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November 24, 2015

Michael J. Giari
Executive Director
Port of Redwood City
675 Seaport Boulevard
Redwood City, CA 94063-5568

Subject: Draft Feasibility Study and Environmental Impact Statement/Environmental Impact Report (DEIS/EIR) for the Redwood City Navigation Improvement Project

Dear Mr. Giari,

Bay Area Air Quality Management District (Air District) staff has reviewed the United States Army Corps of Engineers (USACE) and the Port of Redwood City's (Port) Draft Feasibility Study and Environmental Impact Statement/Environmental Impact Report (DEIS/EIR) for the Redwood City Navigation Improvement Project (Project). The Project consists of dredging San Bruno Shoals Channel, the Redwood City Channel, and the Redwood City Berth. Below, please find comments on the DEIS/EIR.

Air Quality Criteria Pollutant Emissions

The Project includes options for different depths of dredging and three proposed sites for depositing dredged materials. The DEIS/EIR concludes that the Project's estimated emissions exceed the significance thresholds by as much as 109 pounds per day (lbs/day) for reactive organic gases (ROG), 1556 lbs/day for oxides of nitrogen (NOx), and 23 lbs/day for fine particulate matter (PM2.5), depending on the scenario. According to the DEIS/EIR, the USACE and the Port commit to mitigating these emissions by reducing the horsepower of the dredge and tugboats, and employing an electric offloader at the Cullinan dredge deposit site. The DEIS/EIR concludes that the latter mitigation measure is not feasible at the more distant Montezuma and SF-DODs sites. With these mitigations, the Project's estimated emissions still exceed the significance thresholds by as much as 59 lbs/day for ROG and 1056 lbs/day for NOx, depending on the scenario (Table A-6, pages 22-23, Appendix A).

The DEIS/EIR includes two proposed mitigation measures. The Air District strongly supports implementation of these proposed measures:

- Equip the transport tugs with Tier 3 engines.
- Require use of an electric dredge for work on the Redwood City Channel and Berth portions of the Project.

In addition, Air District staff recommends that the Project implement the following feasible mitigation measures:

- Equip the diesel clamshell dredges with Tier 3 engines.
- Purchase and use cleaner equipment exceeding any existing regulations for non-Project Port operations activities and tenant activities, such as replacing older on-road trucks, off-road cargo handling equipment, or replacing the existing switcher locomotives with cleaner locomotives.
- Fund an off-site emission reductions program through the Air District's grant programs, such as the Carl Moyer Program or Vehicle Buy Back program.

These programs reduce ROG, NOx, and PM2.5 emissions at a cost of approximately \$18,000 to \$33,500 per ton of emissions reduced. The specific funding level needed to fully mitigate the impact would need to be determined and a five percent administration fee would be added to the cost per ton, but Air District staff is willing to work with USACE and the Port to implement such an off-site mitigation program.

Greenhouse Gases (GHG) Emissions

The DEIS/EIR quantifies the Project's construction GHG emissions, but does not determine whether these emissions are significant. Air District staff recommends that the project include all feasible measures to minimize GHG impacts. The DEIS/EIR proposed potential measures to equip the transport tugs with Tier 3 engines and to electrify the dredge working in the Redwood City Channel also would reduce GHG emissions. Moreover, additional strategies described above to reduce ROG, NOx, and PM2.5 emissions from the Project, at the Port, and through an off-site grant program, also could reduce the Project's GHG emissions impact.

Air District staff is available to assist USACE and the Port in addressing these comments. If you have any questions, please contact Alison Kirk, Senior Planner, at (415) 749-5169 or akirk@baaqmd.gov.

Sincerely,



Jean Roggenkamp
Deputy Executive Officer

cc: BAAQMD Chair Carole Groom
BAAQMD Director David J. Canepa