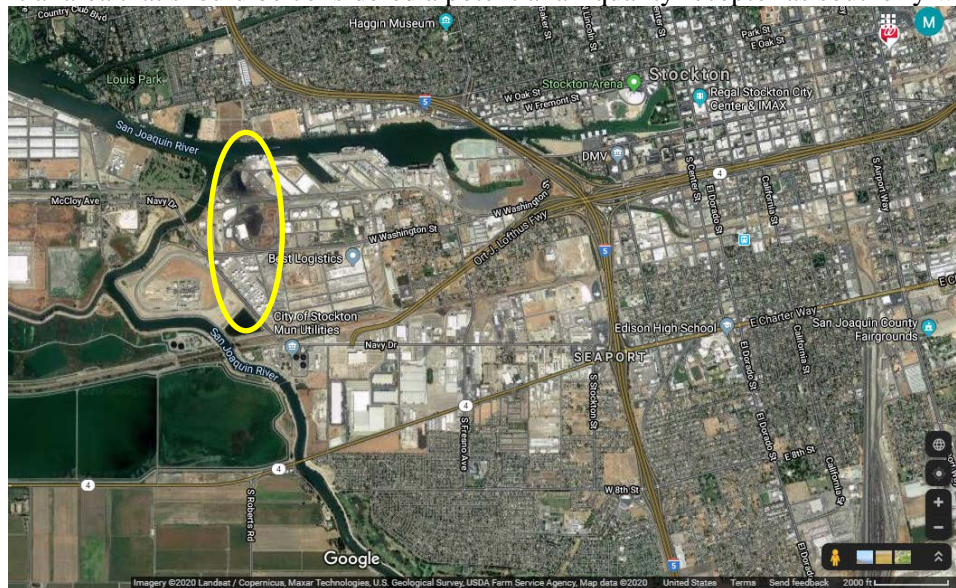
A workshop should be held to hear the concerns of the community before the final EIR is prepared and briefing notices provided so that the community can be informed and knowledgeable when reviewing the final EIR. A workshop should be held to ensure that interested persons are informed about discretionary decisions and have the opportunity to provide input.

### Air Quality

For all those participating in the Peace March to honor Martin Luther King Jr. air quality concerns were not discussed; nevertheless, many of the elderly or breathing impaired participants experienced impaired air quality. The following air quality conditions were documented at the time of the Peace March for the 95202 zip code<sup>2</sup>.

Current Conditions	
Air Quality Index (AQI) observed at 11:00 PST	
<b>74</b> Moderate	
Health Message: Unusually sensitive people should consider reducing prolonged or heavy exertion. Note: Values above 500 are considered beyond the AQI. Follow recommendations for the Hazardous category. Additional information on reducing exposure to extremely high levels of particulate pollution is available <a href="#">here</a> .	
AQI - Pollutant Details	
Ozone	<b>3</b> Good
Particles (PM <sub>2.5</sub> )	<b>74</b> Moderate

The DEIR stated that much of the Valley's ambient PM<sub>10</sub> and PM<sub>2.5</sub> is secondary particular matter formed in atmospheric reactions of NO<sub>x</sub>. However, based on federal and state standards, the San Joaquin Valley Air Pollution Control District has achieved NO<sub>2</sub> attainment but not for Ozone, PM<sub>10</sub> and PM<sub>2.5</sub>. This suggests that the existing standards for nitrogen dioxide may not be protective or that other sources of particulate matter prevail. The DEIR recognized that the nearest residential area is approximately 1,200 to the north while the nearest residential receptor to the NuStar terminal is located approximately 4000 feet to the east. North of the Deep Water Canal is a residential area that should be considered a potential air quality receptor as southerly winds occur<sup>3</sup>.



<sup>2</sup> Accessed 1.20.2020. Air Now: [https://airnow.gov/index.cfm?action=airnow.local\\_city&zipcode=95202&submit=Go](https://airnow.gov/index.cfm?action=airnow.local_city&zipcode=95202&submit=Go)

<sup>3</sup> Accessed 1.20.2020.

