

## Part 1 of 4

# Final Environmental Impact Report Tenth Avenue Marine Terminal Redevelopment Plan and Demolition and Initial Rail Component



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**December 2016**

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# **FINAL ENVIRONMENTAL IMPACT REPORT**

## **TENTH AVENUE MARINE TERMINAL REDEVELOPMENT PLAN AND DEMOLITION AND INITIAL RAIL COMPONENT**

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## Acronyms and Abbreviations

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2008 Plan	2008 Maritime Business Plan
AB	Assembly Bill
ARB	California Air Resources Board
BACT	Best Available Control Technology
Board	Board of Port Commissioners
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CDP	Coastal Development Permit
CEQA	California Environmental Quality Act
CHE	cargo-handling equipment
CO	carbon monoxide
CO <sub>2</sub>	carbon dioxide
dB	decibel
dBA	A-weighted decibel
DEH	Department of Environmental Health
District	San Diego Unified Port District
DPM	diesel particulate matter
EHC	Environmental Health Coalition
EIR	Environmental Impact Report
EPA	U.S. Environmental Protection Agency
GHG	greenhouse gas
GPS	global positioning system
HDPE	high-density polyethylene
HRA	health risk assessment
IT	Information Technology
LEA	Local Enforcement Agency
L <sub>eq</sub>	equivalent noise level
LOS	level of service
MMRP	Mitigation Monitoring and Reporting Program
MMRP	Mitigation Monitoring and Reporting Program
MPC	maximum practical capacity
MT	metric ton
MTCO <sub>2e</sub>	metric tons of carbon dioxide equivalent
MTS	Metropolitan Transit System
NBSD	Naval Base San Diego
NOP	Notice of Preparation
NO <sub>x</sub>	nitrogen oxide

OEHHA	Office of Environmental Health Hazard Assessment
OSHA	Occupational Health and Safety Administration
PI	Principal Investigator
PM10	particulate matter 10 microns or less in diameter
PM2.5	particulate matter 2.5 microns or less in diameter
Program	Community Health and Safety Program
PTR	Periodic Technology Review
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SDAPCD	San Diego Air Pollution Control District
SMP	Soil Management Plan
SO <sub>x</sub>	sulfur oxide
STC	Sustainable Terminal Capacity
SWRCB	State Water Resources Control Board
TAMT	Tenth Avenue Marine Terminal
TAMT plan	Tenth Avenue Marine Terminal Redevelopment Plan
TDM	Traffic Demand Management
VOC	volatile organic compound
VSR	vessel speed reduction



### 1.1 Project Overview

The San Diego Unified Port District (District) is proposing the Tenth Avenue Marine Terminal Redevelopment Plan (TAMT plan), which includes a variety of infrastructure investments that may be undertaken over the long term to accommodate an increase of the terminal's (project site) capabilities and capacity. These include up to five gantry cranes, additional and consolidated dry bulk storage capacity (which may include a new 100,000-square-foot dry bulk structure or an equivalent vertical storage facility), enhancements to the existing conveyor system, demolition of the molasses tanks and Warehouse C, additional open storage space, on-dock intermodal rail facilities, a centralized gate facility, and the Demolition and Initial Rail Component, and are herein referred to as the proposed project. Furthermore, as berthing capacity at the project site has been deemed adequate, the TAMT plan focuses on landside improvements only, and no dredging or waterside improvements are proposed.

One near-term and well-defined component of the TAMT plan is the Demolition and Initial Rail Component. This component is analyzed at the project level and would include demolition of two underutilized transit sheds (Transit Shed #1 and Transit Shed #2), on-terminal rail upgrades that include a rail lubricator and compressed air system for air brake testing, stormwater drainage improvements, subsurface conduit and electrical improvements to allow for further electrification and/or shore power capabilities prior to resurfacing, a new electrical gear room, restroom, technology support room (approximately 782 square feet), and an outdoor storage facility (approximately 850 square feet), as well as a new 3,600-square-foot modular office with restroom facilities near the central gate facility, which would replace the offices that would be demolished as part of Transit Shed #2.

The project is consistent with the Port Master Plan and therefore a Port Master Plan amendment is not required. Furthermore, a Coastal Development Permit is not needed for the TAMT plan component because it is not considered development with regard to the Coastal Act. However, a non-appealable Coastal Development Permit (CDP) would be required for the Demolition and Initial Rail Component.

### 1.2 Certification of the Final EIR

The District is the Lead Agency, as defined under California Environmental Quality Act (CEQA) Guidelines Section 15050, because it has principal responsibility for carrying out and approving the proposed project. As Lead Agency, the District also has primary responsibility for complying with CEQA. Therefore, the Board of Port Commissioners (Board), as the decision-making body of the District, is required to consider the information contained in the Final Environmental Impact Report (EIR) prior to approving the proposed project and issuing the CDP. Specifically, the Board must certify that:

- The Final EIR has been completed in compliance with CEQA;

- The Final EIR was presented to the decision-making body of the Lead Agency and the decision-making body reviewed and considered the information contained in the Final EIR prior to approving the project; and
- The Final EIR reflects the Lead Agency's independent judgment and analysis.

Other agencies may use the information contained in this Final EIR when considering issuance or authorization of any other approvals for the project. The Final EIR, in compliance with Section 15132 of the State CEQA guidelines, includes the chapters and attachments listed under Section 1.3.

## 1.3 Contents and Organization of the Final EIR

The content and format of this Final EIR are designed to meet the requirements of CEQA and the State CEQA Guidelines, Article 9, and specifically State CEQA Guidelines Section 15132. Table 1-1 summarizes the organization and content of the Final EIR.

The Draft EIR that was previously circulated for public review is an integral part of the Final EIR; both documents are intended to be used together. The Draft EIR was not reprinted; however, a CD copy of the Draft EIR is enclosed with this Final EIR. A paper copy of the Draft EIR, including its appendices, is available at the District Clerk office at 3165 Pacific Highway, San Diego, CA 92101, during regular business hours, which are Monday through Friday, 8 a.m. to 5 p.m.

**Table 1-1. Document Organization and CEQA Requirements**

<b>Location</b>	<b>Contents</b>
Chapter 1 <i>Introduction</i>	Provides background on the proposed project, the requirements for a Final EIR and other related documents, and the organization of the Final EIR.
Chapter 2 <i>Executive Summary</i>	Briefly summarizes the proposed project; identifies each significant effect, with proposed mitigation measures and alternatives that would reduce or avoid that effect; identifies the areas of controversy known to the Lead Agency, including issues raised by agencies and the public; and summarizes the issues to be resolved, including the choice among alternatives and how to mitigate the significant effects (State CEQA Guidelines Section 15123).
Chapter 3 <i>Revisions to the Draft EIR</i>	Includes the revisions to the Draft EIR and its technical appendices (where appropriate), which were developed in response to comments received during the public review period for the Draft EIR.
Chapter 4 <i>Comments Received and District Responses</i>	Includes a list of agencies, organizations, and individuals that provided comments on the Draft EIR during the public review period as well as the distribution list that was used to circulate the Draft EIR. Each comment is assigned a comment number, which corresponds to a response (State CEQA Guidelines Section 15132).
Attachment 1 <i>Mitigation Monitoring and Reporting Program</i>	Attachment 1 of the Final EIR provides the Mitigation Monitoring and Reporting Program (MMRP) for the project. The MMRP is presented in table format and identifies mitigation measures for the proposed project, the party responsible for implementing the mitigation measures, the timing of implementing the mitigation measures, and the monitoring and reporting procedures for each mitigation measure.

<b>Location</b>	<b>Contents</b>
Attachment 2 <i>Revised Draft EIR</i>	Attachment 2 of the Final EIR contains the Draft EIR that was previously circulated for public review, with revisions as outlined in Chapter 3 of the Final EIR. The Draft EIR contains all the contents described within CEQA and the State CEQA Guidelines, Article 9. Attachment 2 is included on the enclosed CD. A hard copy is available at the District Clerk's office.
Attachment 3 <i>Revised Draft EIR Technical Appendices</i>	Attachment 3 of the Final EIR consists of Appendices A through E of the Draft EIR, revised as indicated in Chapter 3 of the Final EIR. The appendices include additional background information and technical detail for several of the resource areas. Also include the initial study/Notice of Preparation and any comments received during the scoping process. Attachment 3 is included on the enclosed CD. A hard copy is available at the District Clerk's office.
Attachment 4 <i>32<sup>nd</sup> Street Supplemental Engineering Report</i>	Attachment 4 of the Final EIR is a supplemental engineering report prepared by Caltrans for improvements to the 32 <sup>nd</sup> Street intersection. Although Caltrans did not have any comments on the Draft EIR, this report was provided to the District during the public review period of the Draft EIR and is included here for informational purposes only. As stated on page 1 of this report, one of the primary purposes of the document is to provide a basis for which the sponsoring agencies can solicit funding from other sources.
Under Separate Cover <i>Findings of Fact and Statement of Overriding Considerations</i>	Provides findings on each significant impact, accompanied by a brief explanation of the rationale for each finding. The findings are supported by substantial evidence in the record. Also provide a written statement related to balancing, as applicable, the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable environmental risks when determining whether to approve the project.



## **2.1 Project Overview and Introduction to the Sustainable Terminal Capacity Alternative**

The proposed project involves (1) adoption of the TAMT plan and (2) implementation of the Demolition and Initial Rail Component. The proposed TAMT plan would replace the existing 2008 Maritime Business Plan (2008 Plan) to provide greater flexibility and meet current and future market conditions at the project site. The TAMT plan provides growth projections by cargo type and potential development scenarios to be considered, as market conditions allow. The proposed TAMT plan includes a variety of infrastructure investments that may be undertaken over the long term to accommodate an increase of the project site's capabilities and capacity. These include up to five gantry cranes, additional and consolidated dry bulk storage capacity (which may include a new 100,000-square-foot dry bulk structure or an equivalent vertical storage facility), enhancements to the existing conveyor system, demolition of the molasses tanks and Warehouse C, additional open storage space, establishment of an on-dock rail facility, a centralized gate facility, and the Demolition and Initial Rail Component.

The Demolition and Initial Rail Component is the initial project-level component of the TAMT plan, which includes demolition of Transit Shed #1 and Transit Shed #2, conduit and electrical improvements to allow for future electrification of the project site, upgrading the sites existing stormwater system, replacement of existing lighting, grading and repaving of the site of the previous transit sheds, on-terminal rail upgrades that include a rail lubricator and compressed air system for air brake testing, and installation of a modular office with restroom facilities, a building with an electrical gear room, additional restroom facilities, and IT room, and outdoor storage space.

Furthermore, based on comments received during the public review period of the Draft EIR related to the air quality and greenhouse gas impacts of the proposed project, District staff is now recommending approval of an alternative to the maximum practical capacity (MPC) throughput scenario analyzed within the June 2016 Draft EIR. This alternative throughput scenario is referred to as the Sustainable Terminal Capacity (STC) Alternative. The STC Alternative represents what the TAMT could handle on a regular basis without having to maximize all facilities concurrently as under the MPC scenario. Under this alternative, the throughput that could be reached under the MPC scenario of the proposed project would be reduced by approximately 25 percent for each of the three cargo nodes that are proposed for changes under the TAMT plan (i.e., Dry Bulk, Refrigerated Containers, and Multipurpose General Cargo). Total annual throughput would be limited to 4,675,567 metric tons (MT). These throughput limits would be enforced throughout the life of the plan.

An estimated throughput breakdown by node includes:

- Dry Bulk: 1,987,500 MT
- Refrigerated Containers: 1,716,000 MT
- Multi-Purpose/General Cargo 733,050 MT

- Liquid Bulk (No Change): 239,017 MT

Like with the MPC throughput scenario, all features described for the proposed project would still be possible with the STC Alternative. However, if adopted, this alternative would not allow throughput to exceed a total of 4,675,567 MT without analyzing the environmental effects of additional throughput, consistent with State law.

## 2.2 Project Location

The project site is at 850 Water Street in San Diego, California, 92101. As shown in Figure 2-1, the TAMT is located along San Diego Bay, south of downtown San Diego, east of the San Diego Convention Center and Hilton Bayfront Hotel, and west adjacent to the San Diego community of Barrio Logan. Figure 2-2 provides an aerial view of the project site. Harbor Drive runs northwesterly approximately 160 feet from the project site boundary. Project site access from Harbor Drive is provided at two locations.

- Primary: from Cesar E. Chavez Parkway; this becomes Crosby Road as it approaches the Terminal
- Secondary: at the southern end of the Hilton hotel parking facility, adjacent to the backlands of the Dole container facility

Major circulation facilities in the area include State Route 75 (i.e., Coronado Bridge), approximately 0.25 mile to the south, and Interstate 5, about 0.5 mile to the north. Trucks that serve the project site are required to access the region's interstate system by transiting southbound from the project site along Harbor Drive, thereby limiting heavy truck activity along the residential streets of the Barrio Logan community.

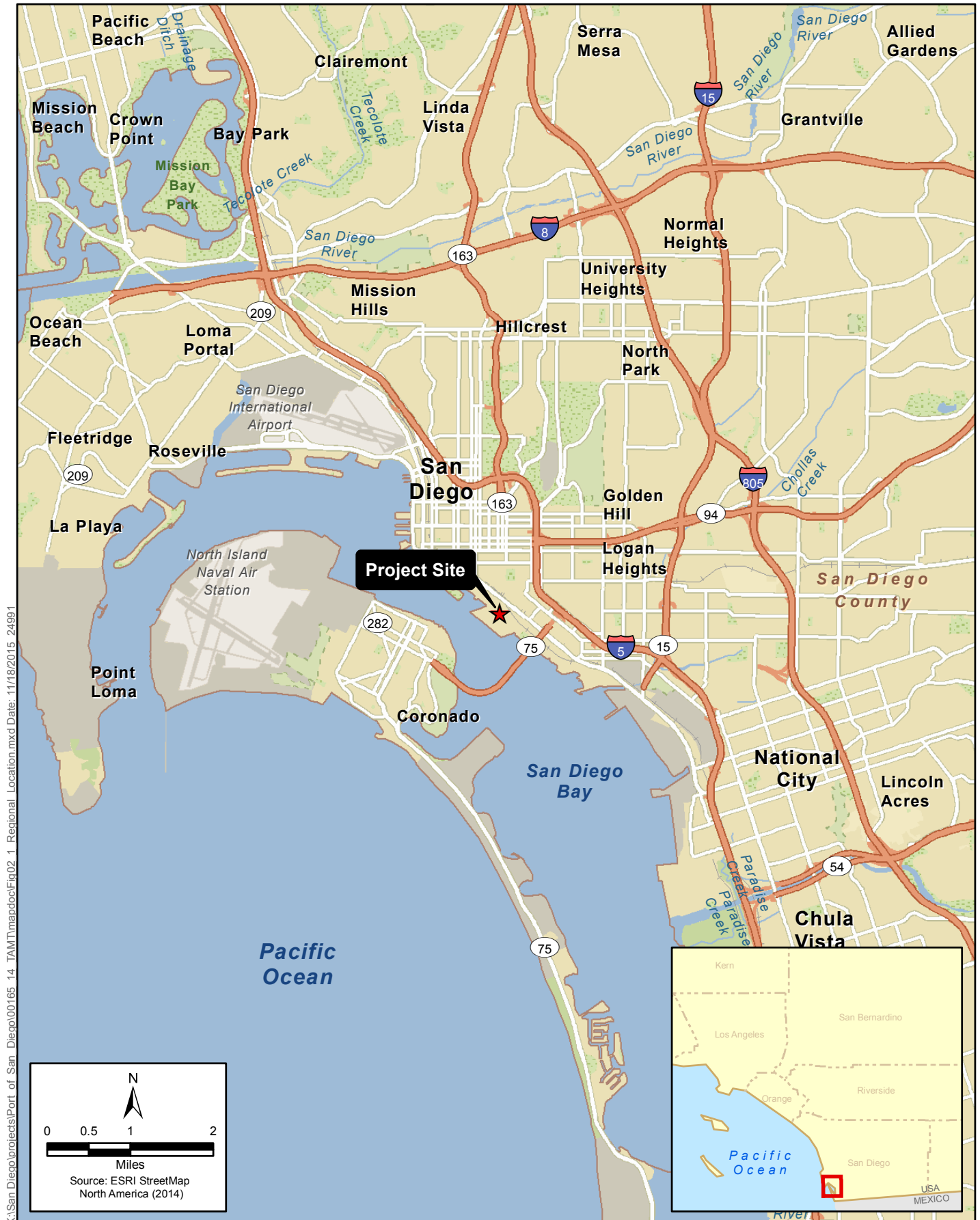
## 2.3 TAMT Plan Components

The TAMT plan replaces portions of the 2008 Plan. The TAMT plan analyzes terminal configuration options, using an updated review of existing cargo throughput and a market forecast to 2035, and identifies five potential development concepts, three of which are analyzed in this Final EIR.<sup>1</sup> The result is a proposed plan that would provide maximum flexibility at the project site to accommodate cargo market opportunities and to implement future terminal infrastructure investments. Although each development concept emphasizes a slightly different mix of cargo, all three development concepts involve establishing flexible but distinct nodes that would handle like cargos in similar operational areas and under similar conditions. The operating nodes are discussed below, whereas three development concepts are discussed in the subsequent section titled *Long-Term Operations*.

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<sup>1</sup> As acknowledged in the Notice of Preparation (NOP), the full refrigerated container and full dry container concepts were excluded from the EIR analysis of the proposed project because they would result in zero volume for multi-purpose/general cargo commodity types. The District has a longstanding commitment handling Multi-purpose/General Cargos and decided at the outset that it does not want to depart from this established and successful business strategy. However, the full refrigerated container and full dry container concepts are addressed in the discussion of alternatives to the proposed project in Chapter 7 of the Draft EIR.





**Figure 2-1**  
**Regional Location**

**Tenth Avenue Marine Terminal Redevelopment Plan and Demolition and Initial Rail Component EIR**







K:\San Diego\projects\Port of San Diego\00165 14 TAM\mapdoc\Fig 2 Proj Loc.mxd 11/18/2015 24991



**Figure 2-2**  
**Project Location Map**  
 Tenth Avenue Marine Terminal Redevelopment Plan and Demolition and Initial Rail Component EIR





The TAMT plan identifies five operating nodes that include dry bulk, liquid bulk, refrigerated container, multi-purpose general cargo, as well as a central gate facility.<sup>2</sup> The Demolition and Initial Rail Component would affect all three nodes along the western portion of the project site boundary including the dry bulk node, the refrigerated container node, and the multi-purpose cargo node. In addition, the new modular offices with restroom facilities are anticipated to be located in the vicinity of the centralized gate facility. The locations of the nodes contemplated in the TAMT plan are shown in Figure 2-3, and the Demolition and Initial Rail Component locations are shown in Figure 2-4. The proposed locations for these nodes are discussed in greater detail below. Because berthing capacity at the project site has been deemed adequate, the TAMT plan focuses on land-side improvements only, and no dredging or waterside improvements are included.

### 2.3.1 Dry Bulk

The dry bulk node would be located on approximately 15 acres in the southeastern portion of the project site, also referred to as terminal “backlands” and shown in brown on Figure 2-3. This node would be served primarily by Berths 10-7/10-8, with secondary access from Berths 10-5/10-6. Proposed dry bulk node improvements would include the following.

- **Open Air Storage Space.** Maintain approximately 5 acres of existing open storage space between Water Street and Terminal Street.
- **Conveyor System.** Upgrade the existing conveyor system to handle multiple bulk commodities, such as cement, bauxite, or soda ash. Currently, the existing conveyer system (which contains two conveyer belts) is owned and operated by a District tenant. It is elevated and ranges between 22 feet and 23.5 feet in height. The system is approximately 60 feet from the shoreline and runs parallel to Berths 10/7 and 10/8 for approximately 650 feet, and then heads northerly for another 400 feet to the southeast corner at Warehouse C. The elevated conveyor then splits into two directions; one system continues northerly for another 450 feet to the central portion of the dry bulk storage area parcel (shown in yellow), and the second system runs northeasterly for approximately 420 feet and zig-zags before it terminates within the dry bulk storage area parcel. The TAMT plan discusses potentially upgrading the conveyer system to enable the handling of multiple commodities by multiple tenants. Upgrades may include increasing the capacity and energy efficiency of the current system, or removing it entirely and replacing it with a new conveyer system. However, the ultimate goal would be to modernize the system so that it can handle multiple bulk commodities for multiple tenants. For the purposes of the environmental analysis, it is assumed that a new conveyer system would replace the existing system to take advantage of any technological upgrades. However, the overall footprint of the new conveyor system, including its size and height, would be similar to the existing system.
- **Consolidated Bulk Discharge Unloader.** Add a consolidated bulk discharge unloader using a 200-MT per hour vacuum for cementitious materials at Berths 10-7/10-8 (either a Kovaco, Siwertell, or equivalent system). Dry bulk operations currently utilize diesel-powered cargo handling equipment, including traditional clamshell grabs and diesel trucks, to transfer bulk products to the first point of rest for storage until delivery to the customer. The consolidated

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<sup>2</sup> Although the TAMT Plan makes reference to a liquid bulk node as an existing condition, the TAMT Plan does not propose any changes (such as infrastructure improvements or capacity enhancements) to the existing liquid bulk node.

bulk discharge unloader would likely use an electrically powered pneumatic loading device and be capable of handling additional throughput.

- **Consolidated Multi-Purpose Dry Bulk Facility.** Construct a consolidated multi-purpose dry bulk facility with two cement terminals and a new semi-permanent storage facility (up to a 100,000-square-foot horizontal structure and/or an equivalent vertical storage facility) to store dry bulk products. Under existing operations, dry bulk goods are stored at multiple storage locations throughout the project site. The consolidated dry bulk facility would centralize dry bulk handling operations on the southeastern portion of the project site to help maximize the existing on-dock rail facility. The consolidated bulk facility would be shared by multiple operators, resulting in operational efficiencies and streamlined traffic flows. For the purposes of the environmental analysis, two 54,000 MT silos at each terminal allowing for a total of 108,000 MT of bulk cement storage capacity were assumed because the vertical height of two large silos is likely to have a greater visual impact than several smaller silos and/or a 100,000-square-foot horizontal dry bulk storage facility. However, any combination of the following options were identified to help accommodate the project site's long-term dry bulk storage needs:
  - Semi-permanent Rubb style of building up to 100,000 square feet for the storage of dry bulk products, or
  - Six 9,000 MT silos to store up to 54,000 MT of bulk cement at each terminal, or
  - Two domes that would each store up to 54,000 MT of bulk cement at each terminal, or
  - Any combination of buildings, silos, and domes to allow up to 108,000 MT of bulk cement storage capacity.
- **Demolish Existing Molasses Tanks.** Demolish existing empty molasses tanks and establish a new dry bulk storage facility.

### 2.3.2 Refrigerated Container

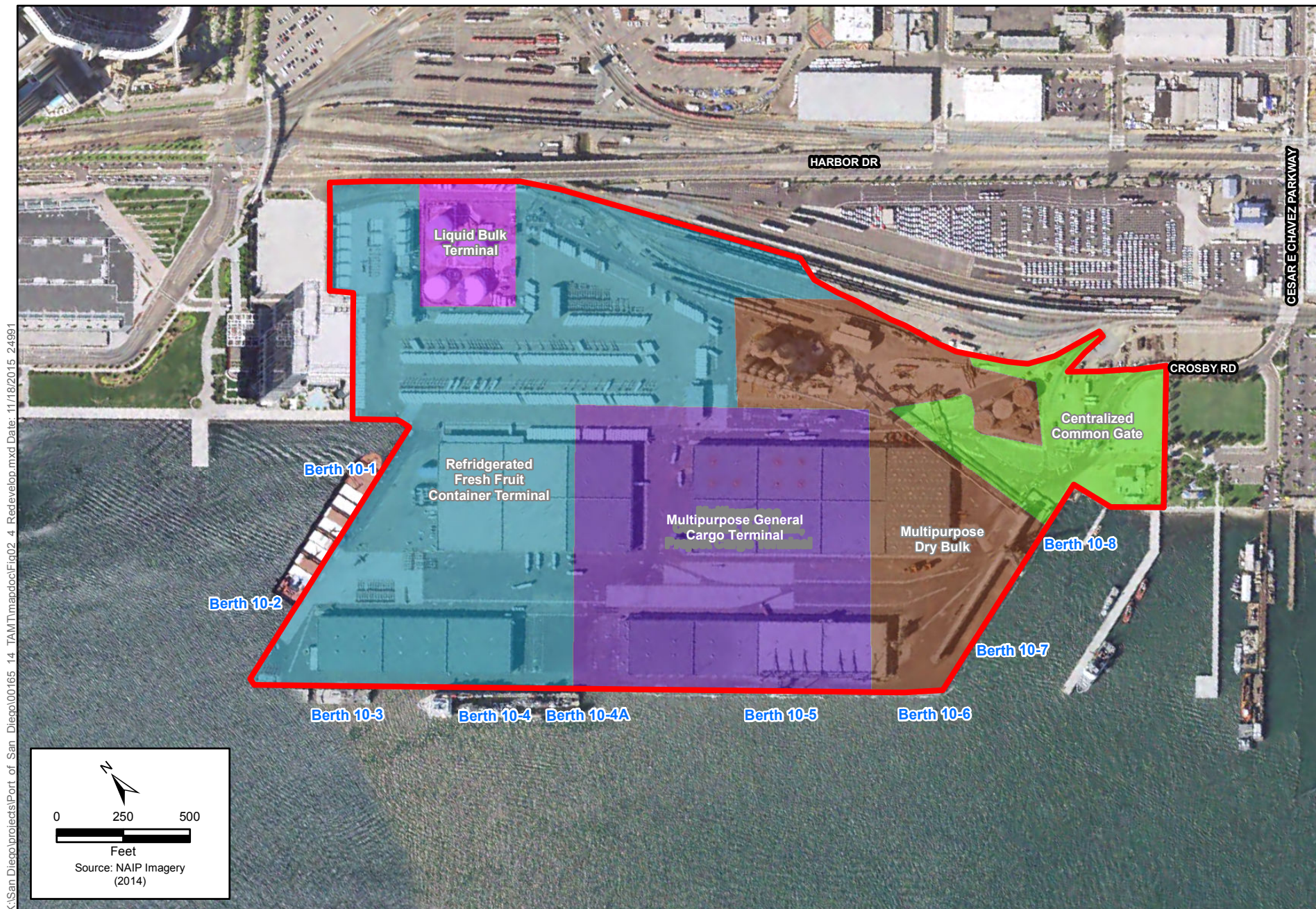
The refrigerated container node would be located on approximately 40 acres within the northern portion of the project site served by Berths 10-1/10-2 and 10-3/10-4, with overflow handled at Berths 10-5/10-6. Figure 2-3 shows the boundary between the refrigerated container node in blue and the multi-purpose general cargo node in purple. The boundaries would be flexible to allow the project site to be used for the handling of diverse cargos as market conditions and vessel schedules permit. As such, construction activities within the refrigerated container and multi-purpose nodes may happen simultaneously. The refrigerated container node would maintain approximately 16 acres of existing outside storage space for refrigerated containers as well as the existing 294,000 square feet of cold storage facility (Warehouse B) and would add the following improvements.

- **Gantry Cranes at Berths 10-1/10-2.** Install up to two rail-mounted 100-foot gauge electrical gantry cranes up to 270 feet tall (when boom is up) at Berths 10-1/10-2.3

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<sup>3</sup> Note that, although Berths 10-1/10-2, 10-3/10-4, and 10-5/10-6 each state up to two gantry cranes each, the total would not exceed five gantry cranes for the entire project.





**Figure 2-3**  
**Tenth Avenue Redevelopment Plan Layout**  
**Tenth Avenue Marine Terminal Redevelopment Plan and Demolition and Initial Rail Component EIR**





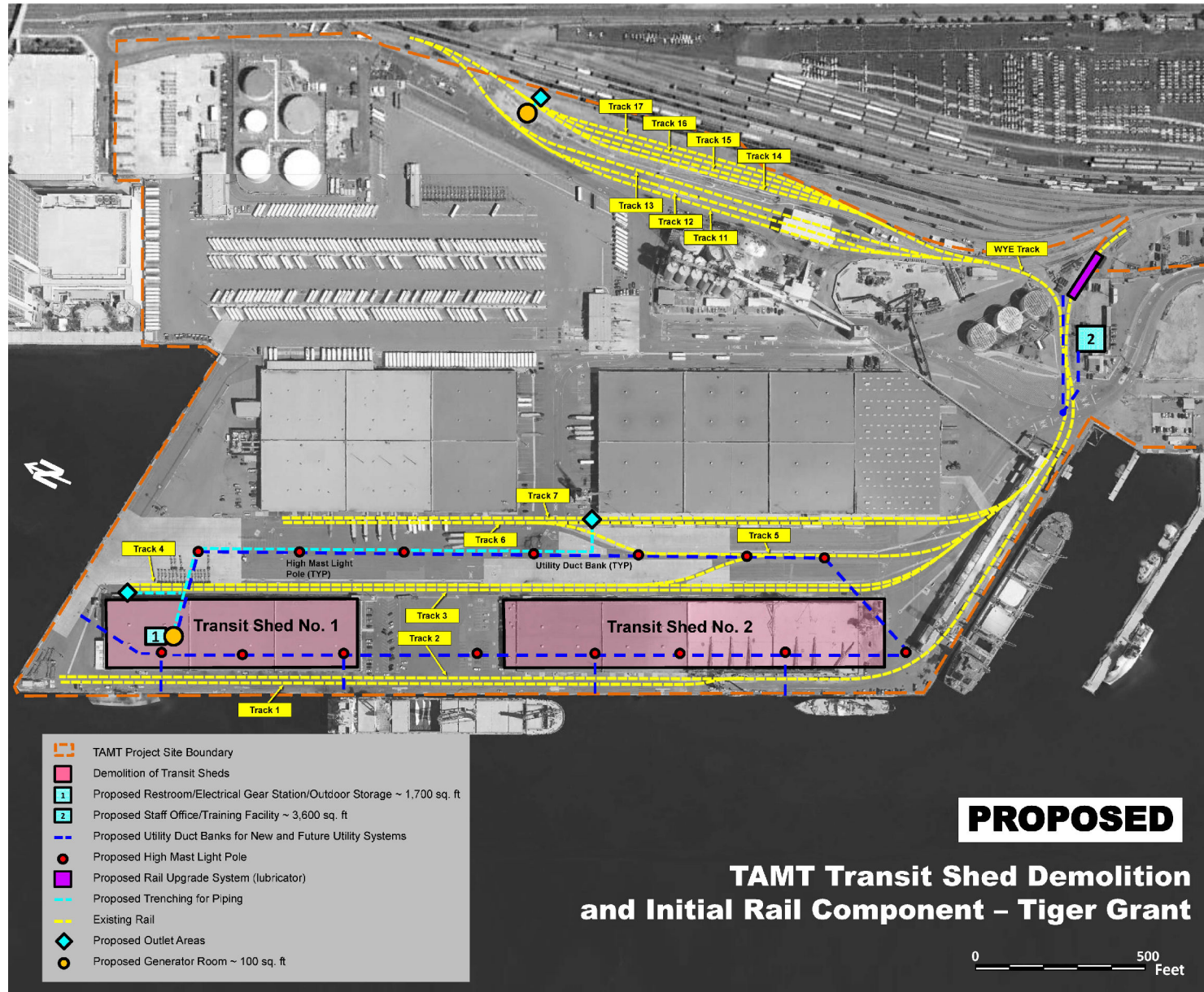


Figure 2-4  
Demolition and Initial Rail Component  
Tenth Avenue Marine Terminal Redevelopment Plan and Demolition and Initial Rail Component EIR



- **Gantry Cranes at Berths 10-3/10-4.** Install up to two rail-mounted 100-foot gauge electrical gantry cranes up to 270 feet tall (when boom is up) at Berths 10-3/10-4, including electrical utility improvements to operate the cranes.

