March 5, 2013

Gary Kassof
Commander, First Coast Guard District
Battery Park Building
One South Street
New York, NY 10004-1466

Re: Docket ID: USCG-2012-1091, Draft Environmental Assessment for the Proposed Modification of the Bayonne Bridge

Dear Mr. Kassof:

I am Roland Lewis, President and CEO of the Metropolitan Waterfront Alliance (MWA). The MWA is committed to transforming the New York and New Jersey Harbor and its waterways to make them cleaner and more accessible, a vibrant place to play, learn, and work with great parks, great jobs, and great transportation for all. This testimony reflects the view of MWA and does not necessarily reflect the views of all of its Alliance Partners.

As the 21st century continues to reshape the nature of global economies, the environment, and the American city, it is critical that we adapt to the new realities of the modern world – a world that continues to grow and a world affected by climate change and local environmental impacts. The continued globalization of economies and the interconnectedness of cities results in an expansion in the global shipping industry, as well as increases in both greenhouse gas emissions and nitrogen and sulfur oxide pollution. It is estimated that, across the globe, shipping emissions are growing by 3-4% per year and could account for a quarter of all the world's greenhouse gas output by 2050.1

Given this growth there are clear economic and environmental pressures that force ports to examine how they want to accommodate the influx of goods coming into their regions. The raising of the Bayonne Bridge—allowing the passage of higher-capacity ships through the New York-New Jersey Harbor—represents a measure toward advancing the environmental and economic sustainability of the New York Metropolitan Region. The Metropolitan Waterfront Alliance supports the raising of the Bayonne Bridge, with the caveat that the regional impacts of an expanded harbor be addressed and mitigated.

Raising the bridge and modernizing our port will result in a net decrease of carbon emissions, ameliorating future climate change risks. This decrease will be achieved in a

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number of ways. For instance, due to their ability to transport a higher quantity of containers and their adherence to new emission standards, newer, larger ships inherently emit lower levels of greenhouse gases than do smaller, older ships. At the current height of the Bayonne Bridge, many of these newer, more efficient shipping vessel models cannot enter the harbor, necessitating the continued use of older, less fuel-efficient ships. By allowing newer, larger ships to enter the harbor, it is estimated that emissions will be reduced by 3-7% annually. In addition, shipping goods via waterborne containers is approximately 7 times more energy-efficient than shipping by truck and 40 times more so than shipping by aircraft.

Moreover, allowing the passage of larger ships through the harbor will obviate the need for additional air trips from other regions and reduce the number of trucks on the road, decreasing overall emissions levels. For these reasons MWA believes that the regional environmental benefits to be gleaned from raising the bridge are likely more than worth the costs.

Second, the regional shipping industry is a significant generator of employment and revenue for the metropolitan area, supporting hundreds of thousands of jobs and accounting for more than $175 billion in annual revenue. By increasing the capacity of goods the port can handle, raising the Bayonne Bridge will encourage the growth of the port and help secure the long-term competitiveness of the Port of New York and New Jersey with other American shipping hubs, thus ensuring that it remains a source of local employment and income. In fact, the United States Army Corps of Engineers projects that raising the bridge will inject an additional $169 million into the national economy annually. Therefore, given projected growth in shipping and local population that will occur regardless, MWA sees the raising of the bridge as critical to maintaining the port’s status as the leading shipping hub of the East Coast.

With that said, however, an infrastructure project of this magnitude will impose its share of effects on the harbor into the future. The impacts of the growth of ship sizes on our region, on the Port, and on the harbor, along with likely future deepening projects, must be addressed by the Port Authority and partnering federal agencies as part of the long-term planning of the future of the Port and associated environmental impacts on the harbor. We must collectively recognize that there are environmental, financial, and physical limits to what seems to be the endless expansion of ship capacity and port facilities.

MWA highly recommends our New York – New Jersey Port and other United States ports work together for agreements to reduce pollution and greenhouse gas emissions from ships and from trucks. The need for national and international agreements to work toward reductions is necessary given climate change and the documented effects of air pollution on vulnerable communities such as Newark, NJ, which suffers from high

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2 http://www.panynj.gov/port/about-port.html
asthma rates. Effective solutions are therefore based on, but not limited to, a global system of carrots and sticks to reduce emissions from shipping. This can include measures such as international greenhouse gas contribution funds \(^3\) and a global cap and trade emissions system trading program for reducing ship greenhouse gas emissions and nitrogen and sulfur oxide pollution\(^4\). International and/or national agreements are critical, as no one port or country has incentives to individually comply with greater emissions or pollutions standards. This is because most pollution reduction measures taken on by an individual port will reduce its competitiveness and drive business to other, more polluting ports.

In addition, MWA highly recommends the following commitments be made as part of the bridge raising project:

- **Environmental justice** – Any negative environmental impacts during construction must not be disproportionately borne by low-income communities and therefore should be offset with investments in public health monitoring. Investments in capital improvements in affected communities must be considered as well.

- **Recreational waterway access and wakes** – Agreements must be reached to ensure supersized ships do not lead to supersized wakes impacting fragile ecosystems, public access areas, and important waterfront infrastructure.

- **Air quality** – Particularly during construction, adverse impacts to air quality should be mitigated by ensuring continuous monitoring of emissions from construction equipment, with a commitment to work stoppage on poor air quality days in the summer, among other measures as a commitment to public health and air quality.

- **Noise pollution** – Particularly during construction, noise pollution should be minimized through construction barriers, vegetated buffers, and noise monitoring and by ensuring noise complaints by local residents are collected and monitored by the New York City Department of Environmental Protection.

- **Community input** – While the raising of the Bayonne Bridge is a project with global significance, the communities whose daily lives will be most directly affected must not be forgotten. They must be given ample forums to express their concerns and notify the Port of any issues that arise throughout the construction process coupled with a robust and effective process put in place to respond to concerns.

\(^3\) https://www.ukchamberofshipping.com/information/publications-and-briefings/environment/

\(^4\) ibid
• Local hiring – The project should make a firm commitment to hire locally for the construction jobs made available by this project.

Essentially, the MWA recognizes the significant value to the New York Metropolitan Area of raising the Bayonne Bridge. A port able to accept more energy-efficient and clean ships will contribute to the short-term environmental and economic sustainability of the region. However, it is critical that this project not allow us to become complacent about the need for long-term solutions to the impacts from increased and mega-sized global shipping on our region and nation. In addition this project must not exist in isolation from its neighboring communities and must address all negative side effects appropriately.

Sincerely,

Roland Lewis
President & CEO