

RE: Comments for 7.21.2025 Port of Stockton Commission Board Meeting

10. Non-agenda Comments

The Port staff have been notified that on 6.25.2025 the GSNR Board voted to move forward without international export or storage of wood pellets at the Port of Stockton. At that meeting I provided copies of the Residents for a Healthy Port and Delta-Sierra Group letters for the record. GSNR received over 5000 comment letters in opposition to the proposed wood export project and in looking these over and a re-evaluation of actual costs associated with forestry, wood pellet production, and transport decided that the possibility existed that they could be left with stranded resources, especially as South Korea has announced a biomass to electricity phase out. Many organizations and community members have asked the Port to agendize the proposed project to present our concerns. The refusal of the Port Commission to listen to a presentation of community concerns until a firm project proposal was submitted to the Port Staff for consideration was a missed opportunity to build goodwill.

The Port Commission will be considering other environmental documents for which they are acting as the lead CEQA agency. Please consider having an agenda item in advance of FEIR preparation and certification when staff can disclose through presentation the concerns of the community so that the lead CEQA agency can further direct staff in how to respond, particularly when asking the Commission to make findings of overriding significance.

13. BayoTech 3028 Navy Drive Hydrogen Production Lease and CEQA Documentation

For over 2 years community members have stated that a full environmental impact analysis was needed after reviewing the initial mitigated negative declaration for the production of hydrogen from methane and after reviewing the recirculated mitigated negative declaration. Now, after having sought legal representation for the Delta-Sierra Group of the Sierra Club, EarthJustice, and the Center for Biological Diversity's legal representation, the Port Commission will consider the staff's recommendation to non-certify CEQA documentation and rescind the lease agreement with BayoTech for 10 years. Community members continued to bring up this project and our concerns to the Port Commission as we did for the GSNR wood export project. Please consider having an agenda item in advance of final environmental document preparation and certification when staff can disclose through presentation the concerns of the community so that the Stockton Port Commission as the lead CEQA agency can further direct staff in how to respond, particularly when asking the Commission to make findings of overriding significance. The historic practices of the Port Commission, only as recently as 5 years ago when the NuStar FEIR was certified without releasing the report to community members that submitted DEIR comments, speaks to a disregard of the impacts that proposed and actual port operations have on the surrounding community. Efforts have been made to foster better relations and trust, but the GSNR and BayoTech responses speak otherwise.

Sincerely,

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