### 2.3.3 Multi-Purpose General Cargo

As shown on Figure 2-3, the Multi-Purpose General Cargo node would comprise approximately 30 acres in the central portion of the project site and would be served primarily by Berths 10-5/10-6, with overflow handled at Berths 10-3/10-4. Similar to the refrigerated container node, the boundary would be flexible to accommodate market needs. This open area would allow the project site to be used for the handling of diverse cargos as market conditions and vessel schedules permit. As such, construction of the refrigerated container and multi-purpose nodes would happen simultaneously. Proposed improvements and operations that would occur at the multi-purpose general cargo node would include the following.

- **Gantry Cranes at Berths 10-5/10-6.** Install up to two rail-mounted 100-foot gauge electrical gantry cranes up to 270 feet tall (when boom is up) at Berths 10-5/10-6.
- **Demolish Warehouse C.** Demolish the 384,000-square-foot Warehouse C to open up access to up to 20 acres of open storage space. In the long term, demolition of Warehouse C would also enable the District to establish an expanded on-dock rail facility to broaden customer access to rail if market conditions allow. There are several other potential backland improvements that may be considered for multi-purpose and/or dry bulk cargos in the future, if market conditions allow. Please note that the items listed below are included here for informational purposes only. Subsequent environmental analysis would be required if any of the following improvements are pursued in the future.
  - Bridge crane<sup>4</sup>
  - Full wheel container module with gantry cranes
  - Rubber-tired cranes for load-on and load-off
  - Straddle carrier<sup>5</sup> (stacked) for an expanded on-dock rail facility
  - Additional paving of backland area
  - Container-handling equipment to handle 100 kip<sup>6</sup> wheel live load
  - Generator and accompanying housing structure
  - Upgrade of shore-side power capabilities to provide shore power to two vessels at the same time

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<sup>4</sup> Bridge crane = an overhead crane consisting of parallel runways with a traveling bridge spanning the gap. A hoist, the lifting component of a crane, travels along the bridge.

<sup>5</sup> Straddle carrier = a vehicle for use in port terminals and intermodal yards for stacking and moving ISO standard containers. Straddles pick and carry containers while straddling their loads and connecting to the top lifting points via a container spreader.

<sup>6</sup> kip = a unit of weight equal to 1,000 pounds; used to express deadweight load.

## 2.3.4 Central Gate Facility

The central gate facility is an existing facility that is located in the southeastern corner of the project site. The TAMT plan would include installing a new truck weigh station. Once a new truck weigh station has been procured, the existing truck weigh station would be sold for reuse or disposed of in a landfill.

The TAMT plan also identifies an alternative gate concept for the Refrigerated Container node and the Multi-purpose General Cargo node. The alternative gate would be sited in the northeast corner of the project site and provide access directly onto Harbor Drive. It would serve as the primary entry and exit location for “freight only” movements for the refrigerated container node and Multi-purpose General Cargo node. According to the Plan, however, the Dry Bulk Node would continue to utilize the existing gate off Caesar Chavez Parkway, particularly for domestic bulk shipments. As such, the transportation analysis looks at how this concept would affect traffic patterns in the area and any other environmental impacts that could result from an alternative gate.<sup>7</sup>

## 2.3.5 Long-Term Operation

To ensure that the “worst case” environmental scenario is analyzed, this Final EIR analyzes the highest maximum practical capacity (MPC) identified for each of the three operating nodes, as shown in the fourth column in Table 2-1 below. In addition, this Final EIR evaluates an alternative scenario that reduces maximum throughput by 25 percent from the MPC scenario. This alternative is referred to as the STC Alternative. Furthermore, liquid bulk throughput is included in the analysis for each scenario, but, as indicated, buildout of the TAMT plan would result in no changes to the infrastructure, operational efficiency, or storage capacity at the liquid bulk node.

**Table 2-1. Development Concepts Identified in the TAMT Plan (in Metric Tons)**

<b>Node</b>	<b>Development Concept #1</b>	<b>Development Concept #2</b>	<b>Development Concept #3</b>	<b>“Worst Case” Scenario Analyzed in EIR</b>
<b>Improvements or Capacity Enhancements Identified in TAMT Plan</b>				
Dry Bulk	2,650,000	2,650,000	2,650,000	2,650,000
Refrigerated Containers	2,288,000	1,555,840	1,555,840	2,288,000
Multi-Purpose General Cargo	327,700	977,400	583,850	977,400
<b>Subtotal</b>	<b>5,265,700</b>	<b>5,183,240</b>	<b>4,789,690</b>	<b>5,915,400</b>
<b>No Improvements or Capacity Enhancements Identified in TAMT Plan</b>				
Liquid Bulk	239,017	239,017	239,017	239,017
<b>Total</b>	<b>5,504,717</b>	<b>5,422,257</b>	<b>5,028,707</b>	<b>6,154,417</b>

<sup>7</sup> Please note that at this time there have been no preliminary engineering studies or other technical work completed that evaluate the technical or operational feasibility of implementing the Alternative Gate Concept. Therefore, the transportation and traffic assessment prepared for the alternative gate concept does not include the same level of detail as that prepared for the existing Central Gate Facility.



Table 2-2 below compares the TAMT plan's "worst case" MPC scenario and STC scenario for each of the nodes with the project site's existing environmental baseline condition by cargo type. The project site's existing environmental baseline condition is based on actual throughput calculations from July 2013 to June 2014, with June 2014 being the point in time at which the environmental analysis was initiated. The table also provides the MPC identified in the 2008 Plan as a reference point to illustrate the MPC that could occur under the existing plan if the proposed TAMT plan were not approved. However, the 2008 Plan MPC is not used as the baseline for the environmental analysis because it represents the project site's theoretical capacity as opposed to the actual environmental conditions that occurred when the environmental analysis commenced. Although it is highly unlikely and improbable that all three nodes would be able to operate at their maximum levels for a sustained period of time, this approach is analyzed to provide the most conservative environmental analysis. However, the recommended scenario is the STC Alternative, which would reflect an approximately 25 percent reduction in the throughput compared to the MPC scenario.

**Table 2-2. TAMT Cargo Throughput Comparisons in Metric Tons**

<b>Node</b>	<b>Existing Conditions – July 2013 to June 2014</b>	<b>2008 Plan Maximum Practical Capacity</b>	<b>TAMT Redevelopment Plan Maximum Practical Capacity "Worst-Case" Scenario<sup>a</sup></b>	<b>TAMT Redevelopment Plan Sustainable Terminal Capacity Alternative Scenario</b>
<b>Improvements or Capacity Enhancements Identified in TAMT Plan</b>				
Dry Bulk	289,864 <sup>b</sup>	2,250,000	2,650,000 <sup>c</sup>	1,987,500
Refrigerated Containers	637,931	730,000	2,288,000	1,716,000
Multi-Purpose General Cargo	85,131 <sup>e</sup>	1,670,000	977,400	733,050
<b>No Improvements or Capacity Enhancements Identified in TAMT Plan</b>				
Liquid Bulk	31,520	220,000	239,017 <sup>d</sup>	239,017
<b>Total</b>	<b>1,044,446</b>	<b>4,870,000</b>	<b>6,154,417</b>	<b>4,675,567</b>

Notes:

<sup>a</sup> The infrastructure improvements identified in the TAMT plan are required to attain the MPCs identified. To provide for a "worst case" environmental impact scenario, this Final EIR analyzes the highest MPC of each of the three cargo nodes as well as the throughput associated with the STC Alternative.

<sup>b</sup> Vessels brought in approximately 158,205 MT of dry bulk, whereas dry bulk tenants trucked in approximately 131,659 MT of dry bulk.

<sup>c</sup> For the purposes of the analysis, two additional dry bulk customers were assumed over existing tenant volume, which resulted in a forecast of approximately 2,146,645 MT. However, the MPC indicates that additional dry bulk volume could be accommodated.

<sup>d</sup> The TAMT plan acknowledges the existing liquid bulk facility; however, it does not propose any operational or infrastructure changes to the existing facility. Current capacity is sufficient to handle market demand and operations at the MPC, and is projected to remain sufficient throughout the plan horizon.

<sup>e</sup> In addition to 33,666 MT of neo-bulk material, the project site also processed 51,465 metric revenue tons of other miscellaneous cargo, yielding a total of 85,131 MT.

## 2.4 Demolition and Initial Rail Component

The Demolition and Initial Rail Component is an initial, project-level component that is necessary to implement the various program-level development scenarios identified in the TAMT plan. The Demolition and Initial Rail Component would include the following features and modifications discussed below and shown on Figure 2-4.

- **Demolition of Transit Sheds #1 and #2.** The transit sheds consist of seven warehouse bays, restroom facilities, and office space. Transit Shed #1 includes approximately 148,000 square feet of warehouse space, comprising Bays A, B, and C, and Transit Shed #2 includes approximately 194,000 square feet of warehouse space, comprising Bays E, F, G, and H. Both transit sheds are approximately 32 feet tall and 200 feet wide. Transit Shed #1 is 740 feet long and Transit Shed #2 is 970 feet long. Transit Shed #1 includes an approximately 2,400-square-foot maintenance shed. Transit Shed #2 includes an approximately 7,000-square-foot head house, which is currently used as office space for terminal operations. Demolition would involve the proper removal of any asbestos, lead, polychlorinated biphenyls, or other potentially hazardous materials that may be present in the Transit Sheds, followed by removal of the existing fire alarm, fire protection systems, and electrical systems. In addition, demolition of Transit Shed #2 would include the removal and/or reuse of all off-loading equipment including the existing distribution and conveyor system.<sup>8</sup> Once this is completed, soil excavation and grading would occur and underground conduit to facilitate future electrification of the area would be installed, followed by paving and leveling across the site.
- **Conduit and Electrical Improvements.** Up to 2,500 linear feet of conduit would be installed west of Warehouse B and Warehouse C and east of the existing Transit Shed #1 and Transit Shed #2 to provide for future electrification of the project site. Trenching for the conduit and electrical improvements would occur prior to paving activities. All electrical utilities would utilize the existing vault system.
- **Subsurface Stormwater Improvements.** Excavate up to 9,200 cubic yards of soil and install one of two potential stormwater drainage systems. Both systems would include design features to capture the 85th percentile storm event. The first option would involve concrete retention vaults that would capture the stormwater and allow water to infiltrate into the underlying soil by placing orifices in the bases of the vaults. The second option would involve collecting and routing overflows to an underground high-density polyethylene (HDPE) pipe retention system. The HDPE pipe retention would also rely on infiltration by placing holes in the bases of the pipes. Both options have been designed to comply with the San Diego Regional Municipal Separate Storm Sewer System Permit (R9-2015-0100) and allow for settling time and capture of aluminum, copper, iron, lead, and zinc.

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<sup>8</sup>To ensure a worst-case environmental scenario, the analysis assumes removal of approximately 5,250 tons of metal, which would be transported to a scrap metal recycling yard or appropriate landfill. This figure is based on the following estimates: existing dust collector (~380 tons), unloading facility, buffer hopper, and horizontal screw converter (~600 tons), the aeroslide and support framing (~2,520 tons), and a 50% contingency factor (~1,750 tons). However, depending on operational needs and the condition/efficiency of the existing equipment, these facilities may also be either upgraded and/or reused at the TAMT.

- **Replacement of Existing Lighting.** The existing 90-foot-tall light poles at the loading docks and around both Transit Shed perimeters would be replaced with 90-foot-tall lights capable of an average 5 foot-candles of light during cargo operations. During non-cargo operations, foot candles would be reduced to 1. The replacement lighting would use light-emitting diodes, improving energy efficiency at the project site, and would be directed downward and away from adjacent land uses and the open water of the bay.
- **On-Terminal Rail Facility Upgrades.** The proposed project would include installation of a rail lubricator and a compressed air system for testing of train air brakes on the existing tracks. As shown on Figure 2-4, the rail lubricator (purple rectangle) would be installed in the southeastern portion of the project site, where there is a sharp and inefficient curve that regularly impedes operations. Manual lubrication would be replaced with an automated lubrication system, thereby increasing both the safety and efficiency of the rail movement.

The purpose of the train air brake tests is twofold: to ensure that the air brakes work on each car and that air propagation exists between the locomotive and the end of the train. The compressed air system would include a compressed air generator and receiver, as well as subsurface piping (approximately 2-inch diameter) that would lead to steel outlets approximately 4 feet in height. The generators would be housed in an approximately 100-square-foot structure (an orange circle on Figure 2-4). The outlets (shown as blue diamonds on Figure 2-4) would be sited adjacent to tracks 3 and 4 (within the former footprint of Transit Shed #1) and adjacent to tracks 6 and 7 (near Warehouse C). A separate compressed air generator system and outlets would be sited along the eastern boundary of the project site to service tracks 14, 15, 16, and 17 (near Searles Valley Operations). In all cases, the outlets would include calibrated air gauges to monitor the air pressure of the yard air system at the outlet, and would feed the train air system by connecting a long braided hose to the glad-hand on the rail cars. This system would be in compliance with the Federal Railroad Administration requirements for air brake systems,<sup>9</sup> and train crews would be required to adhere to the Air Brake and Train Handling rules established by the BNSF railroad.<sup>10</sup>

- **Temporary Modular Office.** An approximately 3,600-square-foot modular office for marine operations with offices, a conference room, a work area, a break room, and parking for up to 15 employees would be constructed in the vicinity of the centralized common gate area. Up to three restrooms would also be added. This modular office and restroom facility would replace the existing approximately 5,400-square-foot headhouse after it is demolished with Transit Shed #2. Underground water, sewer, and electrical utilities would be installed to support the proposed modular structure.
- **Electrical Gear Room, Restroom Facility, and Information Technology (IT) Room (approximately 782 square feet), and Outdoor Equipment Storage Area (850 square feet).** The project would include the construction of a facility totaling approximately 782 square feet

<sup>9</sup> The Federal Railroad Administration establishes brake system safety standards in 49 CFR 232. Typically, a Class 1 air test is required before a train departs a terminal per section 232.205. However, when yard air is used to test cars, the train is only required to do a Class III air test pursuant to Section 232.217, which ensures that the train air-line is intact after making up the train. This avoids performing the detailed Class 1 air test, which avoids blocking crossings while each car is examined during the air test.

<sup>10</sup> BNSF Air Brake and Train Handling Rules (April 7, 2010, including revisions through May 1, 2013) Section 100.10.2 identifies specific rules train crews must follow subsequent to a yard air test.

on the western portion of the project site where the existing Transit Shed #1 is located. The restroom facilities would be approximately 16 feet by 23 feet, the switching gear room for charging stations would be approximately 12 feet by 23 feet, and the IT and back services area would be approximately 6 feet by 23 feet. In addition, there would be an outdoor storage area of approximately 34 feet by 25 feet, which would be surrounded by a chain-link fence that could be covered with a chain-link fence or tarp. The following types of equipment would be stored in this area.

- Cones and cone baskets
- Lashing rods
- Stokes baskets (e.g., rescue baskets)
- Up to three forklifts
- Electric plug-ins as needed
- Other miscellaneous equipment.

### **Near-Term Operation**

Once the existing transit sheds are removed, cargo nodes may be developed as recommended by the proposed TAMT plan, based on cargo type and market availability. The throughput that is anticipated as a result of the Demolition and Initial Rail Component is provided in Table 2-3 below.

**Table 2-3. Demolition and Initial Rail Component Cargo Estimates Compared to Existing Conditions (in Metric Tons)**

<b>Node</b>	<b>Existing Conditions – Actual Throughput July 2013 to June 2014</b>	<b>Demolition and Initial Rail Component – Throughput Estimates July 2020 to June 2021<sup>a</sup></b>	<b>Anticipated Net Increase</b>
<b>Improvements and Capacity Enhancements Identified in TAMT Plan</b>			
Dry Bulk	289,864 <sup>b</sup>	289,864	0
Refrigerated Containers	637,931	685,931	+48,000
Multi-Purpose General Cargo	85,131 <sup>c</sup>	124,078	+38,947
<b>Subtotal</b>	<b>1,012,926</b>	<b>1,099,873</b>	<b>+86,947</b>
<b>No Improvements or Capacity Enhancements Identified in TAMT Plan</b>			
Liquid Bulk	31,520	31,520 <sup>d</sup>	0
<b>Total</b>	<b>1,044,446</b>	<b>1,131,393</b>	<b>+86,947</b>

<sup>a</sup> Throughput estimates are based on the District's 5-year budgetary projections that were developed after receiving notification of the TIGER Grant Award. Throughput estimates are higher than baseline conditions due to increased activity from existing customers. Note that these project-level throughput estimates exclude tenant projects (such as Mitsubishi and the Dole Refrigerated Rack project) because these projects have independent utility and are not directly associated with the Demolition and Initial Rail Component. Both projects will be doing stand-alone environmental analyses, which are summarized in Chapter 5, *Cumulative Analysis*, of the Draft EIR.

<sup>b</sup> Vessels brought in approximately 158,205 MT of dry bulk, whereas dry bulk tenants trucked in approximately 131,659 MT of dry bulk.

<sup>c</sup> In addition to 33,666 MT of neo-bulk material, the project site also processed 51,465 metric revenue tons of other miscellaneous cargo, yielding a total of 85,131 MT.

<sup>d</sup> Liquid bulk throughput is not expected to increase as a result of the Demolition and Initial Rail Component. Therefore, throughput projections for Liquid Bulk reflect existing conditions.

## 2.5 Project Alternatives

Alternatives analyzed in Chapter 7 (*Alternatives*) of the Draft EIR include the No Project/No Build Alternative, the 2008 Maritime Business Plan Buildout Alternative, the Reduced Project Alternative, the Full Refrigerated and Dry Container Buildout Alternative, and the STC Alternative.

The STC Alternative was added to the Final EIR in response to comments received by the California Air Resources Board (ARB), the San Diego Air Pollution Control District, and the Environmental Health Coalition about the MPC scenario's significant and unavoidable impacts associated with criteria pollutants and health risk. Extensive coordination between the District's Maritime business and operations staff, Real Estate staff, and Planning and Green Port staff occurred in an effort to develop an alternative that would reduce criteria pollutants and toxic air contaminants further while still achieving the basic project objectives and remaining feasible.

The STC Alternative represents what the TAMT could handle on a regular basis without having to maximize all facilities concurrently as under the MPC scenario. Under this alternative, the throughput that could be reached under the MPC scenario of the proposed project would be reduced by 25 percent for each of the three cargo nodes that are proposed for changes under the TAMT plan

(i.e., Dry Bulk, Refrigerated Containers, and Multipurpose General Cargo). Total annual throughput would be limited to 4,675,567 MT. These throughput limits would be enforced throughout the life of the plan.

An estimated throughput breakdown by node includes:

- Dry Bulk: 1,987,500 MT
- Refrigerated Containers: 1,716,000 MT
- Multi-Purpose/General Cargo 733,050 MT
- Liquid Bulk (No Change): 239,017 MT

Like with the MPC throughput scenario, all features described for the proposed project would still be possible with the STC Alternative. However, if adopted, this alternative would not allow throughput to exceed a total of 4,675,567 MT without analyzing the environmental effects of additional throughput, consistent with State law.

## 2.5.1 Environmentally Superior Alternative

Pursuant to CEQA, the EIR is required to identify the environmentally superior alternative. Although the No Project/No Build Alternative reduces the greatest number of significant impacts, CEQA requires that when the environmentally superior alternative is the No Project Alternative, another alternative should be identified. Therefore, as indicated in Table 7-3 of Chapter 7, *Alternatives to the Proposed Project*, of the Draft EIR, the Reduced Project Alternative would be the environmentally superior alternative. The Reduced Project Alternative would reduce significant impacts on air quality and health risk, greenhouse gas emissions, noise, and transportation by eliminating components such as the gantry cranes and other efficient technologies and strategies that would otherwise help the terminal increase its throughput. The reduced throughput would mean less activity on the project site and fewer vessel and truck trips. More importantly, though, is the fact that the Reduced Project Alternative would not meet several of the central project objectives, including Objectives #1, #2, #5, or #6 as described in Section 7.5.3.12.

Table 2-4 presents the impacts associated with the proposed project compared with the alternatives.

**Table 2-4. Summary Impacts of Alternatives Relative to the Proposed Project**

Environmental Resource	Proposed Project Determination	No Project/ No Build (Alt 1)	2008 Maritime Business Plan Buildout (Alt 2)	Reduced Project (Alt 3)	Full Refrigerated and Dry Container Buildout (Alt 4)	Sustainable Terminal Capacity (Alt 5)
Aesthetics and Visual Resources	Significant and Unavoidable	-2	-2	-2	0	0
Air Quality and Health Risk	Significant and Unavoidable	-1	+2	-2	0	-2
Biological Resources	Less Than Significant w/Mitigation	-1	+1	0	0	0
Cultural Resources	Less Than Significant w/Mitigation	-1	+1	0	0	0
Geology and Soils	Less Than Significant	0	0	0	0	0
Greenhouse Gas Emissions	Significant and Unavoidable	-1	+2	-1	0	-1
Hazards and Hazardous Materials	Less Than Significant w/Mitigation	-1	0	0	0	0
Hydrology and Water Quality	Less Than Significant	+1	+1	0	0	0
Noise and Vibration	Significant and Unavoidable	-2	0	-2	0	-1
Transportation, Circulation, and Parking	Significant and Unavoidable	-2	0	-2	+1	-1
Utilities and Energy	Less than Significant	-2	+1	-1	+1	-1
<b>Total<sup>1</sup></b>	<b>--</b>	<b>-12</b>	<b>+4</b>	<b>-10</b>	<b>+2</b>	<b>-6</b>
Legend: -2= Substantially Reduced -1= Slightly Reduced 0 = Similar +1 = Slightly Greater +2 = Substantially Greater <sup>1</sup> Lowest score is environmentally superior						

## 2.6 Impact Summary

The proposed project would result in significant project impacts related to aesthetics and visual resources, air quality and health risk, biological resources, cultural resources, greenhouse gas emissions, hazards and hazardous materials, noise and vibration, and transportation, circulation and parking. The project would contribute to cumulative impacts related to air quality and health risk, greenhouse gas emissions, noise and vibration, transportation, circulation and parking, and utilities and energy. Table 2-5 presents the significant impacts, the proposed mitigation measures, and the level of significance after mitigation.



**Table 2-5. Project Impacts and Mitigation Measures**

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
<b>4.1 Aesthetics and Visual Resources</b>				
<b>Project Impacts</b>				
Existing Visual Character or Quality	<i>Demolition and Initial Rail Component</i>			
	Implementation of the Demolition and Initial Rail Component would not substantially degrade the existing visual character or quality of the site and its surroundings.	STC: LS MPC: LS	No mitigation is required.	N/A
	<i>Full TAMT Plan Buildout</i>			
	<b>Impact-AES-1: Visual Impacts from Installation of up to Five Gantry Cranes.</b> Implementation of up to two gantry cranes at Berths 10-1/10-2, two gantry cranes at Berths 10-3/10-4, and up to two gantry cranes at Berths 10-5/10-6 (not to exceed a total of 5 cranes) would result in a significant adverse change to the existing visual character and quality of the project site from key observation points surrounding the project site.	STC: PS MPC: PS	No mitigation is available to reduce this impact.	STC: SU MPC: SU
New Source of Substantial Light or Glare	<i>Demolition and Initial Rail Component</i>			
	Implementation of the proposed project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area.	STC: LS MPC: LS	No mitigation is required.	N/A
	<i>Full TAMT Plan Buildout</i>			
	Buildout of the TAMT plan would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area.	STC: LS MPC: LS	No mitigation is required.	N/A

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
<b>4.2 Air Quality</b>				
<b>Project Impacts</b>				
Conflict with an Air Quality Management Plan	<i>Demolition and Initial Rail Component</i>			
	Implementation of the Demolition and Initial Rail Component would not conflict with or obstruct implementation of an applicable air quality plan.	STC: LS MPC: LS	No mitigation is required.	N/A
	<i>Full TAMT Plan Buildout</i>			
	Buildout of the TAMT plan would not conflict with or obstruct implementation of an applicable air quality plan.	STC: LS MPC: LS	No mitigation is required.	N/A
Criteria Pollutants (Construction)	<i>Demolition and Initial Rail Component</i>			
	Construction of the Demolition and Initial Rail Component would not violate an air quality standard or contribute substantially to an existing or projected air quality standard.	STC: LS MPC: LS	No mitigation is required.	N/A
	<i>Full TAMT Plan Buildout</i>			
	<b>Impact-AQ-1: Emissions in Excess of Criteria Pollutant Thresholds During TAMT Plan Buildout Construction.</b> Specific construction details (such as timing, phasing, and overlapping of possible construction projects that would be implemented over the life of the TAMT plan) are not known at this time. Therefore, project emissions during construction, before mitigation, could exceed the San Diego County SLTs. The contribution of project-related emissions is considered significant because the project would have the potential to exceed thresholds that have been set by SDAPCD to attain the NAAQS and CAAQS, the purpose of which is to provide for the protection of public health.	STC: PS MPC: PS	<b>MM-AQ-1: Implement Best Management Practices During Construction of Future TAMT Plan Components.</b> All proponents of future projects shall implement Best Management Practices (BMPs) to reduce air emissions from all construction activities implemented as part of full TAMT plan buildout. The following measures are required to limit construction equipment exhaust from on-road trucks and heavy-duty equipment used during construction. <ul style="list-style-type: none"> <li>• Ensure that all off-road diesel-powered equipment used during construction between 2020 and 2025 is equipped with the U.S. Environmental Protection Agency (EPA) Tier 3 or cleaner engines, except for specialized construction equipment for which an EPA Tier 3 engine is not available.</li> <li>• Ensure that all off-road diesel-powered</li> </ul>	STC: SU MPC: SU

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>equipment used during construction beyond 2025 is equipped with EPA Tier 4 Final or cleaner engines, except for specialized construction equipment for which an EPA Tier 4 Final engine is not available.</p> <p>In addition, all future project proponents shall implement the relevant BMPs, consistent with the applicable industrial Storm Water Pollution Prevention Plan (SWPPP). In no case would any BMP be implemented if it conflicted with the SWPPP or other applicable water quality permit requirements. BMP dust control measures would include, but are not limited to, the following.</p> <ul style="list-style-type: none"> <li>• Water the grading areas at least twice daily to minimize fugitive dust.</li> <li>• Stabilize graded areas as quickly as possible to minimize fugitive dust.</li> <li>• Apply chemical stabilizer or pave the last 100 feet of internal travel path within the construction site prior to public road entry.</li> <li>• Install wheel washers adjacent to a paved apron prior to vehicle entry on public roads.</li> <li>• Remove any visible track-out into traveled public streets within 30 minutes of occurrence.</li> <li>• Wet wash the construction access point at the end of each workday if any vehicle travel on unpaved surfaces has occurred.</li> <li>• Provide sufficient perimeter erosion control to prevent washout of silty material onto public roads.</li> <li>• Cover haul trucks or maintain at least 12 inches of freeboard to reduce blow-off during hauling.</li> <li>• Suspend all soil disturbance and travel on unpaved surfaces if winds exceed 25 mph.</li> <li>• Cover/water onsite stockpiles of excavated</li> </ul>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>material.</p> <ul style="list-style-type: none"> <li>Enforce a 15 mph speed limit on unpaved surfaces.</li> <li>On dry days, sweep up any dirt and debris spilled onto paved surfaces immediately to reduce re-suspension of particulate matter caused by vehicle movement. Clean approach routes to construction sites daily for construction-related dirt in dry weather.</li> <li>Hydroseed, landscape, or develop as quickly as possible all disturbed areas as directed by the San Diego Unified Port District and/or San Diego Air Pollution Control District to reduce dust generation.</li> <li>Limit the daily grading volumes/area.</li> </ul> <p>Prior to the commencement of construction activities, the project proponent shall submit evidence to the San Diego Unified Port District of the project proponent's compliance with the BMPs and that construction equipment is maintained and properly tuned in accordance with manufacturers' specifications, which shall be subject to confirmation by the San Diego Unified Port District during construction.</p>	
Criteria Pollutants (Operation)	<p><i>Demolition and Initial Rail Component</i></p> <p>Operation of the Demolition and Initial Rail Component would not violate an air quality standard or contribute substantially to an existing or projected air quality standard.</p> <p><i>Full TAMT Plan Buildout</i></p> <p><b>Impact-AQ-2: Emissions in Excess of Criteria Pollutant Thresholds During TAMT Plan Buildout Operations.</b> Project emissions during operations, before mitigation, would exceed the San Diego County SLTs for VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. The contribution of project-</p>	<p>STC: LS MPC: LS</p> <p>STC: PS MPC: PS</p>	<p>No mitigation is required.</p> <p><b>MM-AQ-2: Implement Diesel Emission-Reduction Measures During Construction and Operations of Future TAMT Plan Components.</b> The project proponent shall implement the following measures during construction and project operations, subject to verification by the District.</p>	<p>N/A</p> <p>STC: LS MPC: LS</p>