[https://www.valleyair.org/Air\\_Quality\\_Plans/docs/2003%20PM10%20Plan/PDF%202003%20PM10%20Plan%20adpt%20chapters/Ch%202-Final.pdf](https://www.valleyair.org/Air_Quality_Plans/docs/2003%20PM10%20Plan/PDF%202003%20PM10%20Plan%20adpt%20chapters/Ch%202-Final.pdf)

The DEIR further stressed the health importance to residents that particulate matter poses, since if the state annual average PM<sub>2.5</sub> standards was met approximately 1,000 premature deaths would be avoided annually. The state PM<sub>2.5</sub> standards were exceeded in our region during 2015 according to the DEIR

The criteria pollutants identified in the DEIR are ozone, particulate matter, carbon monoxide, nitrogen dioxide and sulfur dioxide. The analysis was based on the modeling of construction and operational emissions including vessels, terminal components, trucks and employee vehicle movements. Truck destinations analyzed were within a 50 mile radius, 35 miles of which would be within the San Joaquin Valley Air Pollution Control District. The basis of this small radius infers a relatively small market; however, to get to downtown Sacramento is 51 miles to the north and to get to Modesto is 33 miles to south (all within the SJVAPCD).

Operation emissions associated with the proposed project from ocean-going vessels, tugboats used to assist OGVs, truck transport, rail transport, and worker vehicles. The DEIR stated that activity associated with rail transport and worker vehicles would not change because of the proposed project, so emissions associated with these sources were not quantified. Without this analysis, the cumulative impact on air quality requested by the SJVAPCD is incomplete. Apparently three rail transporters are involved with project operations: Union Pacific (UP), Burlington Northern Santa Fe Railway (BNSF) and Central California Traction. The number of trip-miles associated with rail transport to the facility was not included in the DEIR.

The DEIR Air Quality analysis stated that the Panamax is the vessel anticipated. These vessels have sizes that are appropriate for travelling through the Panama canal with dimensions of the maximum size, 965-foot overall length, 106-foot beam, and 39-foot drafts<sup>4</sup>. According to the 2018 Port of Stockton Annual Report, the max draft - mean lower low water (MLLW) is 35 feet for all except for 16,17,18. Berth 10/11 is currently able to handle 35 feet draft not the proposed 39-foot drafts. The Sierra Club is concerned that plans to accommodate vessels of the proposed larger size will affect the benefit/cost ratio for the deepening of the navigation channels to Stockton. Please describe the size of the Panamax that is proposed to be used and how the existing channel depths will handle these larger vessels.

### **Greenhouse Gases**

The No project alternative environmental conditions are referred to as the baseline. The DEIR baseline is the set of conditions that existed at the time of the June 2019 Notice of Preparation circulation. The existing project according to the DEIR in 2018 received and transferred 3.147 million barrels of ultra low sulfur diesel and has 17,011 truck calls annually. The other products handled at the existing terminal, evidently were not analyzed as part of the baseline analysis.

he proposed project could result in 1.728 million barrels of imported renewable diesel which presumably would reduce rail or pipeline conveyance of ULSD. This was not discussed in the DEIR and may be affected by the permit conditions which would be determined by the San Joaquin Valley Air Pollution Control District.

The source of the renewable diesel was not disclosed so that air quality benefits from reducing ULSD diesel is not possible. According to US Department of Energy<sup>5</sup> renewable diesel is chemically similar to petroleum diesel unlike biodiesel. Biodiesel is produced exclusively from lipids such as vegetable oils, animal fats, grease, and algae. Renewable diesel is produced from lipids and cellulosic biomass such as crop residues, woody biomass, and dedicated energy crops. Information suggest that the refining location for the proposed renewable diesel may be from Singapore.

