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Bay Area Air District:



October 17, 2022

Michael Li, Senior Environmental Planner
City and County of San Francisco
49 South Van Ness Ave, Suite 1400
San Francisco, CA 94103

RE: San Francisco International Airport Shoreline Protection Program (State Clearinghouse No. 2020110456)

Dear Michael Li,

Bay Area Air Quality Management District (Air District) staff has reviewed the San Francisco International Airport's (Airport) proposal to implement the Shoreline Protection Program (Project) to address flood protection and future sea-level rise around the Airport that would comply with current Federal Emergency Management Administration (FEMA) requirements for flood protection. The Airport's shoreline and western landside boundary are divided into 16 "reaches" based on shoreline orientation, existing protection type, and other attributes. The Project would remove the existing shoreline protection features and construct a new shoreline protection system comprised of a combination of reinforced concrete and steel sheet pile walls to eliminate the probability of flooding at the Airport until 2085. The proposed shoreline protection system for Reaches 1–16 would be approximately 55,550 feet (10.5 miles) long, would require the placement of approximately 26 acres of open water fill in the bay along various reaches, and would impact approximately 3 acres of wetland areas. The DEIR Air Quality Chapter concludes that construction-related nitrogen oxides (NOx) emissions are a significant and unavoidable impact despite mitigation measures. Construction-related emissions of NOx, primarily from marine vessels, would exceed the City's California Environmental Quality Act (CEQA) thresholds during the first four years of construction, expected to be 2025 through 2028.

Air Quality Impacts and Mitigation Measures

- Mitigation Measure M-AQ-3a (M-AQ-3a): Clean Off-Road Construction Equipment, Subsection 1a states: "All portable engines, such as generators, shall be electric. If grid electricity is not available, propane or natural gas generators shall be used if feasible."
 - The Air District recommends that M-AQ-3a require that if grid electricity is not available, that alternative power be evaluated for feasibility before considering propane and natural gas generators, and editing M-AQ-3a to state that "if grid electricity is not available, alternative power such as but not limited to, battery storage and hydrogen fuel cells shall be considered for feasibility before consideration of propane and natural gas generators. Only if no other options

are available, Final Tier 4 generators or generators using Best Available Control Technology (BACT) that meets CARB's Final Tier 4 emission standards shall be used with renewable diesel fuel.”


- Mitigation Measure M-AQ-3b: Clean On-Road Trucks Subsection 1a states: “All on-road heavy-duty diesel trucks with a gross vehicle weight rating of 19,500 pounds or greater used at the project site (such as haul trucks, water trucks, dump trucks, concrete trucks, and vendor trucks) shall be model year 2018 or newer.”
 - The Air District recommends replacing “2018 or newer” truck language with, “Medium and Heavy-Duty diesel on-road vehicles should be no more than eight years old, or powered by zero or near zero-emissions technology, as certified by the California Air Resources Board, whenever feasible.”
- Mitigation Measure M-AQ-3c: Electric Worker Shuttles - The Air District supports the use of electric shuttles to transport construction workers from parking areas to each construction site. The Air District recommends adding language to implement a program that incentivizes construction workers to carpool, use EVs, or use public transit to commute to and from the parking areas and/or each construction site. The program may include the following features, as feasible: providing a shuttle service to and from BART; preferential parking to carpool vehicles, vanpool vehicles, and EVs; and scheduling work shifts to be compatible with the schedules of local transit services.
- Mitigation Measure M-AQ-3d: Clean Marine Vessels – The Air District supports the inclusion of language stating that engines will “meet or exceed” U.S. Environmental Protection Agency or California Air Resources Board Tier 4 Marine Engine emission standards. To reduce idling emissions, the Air District recommends that the main propulsion engines be shut off and the provision of shoreside electrical connections, where feasible, to reduce emissions from onboard auxiliary engines when marine vessels are anchored, tied to shore or at berth.
- Mitigation Measure M-AQ-3e: Offset Remaining Construction Emissions - The Air District strongly supports the implementation of all available on-site emission reduction measures before relying on off-site measures. This type of “exhaust all options first” language should be added to the introductory paragraph of this measure.

Compliance with Air District Regulations

The Air District enforces local air quality rules and regulations related to construction emissions which are designed to improve public health and air quality. If you have any questions regarding the Air District’s regulations, please visit <https://www.baaqmd.gov/rules-and-compliance> and consult with the Compliance and Enforcement section at (415) 749-4795 or compliance@baaqmd.gov.

Air District staff is available to assist the City to address these comments. If you have any questions please contact Alicia Parker, Principal Environmental Planner, at (628) 207-1466, or aparker@baaqmd.org.

Sincerely,



Greg Nudd
Deputy Air Pollution Control Officer

cc: BAAQMD Director Tyrone Jue
BAAQMD Director Myrna Melgar
BAAQMD Director Shamann Walton
BAAQMD Vice Chair Davina Hurt
BAAQMD Director Carole Groom
BAAQMD Director David J. Canepa