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	related emissions is considered significant because the project would exceed thresholds that have been set by SDAPCD to attain the NAAQS and CAAQS, the purpose of which is to provide for the protection of public health.		<ul style="list-style-type: none"> <li>i. All project proponents shall limit all construction and operations equipment, drayage, and delivery truck idling times by shutting down equipment when not in use and reducing the maximum idling time to less than 3 minutes. The project proponent shall install clear signage regarding the limitation on idling time at the delivery driveway and loading areas and shall submit quarterly reports of violators to the District. This measure shall be enforced by terminal supervisors, and repeat violators shall be subject to penalties pursuant to California airborne toxics control measure 13 California Code of Regulations Section 2485. The project proponent shall submit evidence of the use of diesel emission reduction measures to the District through annual reporting, with the first report due 1 year from the date of project completion and each report due exactly 1 year after, noting all violations with relevant identifying information of the vehicles and drivers in violation of these measures.</li> <li>ii. The project proponent shall verify that all construction and operations equipment is maintained and properly tuned in accordance with manufacturers' specifications. Prior to the commencement of construction and operations activities using diesel-powered vehicles or equipment, the project proponent shall verify that all vehicles and equipment have been checked by a certified mechanic and determined to be running in proper condition prior to admittance into any terminal leasehold. The project proponent shall submit a report by the certified mechanic of the condition of the construction and operations vehicles and equipment to the District prior to commencement of their use.</li> </ul>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p><b>MM-AQ-3: Comply with San Diego Unified Port District Climate Action Plan Measures.</b> Prior to approval of all discretionary actions and/or Coastal Development Permits, the project proponent shall be required to implement the following measures to be consistent with the Climate Action Plan.</p> <ul style="list-style-type: none"> <li>• Vessels shall comply with the District's voluntary vessel speed reduction program, which targets 80 percent compliance.</li> <li>• Eligible vessels shall comply with ARB's at-berth regulation that requires shore power or alternative control technology regulation for 80 percent of eligible calls by 2020, minus idle time to clear customs consistent with California Air Resources Board regulations. This is a project feature made into a mitigation measure to ensure compliance.</li> <li>• Designated truck haul routes shall be used, and the project proponent shall decrease onsite movements where practicable.</li> <li>• No commercial drive-through shall be implemented.</li> <li>• Compliance with Assembly Bill 939 and the City of San Diego's Recycling Ordinance shall be mandatory and shall include recycling at least 50 percent of solid waste; compliance with the City of San Diego's Construction and Demolition Debris Deposit Ordinance shall be mandatory and shall include recycling at least 50 percent of all construction debris. This measure shall be applied during construction and operation of the proposed project.</li> <li>• Light fixtures shall be replaced with lower-energy bulbs such as fluorescent, Light-Emitting Diodes (LEDs), Compact Fluorescent Lights (CFLs), or the most energy-efficient</li> </ul>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>lighting that meets required lighting standards and is commercially available.</p> <ul style="list-style-type: none"> <li>Implementation of Climate Action Plan measures will be included as part of any discretionary actions and/or Coastal Development Permit(s) associated with this project. Evidence of implementation and compliance with this mitigation measure shall be provided to the District by the project proponent on an annual basis through 2035 (buildout of the TAMT plan).</li> </ul> <p><b>MM-AQ-4: Implement Best Available Control Technologies for Conveyor System and Bulk Discharge Unloader for Future Dry Bulk Operations associated with the TAMT Plan.</b> As a condition of approval of any new or amended real estate agreement or Coastal Development Permit for dry bulk operations that would result in an increase in daily or annual throughput over baseline conditions, the San Diego Unified Port District shall require the project proponent to install and use the best available control technologies to achieve a minimum 95% control efficiency for particulate matter in one of the following ways:</p> <ul style="list-style-type: none"> <li>Upgrade the existing Conveyor System and Bulk Discharge Unloader (if proposed for use) to meet the minimum 95% control efficiency.</li> <li>Replace the existing Conveyor System and Bulk Discharge Unloader with a new Conveyor System and Bulk Discharge Unloader that meets the minimum 95% control efficiency and properly dispose of the existing system in compliance with all applicable laws and regulations.</li> <li>Bypass the existing Conveyor System and Bulk Discharge Unloader and install a new Conveyor System and Bulk Discharge Unloader that meets</li> </ul>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>the minimum 95% control efficiency.</p> <p>The project proponent that finances an upgrade or replacement to the new system may be reimbursed, based on anticipated percent usage, by future users of the system. The San Diego Unified Port District will assist such reimbursement by conditioning its approval of other users of the system during the first 5 years of its operation on reimbursement of the cost of the system on a “fair share” basis.</p> <p>Under no circumstance shall a project proponent seeking discretionary approval for dry bulk operations be allowed to increase daily or annual throughput of dry bulk operations without first completing the upgrade or replacement of the existing system, or installation of a new system required above.</p> <p>The recipient of a discretionary approval by the San Diego Unified Port District subject to this mitigation measure shall provide written evidence of implementation and compliance with this mitigation measure to the San Diego Unified Port District on an annual basis through 2035 (buildout of the TAMT plan).</p> <p><b>MM-AQ-5: Implement Vessel Speed Reduction Program Beyond Climate Action Plan Compliance for Future Operations Associated with the TAMT Plan.</b> Every quarter following approval of the first discretionary action approval and/or issuance of the first Coastal Development Permit associated with a future project proposed under the TAMT plan, whichever occurs first, the project proponent shall provide a report of the annual vessel activity and throughput by cargo node to date and the projected total throughput for the previous 6 months to the San Diego Unified Port District’s Planning &amp; Green Port Department. Prior to the annual vessel calls reaching 91 calls (76 new</p>	



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			<p>calls over existing) for dry bulk, 117 calls (60 new calls over existing) for refrigerated containers, and 96 calls (68 new calls over existing) for multi-purpose general cargo under the MPC scenario (or 79 calls [64 new calls over existing] for dry bulk, 98 calls [41 new calls over existing] for refrigerated containers, and 78 calls [50 new calls over existing] for multi-purpose general cargo under the STC Alternative), or beginning January 1, 2030 for all vessels irrespective of the number of calls occurring on an annual basis, whichever occurs first, the project proponent shall implement vessel speed reduction measures to reduce the project's criteria pollutant emissions. The program shall require that 90 percent of the vessels calling at the project site reduce their speeds to 12 knots starting at 40 nautical miles from Point Loma. Due to the international border to the south and California Air Resources Board limit for rulemaking being 24 nautical miles from the coastline, some vessel calls travel within the San Diego Air Basin for less than 40 nautical miles. For those vessel calls, vessel operators are required to reduce their speeds to 12 knots at the point those vessels enter the San Diego Air Basin and maintain speeds of 12 knots over the entire distance to/from Point Loma. To be compliant with the vessel speed limit, the vessel's weighted average speed shall be 12 knots or less from the 40 nautical mile latitude and longitude positions on each respective route to/from Point Loma.</p> <p>Implementation of this VSR program will be required as part of any discretionary action and/or Coastal Development Permit(s) associated with the TAMT plan. Evidence of implementation and compliance with this mitigation measure shall be provided to the San Diego Unified Port District's Planning &amp; Green Port Department on a quarterly basis through 2035 (buildout of the TAMT plan). The</p>	

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			<p>San Diego Unified Port District will verify compliance through analysis of Automatic Identification System data or by requesting a vessel's Electronic Chart Display Identification System log from the captain.</p> <p><b>MM-AQ-6: Electric Cargo Handling Equipment Upgrades.</b> This measure has multiple steps for compliance, as specified below.</p> <p>A. Prior to January 1, 2020, the San Diego Unified Port District shall ensure that at least three pieces of existing non-electric cargo handling equipment at the terminal are replaced by electric cargo handling equipment, none of which were previously operating at the terminal during the 2013/2014 baseline year of the EIR analysis. Possible ways the electric cargo handling equipment may be obtained include, but are not limited to, the following:</p> <ol style="list-style-type: none"> <li>1. Purchased, leased, or otherwise acquired, in whole or in part, through funding provided to a tenant by the San Diego Unified Port District;</li> <li>2. Purchased, leased, or otherwise acquired, in whole or in part, through funding provided to a tenant by other sources; or</li> <li>3. Purchased, leased, or otherwise acquired, in whole or in part, by the tenant in compliance with a condition of a discretionary approval issued by the San Diego Unified Port District.</li> </ol> <p>Written evidence of the acquisition of the electric cargo handling equipment and the equipment it will replace and remove from further operation at the terminal must be provided to the San Diego Unified Port District. The San Diego Unified Port District shall further ensure that the electric cargo handling</p>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>equipment is in use at each of the three nodes throughout the expected operating life. This will be accomplished by requiring each tenant that employs electric cargo handling equipment pursuant to this measure to report the equipment's annual number of hours of operation to the San Diego Unified Port District and by requiring the San Diego Unified Port District to monitor use of the electric cargo handling equipment as part of the San Diego Unified Port District's TAMT equipment inventory.</p> <p>B. Prior to January 1, 2025, the San Diego Unified Port District also shall ensure that no fewer than 20 non-electric yard trucks in operation are replaced at the TAMT by 20 electric yard trucks. Possible ways the electric yard trucks may be obtained include, but are not limited to, the following:</p> <ol style="list-style-type: none"> <li>1. Purchased, leased, or otherwise acquired, in whole or in part, through funding provided to a tenant by the San Diego Unified Port District;</li> <li>2. Purchased, leased, or otherwise acquired, in whole or in part, through funding provided to a tenant by other sources; or</li> <li>3. Purchased, leased, or otherwise acquired, in whole or in part, by the tenant in compliance with a condition of a discretionary approval issued by the San Diego Unified Port District.</li> </ol> <p>Written evidence of the acquisition of the electric yard trucks, and the non-electric yard trucks they will replace and remove from further operation at the terminal, must be provided to the San Diego Unified Port District. The San Diego Unified Port District shall further</p>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>ensure that the electric yard trucks are in use at the TAMT throughout the expected operating life of the equipment. Each tenant that employs electric trucks pursuant to this measure shall report the equipment's annual number of hours of operation to the San Diego Unified Port District, and the San Diego Unified Port District shall monitor use of the electric trucks as part of the San Diego Unified Port District's TAMT equipment inventory.</p> <p>C. Prior to January 1, 2030, the San Diego Unified Port District also shall ensure that no fewer than three existing non-electric reach stackers and ten non-electric forklifts in operation are replaced at the TAMT by three fully electric reach stackers and ten fully electric forklifts. Possible ways the electric reach stackers and forklifts may be obtained include, but are not limited to:</p> <ol style="list-style-type: none"> <li>1. Purchased, leased, or acquired, in whole or in part, through funding provided to the tenant by the San Diego Unified Port District;</li> <li>2. Purchased, leased, or acquired, in whole or in part, through funding provided to the tenant by other sources; or</li> <li>3. Purchased, leased, or otherwise acquired, in whole or in part, by the tenant in compliance with a condition of a discretionary approval issued by the San Diego Unified Port District.</li> </ol> <p>Written evidence of the acquisition of the three electric reach stackers and ten electric forklifts and the conventional equipment they will replace and remove from further operation at the terminal must be provided to the San Diego Unified Port District. The San Diego Unified Port</p>	

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			<p>District shall further ensure that the electric reach stackers and forklifts are in use at the TAMT throughout the expected operating life of the equipment. Each tenant that employs electric reach stackers or electric forklifts pursuant to this measure shall report the equipment's annual number of hours of operation to the San Diego Unified Port District, and the San Diego Unified Port District shall monitor use of the electric reach stackers and forklifts as part of the San Diego Unified Port District's TAMT equipment inventory.</p> <p>D. The electric equipment employed pursuant to paragraphs A, B, and C of this mitigation measure may be replaced by other technologies or other types of cargo handling equipment as long as the replacement equipment achieves the same or greater criteria pollutant, toxic air contaminant, and greenhouse gas emission reductions as compared to the equipment required by paragraphs A, B, and C of this mitigation measure.</p> <p><b>MM-AQ-7: Annual Inventory Submittal and Periodic Technology Review.</b> The San Diego Unified Port District regularly monitors technologies for reducing air emissions as part of its Climate Action Plan and long-range sustainability goals, which encourage the San Diego Unified Port District and its tenants to use cleaner technologies over time as they become available and feasible. As a condition of approval of any new or amended real estate agreement or Coastal Development Permit, the San Diego Unified Port District shall require the project proponent to submit to the San Diego Unified Port District an annual inventory of all equipment that generates criteria pollutant, toxic air contaminant, and greenhouse gas emissions operated by the</p>	

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			<p>project proponent at the TAMT throughout the life of the lease up to 2035 (buildout of the TAMT plan). The equipment inventory shall include the year, make, and model of the equipment that was used in the previous year, including annual hours of operation for each piece of equipment, including but not limited to heavy-duty drayage and non-drayage trucks, yard equipment, assist and ocean-going tugs, ocean-going vessels, bulk material handling equipment, and any other type of cargo handling equipment. The purpose of the inventory is to track emissions and equipment at TAMT and to assist in technological reviews, as described below.</p> <p>To promote new emission control technologies, the San Diego Unified Port District will perform a Periodic Technology Review annually. The Periodic Technology Review will coincide with monitoring and reporting pursuant to the San Diego Unified Port District's Climate Action Plan, and will include the following:</p> <ol style="list-style-type: none"> <li>1. Develop and maintain an inventory of equipment in operation at the TAMT that generates criteria pollutant, toxic air contaminant, and greenhouse gas emissions, including the equipment model year, model name, and annual hours of operation, based on the annual tenant inventories submitted to the San Diego Unified Port District as described above.</li> <li>2. Identify and assist with enforcement of changes to emission regulations for heavy-duty trucks, yard equipment, tugs, vessels, bulk handling equipment, and other equipment that generates criterial pollutant, toxic air contaminant, and greenhouse gas emissions.</li> <li>3. Identify, and assist with implementation of, any feasible new emissions-reduction technologies</li> </ol>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>that may reduce emissions at the project site, including technologies applicable to heavy-duty trucks, yard equipment, tugs, vessels, and bulk handling equipment.</p> <ol style="list-style-type: none"> <li>4. Collaborate with the California Air Resources Board and San Diego Air Pollution Control District to ensure these technologies are available and to identify funding opportunities, including funding from the Prop 1B: Good Movement Emission Reduction Program, among others.</li> <li>5. Prioritize older equipment in operation at the TAMT that generates the highest levels of criterion pollutant, toxic air contaminant, and greenhouse gas emissions to be replaced based on the level of emissions and cost-effectiveness of the emissions reduction (i.e., biggest reduction per dollar), and identify implementation mechanisms including, but not limited to, tenant-based improvements, grant programs, or a combination thereof, based on regulatory requirements and the feasibility analyses specified in paragraph 3 above. Use the Carl Moyer Program, or similar cost-effectiveness criteria, to assess the economic feasibility (e.g., cost effectiveness) of the identified new technologies.</li> <li>6. Ensure that any upgraded or retired equipment is accounted for as part of the San Diego Unified Port District's Maritime Emissions Inventory and Climate Action Plan.</li> </ol> <p>If Periodic Technology Review identifies new technology that will be effective in reducing emissions compared to the equipment in operation at the time of the review, and the San Diego Unified Port District determines that installation or use of the technology is feasible, the San Diego Unified Port</p>	

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			<p>District shall require the use of such technology as a condition of any discretionary approval issued by the San Diego Unified Port District for any new, expanded, or extended operations at the TAMT. Furthermore, the District and/or project proponent must demonstrate that emissions of volatile organic compounds (VOCs) would be less than 75 pounds per day on a peak day once cargo throughput exceeds 4,000,000 metric tons annually. If technological advancements are unable to reduce VOC emissions to 75 pounds per day or less on a peak day, then the District shall limit the number of vessels allowed to no more than three on a peak day once total throughput exceeds 4,000,000 metric tons annually. These operational restrictions will ensure that VOC emissions do not exceed threshold standards established by the San Diego Air Pollution Control District. Verification of compliance with this measure is the responsibility of the District.</p> <p><b>MM-AQ-8: Implement Exhaust Emissions Reduction Program at the Tenth Avenue Marine Terminal.</b> The San Diego Unified Port District shall implement a program at the TAMT by January 1, 2020 to further reduce emissions from terminal-wide emissions sources.</p> <ul style="list-style-type: none"> <li>A. The program shall be implemented through the Coastal Development Permit process; the tenant leasing process, including the issuance of new, extended, or amended leases; and other short-term real estate agreements at the TAMT.</li> <li>B. The program shall be focused on incentives to reduce criteria pollutant, toxic air contaminant, and greenhouse gas emissions by attracting clean vessels, trucks, and equipment to the TAMT—including but not limited to vessels that use shore power while at berth, zero and near-zero emission cargo handling equipment</li> </ul>	



Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>technologies, energy efficiency measures, or renewable energy—and by otherwise incorporating technological and operational practices that reduce criteria pollutant, toxic air contaminant, and greenhouse gas emissions from terminal operations beyond existing regulatory requirements. The program shall include specific incentives for existing and future tenants, which may include but are not limited to: an extended lease term, expedited permit processing, reduced permit fees, and eligibility for grants or other financial assistance. The nature and extent of such incentives will be based on an emissions reduction schedule established by the San Diego Unified Port District for criteria pollutants, toxic air contaminants, and greenhouse gas emissions.</p> <p>C. The program shall identify specific emission reduction equipment and practices that may qualify for incentives, which may include but not be limited to the following.</p> <ul style="list-style-type: none"> <li>• Vessels: Demonstrate that at least 50 percent of annual vessel calls will be equipped with Tier II or better main and auxiliary engines, as defined by International Convention for the Prevention of Pollution from Ships Annex VI 2008 regulations or other standards set forth by the International Convention for the Prevention of Pollution from Ships, U.S. Environmental Protection Agency, or the California Air Resources Board in the future.</li> <li>• Vessel Hoteling: Demonstrate that vessel calls will use shore power or a California Air Resources Board-approved alternative</li> </ul>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>emission capture and control system or install a shore power or California Air Resources Board–approved alternative emission capture and control system for the purpose of reducing ocean-going vessel hoteling emissions.</p> <ul style="list-style-type: none"> <li>• Heavy-Duty Trucks: Demonstrate that at least 50 percent of annual cargo throughput will be transported with zero/near-zero emission trucks, hybrid trucks, and/or other alternative truck technologies. To qualify, the trucks must result in emission reductions greater than those required by state and federal regulatory agencies at the time of project approval.</li> <li>• Switch and Line Haul Locomotives: Demonstrate that at least 50 percent of annual cargo will be transported with Tier 3 or above locomotive engines for line-haul, as defined by the U.S. Environmental Protection Agency in 2008 (73 Federal Register 88 25098–25352), and a Tier 3 or above switcher or railcar mover for switching activity at both the terminal and yard.</li> <li>• Terminal Infrastructure: Install electric charging stations and/or other terminal infrastructure and equipment that support and facilitate zero or near-zero emission technologies.</li> </ul> <p><b>MM-AQ-9: Use of At-Berth Emission Capture and/or Control System to Reduce Vessel Hoteling Emissions.</b> The San Diego Unified Port District shall require the use of an At-Berth Emission Capture and/or Control System (i.e., Bonnet System) to reduce vessel hoteling emissions prior to terminal-related emissions reaching a cancer risk of 10 per</p>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>million at the maximally exposed sensitive receptor location. Based on the Health Risk Assessment for the TAMT Redevelopment Plan Environmental Impact Report, an At-Berth Emission Capture and/or Control System shall be required prior to reaching an annual throughput of 691,418 metric tons for dry bulk, assuming no growth in multi-purpose general cargo; an annual throughput of 356,666 metric tons for multi-purpose general cargo (including break bulk, neobulk, roll-on/roll-off, and other non-container, non-dry bulk cargo, and non-liquid bulk cargo), assuming no growth in dry bulk; or any combination of dry bulk and multi-purpose general cargo throughput of 691,418 metric tons, whichever occurs first. The San Diego Unified Port District shall either install directly or enter into a contract with an entity that provides the emission capture and/or control system or an equivalent alternative technology, to reduce emissions from vessels that are unable to cold iron at TAMT or are exempt from the California Air Resources Board's at-berth regulation. The San Diego Unified Port District may charge a fee for the use of an Emissions Capture and Control System (or an alternative at-berth system that reduces vessel hoteling emissions) based on the vessel type and the length of its stay. The system shall be a technology that has been approved by the California Air Resources Board and meets the requirements set forth in the California Air Resources Board's at-berth regulations. If the San Diego Unified Port District determines the need for an Emissions Capture and Control System (or an alternative at-berth system that reduces vessel hoteling emissions) prior to, or later than, the throughput figures listed above, or if shore power or other future regulatory requirements are able to reduce vessel hoteling emissions, then the requirement for the At-Berth Emission Capture</p>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>and/or Control System shall be updated and adjusted accordingly, at the San Diego Unified Port District's discretion.</p> <p>All vessels that are not shore-power equipped shall use the Emission Capture and/or Control System (or an alternative at-berth system that reduces vessel hoteling emissions at an equivalent level), provided there are no operational limitations and it is not being used by another vessel. If the Emission Capture and/or Control System is operationally unable to connect to an at-berth vessel or if it is being used by another vessel, multi-purpose/general cargo or dry bulk vessels will be allowed to berth without it.</p>	
Cumulatively Considerable Criteria Pollutant Contribution under an Ambient Air Quality Standard	<p><i>Demolition and Initial Rail Component</i></p> <p>Implementation of the Demolition and Initial Rail Component would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard.</p>	STC: LS MPC: LS	No mitigation is required.	N/A
	<p><i>Full TAMT Plan Buildout</i></p> <p><b>Impact-AQ-3: Cumulative Emissions in Excess of Criteria Pollutant Thresholds During TAMT Plan Buildout Operations.</b></p> <p>Project emissions during operations, before mitigation, would exceed the San Diego County SLTs for VOC, NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>, and when combined with other nearby past, present, and probable future projects, the full TAMT plan buildout's contribution would be cumulatively considerable. The contribution of project-related emissions is considered significant because full TAMT plan buildout would exceed thresholds that have been set by SDAPCD to attain the NAAQS and CAAQS, the purpose of</p>		Implement <b>MM-AQ-2</b> through <b>MM-AQ-9</b> , as described above.	STC: LS MPC: LS

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	which is to provide for the protection of public health			
Sensitive Receptors	<i>Demolition and Initial Rail Component</i>			
	Implementation of the Demolition and Initial Rail Component would not expose sensitive receptors to substantial pollutant concentrations.	STC: LS MPC: LS	No mitigation is required.	N/A
	<i>Full TAMT Plan Buildout</i> <b>Impact-AQ-4: Health Risk During Full TAMT Plan Buildout Operations.</b> Project TAC emissions during full TAMT plan buildout operations, before mitigation, would result in a significant incremental health risk by exceeding thresholds for incremental cancer risk at nearby receptors.	STC: PS MPC: PS	Implement <b>MM-AQ-2</b> through <b>MM-AQ-9</b> , as described above.	STC: LS MPC: SU for residential receptors; LS for park and school receptors
Objectionable Odors	<i>Demolition and Initial Rail Component</i>			
	Implementation of the Demolition and Initial Rail Component would not create objectionable odors affecting a substantial number of people.	STC: LS MPC: LS	No mitigation is required.	N/A
	<i>Full TAMT Plan Buildout</i> Buildout of the TAMT plan would not create objectionable odors affecting a substantial number of people.	STC: LS MPC: LS	No mitigation is required.	N/A
<b>Cumulative Impacts</b>				
Criteria Pollutants (Construction)	<i>Demolition and Initial Rail Component</i> Implementation of the Demolition and Initial Rail Component would not violate an air quality standard or contribute substantially to an existing or projected air quality standard.	STC: LS MPC: LS	No mitigation is required.	N/A

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	<i>Full TAMT Plan Buildout</i> <b>Impact-C-AQ-1: Emissions in Excess of Cumulative Thresholds During Full TAMT Plan Buildout Construction.</b> Emissions during construction of full TAMT plan buildout would exceed the cumulative San Diego County SLTs.	STC: PS MPC: PS	Implement <b>MM-AQ-1</b> , as described above.	STC: SU MPC: SU
	<i>Demolition and Initial Rail Component</i> Implementation of the Demolition and Initial Rail Component would not violate an air quality standard or contribute substantially to an existing or projected air quality standard.	STC: LS MPC: LS	No mitigation is required.	N/A
Criteria Pollutants (Operation)	<i>Full TAMT Plan Buildout</i> <b>Impact-C-AQ-2: Emissions in Excess of Cumulative Thresholds During Full TAMT Plan Buildout Operations.</b> Emissions during operations would exceed the cumulative San Diego County SLTs for VOC, NO <sub>x</sub> , PM <sub>10</sub> , and PM <sub>2.5</sub> at maximum capacity primarily of the full TAMT plan buildout due to vessel, train, and truck activity and bulk processing.	STC: PS MPC: PS	Implement <b>MM-AQ-2</b> through <b>MM-AQ-9</b> , as described above.	STC: LTS MPC: LTS
Health Risk	<i>Demolition and Initial Rail Component</i> Implementation of the Demolition and Initial Rail Component would not expose sensitive receptors to substantial pollutant concentrations.	STC: LS MPC: LS	No mitigation is required.	N/A
	<i>Full TAMT Plan Buildout</i> <b>Impact-C-AQ-3: Cumulative Health Risk Emissions During Operations.</b> Emissions during full TAMT plan buildout operations would exceed the incremental risk thresholds associated with long-term operation up to maximum capacity primarily due to vessel, terminal equipment, and truck activity.	STC: PS MPC: PS	Implement <b>MM-AQ-2</b> through <b>MM-AQ-9</b> , as described above	STC: LS MPC: SU for residential receptors; LS for park and school receptors

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
<b>4.3 Biological Resources</b>				
<b>Project Impacts</b>				
Candidate, Sensitive, or Special-Status Species	<p><i>Demolition and Initial Rail Component</i></p> <p><b>Impact-BIO-1: Potential Destruction of Migratory Bird Treaty Act Protected Nests.</b></p> <p>Onsite demolition of structures during construction, as well as noise from construction activity, could result in the destruction and loss of active bird nests that could be present within the project area during the nesting season (February 1 through August 31). The MBTA prohibits take of nearly all native birds. Similar provisions within the California Fish and Game Code protect all native birds of prey (Section 3503.5) and all non-game birds that occur naturally in the state (Section 3800).</p>	STC: PS MPC: PS	<p><b>MM-BIO-1: Avoid Nesting Season for Birds or Conduct Preconstruction Nesting Survey.</b> To ensure compliance with the MBTA and similar provisions under the California Fish and Game Code, the project proponent in direct coordination with the general contractor shall conduct demolition of Transit Shed #1, Transit Shed #2, Warehouse C, the molasses tanks, and other existing structures during the non-breeding season (between September 1 and January 31) or shall implement the following.</p> <ul style="list-style-type: none"> <li>• If demolition of a structure is scheduled to occur between February 1 and August 31, the project proponent shall retain a qualified biologist (with knowledge of the species to be surveyed) who shall conduct a focused nesting survey prior to demolition of any structures within 1 week of scheduled demolition. A qualified biologist is a person who, by reason of his or her knowledge of the natural sciences and the principles of wildlife biology, acquired by wildlife biology education and experience, performs services including, but not limited to, consultation investigation, surveying, evaluation, planning, or responsible supervision of wildlife biology activities when those professional services require the application of biology principles and techniques.</li> <li>• The survey to look for active nests shall be conducted and results reported in writing to the District for review and approval prior to the commencement of any demolition or construction activities on the project site. The survey shall occur between sunrise and</li> </ul>	STC: LS MPC: LS

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	<b>Impact-BIO-2: Potential Destruction of Special-Status and other Sensitive Bat Maternity Roosts.</b> Demolition of onsite structures during construction could result in the loss of bat maternity roosts that could occur within the project area during the maternity season (April 15 through August 31).	STC: PS MPC: PS	<p>12:00 p.m., when birds are most active. If no active nests are detected during these survey, the biologist will prepare a letter report to the District documenting the results of the survey. If there is a delay of more than 7 days between when the nesting bird survey is performed and demolition begins, the qualified biologist shall confirm in writing to the District that he/she has resurveyed the structure proposed for demolition and that no new nests have been established.</p> <ul style="list-style-type: none"> <li>• If the survey confirms an active nest on any of the structures to be demolished, demolition of the structure shall not occur until after a qualified biologist determines that the nest is no longer active or that the young have fledged.</li> </ul> <p><b>MM-BIO-2: Avoid Bat Maternity Roosts or Conduct Preconstruction Maternity Bat Roost Survey.</b> If demolition of any structures is scheduled during the bat maternity season when reproductively active females and dependent young could be present (between April 15 and August 31), a qualified biologist (as defined under MM-BIO-1 and with knowledge of the species to be surveyed) shall conduct a preconstruction survey to determine whether bats are present. The survey shall examine potential suitable roost sites for evidence of bat presence (presence of bats, guano, or urine stains), and it shall be conducted no more than 7 days prior to demolition of the structures. If no active maternity roosts are detected during these survey, the biologist will prepare a letter report to the District documenting the results of the survey. The survey shall be submitted in writing to the District for review and approval prior to the commencement of any demolition activities on the project site. If the biologist determines that the area surveyed does not</p>	STC: LS MPC: LS



Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			contain any active maternity roosts, demolition may commence. If active maternity roosts are found, demolition of the structure shall be postponed and roosting structures shall be retained until a qualified biologist has determined that the maternity roost is no longer active and the young can take care of themselves. The need for a construction buffer shall be determined through consultation among the qualified biologist, the District, and CDFW.	
	<i>Full TAMT Plan Buildout</i> See <b>Impact-BIO-1</b> and <b>Impact BIO-2</b>	STC: PS MPC: PS	Implement <b>MM-BIO-1</b> and <b>MM-BIO-2</b> .	STC: LS MPC: LS
<b>4.4 Cultural Resources</b>				
<b>Project Impacts</b>				
Historical Resource	<i>Demolition and Initial Rail Component</i>			
	Implementation of the Demolition and Initial Rail Component would not cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the State CEQA Guidelines.	STC: LS MPC: LS	No mitigation is required.	N/A
	<i>Full TAMT Plan Buildout</i>			
	Buildout of the TAMT plan would not cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the State CEQA Guidelines.	STC: LS MPC: LS	No mitigation is required.	N/A
Archaeological Resource	<i>Demolition and Initial Rail Component</i>			
	Implementation of the Demolition and Initial Rail Component would not cause a substantial adverse change in the significance of an archaeological resource as defined in Section 15064.5 of the State CEQA Guidelines.	STC: LS MPC: LS	No mitigation is required.	N/A