The US Department of Energy has stated that:

Imports from Singapore remain significant, planned renewable diesel production capacity additions during the next several years have the potential to increase the share of domestic renewable diesel in the California market. A number of low carbon fuel standard (LCFS) amendments are slated to go into effect in 2019, including an extension of the program to increase the total reduction in carbon intensity to at least 20% by 2030.

---

<sup>4</sup> Accessed 1.26.2020. <http://savethecape.org/stcwp1/wp-content/uploads/PDFs/ShipSize.pdf>

<sup>5</sup> Accessed 1.20.2020. [https://afdc.energy.gov/fuels/emerging\\_hydrocarbon.html](https://afdc.energy.gov/fuels/emerging_hydrocarbon.html)

The impacts related to overseas production cannot be controlled by California regulations. The possibility exists that the destruction of woody biomass needed to create the renewable diesel may have greater impacts on global climate change than the benefit of renewable diesel as a transitional petroleum substitute.

Furthermore, the DEIR included statements from the California Energy Commission related to the emissions of a wide variety of alternative fuels:

Renewable diesel has 58 to 80% lower greenhouse gas emissions than petroleum diesel (EIA 2018). Carbon intensity (CI), a measure of carbon by weight emitted per unit of energy consumed and is used to compare the net GHG of materials or activities. Lower CI values relate to lower GHG emissions, while higher CI values are related to higher emissions. CI can be used to compare how the sources of materials influence carbon emissions and also how different renewable fuels compare to each other. For example, renewable diesel made from animal tallow has a CI of 19.65, while renewable diesel made from domestic soybeans has a CI of 82.16. For comparison, ULSD has a CI of 94.71 and biodiesel made from domestic soybeans has a CI of 82.35 (ARB 2009).

While these carbon intensity values are interesting, the carbon intensity value for the proposed renewable diesel imports was not disclosed.

The DEIR Impact Analysis stated that since most of the emissions are from mobile sources, that the SJVAPCD BPS (best performance standard) do not apply and that the SJVAPCD has not established BPS for the wide variety of land use sources that occur within the Valley. Instead, SJVAPCD recommends determining whether the GHG emissions would result in a 29% reduction compared to BAU (business as usual). The DEIR cited the 2015 Center for Biological Diversity v. California Department of Fish and Wildlife California Supreme Court decision which invalidated the BAU approach. Other California air districts have established a GHC threshold of 1,100 metric tons of CO<sub>2</sub> per year for land use plans and 10,000 metric tons per year for stationary sources. The DEIR stated that the proposed project is neither a land use plan nor a stationary source. The South Coast Air Quality Management District allows 10,000 metric tons per year of CO<sub>2</sub> for industrial project, including Port Projects. This value was used as the criteria determining whether or not the proposed project resulted in a significant impact requiring mitigation. The analyses used for the project only with the proposed buildout resulted in 5924 metric tons over the 6096 metric tons per year. Since the proposed buildout resulted in less than 10,000 metric ton increase, the DEIR found that impacts were considered less than significant requiring no mitigation measures. The Delta Sierra Group is concerned that this analysis is not protective of the City of Stockton climate goals which call for a reduction of GHG. The DEIR included a cumulative analysis of air quality impacts and the total impact from GHG emissions should have resulted in a significant impact requiring mitigation measures.

**Hazards and Hazardous Materials**

The DEIR stated that known hazards and hazardous material conditions in the project area were based in part on information available from the California Department of Toxic Substances Control EnviroStor and the State Water Resources Control Board GeoTracker databased websites, site-specific and regional emergency response plans, federal, state and local regulations, fire hazard maps, school and airfield public records, and NuStar’s Facility Response Plan. The project area was defined as the NuStar Terminal, pipeline, and Dock 10/11.

The Delta-Sierra Group disagrees that the project represents a less than significant impact related to existing problems identified at cleanup sites and recent NuStar fires at their Crocket Terminal.