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	<p><i>Full TAMT Plan Buildout</i></p> <p><b>Impact-CUL-1: Potential Buried Archaeological Resources.</b> The recorded portions of site CA-SDI-5931 are close to the eastern study area boundary. The exact boundaries of CA-SDI-5931 are not known and evidence suggests that the site could be larger than the area tested in 1993. Therefore, project activities within the eastern area of the project site, as mapped on Figure 4.4-1, could potentially encounter archaeological subsurface deposits associated with CA-SDI-5931. Such an encounter, if it were to destroy archaeological resources, would be considered significant.</p>	<p>STC: PS MPC: PS</p>	<p><b>MM-CUL-1: Archaeological Monitoring in Areas of Sensitivity.</b> To reduce potential impacts on CA-SDI-5931, all proposed grading, excavating, and geotechnical testing for the proposed project in the area of potential archaeological sensitivity shall be monitored by a qualified archaeologist(s), who meets the Secretary of the Interior's Professional Qualifications Standards, as promulgated in 36 CFR 61, and a Native American cultural monitor, the latter of which has been requested by the Viejas Band of Kumeyaay Indians. The sensitive portion of the project area, where it is possible that artifacts associated with CA-SDI-5931 could be buried, is immediately east of Warehouse C and south and east of the silo complex and the rail car unloading building, as indicated on Figure 4.4-1. The sensitive area includes the molasses tanks, truck scale building, spur lines north, east, and south of the molasses tanks, and paved and unpaved parking areas near the Crosby Road entrance. The following additional conditions shall only apply to the sensitive portion of the project area indicated on Figure 4.4-1 during earthwork activities, including grading and trenching.</p> <ul style="list-style-type: none"> <li>• The Qualified Archaeologist shall participate in a preconstruction meeting to inform all personnel of the potential for historical archaeological materials to be encountered during ground-disturbing activities.</li> <li>• If an isolated artifact or historic period deposit is discovered that requires salvaging, the Qualified Archaeologist shall have the authority to temporarily halt construction activities within 100 feet of the find and shall be given sufficient time to recover the item(s) and map its location with a global positioning system</li> </ul>	<p>STC: LS MPC: LS</p>

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>(GPS) device.</p> <ul style="list-style-type: none"> <li>• If a potentially eligible Native American archaeological resource is discovered, the Qualified Archaeologist shall have the authority to temporarily halt construction activities within 100 feet of the find until a Qualified Archaeologist Principal Investigator (PI) makes a determination regarding the significance of the resource. <ul style="list-style-type: none"> <li>○ The PI will notify the District to discuss the significance determination and shall also submit a letter indicating whether additional mitigation is required. If the resource is determined to be not significant, the PI shall submit a letter to the District indicating that artifacts will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that no further work is required.</li> <li>○ If the resource is determined to be significant, the PI shall submit an Archaeological Data Recovery Plan that has been reviewed by the Native American consultant/monitor, and obtain written approval from the Port to complete data recovery. Impacts on significant resources must be mitigated before ground-disturbing activities in the area of discovery will be allowed to resume.</li> </ul> </li> <li>• The Qualified Archaeologist shall treat recovered items in accordance with current professional standards by properly determining provenance, cleaning, analyzing, researching, reporting, and curating them in a collection facility meeting the Secretary of the Interior's Standards, as promulgated in 36 CFR 79, such as the San Diego Archaeological Center.</li> </ul>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<ul style="list-style-type: none"> <li>Within 60 days after completion of the ground-disturbing activity, the Qualified Archaeologist shall prepare and submit a final report to the District for review and approval, which shall discuss the monitoring program and its results, and provide interpretations about the recovered materials, noting to the extent feasible each item's class, material, function, and origin.</li> </ul>	
Disturbance of Human Remains	<i>Demolition and Initial Rail Component</i> Implementation of the proposed Demolition and Initial Rail Component would not disturb human remains, including those interred outside of formal cemeteries.	STC: LS MPC: LS	No mitigation is required.	N/A
	<i>Full TAMT Plan Buildout</i> <b>Impact-CUL-2: Potential Disturbance of Prehistoric Human Remains.</b> The recorded portion of CA-SDI-5931 included one Native American burial found during grading activities within the rail yard adjacent to the project site and testing indicated the possibility of other prehistoric human burials beyond the areas tested. The exact boundaries of site CA-SDI-5931 are not known, and it is possible that the site extends to the eastern portion of the study area as indicated in Figure 4.4-1, where ground-disturbing activities could take place as part of the implementation of the proposed TAMT plan. Therefore, any ground-disturbing activities in this area would have the potential to encounter prehistoric human remains.	STC: PS MPC: PS	Implement <b>MM-CUL-1</b> , as described above.	STC: LS MPC: LS

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
<b>4.5 Geology and Soils</b>				
<b>Project Impacts</b>				
Earthquake Fault; Seismic Ground Shaking; Seismic-related Ground Failure	<i>Demolition and Initial Rail Component</i>			
	Implementation of the Demolition and Initial Rail Component would not exacerbate the potential of a: (i) rupture of a known earthquake fault; (ii) strong seismic ground shaking; and (iii) seismic-related ground failure, including liquefaction.	STC: LS MPC: LS	No mitigation is required.	N/A
	<i>Full TAMT Plan Buildout</i>			
	Buildout of the TAMT plan would not exacerbate the potential of a: (i) rupture of a known earthquake fault; (ii) strong seismic ground shaking; and (iii) seismic-related ground failure, including liquefaction.	STC: LS MPC: LS	No mitigation is required.	N/A
Unstable soils; Lateral Spreading, Subsidence, or Collapse	<i>Demolition and Initial Rail Component</i>			
	Implementation of the Demolition and Initial Rail Component would not cause a geologic unit or soil to become unstable and exacerbate the potential of onsite or offsite lateral spreading, subsidence, or collapse.	STC: LS MPC: LS	No mitigation is required.	N/A
	<i>Full TAMT Plan Buildout</i>			
	Buildout of the TAMT plan would not cause a geologic unit or soil to become unstable and exacerbate the potential of onsite or offsite lateral spreading, subsidence, or collapse.	STC: LS MPC: LS	No mitigation is required.	N/A
<b>4.6 Greenhouse Gas Emissions and Climate Change</b>				
<b>Project Impacts</b>				
Direct and Indirect Generation of GHGs by 2020	<b>Impact-GHG-1: Project GHG Emissions through 2020.</b> Project GHG emissions during combined project construction and operational activities, before mitigation, would be inconsistent with the CAP's reduction target of 33 percent. Additionally, the proposed project	STC: PS MPC: PS	<b>MM-GHG-1: Implement Diesel Emission-Reduction Measures During Construction and Operations of Future TAMT Plan Components.</b> The District shall implement the following measures during project construction and operations, subject to verification by the District.	STC: LS MPC: LS

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	would only partially comply with plans, policies, and regulatory programs outlined in the Scoping Plan and adopted by ARB or other California agencies for the purpose of reducing the emissions of GHGs.		<ul style="list-style-type: none"> <li>i. All project proponents shall limit all equipment, drayage, and delivery truck idling times by shutting down equipment when not in use and reducing the maximum idling time to less than 3 minutes. The project proponent shall install clear signage regarding the limitation on idling time at the delivery driveway and loading areas and shall submit quarterly reports of violators to the District. This measure shall be enforced by terminal supervisors, and repeat violators shall be subject to penalties pursuant to California airborne toxics control measure 13 California Code of Regulations Section 2485. The project proponent shall submit evidence of the use of diesel reduction measures to the District through annual reporting, with the first report due 1 year from the date of project completion and each report due exactly 1 year after, noting all violations with relevant identifying information of the vehicles and drivers in violation of these measures.</li> <li>ii. The project proponent shall verify that all construction and operations equipment is maintained and properly tuned in accordance with manufacturers' specifications. Prior to the commencement of construction and operations activities using diesel-powered vehicles or equipment, the project proponent shall verify that all vehicles and equipment have been checked by a certified mechanic and determined to be running in proper condition prior to admittance into TAMT. The project proponent shall submit a report by the certified mechanic of the condition of the construction and operations vehicles and equipment to the District prior to commencement of their use.</li> </ul>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p><b>MM-GHG-2: Comply with San Diego Unified Port District Climate Action Plan Measures.</b> Prior to approval of all discretionary actions and/or Coastal Development Permits, the project proponent shall be required to implement the following measures to be consistent with the Climate Action Plan.</p> <ul style="list-style-type: none"> <li>• Vessels shall comply with the District's voluntary vessel speed reduction program, which targets 80 percent compliance.</li> <li>• Eligible vessels shall comply with ARB's at-berth regulation that requires shore power or alternative control technology regulation for 80 percent of eligible calls by 2020, minus idle time to clear customs consistent with California Air Resources Board regulations. This is a project feature made into a mitigation measure to ensure compliance.</li> <li>• Designated truck haul routes shall be used, and the project proponent shall decrease onsite movements where practicable.</li> <li>• No commercial drive-through shall be implemented.</li> <li>• Compliance with Assembly Bill 939 and the City of San Diego's Recycling Ordinance shall be mandatory and shall include recycling at least 50 percent of solid waste; compliance with the City of San Diego's Construction and Demolition Debris Deposit Ordinance shall be mandatory and shall include recycling at least 50 percent of all construction debris. This measure shall be applied during construction and operation of the proposed project.</li> <li>• Light fixtures shall be replaced with lower-energy bulbs such as fluorescent, Light-Emitting Diodes (LEDs), Compact Fluorescent Lights (CFLs), or the most energy-efficient lighting that meets required lighting standards and is</li> </ul>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>commercially available.</p> <p>Implementation of Climate Action Plan measures will be included as part of any discretionary actions and/or Coastal Development Permit(s) associated with this project. Evidence of implementation and compliance with this mitigation measure shall be provided to the District by the project proponent on an annual basis through 2035 (buildout of the TAMT plan).</p> <p><b>MM-GHG-3: Electric Cargo-Handling Equipment Upgrades.</b> Prior to January 1, 2020, the San Diego Unified Port District shall ensure that at least three pieces of existing non-electric cargo-handling equipment (CHE) at the terminal are replaced by electric CHE, none of which were previously operating at the terminal during the 2013/2014 baseline year of the EIR analysis. Possible ways the electric CHE may be obtained include, but are not limited to, the following:</p> <ol style="list-style-type: none"> <li>1. Purchased, leased, or otherwise acquired, in whole or in part, through funding provided to a tenant by the San Diego Unified Port District; or</li> <li>2. Purchased, leased, or otherwise acquired, in whole or in part, through funding provided to a tenant by other sources; or</li> <li>3. Purchased, leased, or otherwise acquired, in whole or in part, by the tenant in compliance with the condition of a discretionary approval issued by the San Diego Unified Port District.</li> </ol> <p>Written evidence of the acquisition of the electric CHE equipment and the equipment it will replace and remove from further operation at the terminal must be provided to the San Diego Unified Port District. The San Diego Unified Port District shall further ensure that the electric CHE is in use at each of the three nodes throughout the expected operating life. This will be accomplished by</p>	



Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
Direct and Indirect Generation of GHGs Beyond 2020	<b>Impact-GHG-2: Project GHG Emissions Beyond 2020.</b> Although proposed project emissions would be on a downward trajectory in the post-2020 period, the proposed project's reduction in GHG emissions during combined project construction and operational activities, before mitigation, may not contribute sufficiently to post-2020 progress toward statewide 2030 and 2050 reduction targets and would not always be in compliance with plans, policies, and regulatory programs adopted by ARB or other California agencies for post-2020 for the purpose of reducing the emissions of GHGs.	STC: PS MPC: PS	<p>requiring each tenant that employs electric CHE pursuant to this measure to report the equipment's annual number of hours of operation to the San Diego Unified Port District and by requiring the San Diego Unified Port District to monitor use of the electric CHE as part of the San Diego Unified Port District's TAMT equipment inventory.</p> <p>The electric equipment employed pursuant to this mitigation measure may be replaced by other technologies or other types of CHE as long as the replacement equipment achieves the same or greater criteria pollutant, toxic air contaminant, and greenhouse gas emission reductions as compared to the equipment required by this mitigation measure.</p> <hr/> <p>Implement <b>MM-GHG-1</b> through <b>MM-GHG-3</b>. <b>MM-GHG-4: Electric Cargo-Handling Equipment Upgrades.</b> In addition to the requirements in MM-GHG-3, this measure has multiple steps for compliance, as specified below.</p> <p>A. Implement MM-GHG-3. The three electric cargo-handling equipment pieces required in MM-GHG-3 will continue to be operational through 2035.</p> <p>B. Prior to January 1, 2025, the San Diego Unified Port District also shall ensure that no fewer than 20 non-electric yard trucks in operation are replaced at the TAMT by 20 electric yard trucks. Possible ways the electric yard trucks may be obtained include, but are not limited to, the following:</p> <ol style="list-style-type: none"> <li>1. Purchased, leased, or otherwise acquired, in whole or in part, through funding provided to a tenant by the San Diego Unified Port District; or</li> <li>2. Purchased, leased, or otherwise acquired, in whole or in part, through funding provided to a tenant by other sources; or</li> </ol>	STC: SU MPC: SU

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>3. Purchased, leased, or otherwise acquired, in whole or in part, by the tenant in compliance with the condition of a discretionary approval issued by the San Diego Unified Port District.</p> <p>Written evidence of the acquisition of the electric yard trucks, and the non-electric yard trucks they will replace and remove from further operation at the terminal, must be provided to the San Diego Unified Port District. The San Diego Unified Port District shall further ensure that the electric yard trucks are in use at the TAMT throughout the expected operating life of the equipment. Each tenant that employs electric trucks pursuant to this measure shall report the equipment's annual number of hours of operation to the San Diego Unified Port District and the San Diego Unified Port District shall monitor use of the electric trucks as part of the San Diego Unified Port District's TAMT equipment inventory.</p> <p>C. Prior to January 1, 2030, the San Diego Unified Port District also shall ensure that no fewer than three existing non-electric reach stackers and ten non-electric forklifts in operation are replaced at the TAMT by three fully electric reach stackers and ten fully electric forklifts. Possible ways the electric reach stackers and forklifts may be obtained include, but are not limited to:</p> <ol style="list-style-type: none"> <li>1. Purchased, leased, or acquired, in whole or in part, through funding provided to the tenant by the San Diego Unified Port District; or</li> <li>2. Purchased, leased, or acquired, in whole or in part, through funding provided to the tenant by other sources; or</li> </ol>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>3. Purchased, leased, or otherwise acquired, in whole or in part, by the tenant in compliance with a condition of a discretionary approval issued by the San Diego Unified Port District.</p> <p>Written evidence of the acquisition of the three electric reach stackers and ten electric forklifts and the conventional equipment they will replace and remove from further operation at the terminal must be provided to the San Diego Unified Port District. The San Diego Unified Port District shall further ensure that the electric reach stackers and forklifts are in use at the TAMT throughout the expected operating life of the equipment. Each tenant that employs electric reach stackers or electric forklifts pursuant to this measure shall report the equipment's annual number of hours of operation to the San Diego Unified Port District and the San Diego Unified Port District shall monitor use of the electric reach stackers and forklifts as part of the San Diego Unified Port District's TAMT equipment inventory.</p> <p>D. The electric equipment employed pursuant to paragraphs A, B, and/or C of this mitigation measure may be replaced by other technologies or other types of cargo-handling equipment as long as the replacement equipment achieves the same or greater criteria pollutant, toxic air contaminant, and greenhouse gas emission reductions as compared to the equipment required by paragraphs A, B, and/or C of this mitigation measure.</p>	
			<p><b>MM-GHG-5: Implement Vessel Speed Reduction Program Beyond Climate Action Plan Compliance for Future Operations Associated with the TAMT Plan.</b> Every quarter following</p>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>approval of the first discretionary action approval and/or issuance of the first Coastal Development Permit associated with a future project proposed under the TAMT plan, whichever occurs first, the project proponent shall provide a report of the annual vessel activity and throughput by cargo node to date and the projected total throughput for the previous 6 months to the San Diego Unified Port District's Planning &amp; Green Port Department. Prior to the annual vessel calls reaching 91 calls (76 new calls over existing) for dry bulk, 117 calls (60 new calls over existing) for refrigerated containers, and 96 calls (68 new calls over existing) for multi-purpose general cargo under the MPC scenario or 79 calls [64 new calls over existing] for dry bulk, 98 calls [41 new calls over existing] for refrigerated containers, and 78 calls [50 new calls over existing] for multi-purpose general cargo under the STC Alternative, or beginning January 1, 2030 for all vessels irrespective of the number of calls occurring on an annual basis, whichever occurs first, the project proponent shall implement vessel speed reduction measures to reduce the project's criteria pollutant emissions. The program shall require that 90 percent of the vessels calling at the project site reduce their speeds to 12 knots starting at 40 nautical miles from Point Loma. Due to the international border to the south and ARB limit for rulemaking 24 nautical miles from the coastline, some vessel calls travel within the San Diego Air Basin for less than 40 nautical miles. For those vessel calls that travel within the San Diego Air Basin for less than 40 nautical miles, vessel operators are required to reduce their speeds to 12 knots at the point those vessels enter the San Diego Air Basin and maintain speeds of 12 knots over the entire distance to/from Point Loma. To be compliant with the vessel speed limit, the vessel's weighted average</p>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>speed shall be 12 knots or less from the 40-nautical-mile latitude and longitude positions on each respective route to/from Point Loma.</p> <p>Implementation of this vessel speed reduction program will be required as part of any discretionary action and/or Coastal Development Permit(s) associated with the TAMT plan. Evidence of implementation and compliance with this mitigation measure shall be provided to the San Diego Unified Port District's Planning &amp; Green Port Department on a quarterly basis through 2035 (buildout of the TAMT plan). The San Diego Unified Port District will verify compliance through analysis of Automatic Identification System data or by requesting a vessel's Electronic Chart Display Identification System log from the captain.</p> <p><b>MM-GHG-6: Implement a Renewable Energy Project or Purchase the Equivalent Greenhouse Gas Offsets from a California Air Resources Board Approved Registry or a Locally Approved Equivalent Program for Future Operations Associated with the TAMT Plan.</b> Prior to the any discretionary approvals and/or issuance of a Coastal Development Permit(s), the project proponents of future components considered in the TAMT plan shall incorporate renewable energy within the TAMT or within/adjacent to areas of the San Diego Unified Port District's jurisdiction; otherwise, the project proponents shall purchase greenhouse gas reduction credits as specified herein to achieve requisite reductions to meet the 2035 reduction target. This requirement may include a micro-grid or similar type of energy management system to help distribute the loads and/or assist in energy storage. To meet the 2035 reduction target at full TAMT plan buildout (using full-buildout throughput numbers listed in Table 3-3 of Chapter 3, <i>Project Description</i>),</p>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>the renewable energy project must offset 27,625 metric tons of carbon dioxide equivalent (MTCO<sub>2</sub>e) per year or 130,751 megawatt-hours per year (MWh/year) or the equivalent amount of greenhouse gas offsets under the MPC scenario or 18,206 MTCO<sub>2</sub>e per year or 86,172 MWh/year or the equivalent amount of greenhouse gas offsets under the STC Alternative.</p> <p>Because it is unknown if the full buildout will ever be achieved given it is based on market demand, the amount of greenhouse gas offsets (whether from renewable energy or purchasing of offsets) per project proposed under the TAMT plan must reduce its fair share of the full buildout GHG emissions amount (i.e., fair share of 27,625 MTCO<sub>2</sub>e under the MPC scenario or 18,206 MTCO<sub>2</sub>e under the STC Alternative), which shall be calculated over the entire life of the project proponent's lease agreement with the District or (if no lease) over the life of the project. As such, a calculation of the greenhouse gas emissions that would be generated by a project proponent's project over the life of the lease at the TAMT or the project life is required to determine the sufficient amount of renewable energy mitigation or greenhouse gas offsets. This proportion shall be based on anticipated throughput of the project proposed under the TAMT plan and shall include all potential emission sources (e.g., trucks, vessels, employees, cargo handling equipment). Evidence shall be submitted to the District prior to the commencement of construction activities.</p> <p>Because it is unknown how "solar ready" the available rooftop areas are within the TAMT, once at the design phase, the renewable energy project may be determined infeasible. Should this determination of infeasibility be made by the San Diego Unified Port District after considering evidence submitted</p>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>by the project proponent related to any structural limitations (i.e., the rooftops cannot support a renewable energy system), then three additional options are available, listed here in order of priority. The San Diego Unified Port District shall either require the renewable energy project to be built off site within the San Diego Unified Port District's jurisdiction, or within the adjacent community (City of San Diego), or shall require the proponent to purchase the equivalent amount of greenhouse gas offsets from a California Air Resources Board approved registry, or a locally approved equivalent program. The selected option or a combination of the above-mentioned options must achieve a total annual reduction of 27,625 MTCO<sub>2</sub>e at full TAMT plan buildout under the MPC scenario or 18,206 MTCO<sub>2</sub>e under the STC Alternative assuming throughput numbers are reached by this point in time. Otherwise, the reduction amount will be proportional to the growth experienced at the TAMT, achieve the same reductions noted in the analysis, and scaled to the actual growth that occurs.</p> <p><b>MM-GHG-7: Annual Inventory Submittal and Periodic Technology Review.</b> The San Diego Unified Port District regularly monitors technologies for reducing air emissions as part of its Climate Action Plan (CAP) and long-range sustainability goals, which encourages the San Diego Unified Port District and its tenants to use cleaner technologies over time as they become available and feasible. As a condition of approval of any new or amended real estate agreement or Coastal Development Permit, the San Diego Unified Port District shall require the project proponent to submit to the San Diego Unified Port District an annual inventory of all equipment that generates criteria pollutant, toxic air contaminant, and greenhouse gas emissions</p>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>operated by the project proponent at the TAMT throughout the life of the lease up to 2035 (buildout of the TAMT plan). The equipment inventory shall include the year, make, and model of the equipment that was used in the previous year, including annual hours of operation for each piece of equipment, including but not limited to heavy duty drayage and non-drayage trucks, yard equipment, assist and ocean going tugs, ocean going vessels, bulk material handling equipment, and/or any other type of cargo handling equipment. The purpose of the inventory is to track emissions and equipment at TAMT and to assist in technological reviews, as described below, To promote new emission control technologies, the San Diego Unified Port District will perform a Periodic Technology Review (PTR) annually. The PTR will coincide with monitoring and reporting pursuant to the San Diego Unified Port District's CAP, and will include the following:</p> <ol style="list-style-type: none"> <li>1. Develop and maintain an inventory of equipment in operation at the TAMT that generates criteria pollutant, toxic air contaminant, and greenhouse gas emissions, including the equipment model year, model name, and annual hours of operation, based on the annual tenant inventories submitted to the San Diego Unified Port District as described above.</li> <li>2. Identify and assist with enforcement of changes to emission regulations for heavy-duty trucks, yard equipment, tugs, vessels, bulk handling equipment, and other equipment that generates criteria pollutant, toxic air contaminant, and greenhouse gas emissions.</li> <li>3. Identify, and assist with implementation of, any feasible new emissions-reduction technologies that may reduce emissions at the project site,</li> </ol>	



Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>including technologies applicable to heavy-duty trucks, yard equipment, tugs, vessels, and bulk handling equipment.</p> <ol style="list-style-type: none"> <li>4. Collaborate with the California Air Resources Board and San Diego Air Pollution Control District to ensure these technologies are available and to identify funding opportunities, including funding from the Prop 1B: Good Movement Emission Reduction Program, among others.</li> <li>5. Prioritize older equipment in operation at the TAMT that generates the highest levels of criteria pollutant, toxic air contaminant, and greenhouse gas emissions to be replaced based on the level of emissions and cost effectiveness of the emissions reduction (i.e., biggest reduction per dollar), and identify implementation mechanisms including, but not limited to, tenant-based improvements, grant programs, and/or a combination thereof, based on regulatory requirements and the feasibility analyses specified in paragraph 3 above. Utilize the Carl Moyer Program, or similar cost-effectiveness criteria, to assess the economic feasibility (e.g., cost effectiveness) of the identified new technologies.</li> <li>6. Ensure that any upgraded and/or retired equipment is accounted for as part of the San Diego Unified Port District's Maritime Emissions Inventory and Climate Action Plan.</li> </ol> <p>If Periodic Technology Review identifies new technology that will be effective in reducing emissions compared to the equipment in operation at the time of the review, and the San Diego Unified Port District determines that installation or use of the technology is feasible, the San Diego Unified Port District shall require the use of such technology as a</p>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>condition of any discretionary approval issued by the San Diego Unified Port District for any new, expanded, or extended operations at the TAMT. Furthermore, the District and/or project proponent must demonstrate that emissions of volatile organic compounds (VOCs) would be less than 75 pounds per day on a peak day once cargo throughput exceeds 4,000,000 metric tons annually. If technological advancements are unable to reduce VOC emissions to 75 pounds per day or less on a peak day, then the District shall limit the number of vessels allowed to no more than three on a peak day once total throughput exceeds 4,000,000 metric tons annually. These operational restrictions will ensure that VOC emissions do not exceed threshold standards established by the San Diego Air Pollution Control District. Verification of compliance with this measure is the responsibility of the District.</p> <p><b>MM-GHG-8: Exhaust Emissions Reduction Program at the Tenth Avenue Marine Terminal.</b> The San Diego Unified Port District shall implement a program at the TAMT by January 1, 2020 to further reduce emissions from terminal-wide emissions sources.</p> <ul style="list-style-type: none"> <li>A. The program shall be implemented through the Coastal Development Permit process, the tenant leasing process, including the issuance of new, extended or amended leases, and other short-term real estate agreements at the TAMT.</li> <li>B. The program shall be focused on incentives to reduce criteria pollutant, toxic air contaminant, and greenhouse gas emissions by attracting clean vessels, trucks, and equipment to the TAMT, including but not limited to vessels that utilize shore power while at berth, zero and near-zero emission cargo handling equipment technologies, energy efficiency measures</li> </ul>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>and/or renewable energy, and by otherwise incorporating technological and operational practices that reduce criteria pollutant, toxic air contaminant, and greenhouse gas emissions from terminal operations beyond existing regulatory requirements. The program shall include specific incentives for existing and future tenants, which may include but is not limited to an extended lease term, expedited permit processing, reduced permit fees, and eligibility for grants or other financial assistance. The nature and extent of such incentives will be based on an emissions reduction schedule established by the San Diego Unified Port District for criteria pollutants, toxic air contaminants, and greenhouse gas emissions.</p> <p>C. The program shall identify specific emission-reduction equipment and practices that may qualify for incentives, including but not limited to the following.</p> <ul style="list-style-type: none"> <li>○ Vessels: Demonstrate that at least 50% of annual vessel calls will be equipped with Tier II or better main and auxiliary engines, as defined by the International Convention for the Prevention of Pollution from Ships Annex VI 2008 regulations or other standards set forth by the International Convention for the Prevention of Pollution from Ships, the U.S. Environmental Protection Agency, and/or California Air Resources Board in the future.</li> <li>○ Vessel Hoteling: Demonstrate that vessel calls will utilize shore power or a California Air Resources Board-approved alternative emission capture and control system or install a shore power or California Air</li> </ul>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>Resources Board-approved alternative emission capture and control system for the purpose of reducing ocean-going vessel hoteling emissions.</p> <ul style="list-style-type: none"> <li>Heavy-Duty Trucks: Demonstrate that at least 50% of annual cargo throughput will be transported with zero/near-zero emission trucks, hybrid trucks, and/or other alternative truck technologies. To qualify, the trucks must result in emission reductions greater than those required by state and federal regulatory agencies at the time of project approval.</li> <li>Switch and Line Haul Locomotives: Demonstrate that at least 50% of annual cargo will be transported with Tier 3 or above locomotive engines for line haul, as defined by the U.S. Environmental Protection Agency in 2008 (73 <i>Federal Register</i> 88 25098–25352), and a Tier 3 or above switcher or railcar mover for switching activity at both the terminal and yard.</li> <li>Terminal Infrastructure: Install electric charging stations and/or other terminal infrastructure and equipment that support and facilitate zero or near-zero emission technologies.</li> </ul> <p><b>MM-GHG-9: Use of At-Berth Emission Capture and/or Control System to Reduce Vessel Hoteling Emissions.</b> The San Diego Unified Port District shall require the use of an At-Berth Emission Capture and/or Control System (i.e., bonnet system) to reduce vessel hoteling emissions prior to terminal-related emissions reaching a cancer risk of 10 per million at the maximally exposed sensitive receptor location. Based on the Health Risk Assessment,</p>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>located in Section 4.2 of the TAMT Redevelopment Plan Environmental Impact Report, an At-Berth Emission Capture and/or Control System shall be required prior to reaching an annual throughput of 691,418 metric tons for dry bulk assuming no growth in multi-purpose general cargo, or an annual throughput of 356,666 metric tons for multi-purpose general cargo (includes break bulk, neobulk, roll-on/roll-off, and other non-container, non-dry bulk cargo, and non-liquid bulk cargo) assuming no growth in dry bulk, or a combined annual throughput of 691,418 metric tons for the dry bulk and multi-purpose/general cargo nodes, whichever occurs first. The San Diego Unified Port District shall either install directly or enter into a contract with an entity that provides the Emission Capture and/or Control System or an equivalent alternative technology, to reduce emissions from vessels that are unable to cold iron at TAMT and/or are exempt from the California Air Resources Board's at-berth regulation. The San Diego Unified Port District may charge a fee for the use of an Emissions Capture and Control System (or an alternative at-berth system that reduces vessel hoteling emissions) based on the vessel type and the length of its stay. The system shall be a technology that has been approved by the California Air Resources Board, and meets the requirements set forth in the California Air Resources Board's at-berth regulations. If the San Diego Unified Port District determines the need for an Emissions Capture and Control System (or an alternative at-berth system that reduces vessel hoteling emissions) prior to, or later than, the throughput figures listed above, or if shore power or other future regulatory requirements are able to reduce vessel hoteling emissions, then the requirement for the At-Berth Emission Capture and/or Control System shall be</p>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>updated and adjusted accordingly, at the San Diego Unified Port District's discretion.</p> <p>All vessels that are not shore-power equipped shall use the Emission Capture and Control System (or an alternative at-berth system that reduces vessel hoteling emissions at an equivalent level), provided there are no operational limitations and it is not being used by another vessel. If the Emission Capture and Control System is operationally unable to connect to an at-berth vessel, or if it is being used by another vessel, multi-purpose/general cargo and/or dry bulk vessels will be allowed to berth without it.</p>	
Effects from Climate Change on Project	Buildout of the TAMT plan, including the Demolition and Initial Rail Component) would not place people or structures at substantial risk of harm due to predicted climate change effects, including sea level rise.	STC: LS MPC: LS	No mitigation is required.	N/A
<b>Cumulative Impacts</b>				
Direct and Indirect Generation of GHGs through 2020	<p><i>Demolition and Initial Rail Component</i></p> <p><b>Impact-C-GHG-1: Demolition and Initial Rail Component GHG Emissions through 2020.</b> Demolition and Initial Rail Component GHG emissions during combined project construction and operational activities, before mitigation, would not achieve the CAP's reduction target of 33 percent below unmitigated levels in 2020 and would only partially comply with plans, policies, and regulatory programs outlined in the Scoping Plan and adopted by ARB or other California agencies for the purpose of reducing the emissions of GHGs.</p>	STC: PS MPC: PS	Implement <b>MM-GHG-1</b> through <b>MM-GHG-3</b> , as described above.	STC: LS MPC: LS

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
Direct and Indirect Generation of GHGs Beyond 2020	<p><i>Full TAMT Plan Buildout</i></p> <p><b>Impact-C-GHG-2: Full TAMT Plan Buildout GHG Emissions Beyond 2020.</b> Although full TAMT plan buildout emissions would be on a downward trajectory in the post-2020 period, the proposed project's reduction in GHG emissions during combined project construction and operational activities, before mitigation, may not contribute sufficiently to post-2020 progress toward statewide 2030 and 2050 reduction targets and would be in non-compliance with plans, policies, and regulatory programs adopted by ARB or other California agencies for post-2020 for the purpose of reducing the emissions of GHGs.</p>	STC: PS MPC: PS	Implement <b>MM-GHG-1</b> through <b>MM-GHG-9</b> , as described above.	STC: SU MPC: SU
<b>4.7 Hazards and Hazardous Materials</b>				
<b>Project Impacts</b>				
Routine Transport, Use, or Disposal of Hazardous Materials	<p><i>Demolition and Initial Rail Component</i></p> <p>Implementation of the Demolition and Initial Rail Component would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.</p> <p><i>Full TAMT Plan Buildout</i></p> <p>Buildout of TAMT plan would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.</p>	STC: LS MPC: LS	No mitigation is required.	N/A
Possible Onsite Soil Contamination	<p><i>Demolition and Initial Rail Component</i></p> <p><b>Impact-HAZ-1: Possible Onsite Soil Contamination.</b> Historical information compiled from previous site assessments and database searches indicates that TPH, benzene, toluene, PAHs, SVOCs, metals (copper, zinc, and lead), and diesel may be encountered during</p>	STC: PS MPC: PS	<b>MM-HAZ-1: Compliance with Soil Management Plan.</b> Prior to approval of the project grading plans and the commencement of any construction activities that would disturb the soil, the District or tenant, whichever is appropriate, and the contractor (collectively "Contractor") shall demonstrate	STC: LS MPC: LS

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	<p>construction activities on the project site. Construction and grading activities within the project site would potentially result in a release of hazardous materials and create a potentially significant hazard to workers, the public, and environment.</p>		<p>compliance with the <i>10th Avenue Marine Terminal, San Diego, CA, Soil Management Plan, prepared by Tetra Tech EM, Inc., November 24, 2010</i> (Appendix J-1 of the Draft EIR) and consider the existing presence of the permitted underground storage tank on site (shown on Figure 4.7-1). Specifically, the Contractor shall demonstrate compliance with the following specific requirements of the plan including, but not limited to, the following.</p> <p><b>Conduct Soil Testing.</b> The Contractor shall comply with the excavated soil management techniques specified in the plan. The Contractor shall follow the soil sampling protocol and soil sampling objectives, and shall comply with the soil characterization methodology identified within the plan.</p> <p><b>Prepare and Implement a Community Health and Safety Program.</b> The Contractor shall develop and implement a site-specific Community Health and Safety Program (Program) that addresses the chemical constituents of concern for the project site. The guidelines of the Program shall be in accordance with the County of San Diego's Department of Environmental Health's Site Assessment and Mitigation Manual (2009) and Environmental Protection Agency. Program shall include detailed plans on air monitoring and other appropriate construction means and methods to minimize the public's and site workers' exposure to the chemical constituents. The contractor shall utilize a Certified Industrial Hygienist with significant experience with chemicals of concern on the project site to approve the Program and actively monitor compliance with the Program during construction activities.</p> <p><b>Complete Soil Disposal.</b> Any soil disturbed by construction activities shall be profiled and disposed of in accordance with California Administrative Code, Title 22, Division 4.5 requirements. If soils are</p>	



Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>determined to be appropriate for reuse, they may be exported to Chula Vista Bayfront Harbor District area for use as fill material, provided the area is not previously developed and not classified as an environmentally sensitive area. Several Chula Vista Bayfront Harbor District parcels that have been cleared through the environmental review process to be used as streets and surface parking and to support subsequent development have been identified as appropriate locations to receive soils deemed suitable for reuse in Appendix J-3.</p> <p>If soils are determined to be hazardous and not suitable for reuse, they shall be disposed of at a regulated Class I landfill. Soils shall be transported in accordance with the Soil Management Plan. Soils to be loaded into trucks for offsite disposal at a Class I landfill shall be moistened with a water spray or mist for dust control in accordance with Section 4.7, Dust Control, of the Soil Management Plan. If dust is visible, positive means shall be applied immediately to prevent airborne dust. Care shall be used to minimize the amount of water applied to soils that may contain elevated concentrations of contaminants.</p> <p>Loaded truck beds shall be covered with a tarp or similar covering device during transportation to the disposal facility. The truck shall be decontaminated after the soil has been removed. The Contractor shall minimize excess water generated during truck decontamination to the extent possible and shall be responsible for proper disposal of any contaminated water generated during truck cleanout.</p> <p><b>MM-HAZ-2: Implement Engineering Controls and Best Management Practices during Construction.</b> Prior to construction, a site-specific Health and Safety Plan shall be prepared by the contractor and approved by a licensed California Certified Industrial</p>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>Hygienist. The Health and Safety Plan shall be prepared per the requirements of 29 Code of Regulations 1910.120 and California Code of Regulations, Title 8, along with applicable federal, state, and local regulations and statutes. During construction, the contractor shall employ engineering controls and BMPs to minimize human exposure to potential contaminants, if encountered. Engineering controls and construction BMPs shall include but not be limited to the following.</p> <ul style="list-style-type: none"> <li>• Where required by the Health and Safety Plan, the contractor employees working on site shall be certified in the Occupational Health and Safety Administration's 40-hour Hazardous Waste Operations and Emergency Response training.</li> <li>• Contractor shall monitor the area around the construction site for fugitive vapor emissions with appropriate field screening instrumentation.</li> <li>• Contractor shall monitor excavation through visual observation by a qualified hazardous materials specialist to look for readily noticeable evidence of contamination, such as staining or odor.</li> <li>• Contractor shall water/mist soil as it is being excavated and loaded onto transportation trucks.</li> <li>• Contractor shall place any stockpiled soil in areas shielded from prevailing winds and shall cover all stockpiles to prevent soil from eroding.</li> <li>• Contractor shall thoroughly decontaminate all construction equipment that has encountered and/or handled lead-impacted soil prior to leaving the work site.</li> </ul>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	<i>Full TAMT Plan Buildout</i> See <b>Impact-HAZ-1</b>	STC: PS MPC: PS	Implement <b>MM-HAZ-1</b> and <b>MM-HAZ-2</b> .	STC: LS MPC: LS
Existing or Proposed Schools	<i>Demolition and Initial Rail Component</i> Implementation of the Demolition and Initial Rail Component would potentially emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.	STC: PS MPC: PS	Implement <b>MM-HAZ-1</b> and <b>MM-HAZ-2</b> , as described above.	STC: LS MPC: LS
	<i>Full TAMT Plan Buildout</i> Buildout of the TAMT plan would potentially emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.	STC: PS MPC: PS	Implement <b>MM-HAZ-1</b> and <b>MM-HAZ-2</b> , as described above.	STC: LS MPC: LS
Hazardous Materials Site	<i>Demolition and Initial Rail Component</i> The Demolition and Initial Rail Component would be located near a site that that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would potentially create a significant hazard to the public or the environment.	STC: PS MPC: PS	Implement <b>MM-HAZ-1</b> and <b>MM-HAZ-2</b> , as described above.	STC: LS MPC: LS
	<i>Full TAMT Plan Buildout</i> Buildout of the TAMT plan would be located on a site that that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would potentially create a significant hazard to the public or the environment.	STC: PS MPC: PS	Implement <b>MM-HAZ-1</b> and <b>MM-HAZ-2</b> , as described above.	STC: LS MPC: LS

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
<b>4.8 Hydrology and Water Quality</b>				
<b>Project Impacts</b>				
Water Quality Standards and Requirements	<i>Demolition and Initial Rail Component</i>			
	Implementation of the Demolition and Initial Rail Component would not violate any water quality standards or waste discharge requirements.	STC: LS MPC: LS	No mitigation is required.	N/A
	<i>Full TAMT Plan Buildout</i>			
	Buildout of the TAMT plan would not violate any water quality standards or waste discharge requirements.	STC: LS MPC: LS	No mitigation is required.	N/A
Degrade Water Quality	<i>Demolition and Initial Rail Component</i>			
	Implementation of the Demolition and Initial Rail Component would not otherwise substantially degrade water quality.	STC: LS MPC: LS	No mitigation is required.	N/A
	<i>Full TAMT Plan Buildout</i>			
	Buildout of the TAMT plan would not otherwise substantially degrade water quality.	STC: LS MPC: LS	No mitigation is required.	N/A
100-Year Flood Hazard Area	<i>Demolition and Initial Rail Component</i>			
	Implementation of the Demolition and Initial Rail Component would not place within a 100-year flood hazard area structures that would impede or redirect flood flows such that the existing environment is substantially affected.	STC: LS MPC: LS	No mitigation is required.	N/A
	<i>Full TAMT Plan Buildout</i>			
	Buildout of the TAMT plan would not place within a 100-year flood hazard area structures that would impede or redirect flood flows such that the existing environment is substantially affected.	STC: LS MPC: LS	No mitigation is required.	N/A

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
<b>4.9 Noise and Vibration</b>				
<b>Project Impacts</b>				
Generate noise levels in excess of established standards	<i>Demolition and Initial Rail Component</i>	STC: LS MPC: LS	No mitigation is required.	N/A
	The Demolition and Initial Rail Component would not expose persons to or generate noise levels in excess of standards established in the City of San Diego's Significance Determination Thresholds and/or the City's Noise Ordinance.			
	<i>Full TAMT Plan Buildout</i>			
	<b>Impact-NOI-1: Exceedance of an Adopted Noise Standard During Plan Operation.</b> Noise levels from operation of the TAMT plan buildout would exceed the City of San Diego's noise ordinance standard of 60 dBA $L_{eq}$ at two parks in the vicinity of the project site.	STC: PS MPC: PS	<b>MM-NOI-1: Design and Implement Feasible Acoustical Treatments for Future Systems and Equipment to Reduce Operational Noise Levels at Nearby Noise-Sensitive Land Uses.</b> Because the potential components described in the buildout condition may only be analyzed at a program level at this time, the District shall retain a qualified acoustical professional, which is defined as someone who is practiced in the science of noise transmission and abatement for a minimum of 5 years in a professional capacity, to evaluate and design acoustical treatments for project facilities once system design plans are available. This shall include design plans for any proposed cranes, dry bulk discharge system, conveying system, loading systems, and buildings added to the terminal under the TAMT plan. The acoustical professional shall evaluate acoustical treatment measures for each piece of equipment or system described herein, individually and in combination with one another (to the extent design plans are available for others), to determine feasibility and the potential to reduce overall noise levels at nearby noise-sensitive receptors. Measures that are available (but not necessarily feasible) include, but are not limited to, the following.	STC: SU MPC: SU
			<ul style="list-style-type: none"> <li>Installing equipment inside of acoustical</li> </ul>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>enclosures, where feasible</p> <ul style="list-style-type: none"> <li>• Installing intake and/or exhaust silencers, where feasible</li> <li>• Using low-noise motors</li> <li>• Placing sound barriers around noise-generating equipment</li> </ul> <p>Each of these measures will be designed and evaluated for design feasibility, achievable noise reduction, and economic feasibility at noise-sensitive receiver locations, all of which are to be determined by the District and not any tenants. If one or more acoustical treatments are incorporated into the facility design, verification noise monitoring shall be conducted at each affected location to determine the effectiveness of acoustical treatments, and to evaluate whether compliance with applicable noise standards is achieved.</p> <p><b>MM-NOI-2: Initiate and Maintain a Complaint and Response Tracking Program.</b> Prior to the commencement of operations of the TAMT plan, the District shall designate a noise disturbance coordinator. The coordinator will be responsible for responding to complaints regarding noise from project operations, will investigate the cause of the complaint, and will ensure that reasonable measures are implemented to correct the problem, where feasible. A contact telephone number for the noise disturbance coordinator will be conspicuously posted at the main entrance to the project site and in other reasonable locations, as appropriate, to ensure the contact information is easily obtained. This measure shall be implemented in combination with MM-NOI-1, which provides several examples of what type of noise attenuation measures may be feasible. The goal of this measure is to provide additional information regarding the sources of loud noises and to assist in the design and implementation of</p>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			measures to reduce the noise to a level that would be at or below the applicable noise standards for the land use experiencing the excessive noise.	
Groundborne Noise	<i>Demolition and Initial Rail Component</i>			
	Implementation of the Demolition and Initial Rail Component would not expose persons to or generate excessive groundborne vibration or groundborne noise levels.	STC: LS MPC: LS	No mitigation is required.	N/A
	<i>Full TAMT Plan Buildout</i>			
	Buildout of the TAMT plan would not expose persons to or generate excessive groundborne vibration or groundborne noise levels.	STC: LS MPC: LS	No mitigation is required.	N/A
Permanent Increase in Ambient Noise Levels	<i>Demolition and Initial Rail Component</i>			
	Implementation of the Demolition and Initial Rail Component would not result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.	STC: LS MPC: LS	No mitigation is required.	N/A
	<i>Full TAMT Plan Buildout</i>			
	<b>Impact-NOI-2: Substantial Permanent Increase in Ambient Noise Levels in the Project Site Vicinity from Buildout of the TAMT Plan.</b> The TAMT plan would result in a substantial permanent increase of 5 dB or more above average existing noise levels at Cesar Chavez Park, Bayfront Park, Embarcadero Marine Park, and Hilton Bayfront Hotel, due to added cranes and unloading systems under the TAMT plan buildout.	STC: PS MPC: PS	Implement <b>MM-NOI-1</b> and <b>MM-NOI-2</b> , as described above.	STC: SU MPC: SU
Substantial Temporary or Periodic Increase in Ambient Noise Levels	<i>Demolition and Initial Rail Component</i>			
	<b>Impact-NOI-3: Substantial Temporary Increase in Ambient Noise Levels During Construction of the Demolition and Initial Rail Component.</b> Construction of the Demolition and Initial Rail Component would	STC: PS MPC: PS	<b>MM-NOI-3: Implement a Construction Noise Reduction Plan.</b> Prior to the commencement of demolition or construction activity, the District shall prepare and implement a noise reduction plan including best practices to reduce construction noise	STC: SU MPC: SU

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	result in a substantial temporary increase of 5 dB or more above average existing noise levels at two parks. This impact would be significant.		<p>at noise-sensitive land uses, such that a temporary increase of more than 5 dB in noise levels does not occur at adjacent noise-sensitive uses. Measures to be included in the noise reduction plan to limit construction noise include the following.</p> <ul style="list-style-type: none"> <li>• Locating stationary equipment (e.g., generators, compressors, rock crushers, cement mixers, idling trucks) as far as possible from noise-sensitive land uses</li> <li>• Prohibiting gasoline or diesel engines from having unmuffled exhaust</li> <li>• Requiring that all construction equipment powered by gasoline or diesel engines have sound-control devices that are at least as effective as those originally provided by the manufacturer and that all equipment be operated and maintained to minimize noise generation</li> <li>• Preventing excessive noise by limiting idle times for vehicles or equipment to 3 minutes, consistent with MM-AQ-2</li> <li>• Using noise-reducing enclosures around stationary noise-generating equipment</li> <li>• Constructing temporary barriers between noise sources and noise-sensitive land uses or taking advantage of existing barrier features (e.g., terrain, structures) to block sound transmission to noise-sensitive land uses. The barriers shall be designed to obstruct the line of sight between the noise-sensitive land use and onsite construction equipment.</li> </ul>	
	<p><i>Full TAMT Plan Buildout</i></p> <p><b>Impact-NOI-4: Substantial Temporary Increase in Ambient Noise Levels During Construction of the Full TAMT Plan Buildout.</b></p> <p>Construction of the other future components</p>	<p>STC: PS</p> <p>MPC: PS</p>	Implement <b>MM-NOI-3</b> , as described above.	<p>STC: SU</p> <p>MPC: SU</p>



Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	associated with the TAMT plan buildout would result in a substantial temporary increase of 5 dB or more above average existing noise levels at three parks.			
<b>Cumulative Impacts</b>				
Operational Noise	<i>Demolition and Initial Rail Component</i>			
	The Demolition and Initial Rail Component's incremental contribution to cumulative noise impacts would not be cumulatively considerable.	STC: LS MPC: LS	No mitigation is required.	N/A
	<i>Full TAMT Plan Buildout</i>			
	<b>Impact-C-NOI-1: Cumulative Contribution to Cumulative Operational Noise.</b> The incremental operational noise contribution from the proposed project combined with operational noise from cumulative projects would result in an exceedance of City standards.	STC: PS MPC: PS	Implement <b>MM-NOI-1</b> and <b>MM NOI-2</b> , as described above.	STC: SU MPC: SU
<b>4.10 Transportation, Circulation, and Parking</b>				
<b>Project Impacts</b>				
Performance of the Circulation System	<i>Demolition and Initial Rail Component</i>			
	<b>Impact-TRA-1: Construction-Related Impact on an Intersection: Norman Scott Road/32nd Street/Wabash Boulevard from Demolition and Initial Rail Component Construction.</b> Construction activities associated with the Demolition and Initial Rail Component, particularly during demolition of Transit Sheds #1 and #2, would generate construction-related traffic that would worsen the existing delay experienced at the Norman Scott Road/32nd Street/Wabash Boulevard intersection by 8.7 seconds in the AM peak hour and by 4.2 seconds in the PM peak hour. The increase in delay at this intersection would exceed the threshold of 1.0 second of additional delay for intersections	STC: PS MPC: PS	<b>MM-TRA-1: Transportation Demand Management (TDM) Plan During Demolition and Initial Rail Component Construction.</b> Prior to commencing construction activities associated with the Demolition and Initial Rail Component, the District shall prepare a TDM plan to reduce potential significant temporary construction-related transportation and parking impacts at the intersection of Norman Scott Road/32 <sup>nd</sup> Street/Wabash Boulevard. The TDM plan shall be implemented during construction to reduce congestion at the Norman Scott Road/32 <sup>nd</sup> Street/Wabash Boulevard intersection by limiting the number of construction worker trips that travel through the affected intersection during peak hours.	STC: SU MPC: SU

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	operating at LOS F and threshold of 2.0 seconds of additional delay for intersections operating at LOS E, resulting in a significant construction-related traffic impact.		<p>The TDM plan shall incorporate TDM strategies to be implemented during construction, including, but not limited to, the following.</p> <ul style="list-style-type: none"> <li>• Implementation of a ride-sharing program to encourage carpooling among workers.</li> <li>• Adjusting work schedules so workers do not access the site during the peak hours.</li> <li>• Provide offsite parking locations for workers outside of the area with shuttle services to bring them on site.</li> <li>• Provide subsidized transit passes for construction workers.</li> <li>• Coordinate with the City of San Diego (which may also include coordination with the local planning group) for additional ideas.</li> </ul>	
	<p><i>Full TAMT Plan Buildout</i></p> <p><b>Impact-TRA-2: Construction Traffic from Future TAMT Plan Construction Projects.</b> Because the timing and details of future construction projects are not yet known, it is possible that two or more construction projects may overlap (the timing of which depends on market need). Because it is not known if the overlap would generate a sufficient number of peak hour trips to result in a significant impact, a worst case is conservatively assumed that several construction projects could occur at the same time, resulting in temporary but significant traffic congestion in the project study area.</p>	<p>STC: PS MPC: PS</p>	<p><b>MM-TRA-2: Traffic Study and Transportation Demand Management (TDM) for Specific Construction Projects.</b> Prior to the approval of any construction activities associated with future components of the TAMT plan, the District shall retain a qualified traffic engineer to prepare a traffic study to analyze the potential transportation impacts associated with the specific construction project. The report shall consider any overlapping construction projects on the TAMT. If the traffic study determines that the proposed construction activity may have a significant impact, the traffic study shall recommend mitigation measures to avoid or reduce the potential impact.</p> <p>The traffic study shall specifically consider if a TDM plan is required to address potential temporary traffic impacts from construction vehicles and equipment. If determined necessary, the TDM plan</p>	<p>STC: SU MPC: SU</p>

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>shall incorporate TDM strategies to be implemented during construction, including, but not limited to, the following.</p> <ul style="list-style-type: none"> <li>• Implementation of a ride-sharing program to encourage carpooling among workers.</li> <li>• Adjusting work schedules so workers do not access the site during the peak hours.</li> <li>• Provide offsite parking locations for workers outside of the area with shuttle services to bring them on site.</li> <li>• Provide subsidized transit passes for construction workers.</li> <li>• Coordinate with the City of San Diego (which may also include coordination with the local planning group) for additional ideas.</li> </ul>	
	<p><b>Impact-TRA-3: Operation-Related Impact on a Roadway Segment: 28<sup>th</sup> Street between Boston Avenue and National Avenue from TAMT Plan Operations.</b> The proposed project would add approximately 891 daily trips (647 daily trips for STC Alternative) to the roadway segment of 28<sup>th</sup> Street between Boston Avenue and National Avenue within the project study area, which would degrade the operations of a roadway segment that is already operating at an unacceptable level under existing conditions (LOS E) to LOS F by increasing volume to capacity ratio by 0.040 (0.029 for STC Alternative). The initial impact is anticipated to occur when 161 new truck trips are being generated, at which point the proposed project would result in a change in V/C ratio greater than 0.01 along the roadway segment of 28<sup>th</sup> Street between Boston Avenue and National Avenue. Therefore, impacts would be significant.</p>	<p>STC: PS MPC: PS</p>	<p><b>MM-TRA-3: Widen the Segment of 28<sup>th</sup> Street between Boston Avenue and National Avenue to a Four-Lane Major Arterial Classification Consistent with the Barrio Logan Community Plan.</b> The District currently has an established program to track the number of trucks that enter and exit the terminal each year associated with TAMT operations. Prior to generating an additional 161 new daily truck trips, the District shall pay a fair-share contribution (MPC would be responsible for 3.9% and STC would be responsible for 2.8%) of the cost to widen the roadway segment of 28<sup>th</sup> Street between Boston Avenue and National Avenue to a Four-Lane Major Arterial classification. The improvement is identified within the draft Barrio Logan Community Plan, and therefore would be paid to the City of San Diego in accordance with Section 142.0640 of the San Diego Municipal Code. Payment of the District's fair share shall be completed prior to reaching 161 new daily truck trips. In order to ensure the significant impact does not occur before the District has paid its fair share to the City, the</p>	<p>STC: SU MPC: SU</p>

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			District shall initiate payment once approximately 150 new daily truck trips are reached under the proposed project. The trigger will be determined by the District by examining the ADT over a 1-month timeframe and comparing the ADT to the baseline of 93 daily trucks generating 186 trips per day (33,349 trucks per year divided by 360 days multiplied by 2 trips for each truck) and 935 daily employee trips (315 existing employees multiplied by 3 trips per day). At the District's discretion, the District may seek reimbursement from tenants that would contribute new daily trips in proportion to their contribution.	
	<b>Impact-TRA-4: Operation-Related Impact on an Intersection: Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard from TAMT Plan Operations.</b> The proposed project would worsen the existing delay experienced during the peak hours at the Norman Scott Road/32 <sup>nd</sup> Street/Wabash Boulevard intersection by 19.1 seconds in the AM peak hour (17.7 seconds for STC Alternative) and by 7.8 seconds in the PM peak hour (7.2 seconds for STC Alternative), where a threshold of 1.0 second of additional delay applies to LOS F and a threshold of 2.0 seconds of additional delay applies to LOS E. The initial impact is anticipated to occur when 195 new daily trips are being generated, at which point the proposed project would contribute more than 1.0 second of delay in the AM peak hour period at the Norman Scott Road/32 <sup>nd</sup> Street/Wabash Boulevard study area intersection. Therefore, impacts would be significant.	STC: PS MPC: PS	<b>MM-TRA-4: Westbound Right-Turn Overlap Phase at Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard Intersection.</b> The San Diego Unified Port District currently has an established program to track the number of trucks that enter and exit the terminal each year associated with TAMT operations. Prior to generating an additional 195 new daily trips, the San Diego Unified Port District shall coordinate with the California Department of Transportation to determine the San Diego Unified Port District's fair share payment to fund the addition of a westbound right-turn overlap phase to the intersection of Norman Scott Road/32 <sup>nd</sup> Street/Wabash Boulevard, a California Department of Transportation-controlled intersection, to improve the delay caused by the proposed project. This would reduce the delay associated with the project by 20.8 seconds during the AM peak hour and by 19.9 seconds during the PM peak hour compared to unmitigated conditions, and would effectively reduce delay at this intersection to below current levels. (Note, for the STC Alternative, this mitigation measure would reduce the unmitigated delay associated with this alternative by 19.4 seconds during the AM peak hour and by 19.3	STC: SU MPC: SU

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			seconds during the PM peak hour.) In order to ensure the significant impact does not occur before the San Diego Unified Port District has paid its fair share to the California Department of Transportation, the San Diego Unified Port District shall initiate payment once approximately 150 new daily trips are reached under the proposed project. The trigger will be determined by the San Diego Unified Port District by examining the average daily trips over a 1-month timeframe and comparing the average daily trips to the baseline of 93 daily trucks generating 186 trips per day (33,349 trucks per year divided by 360 days multiplied by 2 trips for each truck) and 935 daily employee trips (315 existing employees multiplied by 3 trips per day). At the San Diego Unified Port District's discretion, the San Diego Unified Port District may seek reimbursement from tenants that would contribute new daily trips in proportion to their contribution.	
Congestion Management Plan	<i>Demolition and Initial Rail Component</i>			
	Implementation of the Demolition and Initial Rail Component would not conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.	STC: LS MPC: LS	No mitigation is required.	N/A
	<i>Full TAMT Plan Buildout</i>			
	Buildout of the TAMT plan would not conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.	STC: LS MPC: LS	No mitigation is required.	N/A

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
Hazards Because of a Design Feature or Incompatible Uses	<i>Demolition and Initial Rail Component</i> Implementation of the Demolition and Initial Rail Component would not substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).	STC: LS MPC: LS	No mitigation is required.	N/A
	<i>Full TAMT Plan Buildout</i> Buildout of the TAMT plan would not substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).	STC: LS MPC: LS	No mitigation is required.	N/A
Conflict with Alternative Transportation	<i>Demolition and Initial Rail Component</i> Implementation of the Demolition and Initial Rail Component would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.	STC: LS MPC: LS	No mitigation is required.	N/A
	<i>Full TAMT Plan Buildout</i> Buildout of the TAMT plan would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.	STC: LS MPC: LS	No mitigation is required.	N/A
Insufficient Parking	<i>Demolition and Initial Rail Component</i> Implementation of the Demolition and Initial Rail Component of the TAMT plan would not result in an inadequate parking supply, either on site or off site.	STC: LS MPC: LS	No mitigation is required.	N/A
	<i>Full TAMT Plan Buildout</i> <b>Impact-TRA-5: Insufficient Parking at Full TAMT Plan Buildout.</b> Full buildout of the TAMT plan may result in a long-term parking shortage, which could increase if future	STC: PS MPC: PS	<b>MM-TRA-5: District Shall Inform All TAMT Workers to Park at the TAMT Facility or at an Authorized Offsite Parking Lot or Parking Garage.</b> All TAMT workers, employees, and	STC: LS MPC: LS

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	components are implemented in areas that currently serve as parking.		<p>contractors are prohibited from using on-street parking or from parking at the neighboring Cesar Chavez Park. If no parking is available on the project site, the District's marine terminal supervisors shall inform all dock workers that they shall park within a parking garage or surface parking lot.</p> <p><b>MM-TRA-6: District to Maintain a Parking Inventory of TAMT.</b> The inventory shall be initiated once the District's maritime operations staff identifies that an average of 475 employees are present at the project site during any single 8-hour shift, or the inventory shall be initiated if any future components of the TAMT plan remove any of the parking areas identified within the EIR to come within 50 parking spaces of an onsite parking deficit. The inventory of the parking supply and demand at the TAMT shall be created and maintained by the District. The inventory shall include the following considerations and requirements:</p> <ul style="list-style-type: none"> <li>i. The inventory shall include all existing tenants, including tenant-specific parking lots or parking spaces identified in their lease and all non-exclusive parking spaces available at the TAMT.</li> <li>ii. The inventory shall include any parking required by the District's existing operations.</li> <li>iii. Once the trigger to prepare an inventory occurs, the inventory shall be updated for each new project component, new lease, or lease renewal where additional parking is required.</li> <li>iv. The inventory shall account for both construction- and operation-related parking supply and demand, but shall update the inventory once construction is completed and construction parking is no longer necessary.</li> <li>v. A determination of the surplus or deficit of parking on TAMT.</li> </ul>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p><b>MM-TRA-7: Proponents for Future Project Components, New Leases, or Lease Renewals Shall Prepare a Parking Management Plan.</b> Prior to approval of any new project component or any new lease/lease renewal at TAMT, the project proponent (e.g., tenant) shall submit a Parking Management Plan to the District for review and approval, demonstrating that there would be adequate parking to accommodate all projected operational parking within their tenant's leasehold or within an area available for use as parking. The Parking Management Plan shall consider the following.</p> <ul style="list-style-type: none"> <li>i. The identification of areas within the tenant's leasehold to accommodate the new project component's, new lease's, or renewed lease's parking needs.</li> <li>ii. Reserved parking spaces outside the tenants leasehold at the TAMT, as authorized by the District through formal agreement signed by the District's Director of Maritime or his/her designee.</li> <li>iii. Alternative transportation options to reduce parking demand such as subsidized transit passes, bicycle racks, employee vanpools, or other carpooling incentive programs.</li> <li>iv. Preferential parking for carpools/vanpools.</li> <li>v. Employee shuttles to/from the union hall at shift changes, as feasible.</li> <li>vi. Reserved parking spaces with an offsite parking provider at either a parking garage or parking lot for the duration of the tenant's lease, which shall include a shuttle program. The offsite parking spaces shall be authorized through a formal agreement with a parking provider and is subject to approval by the District.</li> </ul>	



Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			vii. Employer Coordination with SANDAG's iCommute Program. The TAMT Parking Management Plan requires review and approval from the District's Director of Maritime, which shall be based on consultation with the TAMT Superintendent. All TAMT Parking Management Plans shall be enforced by the TAMT Superintendent.	
<b>Cumulative Impacts</b>				
Performance of the Circulation System	<p><i>Demolition and Initial Rail Component</i></p> <p><b>Impact-C-TRA-1: Construction-Related Impact on an Intersection: Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard from Demolition and Initial Rail Component.</b></p> <p>Construction activities associated with the Demolition and Initial Rail Component, particularly during demolition of Transit Sheds #1 and #2, would generate construction-related traffic that would worsen the existing delay experienced at the Norman Scott Road/32<sup>nd</sup> Street/ Wabash Boulevard intersection by 7.3 seconds in the AM peak hour and 2.6 seconds in the PM peak hour. The increase in delay at this intersection would exceed the threshold of 1.0 second of additional delay for intersections operating at LOS F and threshold of 2.0 seconds of additional delay for intersections operating at LOS E. Because construction-related traffic for the Demolition and Initial Rail Component would cause greater than a 1-second delay at the intersection of Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard within the project study area, the Demolition and Initial Rail Component would result in a cumulatively considerable significant impact on this intersection.</p>	STC: PS MPC: PS	Implement <b>MM-TRA-1</b> , as described above.	STC: SU MPC: SU

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	<p><i>Full TAMT Plan Buildout</i></p> <p><b>Impact-C-TRA-2: Contribute to Temporary Traffic Congestion from Construction of Full TAMT Plan Buildout.</b> Given the lack of construction and schedule details at this time, it is not known if construction of the full TAMT plan buildout would overlap with construction of cumulative projects in the project study area. As a result, it is unknown whether construction associated with full TAMT plan buildout, when combined with construction traffic from past, present, and reasonably foreseeable future projects, would result in temporary but cumulatively considerable traffic congestion in the project study area.</p> <p><b>Impact-C-TRA-3: Contribute to an Unacceptable Level of Operation at a Roadway Segment: 28th Street between Boston Avenue and National Avenue from TAMT Plan Buildout.</b> Operation of the full TAMT plan buildout would result in a considerable contribution to the cumulative impact at the roadway segment of 28th Street between Boston Avenue and National Avenue within the project study area, which would degrade the operations of a roadway segment that would already operate at an unacceptable level under cumulative conditions (LOS F). The proposed project would increase the V/C ratio by 0.040, which exceeds the City's threshold of 0.01 for roadway segments operating at LOS F. Therefore, full TAMT plan buildout would result in a cumulatively considerable significant impact on this roadway segment.</p>	<p>STC: PS MPC: PS</p> <p>STC: SU MPC: SU</p>	<p>Implement <b>MM-TRA-2.</b></p> <p>Implement <b>MM-TRA-3.</b></p>	<p>STC: SU MPC: SU</p> <p>STC: SU MPC: SU</p>

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	<p><b>Impact-C-TRA-4: Contribute to an Unacceptable Level of Operation at an Intersection: Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard from TAMT Plan Buildout.</b> Operation of the full TAMT plan buildout would worsen the delay experienced during the peak hours at the Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard intersection by 17.5 seconds in the AM peak hour and by 8.2 seconds in the PM peak hour under Future Year 2035 cumulative conditions, where a threshold of 1.0 second of additional delay applies to intersections operating at LOS F and a threshold of 2.0 seconds of additional delay applies to intersections operating at LOS E. Because the proposed project would cause greater than a 1-second delay on the intersection of Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard within the project study area, full buildout of the TAMT plan would result in a cumulatively considerable significant impact on this intersection.</p>	STC: SU MPC: SU	Implement <b>MM-TRA-4.</b>	STC: SU MPC: SU
	<p><b>Impact-C-TRA-5: Contribute to an Unacceptable Level of Operation at Four Freeway Segments from TAMT Plan Buildout.</b> Operation of the full TAMT plan buildout would result in a considerable contribution to the cumulative impact at the freeway segments of I-5 northbound between SR-94 and Imperial Avenue, I-5 northbound between 28th Street and SR-15, I-5 northbound between SR-15 and Main Street, and SR-15 southbound between Market Street and Ocean View Boulevard, which are projected to operate at LOS F. Operation of the full TAMT plan buildout would result in a change in V/C ratio greater than 0.005 for freeway segments</p>	STC: SU MPC: SU	<p><b>MM-C-TRA-1: Construct Managed Lanes on I-5 and SR-15.</b> SANDAG currently has plans to construct two managed lanes (one in each direction) on I-5 between SR-15 and Palomar Street by the year 2030 as well as two additional multi-purpose lanes and two managed lanes on SR-15 between I-5 and SR-94 by the year 2050. The District shall coordinate with SANDAG and Caltrans to determine the proposed project's fair share contribution. Because this mitigation measure is far into the future, the exact amount will need to be determined at a future date and prior to the project's contribution to the affected freeway mainline sections reaching 0.005 change in V/C ratio. The following fair-share percentages under the MPC scenario analyzed for the proposed</p>	STC: SU MPC: SU

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	operating at LOS F, and therefore would result in cumulatively considerable significant impact on these freeway segments.		<p>project, per affected freeway facility, should serve as guidance to the amount the District should pay toward a program or plan for the aforementioned freeway facility improvements to be constructed.</p> <ul style="list-style-type: none"> <li>• I-5 northbound between SR-94 &amp; Imperial Avenue: 5 percent of the total cost for improvements to this segment.</li> <li>• I-5 northbound between 28<sup>th</sup> Street &amp; SR-15: 13 percent of the total cost for improvements to this segment.</li> <li>• I-5 northbound between SR-15 &amp; Main Street: 6 percent of the total cost for improvements at this segment.</li> <li>• SR-15 southbound between Market Street &amp; Ocean View Boulevard: 11 percent of the total cost for improvements to this segment.</li> </ul> <p>The following fair-share percentages under the STC Alternative scenario, per affected freeway facility, should serve as guidance to the amount the District should pay toward a program or plan for the aforementioned freeway facility improvements to be constructed.</p> <ul style="list-style-type: none"> <li>• I-5 northbound between SR-94 &amp; Imperial Avenue: 5 percent of the total cost for improvements to this segment.</li> <li>• I-5 northbound between SR-15 &amp; Main Street: 6 percent of the total cost for improvements at this segment.</li> <li>• SR-15 southbound between Market Street &amp; Ocean View Boulevard: 11 percent of the total cost for improvements to this segment.</li> </ul>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
<b>Utilities and Energy</b>				
Project Impacts				
Water supplies and treatment facilities	<i>Demolition and Initial Rail Component</i>			
	Implementation of the Demolition and Initial Rail Component would: a) Not result in insufficient water supplies from existing entitlements and resources, resulting in the need for new or expanded entitlements; b) Not require or result in the construction of new water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.	STC: LS MPC: LS	No mitigation is required.	N/A
	<i>Full TAMT Plan Buildout</i>			
	Buildout of the TAMT plan would: a) Not result in insufficient water supplies from existing entitlements and resources, resulting in the need for new or expanded entitlements; b) Not require or result in the construction of new water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.	STC: LS MPC: LS	No mitigation is required.	N/A
Stormwater drainage	<i>Demolition and Initial Rail Component</i>			
	The Demolition and Initial Rail Component would not result in or require the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effect.	STC: LS MPC: LS	No mitigation is required.	N/A
	<i>Full TAMT Plan Buildout</i>			
	Buildout of the TAMT plan would not result in or require the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effect.	STC: LS MPC: LS	No mitigation is required.	N/A

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
Landfills	<i>Demolition and Initial Rail Component</i> Implementation of the Demolition and Initial Rail Component would be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs.	STC: LS MPC: LS	No mitigation is required.	N/A
	<i>Full TAMT Plan Buildout</i> Buildout of the TAMT plan would be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs.	STC: LS MPC: LS	No mitigation is required.	N/A
Wasteful, Inefficient, and Unnecessary Usage of Direct or Indirect Energy	<i>Demolition and Initial Rail Component</i> Implementation of the Demolition and Initial Rail Component would not result in the wasteful, inefficient, and unnecessary usage of direct or indirect energy	STC: LS MPC: LS	No mitigation is required, but <b>MM-GHG-1</b> through <b>MM-GHG-7</b> would further reduce the project's energy demand and reduce fossil fuel use.	N/A
	<i>Full TAMT Plan Buildout</i> Buildout of the TAMT plan would not result in the wasteful, inefficient, and unnecessary usage of direct or indirect energy	STC: LS MPC: LS	No mitigation is required, but <b>MM-GHG-1</b> through <b>MM-GHG-7</b> would further reduce the project's energy demand and reduce fossil fuel use.	N/A
<b>Cumulative Impacts</b>				
Solid waste	<i>Demolition and Initial Rail Component</i> <b>Impact-C-UTIL-1: The Demolition and Initial Rail Component would Generate Solid Waste that Would Exceed the City Threshold.</b> The Demolition and Initial Rail Component would exceed an annual generation of 60 tons of solid waste, which would exceed the City's cumulative solid waste threshold. Therefore, this is considered to be a significant cumulative impact.	STC: PS MPC: PS	<b>MM-C-UTIL-1: Prepare a Waste Management Plan.</b> Prior to issuance of the construction permits, a waste management plan shall be prepared by the Applicant and submitted to the City's Environmental Services Department for approval. The plan shall address the demolition, construction, and operation phases of the proposed project as applicable, and shall include the following. 1. A timeline for each of the main phases of the proposed plan and near-term improvements (construction and operation).	STC: LS MPC: LS

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<ol style="list-style-type: none"> <li>2. Tons of waste anticipated to be generated (construction and operation).</li> <li>3. Type of waste to be generated (construction and operation).</li> <li>4. Description of how the proposed project will reduce the generation of construction and demolition (C&amp;D) debris.</li> <li>5. Description of how C&amp;D material will be reused on site.</li> <li>6. The name and location of recycling, reuse, and landfill facilities where recyclables and waste will be taken if not reused on site.</li> <li>7. Description of how the C&amp;D waste will be separated if a mixed C&amp;D facility is not used for recycling.</li> <li>8. Description of how the waste reduction and recycling goals will be communicated to subcontractors.</li> <li>9. Description of how a “buy recycled” program for green construction products will be incorporated into the proposed project.</li> <li>10. Description of any ISO or other certification, if any.</li> </ol>	
	<p><i>Full TAMT Plan Buildout</i></p> <p><b>Impact-C-UTIL-2: The TAMT Plan would Generate Solid Waste that Would Exceed the City Threshold.</b> The TAMT plan would exceed an annual generation of 60 tons of solid waste, which would exceed the City’s cumulative solid waste threshold. Therefore, this is considered to be a significant cumulative impact.</p>	<p>STC: PS</p> <p>MPC: PS</p>	<p>Implement <b>MM-C-UTIL-1</b></p>	<p>STC: LS</p> <p>MPC: LS</p>
<p>Notes: PS = Potentially significant; LS = Less than significant; SU = Significant and Unavoidable; N/A = Not applicable; STC = Sustainable Terminal Capacity Alternative scenario; MPC = Maximum Practical Capacity scenario.</p>				

## 2.7 Areas of Known Controversy/ Issues Raised by Agencies and the Public

Section 15123 of the State CEQA Guidelines requires the summary of an EIR to include areas of controversy known to the Lead Agency, including issues raised by agencies and the public. The District circulated a Notice of Preparation (NOP) to solicit agency and public comments on the scope and content of the environmental analysis beginning on March 12, 2015, and ending on April 14, 2015. The Initial Study/Environmental Checklist and NOP are included as Appendix A of the Draft EIR.

A total of 14 comment letters were received during the NOP public review period. The primary issues raised related to air quality, greenhouse gas emissions, and transportation and traffic. In addition, a few comments were raised on the project's effect on water quality, energy, environmental justice, Coastal Act consistency, and alternatives. A summary of all comments received is included in Table 1-2 of Chapter 1, *Introduction*, of the Draft EIR, and all NOP comment letters are included in Appendix B of the Draft EIR.

A total of 10 comment letters, including one attachment, were received during the Draft EIR public review period. Comments received on the Draft EIR included many similar concerns to those received during the NOP public review period. They included comments on air quality and health risk, aesthetics, transportation, circulation, and parking, cumulative projects, greenhouse gas emissions, hazardous materials, hydrology and water quality, and noise. The comment letters and the District's responses are provided in Chapter 4, *Comments Received and District Responses*, of this Final EIR. As a result of comments received on air quality and health risk, the District included a new alternative, the STC Alternative, that would reduce throughput by approximately 25 percent from the MPC scenario. The reduction in throughput, combined with additional mitigation measures, reduced air quality impacts for all criteria pollutants—volatile organic compounds (VOC), nitrogen oxides (NO<sub>x</sub>), sulfur oxides (SO<sub>x</sub>), carbon monoxide (CO), particulate matter 10 microns or less in diameter (PM<sub>10</sub>), and particulate matter 2.5 microns or less in diameter (PM<sub>2.5</sub>)—to less-than-significant levels. It also reduced health risk impacts at residents, schools, and parks to less-than-significant levels, whereas the MPC scenario (as revised) would reduce health risk impacts on schools and parks to less-than-significant levels, but impacts on residents would remain significant and unavoidable. As a result, District staff now recommends approval of the STC Alternative throughput scenario.

The Board of Port Commissioners will determine whether or not to adopt a Statement of Overriding Considerations for approval of the project identifying the benefits of the project that outweigh the significant and unavoidable impacts.



## 3.1 Introduction

This chapter reflects the modifications to the Draft EIR that may have resulted from comments received during the 50-day public review of the Draft EIR or that were required for purposes of clarification. These modifications do not alter the conclusions of the environmental analysis such that new significant environmental impacts have been identified, nor do they constitute significant new information. The modifications are provided by chapter and indicated with the page number from the Draft EIR. This chapter is intended to be used in conjunction with the analysis contained within the Draft EIR.

Additional text is shown as underlined and deleted text is shown in ~~striketrough~~.

Attachments 2 and 3 of this Final EIR include the Draft EIR and appendices, respectively, revised as described below.

## 3.2 EIR Chapter/Section Changes

### 3.2.1 Changes to *Executive Summary*

#### Page S-1

#### Project Location

As shown in Figure ES-1, the project site is located along San Diego Bay, south of downtown San Diego, east of the San Diego Convention Center and Hilton Bayfront Hotel, and west adjacent to the San Diego community of Barrio Logan. Figure ES-2 provides an aerial view of the project site. Harbor Drive runs northwesterly approximately 160 feet from the project site boundary. Project site access from Harbor Drive is provided at two locations.

#### Page S-3

#### Project Components

#### TAMT Plan

The TAMT plan replaces portions of the 2008 Maritime Business Plan (2008 Plan). The TAMT plan analyzes terminal configuration options, using an updated review of existing cargo throughput and a market forecast to 2035, and identifies five potential development concepts, three of which are

analyzed in this Draft EIR.<sup>1</sup> The result is a proposed plan that would provide maximum flexibility at the project site to accommodate cargo market opportunities and to implement future terminal infrastructure investments. Although each development concept emphasizes a slightly different mix of cargo, all three development concepts involve establishing flexible but distinct nodes that would handle like cargos in similar operational areas and under similar conditions. The operating nodes are discussed below, whereas three development concepts are discussed in the subsequent section titled *Long-Term Operations*.

The TAMT plan identifies five operating nodes that include dry bulk, liquid bulk, refrigerated container, multi-purpose general cargo, as well as a central gate facility.<sup>2</sup> The Demolition and Initial Rail Component would affect all three nodes along the western portion of the project site boundary including the dry bulk node, the refrigerated container node, and the multi-purpose cargo node. In addition, the new modular offices with restroom facilities are anticipated to be located in the vicinity of the centralized gate facility. The locations of the nodes contemplated in the TAMT plan are shown in Figure ES-~~43~~3, and the Demolition and Initial Rail Component locations are shown in Figure ES-~~42~~2. The proposed locations for these nodes are discussed in greater detail below. Because berthing capacity at the project site has been deemed adequate, the TAMT plan focuses on land-side improvements only, and no dredging or waterside improvements are included.

### **Dry Bulk**

The dry bulk node would be located on approximately 15 acres in the southeastern portion of the project site, also referred to as terminal “backlands” and shown in brown on Figure ES-~~34~~3. This node would be served primarily by Berths 10-7/10-8, with secondary access from Berths 10-5/10-6. Proposed dry bulk node improvements would include the following.

## **Pages S-4 and S-5**

### **Refrigerated Container**

The refrigerated container node would be located on approximately 40 acres within the northern portion of the project site served by Berths 10-1/10-2 and 10-3/10-4, with overflow handled at Berths 10-5/10-6. Figure ES-~~43~~3 shows the boundary between the refrigerated container node in blue and the multi-purpose general cargo node in purple. The boundaries would be flexible to allow the project site to be used for the handling of diverse cargos as market conditions and vessel schedules permit. As such, construction activities within the refrigerated container and multi-purpose nodes may happen simultaneously. The refrigerated container node would maintain approximately 16 acres of existing outside storage space for refrigerated containers as well as the

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<sup>1</sup> As acknowledged in the Notice of Preparation (NOP), the full refrigerated container and full dry container concepts were excluded from the EIR analysis of the proposed project because they would result in zero volume for multi-purpose/general cargo commodity types. The District has a longstanding commitment handling Multi-purpose/General Cargos and decided at the outset that it does not want to depart from this established and successful business strategy. However, the full refrigerated container and full dry container concepts are addressed in the discussion of alternatives to the proposed project in Chapter 7 of this Draft EIR.

<sup>2</sup> Although the TAMT Plan makes reference to a liquid bulk node as an existing condition, the TAMT Plan does not propose any changes (such as infrastructure improvements or capacity enhancements) to the existing liquid bulk node.

existing 294,000 square feet of cold storage facility (Warehouse B) and would add the following improvements.

- **Gantry Cranes at Berths 10-1/10-2.** Install up to two rail-mounted 100-foot gauge electrical gantry cranes up to 270 feet tall (when boom is up) at Berths 10-1/10-2.<sup>3</sup>
- **Gantry Cranes at Berths 10-3/10-4.** Install up to two rail-mounted 100-foot gauge electrical gantry cranes up to 270 feet tall (when boom is up) at Berths 10-3/10-4, including electrical utility improvements to operate the cranes.

### Multi-Purpose General Cargo

As shown on Figure ES-31, the Multi-Purpose General Cargo node would comprise approximately 30 acres in the central portion of the project site and would be served primarily by Berths 10-5/10-6, with overflow handled at Berths 10-3/10-4. Similar to the refrigerated container node, the boundary would be flexible to accommodate market needs. This open area would allow the project site to be used for the handling of diverse cargos as market conditions and vessel schedules permit. As such, construction of the refrigerated container and multi-purpose nodes would happen simultaneously. Proposed improvements and operations that would occur at the multi-purpose general cargo node would include the following.

## Page S-6

### Long-Term Operation

To ensure that the “worst case” environmental scenario is analyzed, this Draft EIR analyzes the highest maximum practical capacity (MPC) identified for each of the three operating nodes, as shown in the fourth column in Table ES-1 below. In addition, this Draft EIR evaluates an alternative scenario that reduces maximum throughput by 25 percent from the MPC scenario. This alternative is referred to as the Sustainable Terminal Capacity (STC) Alternative. Furthermore, liquid bulk throughput is included in the analysis for each scenario, but, as indicated, buildout of the TAMT plan would result in no changes to the infrastructure, operational efficiency, or storage capacity at the liquid bulk node.

## Pages S-7 through S-10

Table ES-2 below compares the TAMT plan’s “worst case” MPC scenario and STC scenario for each of the nodes with the project site’s existing environmental baseline condition by cargo type. The project site’s existing environmental baseline condition is based on actual throughput calculations from July 2013 to June 2014, with June 2014 being the point in time at which the environmental analysis was initiated. The table also provides the MPC identified in the 2008 Plan as a reference point to illustrate the MPC that could occur under the existing plan if the proposed TAMT plan were not approved. However, the 2008 Plan MPC is not used as the baseline for the environmental analysis because it represents the project site’s theoretical capacity as opposed to the actual environmental conditions that occurred when the environmental analysis commenced. Although it is highly unlikely and improbable that all three nodes would be able to operate at their maximum

<sup>3</sup> Note that, although Berths 10-1/10-2, 10-3/10-4, and 10-5/10-6 each state up to two gantry cranes each, the total would not exceed five gantry cranes for the entire project.

levels for a sustained period of time, this approach is analyzed to provide the most conservative environmental analysis. However, the recommended scenario is the STC Alternative, which would reflect an approximately 25 percent reduction in throughput compared to the MPC scenario.

**Table ES-2. TAMT Cargo Throughput Comparisons in Metric Tons**

<b>Node</b>	<b>Existing Conditions – July 2013 to June 2014</b>	<b>2008 Plan Maximum Practical Capacity</b>	<b>TAMT Redevelopment Plan Maximum Practical Capacity “Worst-Case” Scenario<sup>a</sup></b>	<b><u>TAMT Redevelopment Plan Sustainable Terminal Capacity Alternative Scenario</u></b>
<b>Improvements or Capacity Enhancements Identified in TAMT Plan</b>				
Dry Bulk	289,864 <sup>b</sup>	2,250,000	2,650,000 <sup>c</sup>	<u>1,987,500</u>
Refrigerated Containers	637,931	730,000	2,288,000	<u>1,716,000</u>
Multi-Purpose General Cargo	85,131 <sup>e</sup>	1,670,000	977,400	<u>733,050</u>
<b>No Improvements or Capacity Enhancements Identified in TAMT Plan</b>				
Liquid Bulk	31,520	220,000	239,017 <sup>d</sup>	<u>239,017</u>
<b>Total</b>	<b>1,044,446</b>	<b>4,870,000</b>	<b>6,154,417</b>	<b><u>4,675,567</u></b>

Notes:

<sup>a</sup> The infrastructure improvements identified in the TAMT plan are required to attain the MPCs identified. To provide for a “worst case” environmental impact scenario, this Draft EIR analyzes the highest MPC of each of the three cargo nodes as well as the throughput associated with the STC Alternative.

<sup>b</sup> Vessels brought in approximately 158,205 MT of dry bulk, whereas dry bulk tenants trucked in approximately 131,659 MT of dry bulk.

<sup>c</sup> For the purposes of the analysis, two additional dry bulk customers were assumed over existing tenant volume, which resulted in a forecast of approximately 2,146,645 MT. However, the MPC indicates that additional dry bulk volume could be accommodated.

<sup>d</sup> The TAMT plan acknowledges the existing liquid bulk facility; however, it does not propose any operational or infrastructure changes to the existing facility. Current capacity is sufficient to handle market demand and operations at the MPC, and is projected to remain sufficient throughout the plan horizon.

<sup>e</sup> In addition to 33,666 MT of neo-bulk material, the project site also processed 51,465 metric revenue tons of other miscellaneous cargo, yielding a total of 85,131 MT.

## Demolition and Initial Rail Component

### Improvements

The Demolition and Initial Rail Component is an initial, project-level component that is necessary to implement the various program-level development scenarios identified in the TAMT plan. The Demolition and Initial Rail Component would include the following features and modifications discussed below and shown on Figure ES-24.

- Demolition of Transit Sheds #1 and #2.** The transit sheds consist of seven warehouse bays, restroom facilities, and office space. Transit Shed #1 includes approximately 148,000 square feet of warehouse space, comprising Bays A, B, and C, and Transit Shed #2 includes approximately 194,000 square feet of warehouse space, comprising Bays E, F, G, and H. Both

transit sheds are approximately 32 feet tall and 200 feet wide. Transit Shed #1 is 740 feet long and Transit Shed #2 is 970 feet long. Transit Shed #1 includes an approximately 2,400-square-foot maintenance shed. Transit Shed #2 includes an approximately 7,000-square-foot head house, which is currently used as office space for terminal operations. Demolition would involve the proper removal of any asbestos, lead, polychlorinated biphenyls, or other potentially hazardous materials that may be present in the Transit Sheds, followed by removal of the existing fire alarm, fire protection systems, and electrical systems. In addition, demolition of Transit Shed #2 would include the removal and/or reuse of all off-loading equipment including the existing distribution and conveyor system.<sup>4</sup> Once this is completed, soil excavation and grading would occur and underground conduit to facilitate future electrification of the area would be installed, followed by paving and leveling across the site.

- **Conduit and Electrical Improvements.** Up to 2,500 linear feet of conduit would be installed west of Warehouse B and Warehouse C and east of the existing Transit Shed #1 and Transit Shed #2 to provide for future electrification of the project site. Trenching for the conduit and electrical improvements would occur prior to paving activities. All electrical utilities would utilize the existing vault system.
- **Subsurface Stormwater Improvements.** Excavate up to 9,200 cubic yards of soil and install one of two potential stormwater drainage systems. Both systems would include design features to capture the 85<sup>th</sup> percentile storm event. The first option would involve concrete retention vaults that would capture the stormwater and allow water to infiltrate into the underlying soil by placing orifices in the bases of the vaults. The second option would involve collecting and routing overflows to an underground high-density polyethylene (HDPE) pipe retention system. The HDPE pipe retention would also rely on infiltration by placing holes in the bases of the pipes. Both options have been designed to comply with the San Diego Regional Municipal Separate Storm Sewer System Permit (R9-2015-0100) and allow for settling time and capture of aluminum, copper, iron, lead, and zinc.
- **Replacement of Existing Lighting.** The existing 90-foot-tall light poles at the loading docks and around both Transit Shed perimeters would be replaced with 90-foot-tall lights capable of an average 5 foot-candles of light during cargo operations. During non-cargo operations, foot candles would be reduced to 1. The replacement lighting would use light-emitting diodes, improving energy efficiency at the project site, and would be directed downward and away from adjacent land uses and the open water of the bay.
- **On-Terminal Rail Facility Upgrades.** The proposed project would include installation of a rail lubricator and a compressed air system for testing of train air brakes on the existing tracks. As shown on Figure ES-24, the rail lubricator (purple rectangle) would be installed in the southeastern portion of the project site, where there is a sharp and inefficient curve that regularly impedes operations. Manual lubrication would be replaced with an automated lubrication system, thereby increasing both the safety and efficiency of the rail movement.

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<sup>4</sup>To ensure a worst-case environmental scenario, the analysis assumes removal of approximately 5,250 tons of metal, which would be transported to a scrap metal recycling yard or appropriate landfill. This figure is based on the following estimates: existing dust collector (~380 tons), unloading facility, buffer hopper, and horizontal screw converter (~600 tons), the aeroslide and support framing (~2,520 tons), and a 50% contingency factor (~1,750 tons). However, depending on operational needs and the condition/efficiency of the existing equipment, these facilities may also be either upgraded and/or reused at the TAMT.

The purpose of the train air brake tests is twofold: to ensure that the air brakes work on each car and that air propagation exists between the locomotive and the end of the train. The compressed air system would include a compressed air generator and receiver, as well as subsurface piping (approximately 2-inch diameter) that would lead to steel outlets approximately 4 feet in height. The generators would be housed in an approximately 100-square-foot structure (an orange circle on Figure ES-42). The outlets (shown as blue diamonds on Figure ES-42) would be sited adjacent to tracks 3 and 4 (within the former footprint of Transit Shed #1) and adjacent to tracks 6 and 7 (near Warehouse C). A separate compressed air generator system and outlets would be sited along the eastern boundary of the project site to service tracks 14, 15, 16, and 17 (near Searles Valley Operations). In all cases, the outlets would include calibrated air gauges to monitor the air pressure of the yard air system at the outlet, and would feed the train air system by connecting a long braided hose to the glad-hand on the rail cars. This system would be in compliance with the Federal Railroad Administration requirements for air brake systems,<sup>5</sup> and train crews would be required to adhere to the Air Brake and Train Handling rules established by the BNSF railroad.<sup>6</sup>

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### **Alternative 5 – Sustainable Terminal Capacity Alternative**

The STC Alternative was added to the Final EIR in response to comments received by the California Air Resources Board (ARB), the San Diego Air Pollution Control District, and the Environmental Health Coalition about the MPC scenario's significant and unavoidable impacts associated with criteria pollutants and health risk. Extensive coordination between the District's Maritime business and operations staff, Real Estate staff, and Planning and Green Port staff occurred in an effort to develop an alternative that would reduce criteria pollutants and toxic air contaminants further while still achieving the basic project objectives and remaining feasible.

The STC Alternative represents what the TAMT could handle on a regular basis without having to maximize all facilities concurrently as under the MPC scenario. Under this alternative, the throughput that could be reached under the MPC scenario of the proposed project would be reduced by 25 percent for each of the three cargo nodes that are proposed for changes under the TAMT plan (i.e., Dry Bulk, Refrigerated Containers, and Multipurpose General Cargo). Total annual throughput would be limited to 4,675,567 MT. These throughput limits would be enforced throughout the life of the plan.

An estimated throughput breakdown by node includes:

- Dry Bulk: 1,987,500 MT
- Refrigerated Containers: 1,716,000 MT

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<sup>5</sup> The Federal Railroad Administration establishes brake system safety standards in 49 CFR 232. Typically, a Class 1 air test is required before a train departs a terminal per section 232.205. However, when yard air is used to test cars, the train is only required to do a Class III air test pursuant to Section 232.217, which ensures that the train air-line is intact after making up the train. This avoids performing the detailed Class 1 air test, which avoids blocking crossings while each car is examined during the air test.

<sup>6</sup> BNSF Air Brake and Train Handling Rules (April 7, 2010, including revisions through May 1, 2013) Section 100.10.2 identifies specific rules train crews must follow subsequent to a yard air test.

- Multi-Purpose/General Cargo 733,050 MT
- Liquid Bulk (No Change): 239,017 MT

Like with the MPC throughput scenario, all features described for the proposed project would still be possible with the STC Alternative. However, if adopted, this alternative would not allow throughput to exceed a total of 4,675,567 MT without analyzing the environmental effects of additional throughput, consistent with State law.

## Environmentally Superior Alternative

Pursuant to CEQA, the EIR is required to identify the environmentally superior alternative. Although the No Project/No Build Alternative reduces the greatest number of significant impacts, CEQA requires that when the environmentally superior alternative is the No Project Alternative, another alternative should be identified. Therefore, as indicated in Table 7-3 of Chapter 7, *Alternatives to the Proposed Project*, the Reduced Project Alternative would be the environmentally superior alternative. The Reduced Project Alternative would reduce significant impacts on air quality and health risk, greenhouse gas emissions, noise, and transportation by eliminating components such as the gantry cranes and other efficient technologies and strategies that would otherwise help the terminal increase its throughput. The reduced throughput would mean less activity on the project site and fewer vessel and truck trips. More importantly, though, is the fact that the Reduced Project Alternative would not meet several of the central project objectives, including Objectives #1, #2, #5, or #6 as described in Section 7.5.3.12.