The DEIR review yielded 33 EnviroStor cleanup sites, and GeoTracker identified 48 cleanup sites with active, open or unidentified status (with some unstated overlap). Nine are within less than 1,000 ft of the project site:

Facility	Address	Status
Learner Company	2711 Navy Drive	Cleanup site open and a land use covenant issued by DTSC to address soil contamination restricting site uses and excavation requirement.
Nustar Terminal	2942 Navy Drive	CVRWQCB issued a groundwater monitoring and reporting plan 4.5.2017; stated that Ethanol I stored in three 33,000 barrel tanks and that gasoline releases at their terminal occurred in March 2002 and a diesel release June 2002.

		<p>Not specified in DEIR<sup>6</sup></p> <p>Environmental Health documents state that there were additional releases not reported in the DEIR:</p> <ul style="list-style-type: none"> <li>• release of ethanol with a small amount released from the secondary containment, September 2017</li> <li>• release of diesel, February 2015</li> <li>• release of diesel, July 2006</li> </ul> <p>The 2017 Monitoring and Report Plan located on the Geotracker website<sup>7</sup> stated that the 37 monitoring wells associated with the site be monitored semi-annually and monitoring wells with free product or a visible sheen shall be monitored at minimum for product thickness and depth to water. Significant volatile organics associated with petroleum products continue to be detected at very shallow groundwater depths. <b>No community involvement documents were available to indicate that NuStar provides updates to the nearby community.</b></p> <p>Unacceptable problems with monitoring well groundwater samples was noted<sup>8</sup>: The following volatile samples were analyzed with significant headspace in the sample containers: ACA-4C (720-94445-5), PS/MW-14 (720-94445-8), PS/MW-14 DUP (720-94445-9), ACA-3A/B (720-94445-10), and PSC-WC-4M (720-94445-19). Significant headspace is defined as a bubble greater than 6 mm in diameter.</p>
Kinder Morgan Energy Partners Stk Terminal	2947 Navy Drive	Cleanup site remains open with verification monitoring as of 2001
Tesoro (now Marathon) Stockton Bulk Fuel Terminal	3003 Navy Drive	The site is open and Tesoro monitors ground water at the site as part of the Stockton Terminals Technical Committee. The site remains open with verification monitoring as of 2002.
STTC	Various	The Stockton Terminals Technical Committee (STTC) is comprised of three bulk fuel facilities at the Port of Stockton including Buckeye Partners LP, Tesoro Petroleum Company Inc, and Former Time Oil Company.
Arco Products Co. Terminal	2700 West Washington	The site is open with assessment and interim remedial action plan as of 2012.
Stockton Petroleum	3025 Navy Drive	The cleanup site remains open but inactive as of November 1999.
HydroAgri North American	3019 Navy Drive	<p>Also known as Yara North American. The fertilizer contaminated site remains open and inactive as of July 1998.</p> <p>Not included in the DEIR<sup>9</sup>: On September 06, 2019, Hazardous Materials Spill Report: Cal OES Control# 19-5783 was issued. The report stated that while conducting boring operations at the Yara North American Site, an underground pipe was impacted resulting in the potential release of an unknown amount of petroleum product. This was based on the petroleum odor emanating from the liquid that flowed from the boring. WBCM conducted excavation activities to determine the source of the release as well as the extent of any potential soil and/or groundwater contamination.</p> <p>The Central Valley Water Board required a Damage Assessment Report (Report) for the Site be submitted. The Report should include information on the excavation at the Site including the amount of material removed, a map of the excavation's extent, soil confirmation sampling results as well as laboratory reports and copies of any disposal manifests generated during this work. The Report must be submitted by November 25, 2019. As of January 26, 2020, this report has not been posted on GeoTracker.</p>
Former Rice Terminal	Washington Street and Navy Drive	<p>The site is open and under assessment as of May 2019.</p> <p>Note: unable to locate the site in screening databases.</p>

<sup>6</sup> <https://www.sjgov.org/departments/envhealth/>

<sup>7</sup> Accessed 1.25.2020.

[https://geotracker.waterboards.ca.gov/profile\\_report?global\\_id=SL0607733381&mytab=esidata#esidata](https://geotracker.waterboards.ca.gov/profile_report?global_id=SL0607733381&mytab=esidata#esidata)

<sup>8</sup> Accessed 1.25.2020: [https://geotracker.waterboards.ca.gov/edfnarr?confirmation\\_number=5156271159](https://geotracker.waterboards.ca.gov/edfnarr?confirmation_number=5156271159)

<sup>9</sup> Accessed 1.25.2020.

[https://geotracker.waterboards.ca.gov/regulators/deliverable\\_documents/1017647862/WBCM%20Construction%20Damage%20Assessment%20Report%20Required%209-23-19.pdf](https://geotracker.waterboards.ca.gov/regulators/deliverable_documents/1017647862/WBCM%20Construction%20Damage%20Assessment%20Report%20Required%209-23-19.pdf)

The DEIR failed to identify sites nearby that contain hazardous materials/wastes which have not undergone any releases that would have caused the sites to be identified in the GeoTracker or EnviroStor databases. Hazardous materials business plans are required to be submitted to San Joaquin County Environmental Health. Please include a list of all nearby facilities with onsite hazardous materials that are within a 1.5-mile radius of the proposed site.

The Department of Toxic Substance Control already commented on the DEIR and their comments are included below and supported by the Delta-Sierra Group. DTSC recommends that the following issues be evaluated in the EIR, Hazards and Hazardous Materials section:

1. The EIR should acknowledge the potential for project site activities to result in the release of hazardous wastes/substances. In instances in which releases may occur, further studies should be carried out to delineate the nature and extent of the contamination, and the potential threat to public health and/or the environment should be evaluated. The EIR should also identify the mechanism(s) to initiate any required investigation and/or remediation and the government agency who will be responsible for providing appropriate regulatory oversight.

Many of open and active clean-up sites are part of the Stockton Terminals Technical Committee. Please consider increasing participation and developing a risk assessment plan for the Port that includes a robust commitment to involve local communities within the immediate area that includes evacuation training should an accident occur, as occurred in the NuStar Crocket facility in October 2019.

The DEIR includes reference to NuStar Facility Plans: fire prevention and firefighting resource plans, training requirements for facility employees, natural disasters, medical emergencies, bomb threats and explosions – these plans were not located and should be readily accessible to neighbors. The proposed project would not result in any changes to staff. The minimum staff levels include: one terminal operator present 24 hours a day, 7 days a week for product transfers and up to two employees working 12-hour shifts Monday through Friday for security and facility maintenance.

The NuStar Facility Plans were not included in the DEIR and are likely similar to those associated with the Crockett Terminal which recently closed down Highway 4 and Highway 80 after an explosion and extensive fire occurred in October 2019. These plans apparently did not prevent the situation reported when “Firefighters who rushed to battle the raging fire at the NuStar tank farm in Crockett found the front gate locked, and the employees had scattered without activating the facility’s automated fire suppression system<sup>10</sup>.”

Again, this calls for the need to more fully disclose hazards to the community and mitigation measures that may be necessary should an accident occur. Relying on the City of Stockton Fire Department to handle a site accident may take away from the Fire Department’s existing duties. Mitigation to reduce reliance on the City of Stockton Fire Department should be included in the final environmental impact report as well as an analysis of existing fire suppression capabilities such as water supplies and pressure and evacuation plans for the neighboring community.