However, as indicated above, based on feedback received during public review of the Draft EIR, notably from ARB, the San Diego Air Pollution Control District, and the Environmental Health Coalition, about the MPC scenario's significant and unavoidable impacts associated with criteria pollutants and health risk, the District organized multiple working sessions with the District's Maritime business and operations staff, Real Estate staff, and Planning and Green Port staff in an effort to develop an alternative that would reduce criteria pollutants and toxic air contaminants further while still achieving the basic project objectives and remaining feasible. In addition, the District met with ARB, the San Diego Air Pollution Control District, and the Environmental Health Coalition to discuss feasible solutions to reduce air quality impacts. The result was the STC Alternative (Alternative 5). The STC Alternative would reduce throughput by 25 percent from the MPC scenario proposed under the project, but would still allow the District to accommodate realistic market forecasts without severely harming the port's and TAMT's economic competitiveness. As such, the STC Alternative is considered feasible, and would reduce significant health risk impacts and several impacts associated with the emission of criteria pollutants while still achieving the basic project objectives. As a result, District staff supports approval of the STC Alternative in place of the MPC scenario.

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**Table ES-4. Project Impacts and Mitigation Measures**

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
<b>4.1 Aesthetics and Visual Resources</b>				
<b>Project Impacts</b>				
Existing Visual Character or Quality	<i>Demolition and Initial Rail Component</i>			
	Implementation of the Demolition and Initial Rail Component would not substantially degrade the existing visual character or quality of the site and its surroundings.	<u>STC: LS</u> <u>MPC: LS</u>	No mitigation is required.	N/A
	<i>Full TAMT Plan Buildout</i>			
	<b>Impact-AES-1: Visual Impacts from Installation of up to Five Gantry Cranes.</b>	<u>STC: PS</u> <u>MPC: PS</u>	No mitigation is available to reduce this impact.	<u>STC: SU</u> <u>MPC: SU</u>
	Implementation of up to two gantry cranes at Berths 10-1/10-2, two gantry cranes at Berths 10-3/10-4, and up to two gantry cranes at Berths 10-5/10-6 (not to exceed a total of 5 cranes) would result in a significant adverse change to the existing visual character and quality of the project site from key observation points surrounding the project site.			
New Source of Substantial Light or Glare	<i>Demolition and Initial Rail Component</i>			
	Implementation of the proposed project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area.	<u>STC: LS</u> <u>MPC: LS</u>	No mitigation is required.	N/A
	<i>Full TAMT Plan Buildout</i>			
	Buildout of the TAMT plan would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area.	<u>STC: LS</u> <u>MPC: LS</u>	No mitigation is required.	N/A



Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
<b>4.2 Air Quality</b>				
<b>Project Impacts</b>				
Conflict with an Air Quality Management Plan	<i>Demolition and Initial Rail Component</i>			
	Implementation of the Demolition and Initial Rail Component would not conflict with or obstruct implementation of an applicable air quality plan.	<u>STC: LS</u> <u>MPC: LS</u>	No mitigation is required.	N/A
	<i>Full TAMD Plan Buildout</i>			
	Buildout of the TAMD plan would not conflict with or obstruct implementation of an applicable air quality plan.	<u>STC: LS</u> <u>MPC: LS</u>	No mitigation is required.	N/A
Criteria Pollutants (Construction)	<i>Demolition and Initial Rail Component</i>			
	Construction of the Demolition and Initial Rail Component would not violate an air quality standard or contribute substantially to an existing or projected air quality standard.	<u>STC: LS</u> <u>MPC: LS</u>	No mitigation is required.	N/A
	<i>Full TAMD Plan Buildout</i>			
	<b>Impact-AQ-1: Emissions in Excess of Criteria Pollutant Thresholds During TAMD Plan Buildout Construction.</b> Specific construction details (such as timing, phasing, and overlapping of possible construction projects that would be implemented over the life of the TAMD plan) are not known at this time. Therefore, project emissions during construction, before mitigation, could exceed the San Diego County SLTs. The contribution of project-related emissions is considered significant because the project would have the potential to exceed thresholds that have been set by SDAPCD to attain the NAAQS and CAAQS, the purpose of which is to provide for the protection of public health.	<u>STC: PS</u> <u>MPC: PS</u>	<b>MM-AQ-1: Implement Best Management Practices During Construction of Future TAMD Plan Components.</b> All proponents of future projects shall implement Best Management Practices (BMPs) to reduce air emissions from all construction activities implemented as part of full TAMD plan buildout. The following measures are required to limit construction equipment exhaust from on-road trucks and heavy-duty equipment used during construction. <ul style="list-style-type: none"> <li>• <del>Use</del><u>Ensure that all off-road diesel oxidation catalysts and catalyzed diesel particulate traps.</u></li> <li>• <del>Maintain all -powered equipment used during construction vehicles and equipment according to manufacturers' specifications.</del></li> <li>• <del>Restrict idling of</del><u>between 2020 and 2025 is equipped with the U.S. Environmental Protection Agency (EPA) Tier 3 or cleaner engines, except for</u></li> </ul>	<u>STC: SU</u> <u>MPC: SU</u>

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p><del>specialized construction vehicles and equipment to a maximum of 3 minutes when for which an EPA Tier 3 engine is not in use (see MM-AQ-2 for definition of “not in use”)-available.</del></p> <ul style="list-style-type: none"> <li><del>• Install high pressure fuel injectors on construction equipment vehicles.</del></li> <li>• <u>Ensure that all off-road diesel-powered equipment used during construction beyond 2025 is equipped with EPA Tier 4 Final or cleaner engines, except for specialized construction equipment for which an EPA Tier 4 Final engine is not available.</u></li> </ul> <p>In addition, all future project proponents shall implement the relevant BMPs, consistent with the applicable industrial Storm Water Pollution Prevention Plan (SWPPP). In no case would any BMP be implemented if it conflicted with the SWPPP or other applicable water quality permit requirements. BMP dust control measures would include, but are not limited to, the following.</p> <ul style="list-style-type: none"> <li>• Water the grading areas at least twice daily to minimize fugitive dust.</li> <li>• Stabilize graded areas as quickly as possible to minimize fugitive dust.</li> <li>• Apply chemical stabilizer or pave the last 100 feet of internal travel path within the construction site prior to public road entry.</li> <li>• Install wheel washers adjacent to a paved apron prior to vehicle entry on public roads.</li> <li>• Remove any visible track-out into traveled public streets within 30 minutes of occurrence.</li> <li>• Wet wash the construction access point at the end of each workday if any vehicle travel on unpaved surfaces has occurred.</li> <li>• Provide sufficient perimeter erosion control to prevent washout of silty material onto public</li> </ul>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>roads.</p> <ul style="list-style-type: none"> <li>Cover haul trucks or maintain at least 12 inches of freeboard to reduce blow-off during hauling.</li> <li>Suspend all soil disturbance and travel on unpaved surfaces if winds exceed 25 mph.</li> <li>Cover/water onsite stockpiles of excavated material.</li> <li>Enforce a 15 mph speed limit on unpaved surfaces.</li> <li>On dry days, sweep up any dirt and debris spilled onto paved surfaces immediately to reduce re-suspension of particulate matter caused by vehicle movement. Clean approach routes to construction sites daily for construction-related dirt in dry weather.</li> <li>Hydroseed, landscape, or develop as quickly as possible all disturbed areas as directed by the <u>San Diego Unified Port District</u> and/or <u>SDAPCD San Diego Air Pollution Control District</u> to reduce dust generation.</li> <li>Limit the daily grading volumes/area.</li> </ul> <p>Prior to the commencement of construction activities, the project proponent shall submit evidence to the <u>San Diego Unified Port District</u> of the project proponent's compliance with the BMPs and that construction equipment is maintained and properly tuned in accordance with manufacturers' specifications, which shall be subject to confirmation by the <u>San Diego Unified Port District</u> during construction.</p>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
Criteria Pollutants (Operation)	<i>Demolition and Initial Rail Component</i> Operation of the Demolition and Initial Rail Component would not violate an air quality standard or contribute substantially to an existing or projected air quality standard.	<u>STC: LS</u> <u>MPC: LS</u>	No mitigation is required.	N/A
	<i>Full TAMT Plan Buildout</i> <b>Impact-AQ-2: Emissions in Excess of Criteria Pollutant Thresholds During TAMT Plan Buildout Operations.</b> Project emissions during operations, before mitigation, would exceed the San Diego County SLTs for VOC, NO <sub>x</sub> , CO, SO <sub>x</sub> , PM <sub>10</sub> , and PM <sub>2.5</sub> . The contribution of project-related emissions is considered significant because the project would exceed thresholds that have been set by SDAPCD to attain the NAAQS and CAAQS, the purpose of which is to provide for the protection of public health.	<u>STC: PS</u> <u>MPC: PS</u>	<b>MM-AQ-2: Implement Diesel Emission-Reduction Measures During Construction and Operations of Future TAMT Plan Components.</b> The project proponent shall implement the following measures during construction and project operations, subject to verification by the District.  i. All project proponents shall limit all construction and operations equipment, drayage, and delivery truck idling times by shutting down equipment when not in use and reducing the maximum idling time to less than 3 minutes. The project proponent shall install clear signage regarding the limitation on idling time at the delivery driveway and loading areas and shall submit quarterly reports of violators to the District. This measure shall be enforced by terminal supervisors, and repeat violators shall be subject to penalties pursuant to California airborne toxics control measure 13 California Code of Regulations Section 2485. The project proponent shall submit evidence of the use of diesel emission reduction measures to the District through annual reporting, with the first report due 1 year from the date of project completion and each report due exactly 1 year after, noting all violations with relevant identifying information of the vehicles and drivers in violation of these measures.  ii. The project proponent shall verify that all construction and operations equipment is maintained and properly tuned in accordance with	<del>SU</del> <u>STC: LS</u> <u>MPC: LS</u>

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>manufacturers' specifications. Prior to the commencement of construction and operations activities using diesel-powered vehicles or equipment, the project proponent shall verify that all vehicles and equipment have been checked by a certified mechanic and determined to be running in proper condition prior to admittance into any terminal leasehold. The project proponent shall submit a report by the certified mechanic of the condition of the construction and operations vehicles and equipment to the District prior to commencement of their use.</p> <p><b>MM-AQ-3: Comply with San Diego Unified Port District Climate Action Plan Measures.</b> Prior to approval of all discretionary actions and/or Coastal Development Permits, the project proponent shall be required to implement the following measures to be consistent with the Climate Action Plan.</p> <ul style="list-style-type: none"> <li>• Vessels shall comply with the District's voluntary vessel speed reduction program, which targets 80 percent compliance.</li> <li>• Eligible vessels shall comply with ARB's at-berth regulation that requires shore power or alternative control technology regulation for 80 percent of eligible calls by 2020, minus idle time to clear customs consistent with California Air Resources Board regulations. This is a project feature made into a mitigation measure to ensure compliance.</li> <li>• Designated truck haul routes shall be used, and the project proponent shall decrease onsite movements where practicable.</li> <li>• No commercial drive-through shall be implemented.</li> <li>• Compliance with Assembly Bill 939 and the City of San Diego's Recycling Ordinance shall be</li> </ul>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>mandatory and shall include recycling at least 50 percent of solid waste; compliance with the City of San Diego's Construction and Demolition Debris Deposit Ordinance shall be mandatory and shall include recycling at least 50 percent of all construction debris. This measure shall be applied during construction and operation of the proposed project.</p> <ul style="list-style-type: none"> <li>• Light fixtures shall be replaced with lower-energy bulbs such as fluorescent, Light-Emitting Diodes (LEDs), Compact Fluorescent Lights (CFLs), or the most energy-efficient lighting that meets required lighting standards and is commercially available.</li> <li>• Implementation of Climate Action Plan measures will be included as part of any discretionary actions and/or Coastal Development Permit(s) associated with this project. Evidence of implementation and compliance with this mitigation measure shall be provided to the District by the project proponent on an annual basis through 2035 (buildout of the TAMT plan).</li> </ul> <p><b>MM-AQ-4: Implement Best Available Control Technologies for Conveyor System and Bulk Discharge Unloader for Future Dry Bulk Operations associated with the TAMT Plan.</b> <del>Prior to the first discretionary action</del> <u>As a condition of approval and/or any new or amended real estate agreement or Coastal Development Permits related to Permit for dry bulk operations associated with that would result in an increase in daily or annual throughput over baseline conditions, the San Diego Unified Port District shall require the TAMT plan, any project proponent shall upgrade the existing or to install a new Conveyor System and Bulk Discharge Unloader that shall include and use the best available control technologies (BACT) that to achieve a minimum 95 percent% control</u></p>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>efficiency. <del>The project proponent that finances for particulate matter in one of the system may be reimbursed, based on anticipated percent usage, by future users of the system. Alternatively, other funding mechanisms may be developed. However, under no circumstance shall the upgrade or new system that includes BACT not be implemented prior to the first discretionary action approval and/or Coastal Development Permits related to dry bulk operations following ways:</del></p> <ul style="list-style-type: none"> <li>• <del>Implementation</del> <u>Upgrade the existing Conveyor System and Bulk Discharge Unloader (if proposed for use) to meet the minimum 95% control efficiency.</u></li> <li>• <u>Replace the existing Conveyor System and Bulk Discharge Unloader with a new Conveyor System and Bulk Discharge Unloader that meets the minimum 95% control efficiency and properly dispose of BACTthe existing system in compliance with all applicable laws and regulations.</u></li> <li>• <u>Bypass the existing Conveyor System and Bulk Discharge Unloader and install a new Conveyor System and Bulk Discharge Unloader that meets the minimum 95% control efficiency.</u></li> </ul> <p><u>The project proponent that finances an upgrade or replacement to the new system may be reimbursed, based on anticipated percent usage, by future users of the system. The San Diego Unified Port District will be a part of anyassist such reimbursement by conditioning its approval of other users of the system during the first 5 years of its operation on reimbursement of the cost of the system on a “fair share” basis.</u></p> <p><u>Under no circumstance shall a project proponent seeking discretionary action approval and/or Coastal Development Permit(s) associated with the TAMT plan. Evidenceapproval for dry bulk operations be allowed to</u></p>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p><u>increase daily or annual throughput of dry bulk operations without first completing the upgrade or replacement of the existing system, or installation of a new system required above.</u></p> <p><u>The recipient of a discretionary approval by the San Diego Unified Port District subject to this mitigation measure shall provide written evidence of implementation and compliance with this mitigation measure shall be provided to the San Diego Unified Port District on an annual basis through 2035 (buildout of the TAMT plan).</u></p> <p><b>MM-AQ-5: Implement Vessel Speed Reduction Program Beyond Climate Action Plan Compliance for Future Operations Associated with the TAMT Plan.</b> Every quarter following approval of the first discretionary action approval and/or issuance of the first Coastal Development Permit associated with a future project proposed under the TAMT plan, whichever occurs first, the project proponent shall provide a report of the annual vessel activity and throughput by cargo node to date and the projected total throughput for the previous 6 months to the <u>San Diego Unified Port District's Planning &amp; Green Port Department</u>. Prior to the annual vessel calls reaching <u>5291</u> calls (<u>3776</u> new calls over existing) for dry bulk, <u>77117</u> calls (<u>2060</u> new calls over existing) for refrigerated containers, and <u>6896</u> calls (<u>4068</u> new calls over existing) for multi-purpose general cargo <u>under the MPC scenario (or 79 calls [64 new calls over existing] for dry bulk, 98 calls [41 new calls over existing] for refrigerated containers, and 78 calls [50 new calls over existing] for multi-purpose general cargo under the STC Alternative), or beginning January 1, 2030 for all vessels irrespective of the number of calls occurring on an annual basis, whichever occurs first, the project proponent shall implement VSR</u><del>vessel speed</del></p>	



Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p><u>reduction</u> measures to reduce the project's criteria pollutant emissions. The program shall require that 90 percent of the vessels calling at the project site reduce their speeds to 12 knots starting at 40 nautical miles from Point Loma. <u>Due to the international border to the south and California Air Resources Board limit for rulemaking being 24 nautical miles from the coastline, some vessel calls travel within the San Diego Air Basin for less than 40 nautical miles. For those vessel calls, vessel operators are required to reduce their speeds to 12 knots at the point those vessels enter the San Diego Air Basin and maintain speeds of 12 knots over the entire distance to/from Point Loma. To be compliant with the vessel speed limit, the vessel's weighted average speed shall be 12 knots or less from the 40 nautical mile latitude and longitude positions on each respective route to/from Point Loma.</u></p> <p>Implementation of this VSR program will be required as part of any discretionary action and/or Coastal Development Permit(s) associated with the TAMT plan. Evidence of implementation and compliance with this mitigation measure shall be provided to the <u>San Diego Unified Port District's Planning &amp; Green Port Department on an annual/quarterly basis through 2035 (buildout of the TAMT plan). The San Diego Unified Port District will verify compliance through analysis of Automatic Identification System data or by requesting a vessel's Electronic Chart Display Identification System log from the captain.</u></p> <p><b>MM-AQ-6: Electric Cargo Handling Equipment Upgrades.</b> As a condition of any Coastal Development Permit, the project proponent, or the District, shall secure funding for and operate one piece of CHE associated with each node. Operation of such equipment on the leasehold shall occur by January 1, 2020 through the expected operating life of the equipment, and evidence of operation shall be provided to the District</p>	

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			<p>upon request. Equipment shall be replaced if alternative technologies (i.e., advancements in electric equipment) are identified and determined to be feasible pursuant to MM-AQ-7. For purposes of the analysis, it was assumed that each node would operate one electric yard truck. This mitigation is similar to MM-GHG-3, and the number of CHE equipment required between the two mitigation measures does not aggregate to more than one piece of CHE per node.</p> <p><b>MM-AQ-7: Periodic Technology Review.</b> To promote new emission control technologies, each tenant who seeks <b>MM-AQ-6: Electric Cargo Handling Equipment Upgrades.</b> This measure has multiple steps for compliance, as specified below.</p> <p>A. Prior to January 1, 2020, the San Diego Unified Port District shall ensure that at least three pieces of <u>existing non-electric cargo handling equipment at the terminal are replaced by electric cargo handling equipment, none of which were previously operating at the terminal during the 2013/2014 baseline year of the EIR analysis. Possible ways the electric cargo handling equipment may be obtained include, but are not limited to, the following:</u></p> <ol style="list-style-type: none"> <li>1. <u>Purchased, leased, or otherwise acquired, in whole or in part, through funding provided to a tenant by the San Diego Unified Port District;</u></li> <li>2. <u>Purchased, leased, or otherwise acquired, in whole or in part, through funding provided to a tenant by other sources; or</u></li> <li>3. <u>Purchased, leased, or otherwise acquired, in whole or in part, by the tenant in compliance with a condition of a discretionary action approval and/or Coastal Development Permit(s) shall perform an investigation into emerging zero and near-zero technologies and submit a report to issued by the San Diego</u></li> </ol>	

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			<p><u>Unified Port District on an annual basis, beginning on, Written evidence of the date such construction, occupancy, or use commences and continuing through 2035 (buildout of the TAMT plan). The District regularly monitors technologies as part of its CAP and long range sustainability goals, which require the acquisition of the electric cargo handling equipment and the equipment it will replace and remove from further operation at the terminal must be provided to the San Diego Unified Port District. The San Diego Unified Port District shall further ensure that the electric cargo handling equipment is in use at each of the three nodes throughout the expected operating life. This will be accomplished by requiring each tenant that employs electric cargo handling equipment pursuant to this measure to report the equipment's annual number of hours of operation to the San Diego Unified Port District and by requiring the San Diego Unified Port District to monitor use of the electric cargo handling equipment as part of the San Diego Unified Port District's TAMT equipment inventory.</u></p> <p><u>B. Prior to January 1, 2025, the San Diego Unified Port District also shall ensure that no fewer than 20 non-electric yard trucks in operation are replaced at the TAMT by 20 electric yard trucks. Possible ways the electric yard trucks may be obtained include, but are not limited to, the following:</u></p> <ol style="list-style-type: none"> <li><u>1. Purchased, leased, or otherwise acquired, in whole or in part, through funding provided to a tenant by the San Diego Unified Port District;</u></li> <li><u>2. Purchased, leased, or otherwise acquired, in whole or in part, through funding provided to a tenant by other sources; or</u></li> </ol>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>3. <u>Purchased, leased, or otherwise acquired, in whole or in part, by the tenant in compliance with a condition of a discretionary approval issued by the San Diego Unified Port District.</u></p> <p><u>Written evidence of the acquisition of the electric yard trucks, and the non-electric yard trucks they will replace and remove from further operation at the terminal, must be provided to the San Diego Unified Port District. The San Diego Unified Port District shall further ensure that the electric yard trucks are in use at the TAMT throughout the expected operating life of the equipment. Each tenant that employs electric trucks pursuant to this measure shall report the equipment's annual number of hours of operation to the San Diego Unified Port District, and the San Diego Unified Port District shall monitor use of the electric trucks as part of the San Diego Unified Port District's TAMT equipment inventory.</u></p> <p>C. <u>Prior to January 1, 2030, the San Diego Unified Port District also shall ensure that no fewer than three existing non-electric reach stackers and ten non-electric forklifts in operation are replaced at the TAMT by three fully electric reach stackers and ten fully electric forklifts. Possible ways the electric reach stackers and forklifts may be obtained include, but are not limited to:</u></p> <ol style="list-style-type: none"> <li><u>1. Purchased, leased, or acquired, in whole or in part, through funding provided to the tenant by the San Diego Unified Port District;</u></li> <li><u>2. Purchased, leased, or acquired, in whole or in part, through funding provided to the tenant by other sources; or</u></li> <li><u>3. Purchased, leased, or otherwise acquired, in whole or in part, by the tenant in compliance with a condition of a discretionary approval</u></li> </ol>	

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			<p><u>issued by the San Diego Unified Port District. Written evidence of the acquisition of the three electric reach stackers and ten electric forklifts and the conventional equipment they will replace and remove from further operation at the terminal must be provided to the San Diego Unified Port District. The San Diego Unified Port District shall further ensure that the electric reach stackers and forklifts are in use at the TAMT throughout the expected operating life of the equipment. Each tenant that employs electric reach stackers or electric forklifts pursuant to this measure shall report the equipment's annual number of hours of operation to the San Diego Unified Port District, and the San Diego Unified Port District shall monitor use of the electric reach stackers and forklifts as part of the San Diego Unified Port District's TAMT equipment inventory.</u></p> <p><u>D. The electric equipment employed pursuant to paragraphs A, B, and C of this mitigation measure may be replaced by other technologies or other types of cargo handling equipment as long as the replacement equipment achieves the same or greater criteria pollutant, toxic air contaminant, and greenhouse gas emission reductions as compared to the equipment required by paragraphs A, B, and C of this mitigation measure.</u></p> <p><b><u>MM-AQ-7: Annual Inventory Submittal and Periodic Technology Review.</u></b> <u>The San Diego Unified Port District regularly monitors technologies for reducing air emissions as part of its Climate Action Plan and long-range sustainability goals, which encourage the San Diego Unified Port District and its tenants to use cleaner technologies over time as they become available and feasible. The Annual Technology Review shall identify any</u>  <u>As a condition of approval of any new or amended</u></p>	

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			<p><u>real estate agreement or Coastal Development Permit, the San Diego Unified Port District shall require the project proponent to submit to the San Diego Unified Port District an annual inventory of all equipment that generates criteria pollutant, toxic air contaminant, and greenhouse gas emissions operated by the project proponent at the TAMT throughout the life of the lease up to 2035 (buildout of the TAMT plan). The equipment inventory shall include the year, make, and model of the equipment that was used in the previous year, including annual hours of operation for each piece of equipment, including but not limited to heavy-duty drayage and non-drayage trucks, yard equipment, assist and ocean-going tugs, ocean-going vessels, bulk material handling equipment, and any other type of cargo handling equipment. The purpose of the inventory is to track emissions and equipment at TAMT and to assist in technological reviews, as described below.</u></p> <p><u>To promote new emission control technologies, the San Diego Unified Port District will perform a Periodic Technology Review annually. The Periodic Technology Review will coincide with monitoring and reporting pursuant to the San Diego Unified Port District's Climate Action Plan, and will include the following:</u></p> <ol style="list-style-type: none"> <li><u>1. Develop and maintain an inventory of equipment in operation at the TAMT that generates criteria pollutant, toxic air contaminant, and greenhouse gas emissions, including the equipment model year, model name, and annual hours of operation, based on the annual tenant inventories submitted to the San Diego Unified Port District as described above.</u></li> <li><u>2. Identify and assist with enforcement of changes to emission regulations for heavy-duty trucks, yard equipment, tugs, vessels, bulk handling equipment, and other equipment that generates criterial pollutant, toxic air contaminant, and greenhouse</u></li> </ol>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p><u>gas emissions.</u></p> <p>3. <u>Identify, and assist with implementation of, any feasible new emissions-reduction technologies that may reduce emissions at the project site, including the feasibility of zero and near-zero emissions technologies applicable to heavy-duty trucks, yard equipment, tugs, vessels, and bulk handling equipment.</u></p> <p>4. <u>Collaborate with the California Air Resources Board and San Diego Air Pollution Control District to ensure these technologies for heavy-duty trucks, yard equipment, tugs, vessels, and bulk handling equipment. If the Periodic Technology Review demonstrates the new technology are available and to identify funding opportunities, including funding from the Prop 1B: Good Movement Emission Reduction Program, among others.</u></p> <p>5. <u>Prioritize older equipment in operation at the TAMT that generates the highest levels of criterial pollutant, toxic air contaminant, and greenhouse gas emissions to be replaced based on the level of emissions and cost-effectiveness of the emissions reduction (i.e., biggest reduction per dollar), and identify implementation mechanisms including, but not limited to, tenant-based improvements, grant programs, or a combination thereof, based on regulatory requirements and the feasibility analyses specified in paragraph 3 above. Use the Carl Moyer Program, or similar cost-effectiveness criteria, to assess the economic feasibility (e.g., cost effectiveness) of the identified new technologies.</u></p> <p>6. <u>Ensure that any upgraded or retired equipment is accounted for as part of the San Diego Unified Port District's Maritime Emissions Inventory and Climate Action Plan.</u></p> <p><u>If Periodic Technology Review identifies new</u></p>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p><del>technology that will be effective in reducing emissions and the compared to the equipment in operation at the time of the review, and the San Diego Unified Port District determines that installation or use of the technology is feasible, the tenant San Diego Unified Port District shall implement require the use of such technology within 12 months of the District's determination as a condition of any discretionary approval issued by the San Diego Unified Port District for any new, expanded, or extended operations at the TAMT. Furthermore, the District and/or project proponent must demonstrate that emissions of volatile organic compounds (VOCs) would be less than 75 pounds per day on a peak day once cargo throughput exceeds 4,000,000 metric tons annually. If technological advancements are unable to reduce VOC emissions to 75 pounds per day or less on a peak day, then the District shall limit the number of vessels allowed to no more than three on a peak day once total throughput exceeds 4,000,000 metric tons annually. These operational restrictions will ensure that VOC emissions do not exceed threshold standards established by the San Diego Air Pollution Control District. Verification of compliance with this measure is the responsibility of the District.</del></p> <p><b>MM-AQ-8: Implement a Sustainable Leasing Exhaust Emissions Reduction Program at the Tenth Avenue Marine Terminal.</b> The San Diego Unified Port District shall work with tenants to develop and implement a policy incentive-based sustainable program at the TAMT by January 1, 2020 to further reduce emissions from terminal-wide emissions sources.</p> <p>A. The program shall be implemented through the Coastal Development Permit process; the tenant leasing program to achieve the District's goals to attract the cleanest ships, ships that utilize process,</p>	



Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p><u>including the issuance of new, extended, or amended leases; and other short-term real estate agreements at the TAMT.</u></p> <p>B. <u>The program shall be focused on incentives to reduce criteria pollutant, toxic air contaminant, and greenhouse gas emissions by attracting clean vessels, trucks, and equipment to the TAMT—including but not limited to vessels that use shore power while at berth, zero and near-zero emission cargo handling equipment technologies, energy efficiency measures, or renewable energy—and by otherwise incorporating technological and operational practices that reduce criteria pollutant emissions. The District's CAP identifies the development of a Sustainable Leasing Policy as one of the GHG reduction measures prioritized for implementation, toxic air contaminant, and greenhouse gas emissions from terminal operations beyond existing regulatory requirements. The program shall include specific incentives for existing and future components under the TAMT plan shall be subject to the Sustainable Leasing Policy tenants, which may include but are not limited to: an extended lease term, expedited permit processing, reduced permit fees, and eligibility for grants or other financial assistance. The nature and extent of such incentives will be based on an emissions reduction schedule established by the San Diego Unified Port District for criteria pollutants, toxic air contaminants, and greenhouse gas emissions.</u></p> <p>C. <u>The program shall identify specific emission reduction equipment and practices that may qualify for incentives, which may include but not limited to the following.</u></p> <ul style="list-style-type: none"> <li><u>Vessels: Demonstrate that at least 50 percent of annual vessel calls will be equipped with</u></li> </ul>	

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			<p><u>Tier II or better main and auxiliary engines, as defined by International Convention for the Prevention of Pollution from Ships Annex VI 2008 regulations or other standards set forth by the International Convention for the Prevention of Pollution from Ships, U.S. Environmental Protection Agency, or the California Air Resources Board in the future.</u></p> <ul style="list-style-type: none"> <li>• <u>Vessel Hoteling: Demonstrate that vessel calls will use shore power or a California Air Resources Board-approved alternative emission capture and control system or install a shore power or California Air Resources Board-approved alternative emission capture and control system for the purpose of reducing ocean-going vessel hoteling emissions.</u></li> <li>• <u>Heavy-Duty Trucks: Demonstrate that at least 50 percent of annual cargo throughput will be transported with zero/near-zero emission trucks, hybrid trucks, and/or other alternative truck technologies. To qualify, the trucks must result in emission reductions greater than those required by state and federal regulatory agencies at the time of project approval.</u></li> <li>• <u>Switch and Line Haul Locomotives: Demonstrate that at least 50 percent of annual cargo will be transported with Tier 3 or above locomotive engines for line-haul, as defined by the U.S. Environmental Protection Agency in 2008 (73 Federal Register 88 25098-25352), and a Tier 3 or above switcher or railcar mover for switching activity at both the terminal and yard.</u></li> <li>• <u>Terminal Infrastructure: Install electric charging stations and/or other terminal infrastructure and equipment that support and</u></li> </ul>	