### **Transportation**

The DEIR stated that operational trucks enter the facility at the truck gates off of Navy Drive. The DEIR also stated that Washington Street, Navy Drive, SR-4 and Charter Way all provide primary access to the project site from the interstate highway system and are all designated to accommodate trucks carrying combustible materials. As shown in the map below the use of West Washington Street results in truck traffic in the neighborhood of Boggs Tract in the Seaport region of Stockton. Considerable efforts have been made to improve access to the Port along Highway 4 and the Port of Stockton Expressway to the west of the map. These efforts are meant to decrease travel times, idling, and decreased travel through the neighborhood. A very important mitigation to the existing operations and any proposed truck travel increases will be to limit West Washington Street traffic to local trips that necessity travel on West Washington Street.

---

<sup>10</sup> Accessed 1.20.2020; *The Daily Dispatch, a service of the Western Fire Chiefs Association Update: NuStar Workers Fled Tank Fire In Crockett Without Activating Fire Suppression System:*  
<https://www.dailydispatch.com/StateNews/CA/2019/October/17/Update.NuStar.Workers.Fled.Tank.Fire.In.Crockett.Without.Activating.Fire.Suppression.System.aspx>





A recent google reviewer suggests that there may be logistical problems with the existing truck travel levels: trucks blocking lanes which use to take 30 min for loading now is over 1 hour. Characterization of traffic levels relating to the existing operations should be based on actual data not a manual’s generalizations.

### **Cumulative Impacts**

A cumulative evaluation of the combined air quality effects of the proposed project and planned or proposed projects was requested by the SJVAPCD which was performed as part of the comprehensive cumulative analysis of all related projects. There were 21 projects identified as part of the cumulative impact analysis because of the proximity of the projects to the proposed project. Section 4 of the DEIR included a quantitative evaluation of these projects as part of the comprehensive cumulative analysis of all related projects.

NuStar has two additional on-terminal projects planned. NuStar is upgrading on-terminal pipelines and truck racks to accommodate new deliveries of ethanol that was evaluated in the Eco-Energy Liquid Bulk Receiving Terminal Project Final Environmental Impact Report, completed by the Port in November 2017 and certified in April 2019. These environmental plans are not available on the Port website nor were located on the NuStar website.

Several of the projects included road improvements, State Route 4 Crosstown Freeway Ramp Extension, Navy Drive widening Daggett Road Grade Separation, and McCloy Ave Extension. The dredging of the Deep Water Ship Channel by from 5 to 7 feet, along with Downtown Stockton projects.

Construction of the SATCO Marine Terminal that distributes concentrated sulfur acid was reportedly in process but may already be complete. The Contanda Facility increasing liquid bulk terminal with greater capacity had an Initial Study and Mitigated Negative Declaration which was not available to review because the report was not posted on the Port of Stockton website. The Contanda Renewable Diesel Bulk Liquid Terminal Development Project has a certified EIR and is in the permitting stage, as is the Eco-Energy Liquid Bulk Receiving Terminal Project referenced earlier. Finally, the Lehigh Cement Terminal was included in the list is in the process of developing a DEIR. The Initial Study/Notice of Preparation is posted on the Delta-Sierra Group website<sup>11</sup>

The cumulative analysis performed failed to include the Lehigh Southwest Stockton Terminal which 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. The figure within the Lehigh Notice of Preparation and Initial Study is shown below:

<sup>11</sup> <https://www.sierraclub.org/mother-lode/delta-sierra/port-stockton>



The Initial Study stated that the current permit for the existing terminal operations allows 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. Table 1 below is from the Lehigh Notice of Preparation/Initial Study and includes baseline and projected mobile sources of air pollutants that should have been included in the cumulative analysis for the NuStar proposed project.

**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.

Cumulative impact analyses should include all existing and proposed projects within the general Port area. The Annual operational emissions only included three of the 21 projects which does not provide the community with a disclosure of cumulative impacts associated with existing and proposed operations at the Port of Stockton.

Thank you for considering our comments on the December 2019 NuStar Marine Oil Terminal Engineering and Maintenance Standards (MOTEMS) Development and Vessel Service Project Draft Environmental Impact Report. 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