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			<p><u>facilitate zero or near-zero emission technologies.</u></p> <p><b><u>MM-AQ-9: Use of At-Berth Emission Capture and/or Control System to Reduce Vessel Hoteling Emissions.</u></b> The San Diego Unified Port District shall require the use of an At-Berth Emission Capture and/or Control System (i.e., Bonnet System) to reduce vessel hoteling emissions prior to terminal-related emissions reaching a cancer risk of 10 per million at the maximally exposed sensitive receptor location. Based on the Health Risk Assessment for the TAMT Redevelopment Plan Environmental Impact Report, an At-Berth Emission Capture and/or Control System shall be required prior to reaching an annual throughput of 691,418 metric tons for dry bulk, assuming no growth in multi-purpose general cargo; an annual throughput of 356,666 metric tons for multi-purpose general cargo (including break bulk, neobulk, roll-on/roll-off, and other non-container, non-dry bulk cargo, and non-liquid bulk cargo), assuming no growth in dry bulk; or any combination of dry bulk and multi-purpose general cargo throughput of 691,418 metric tons, whichever occurs first. The San Diego Unified Port District shall either install directly or enter into a contract with an entity that provides the emission capture and/or control system or an equivalent alternative technology, to reduce emissions from vessels that are unable to cold iron at TAMT or are exempt from the California Air Resources Board's at-berth regulation. The San Diego Unified Port District may charge a fee for the use of an Emissions Capture and Control System (or an alternative at-berth system that reduces vessel hoteling emissions) based on the vessel type and the length of its stay. The system shall be a technology that has been approved by the California Air Resources Board and meets the requirements set forth in the California Air</p>	

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<p><u>Resources Board's at-berth regulations. If the San Diego Unified Port District determines the need for an Emissions Capture and Control System (or an alternative at-berth system that reduces vessel hoteling emissions) prior to, or later than, the throughput figures listed above, or if shore power or other future regulatory requirements are able to reduce vessel hoteling emissions, then the requirement for the At-Berth Emission Capture and/or Control System shall be updated and adjusted accordingly, at the San Diego Unified Port District's discretion.</u></p> <p><u>All vessels that are not shore-power equipped shall use the Emission Capture and/or Control System (or an alternative at-berth system that reduces vessel hoteling emissions at an equivalent level), provided there are no operational limitations and it is not being used by another vessel. If the Emission Capture and/or Control System is operationally unable to connect to an at-berth vessel or if it is being used by another vessel, multi-purpose/general cargo or dry bulk vessels will be allowed to berth without it.</u></p>				
Cumulatively Considerable Criteria Pollutant Contribution under an Ambient Air Quality Standard	<p><i>Demolition and Initial Rail Component</i></p> <p>Implementation of the Demolition and Initial Rail Component would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard.</p> <p><i>Full TAMT Plan Buildout</i></p> <p><b>Impact-AQ-3: Cumulative Emissions in Excess of Criteria Pollutant Thresholds During TAMT Plan Buildout Operations.</b> Project emissions during operations, before mitigation, would exceed the San Diego County SLTs for VOC, NO<sub>x</sub>, <del>CO</del>-PM10, and PM2.5, and when combined with other nearby</p>	<p><u>STC: LS</u> <u>MPC: LS</u></p>	No mitigation is required.	N/A
		<p><u>STC: PS</u> <u>MPC: PS</u></p>	Implement <b>MM-AQ-2</b> through <b>MM-AQ-89</b> , as described above.	<p><u>SUSTC: LS</u> <u>MPC: LS</u></p>

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	past, present, and probable future projects, the full TAMT plan buildout's contribution would be cumulatively considerable. The contribution of project-related emissions is considered significant because full TAMT plan buildout would exceed thresholds that have been set by SDAPCD to attain the NAAQS and CAAQS, the purpose of which is to provide for the protection of public health			
Sensitive Receptors	<i>Demolition and Initial Rail Component</i> Implementation of the Demolition and Initial Rail Component would not expose sensitive receptors to substantial pollutant concentrations.	<u>STC: LS</u> <u>MPC: LS</u>	No mitigation is required.	N/A
	<i>Full TAMT Plan Buildout</i> <b>Impact-AQ-4: Health Risk During Full TAMT Plan Buildout Operations.</b> Project TAC emissions during full TAMT plan buildout operations, before mitigation, would result in a significant incremental health risk by exceeding thresholds for incremental cancer risk at nearby receptors.	<u>STC: PS</u> <u>MPC: PS</u>	Implement <b>MM-AQ-2</b> through <b>MM-AQ-89</b> , as described above.	<u>SU</u> <u>STC: LS</u> <u>MPC: SU for residential receptors; LS for park and school receptors</u>
Objectionable Odors	<i>Demolition and Initial Rail Component</i> Implementation of the Demolition and Initial Rail Component would not create objectionable odors affecting a substantial number of people.	<u>STC: LS</u> <u>MPC: LS</u>	No mitigation is required.	N/A
	<i>Full TAMT Plan Buildout</i> Buildout of the TAMT plan would not create objectionable odors affecting a substantial number of people.	<u>STC: LS</u> <u>MPC: LS</u>	No mitigation is required.	N/A

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
<b>Cumulative Impacts</b>				
Criteria Pollutants (Construction)	<i>Demolition and Initial Rail Component</i>			
	Implementation of the Demolition and Initial Rail Component would not violate an air quality standard or contribute substantially to an existing or projected air quality standard. <i>Full TAMT Plan Buildout</i>	<u>STC: LS</u> <u>MPC: LS</u>	No mitigation is required.	N/A
	<b>Impact-C-AQ-1: Emissions in Excess of Cumulative Thresholds During Full TAMT Plan Buildout Construction.</b> Emissions during construction of full TAMT plan buildout would exceed the cumulative San Diego County SLTs.	<u>STC: PS</u> <u>MPC: PS</u>	Implement <b>MM-AQ-1</b> , as described above.	<u>STC: SU</u> <u>MPC: SU</u>
Criteria Pollutants (Operation)	<i>Demolition and Initial Rail Component</i>			
	Implementation of the Demolition and Initial Rail Component would not violate an air quality standard or contribute substantially to an existing or projected air quality standard. <i>Full TAMT Plan Buildout</i>	<u>STC: LS</u> <u>MPC: LS</u>	No mitigation is required.	N/A
	<b>Impact-C-AQ-2: Emissions in Excess of Cumulative Thresholds During Full TAMT Plan Buildout Operations.</b> Emissions during operations would exceed the cumulative San Diego County SLTs for <u>VOC, NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub></u> at maximum capacity primarily of the full TAMT plan buildout due to vessel, train, and truck activity and bulk processing.	<u>STC: PS</u> <u>MPC: PS</u>	Implement <b>MM-AQ-2</b> through <b>MM-AQ-89</b> , as described above.	<u>STC: LTS</u> <u>MPC: LTS</u>

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
Health Risk	<p><i>Demolition and Initial Rail Component</i></p> <p>Implementation of the Demolition and Initial Rail Component would not expose sensitive receptors to substantial pollutant concentrations.</p> <p><i>Full TAMT Plan Buildout</i></p> <p><b>Impact-C-AQ-3: Cumulative Health Risk Emissions During Operations.</b> Emissions during full TAMT plan buildout operations would exceed the incremental risk thresholds associated with long-term operation up to maximum capacity primarily due to vessel, terminal equipment, and truck activity.</p>	<p><u>STC: LS</u> <u>MPC: LS</u></p> <p><u>STC: PS</u> <u>MPC: PS</u></p>	<p>No mitigation is required.</p> <p>Implement <b>MM-AQ-2</b> through <b>MM-AQ-89</b>, as described above</p>	<p>N/A</p> <p><del>SU</del><u>STC: LS</u> <u>MPC: SU for residential receptors; LS for park and school receptors</u></p>
<b>4.3 Biological Resources</b>				
<b>Project Impacts</b>				
Candidate, Sensitive, or Special-Status Species	<p><i>Demolition and Initial Rail Component</i></p> <p><b>Impact-BIO-1: Potential Destruction of Migratory Bird Treaty Act Protected Nests.</b> Onsite demolition of structures during construction, as well as noise from construction activity, could result in the destruction and loss of active bird nests that could be present within the project area during the nesting season (February 1 through August 31). The MBTA prohibits take of nearly all native birds. Similar provisions within the California Fish and Game Code protect all native birds of prey (Section 3503.5) and all non-game birds that occur naturally in the state (Section 3800).</p>	<p><u>STC: PS</u> <u>MPC: PS</u></p>	<p><del><b>For Impact-BIO-1:</b></del> <b>MM-BIO-1: Avoid Nesting Season for Birds or Conduct Preconstruction Nesting Survey.</b> To ensure compliance with the MBTA and similar provisions under the California Fish and Game Code, the project proponent in direct coordination with the general contractor shall conduct demolition of Transit Shed #1, Transit Shed #2, Warehouse C, the molasses tanks, and other existing structures during the non-breeding season (between September 1 and January 31) or shall implement the following.</p> <ul style="list-style-type: none"> <li>If demolition of a structure is scheduled to occur between February 1 and August 31, the project proponent shall retain a qualified biologist (with knowledge of the species to be surveyed) who shall conduct a focused nesting survey prior to demolition of any structures within 1 week of scheduled demolition. A qualified biologist is a</li> </ul>	<p><u>STC: LS</u> <u>MPC: LS</u></p>

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>person who, by reason of his or her knowledge of the natural sciences and the principles of wildlife biology, acquired by wildlife biology education and experience, performs services including, but not limited to, consultation investigation, surveying, evaluation, planning, or responsible supervision of wildlife biology activities when those professional services require the application of biology principles and techniques.</p> <ul style="list-style-type: none"> <li>• The survey to look for active nests shall be conducted and results reported in writing to the District for review and approval prior to the commencement of any demolition or construction activities on the project site. The survey shall occur between sunrise and 12:00 p.m., when birds are most active. If no active nests are detected during these survey, the biologist will prepare a letter report to the District documenting the results of the survey. If there is a delay of more than 7 days between when the nesting bird survey is performed and demolition begins, the qualified biologist shall confirm in writing to the District that he/she has resurveyed the structure proposed for demolition and that no new nests have been established.</li> <li>• If the survey confirms an active nest on any of the structures to be demolished, demolition of the structure shall not occur until after a qualified biologist determines that the nest is no longer active or that the young have fledged.</li> </ul>	



Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	<b>Impact-BIO-2: Potential Destruction of Special-Status and other Sensitive Bat Maternity Roosts.</b> Demolition of onsite structures during construction could result in the loss of bat maternity roosts that could occur within the project area during the maternity season (April 15 through August 31).	<u>STC: PS</u> <u>MPC: PS</u>	<b>MM-BIO-2: Avoid Bat Maternity Roosts or Conduct Preconstruction Maternity Bat Roost Survey.</b> If demolition of any structures is scheduled during the bat maternity season when reproductively active females and dependent young could be present (between April 15 and August 31), a qualified biologist (as defined under MM-BIO-1 and with knowledge of the species to be surveyed) shall conduct a preconstruction survey to determine whether bats are present. The survey shall examine potential suitable roost sites for evidence of bat presence (presence of bats, guano, or urine stains), and it shall be conducted no more than 7 days prior to demolition of the structures. If no active maternity roosts are detected during these survey, the biologist will prepare a letter report to the District documenting the results of the survey. The survey shall be submitted in writing to the District for review and approval prior to the commencement of any demolition activities on the project site. If the biologist determines that the area surveyed does not contain any active maternity roosts, demolition may commence. If active maternity roosts are found, demolition of the structure shall be postponed and roosting structures shall be retained until a qualified biologist has determined that the maternity roost is no longer active and the young can take care of themselves. The need for a construction buffer shall be determined through consultation among the qualified biologist, the District, and CDFW.	<u>STC: LS</u> <u>MPC: LS</u>
	<i>Full TAMT Plan Buildout</i> See <b>Impact-BIO-1</b> and <b>Impact BIO-2</b>	<u>STC: PS</u> <u>MPC: PS</u>	Implement <b>MM-BIO-1</b> and <b>MM-BIO-2</b> .	<u>STC: LS</u> <u>MPC: LS</u>

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
<b>4.4 Cultural Resources</b>				
<b>Project Impacts</b>				
Historical Resource	<i>Demolition and Initial Rail Component</i>			
	Implementation of the Demolition and Initial Rail Component would not cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the State CEQA Guidelines.	<u>STC: LS</u> <u>MPC: LS</u>	No mitigation is required.	N/A
	<i>Full TAMT Plan Buildout</i>			
	Buildout of the TAMT plan would not cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the State CEQA Guidelines.	<u>STC: LS</u> <u>MPC: LS</u>	No mitigation is required.	N/A
Archaeological Resource	<i>Demolition and Initial Rail Component</i>			
	Implementation of the Demolition and Initial Rail Component would not cause a substantial adverse change in the significance of an archaeological resource as defined in Section 15064.5 of the State CEQA Guidelines.	<u>STC: LS</u> <u>MPC: LS</u>	No mitigation is required.	N/A
	<i>Full TAMT Plan Buildout</i>			
	<b>Impact-CUL-1: Potential Buried Archaeological Resources.</b> The recorded portions of site CA-SDI-5931 are close to the eastern study area boundary. The exact boundaries of CA-SDI-5931 are not known and evidence suggests that the site could be larger than the area tested in 1993. Therefore, project activities within the eastern area of the project site, as mapped on Figure 4.4-1, could potentially encounter archaeological subsurface deposits associated with CA-SDI-5931. Such an encounter, if it were to destroy archaeological resources, would be considered significant.	<u>STC: PS</u> <u>MPC: PS</u>	<b>MM-CUL-1: Archaeological Monitoring in Areas of Sensitivity.</b> To reduce potential impacts on CA-SDI-5931, all proposed grading <del>and</del> , excavating, <u>and geotechnical testing</u> for the proposed project in the area of potential archaeological sensitivity shall be monitored by a qualified archaeologist(s), who meets the Secretary of the Interior's Professional Qualifications Standards, as promulgated in 36 CFR 61, and a Native American cultural monitor, the latter of which has been requested by the Viejas Band of Kumeyaay Indians. The sensitive portion of the project area, where it is possible that artifacts associated with CA-SDI-5931 could be buried, is immediately east of Warehouse C and south and east of the silo complex and	<u>STC: LS</u> <u>MPC: LS</u>

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>the rail car unloading building, as indicated on Figure 4.4-1. The sensitive area includes the molasses tanks, truck scale building, spur lines north, east, and south of the molasses tanks, and paved and unpaved parking areas near the Crosby Road entrance. The following additional conditions shall only apply to the sensitive portion of the project area indicated on Figure 4.4.-1 during earthwork activities, including grading and trenching.</p> <ul style="list-style-type: none"> <li>• The Qualified Archaeologist shall participate in a preconstruction meeting to inform all personnel of the potential for historical archaeological materials to be encountered during ground-disturbing activities.</li> <li>• If an isolated artifact or historic period deposit is discovered that requires salvaging, the Qualified Archaeologist shall have the authority to temporarily halt construction activities within 100 feet of the find and shall be given sufficient time to recover the item(s) and map its location with a global positioning system (GPS) device.</li> <li>• If a potentially eligible Native American archaeological resource is discovered, the Qualified Archaeologist shall have the authority to temporarily halt construction activities within 100 feet of the find until a Qualified Archaeologist Principal Investigator (PI) makes a determination regarding the significance of the resource. <ul style="list-style-type: none"> <li>○ The PI will notify the District to discuss the significance determination and shall also submit a letter indicating whether additional mitigation is required. If the resource is determined to be not significant, the PI shall submit a letter to the District indicating that artifacts will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that no</li> </ul> </li> </ul>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>further work is required.</p> <ul style="list-style-type: none"> <li>○ If the resource is determined to be significant, the PI shall submit an Archaeological Data Recovery Plan that has been reviewed by the Native American consultant/monitor, and obtain written approval from the Port to complete data recovery. Impacts on significant resources must be mitigated before ground-disturbing activities in the area of discovery will be allowed to resume.</li> <li>● The Qualified Archaeologist shall treat recovered items in accordance with current professional standards by properly determining provenance, cleaning, analyzing, researching, reporting, and curating them in a collection facility meeting the Secretary of the Interior's Standards, as promulgated in 36 CFR 79, such as the San Diego Archaeological Center.</li> <li>● Within 60 days after completion of the ground-disturbing activity, the Qualified Archaeologist shall prepare and submit a final report to the District for review and approval, which shall discuss the monitoring program and its results, and provide interpretations about the recovered materials, noting to the extent feasible each item's class, material, function, and origin.</li> </ul>	
Disturbance of Human Remains	<i>Demolition and Initial Rail Component</i> Implementation of the proposed Demolition and Initial Rail Component would not disturb human remains, including those interred outside of formal cemeteries. <i>Full TAMT Plan Buildout</i>	<u>STC: LS</u> <u>MPC: LS</u>	No mitigation is required.	N/A
	<b>Impact-CUL-2: Potential Disturbance of Prehistoric Human Remains.</b> The recorded portion of CA-SDI-5931 included one Native	<u>STC: PS</u> <u>MPC: PS</u>	Implement <b>MM-CUL-1</b> , as described above.	<u>STC: LS</u> <u>MPC: LS</u>

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	American burial found during grading activities within the rail yard adjacent to the project site and testing indicated the possibility of other prehistoric human burials beyond the areas tested. The exact boundaries of site CA-SDI-5931 are not known, and it is possible that the site extends to the eastern portion of the study area as indicated in Figure 4.4-1, where ground-disturbing activities could take place as part of the implementation of the proposed TAMT plan. Therefore, any ground-disturbing activities in this area would have the potential to encounter prehistoric human remains.			
<b>4.5 Geology and Soils</b>				
<b>Project Impacts</b>				
Earthquake Fault; Seismic Ground Shaking; Seismic-related Ground Failure	<i>Demolition and Initial Rail Component</i> Implementation of the Demolition and Initial Rail Component would not exacerbate the potential of a: (i) rupture of a known earthquake fault; (ii) strong seismic ground shaking; and (iii) seismic-related ground failure, including liquefaction.	<u>STC: LS</u> <u>MPC: LS</u>	No mitigation is required.	N/A
	<i>Full TAMT Plan Buildout</i> Buildout of the TAMT plan would not exacerbate the potential of a: (i) rupture of a known earthquake fault; (ii) strong seismic ground shaking; and (iii) seismic-related ground failure, including liquefaction.	<u>STC: LS</u> <u>MPC: LS</u>	No mitigation is required.	N/A

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
Unstable soils; Lateral Spreading, Subsidence, or Collapse	<p><i>Demolition and Initial Rail Component</i></p> <p>Implementation of the Demolition and Initial Rail Component would not cause a geologic unit or soil to become unstable and exacerbate the potential of onsite or offsite lateral spreading, subsidence, or collapse.</p> <p><i>Full TAMT Plan Buildout</i></p> <p>Buildout of the TAMT plan would not cause a geologic unit or soil to become unstable and exacerbate the potential of onsite or offsite lateral spreading, subsidence, or collapse.</p>	<p><u>STC: LS</u></p> <p><u>MPC: LS</u></p>	No mitigation is required.	N/A
		<p><u>STC: LS</u></p> <p><u>MPC: LS</u></p>	No mitigation is required.	N/A
<b>4.6 Greenhouse Gas Emissions and Climate Change</b>				
<b>Project Impacts</b>				
Direct and Indirect Generation of GHGs by 2020	<p><b>Impact-GHG-1: Project GHG Emissions through 2020.</b> Project GHG emissions during combined project construction and operational activities, before mitigation, would be inconsistent with the CAP's reduction target of 33 percent. Additionally, the proposed project would only partially comply with plans, policies, and regulatory programs outlined in the Scoping Plan and adopted by ARB or other California agencies for the purpose of reducing the emissions of GHGs.</p>	<p><u>STC: PS</u></p> <p><u>MPC: PS</u></p>	<p><b>MM-GHG-1: Implement Diesel Emission-Reduction Measures During Construction and Operations of Future TAMT Plan Components.</b> The District shall implement the following measures during project construction and operations, subject to verification by the District.</p> <p>i. All project proponents shall limit all equipment, drayage, and delivery truck idling times by shutting down equipment when not in use and reducing the maximum idling time to less than 3 minutes. The project proponent shall install clear signage regarding the limitation on idling time at the delivery driveway and loading areas and shall submit quarterly reports of violators to the District. This measure shall be enforced by terminal supervisors, and repeat violators shall be subject to penalties pursuant to California airborne toxics control measure 13 California Code of Regulations Section 2485. The project proponent shall submit evidence of the use of diesel reduction measures to the District through annual reporting, with the first report due 1 year from the date of project</p>	<p><u>STC: LS</u></p> <p><u>MPC: LS</u></p>

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>completion and each report due exactly 1 year after, noting all violations with relevant identifying information of the vehicles and drivers in violation of these measures.</p> <p>ii. The project proponent shall verify that all construction and operations equipment is maintained and properly tuned in accordance with manufacturers' specifications. Prior to the commencement of construction and operations activities using diesel-powered vehicles or equipment, the project proponent shall verify that all vehicles and equipment have been checked by a certified mechanic and determined to be running in proper condition prior to admittance into TAMT. The project proponent shall submit a report by the certified mechanic of the condition of the construction and operations vehicles and equipment to the District prior to commencement of their use.</p> <p><b>MM-GHG-2: Comply with San Diego Unified Port District Climate Action Plan Measures.</b> Prior to approval of all discretionary actions and/or Coastal Development Permits, the project proponent shall be required to implement the following measures to be consistent with the Climate Action Plan.</p> <ul style="list-style-type: none"> <li>• Vessels shall comply with the District's voluntary vessel speed reduction program, which targets 80 percent compliance.</li> <li>• Eligible vessels shall comply with ARB's at-berth regulation that requires shore power or alternative control technology regulation for 80 percent of eligible calls by 2020, minus idle time to clear customs consistent with California Air Resources Board regulations. This is a project feature made into a mitigation measure to ensure compliance.</li> <li>• Designated truck haul routes shall be used, and the</li> </ul>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>project proponent shall decrease onsite movements where practicable.</p> <ul style="list-style-type: none"> <li>• No commercial drive-through shall be implemented.</li> <li>• Compliance with Assembly Bill 939 and the City of San Diego's Recycling Ordinance shall be mandatory and shall include recycling at least 50 percent of solid waste; compliance with the City of San Diego's Construction and Demolition Debris Deposit Ordinance shall be mandatory and shall include recycling at least 50 percent of all construction debris. This measure shall be applied during construction and operation of the proposed project.</li> <li>• Light fixtures shall be replaced with lower-energy bulbs such as fluorescent, Light-Emitting Diodes (LEDs), Compact Fluorescent Lights (CFLs), or the most energy-efficient lighting that meets required lighting standards and is commercially available.</li> </ul> <p>Implementation of Climate Action Plan measures will be included as part of any discretionary actions and/or Coastal Development Permit(s) associated with this project. Evidence of implementation and compliance with this mitigation measure shall be provided to the District by the project proponent on an annual basis through 2035 (buildout of the TAMT plan).</p> <p><b>MM-GHG-3: Electric Cargo-Handling Equipment Upgrades.</b> <del>As a condition of any Coastal Development Permit, the project proponent, or the District, shall secure funding for and operate one piece of CHE associated with each node. Operation of such equipment on TAMT shall occur by January 1, 2020 through the expected operating life of the equipment, and evidence of operation shall be provided to the District upon request. Equipment shall be replaced if alternative technologies (i.e., advancements in electric equipment)</del></p>	



Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>are identified and determined to be feasible pursuant to MM-AQ-7. For purposes of the analysis, it was assumed that each node would operate one electric yard truck. This mitigation is similar to MM-AQ-6, and the number of CHE equipment required between the two mitigation measures does not aggregate to more than one piece of CHE per node. Prior to January 1, 2020, the San Diego Unified Port District shall ensure that at least three pieces of existing non-electric cargo-handling equipment (CHE) at the terminal are replaced by electric CHE, none of which were previously operating at the terminal during the 2013/2014 baseline year of the EIR analysis. Possible ways the electric CHE may be obtained include, but are not limited to, the following:</p> <ol style="list-style-type: none"> <li>1. Purchased, leased, or otherwise acquired, in whole or in part, through funding provided to a tenant by the San Diego Unified Port District; or</li> <li>2. Purchased, leased, or otherwise acquired, in whole or in part, through funding provided to a tenant by other sources; or</li> <li>3. Purchased, leased, or otherwise acquired, in whole or in part, by the tenant in compliance with the condition of a discretionary approval issued by the San Diego Unified Port District.</li> </ol> <p>Written evidence of the acquisition of the electric CHE equipment and the equipment it will replace and remove from further operation at the terminal must be provided to the San Diego Unified Port District. The San Diego Unified Port District shall further ensure that the electric CHE is in use at each of the three nodes throughout the expected operating life. This will be accomplished by requiring each tenant that employs electric CHE pursuant to this measure to report the equipment's annual number of hours of operation to the San Diego Unified Port District and by requiring the San Diego Unified Port District to monitor use of the electric</p>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
Direct and Indirect Generation of GHGs Beyond 2020	<b>Impact-GHG-2: Project GHG Emissions Beyond 2020.</b> Although proposed project emissions would be on a downward trajectory in the post-2020 period, the proposed project's reduction in GHG emissions during combined project construction and operational activities, before mitigation, may not contribute sufficiently to post-2020 progress toward statewide 2030 and 2050 reduction targets and would not always be in compliance with plans, policies, and regulatory programs adopted by ARB or other California agencies for post-2020 for the purpose of reducing the emissions of GHGs.	<u>STC: PS</u> <u>MPC: PS</u>	<u>CHE as part of the San Diego Unified Port District's TAMT equipment inventory.</u> <u>The electric equipment employed pursuant to this mitigation measure may be replaced by other technologies or other types of CHE as long as the replacement equipment achieves the same or greater criteria pollutant, toxic air contaminant, and greenhouse gas emission reductions as compared to the equipment required by this mitigation measure.</u>	<u>STC: SU</u> <u>MPC: SU</u>
			Implement <b>MM-GHG-1</b> through <b>MM-GHG-3</b> . <b>MM-GHG-4: Electric Cargo-Handling Equipment Upgrades.</b> <u>As-In addition to the requirements in MM-GHG-3, this measure has multiple steps for compliance, as specified below.</u> <u>A. Implement MM-GHG-3. The three electric cargo-handling equipment pieces required in MM-GHG-3 will continue to be operational through 2035.</u> <u>B. Prior to January 1, 2025, the San Diego Unified Port District also shall ensure that no fewer than 20 non-electric yard trucks in operation are replaced at the TAMT by 20 electric yard trucks. Possible ways the electric yard trucks may be obtained include, but are not limited to, the following:</u> <u>1. Purchased, leased, or otherwise acquired, in whole or in part, through funding provided to a tenant by the San Diego Unified Port District;</u> <u>or</u> <u>2. Purchased, leased, or otherwise acquired, in whole or in part, through funding provided to a tenant by other sources; or</u> <u>3. Purchased, leased, or otherwise acquired, in whole or in part, by the tenant in compliance with the condition of any Coastal Development Permit, the project proponent, or the District, shall secure funding for and operate one piece of CHE associated with each node. Operationa</u>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p><u>discretionary approval issued by the San Diego Unified Port District.</u></p> <p><u>Written evidence of the acquisition of such equipment on TAMT the electric yard trucks, and the non-electric yard trucks they will replace and remove from further operation at the terminal, must be provided to the San Diego Unified Port District. The San Diego Unified Port District shall occur by January 1, 2030 through further ensure that the electric yard trucks are in use at the TAMT throughout the expected operating life of the equipment, and evidence of operation shall be provided to the District upon request. Equipment shall be replaced if alternative. Each tenant that employs electric trucks pursuant to this measure shall report the equipment's annual number of hours of operation to the San Diego Unified Port District and the San Diego Unified Port District shall monitor use of the electric trucks as part of the San Diego Unified Port District's TAMT equipment inventory.</u></p> <p><u>C. Prior to January 1, 2030, the San Diego Unified Port District also shall ensure that no fewer than three existing non-electric reach stackers and ten non-electric forklifts in operation are replaced at the TAMT by three fully electric reach stackers and ten fully electric forklifts. Possible ways the electric reach stackers and forklifts may be obtained include, but are not limited to:</u></p> <ol style="list-style-type: none"> <li><u>1. Purchased, leased, or acquired, in whole or in part, through funding provided to the tenant by the San Diego Unified Port District; or</u></li> <li><u>2. Purchased, leased, or acquired, in whole or in part, through funding provided to the tenant by other sources; or</u></li> <li><u>3. Purchased, leased, or otherwise acquired, in</u></li> </ol>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p><u>whole or in part, by the tenant in compliance with a condition of a discretionary approval issued by the San Diego Unified Port District.</u></p> <p><u>Written evidence of the acquisition of the three electric reach stackers and ten electric forklifts and the conventional equipment they will replace and remove from further operation at the terminal must be provided to the San Diego Unified Port District. The San Diego Unified Port District shall further ensure that the electric reach stackers and forklifts are in use at the TAMT throughout the expected operating life of the equipment. Each tenant that employs electric reach stackers or electric forklifts pursuant to this measure shall report the equipment's annual number of hours of operation to the San Diego Unified Port District and the San Diego Unified Port District shall monitor use of the electric reach stackers and forklifts as part of the San Diego Unified Port District's TAMT equipment inventory.</u></p> <p><u>D. The electric equipment employed pursuant to paragraphs A, B, and/or C of this mitigation measure may be replaced by other technologies (i.e., advancements in electric equipment) are identified and determined to be feasible pursuant to MM-AQ-7. For purposes of the analysis, it was assumed that each node would operate one electric yard truck. This mitigation is similar to MM-GHG-3, which requires a purchase by 2020, but the number of CHE equipment required by MM-GHG-4 is in addition to MM-GHG-3 or other types of cargo-handling equipment as long as the replacement equipment achieves the same or greater criteria pollutant, toxic air contaminant, and greenhouse gas emission reductions as compared to the equipment required by paragraphs A, B, and/or C of this mitigation measure.</u></p>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p><b>MM-GHG-5: Implement Vessel Speed Reduction Program Beyond Climate Action Plan Compliance for Future Operations Associated with the TAMT Plan.</b> Every quarter following approval of the first discretionary action approval and/or issuance of the first Coastal Development Permit associated with a future project proposed under the TAMT plan, whichever occurs first, the project proponent shall provide a report of the annual vessel activity and throughput by cargo node to date and the projected total throughput for the previous 6 months to the <u>San Diego Unified Port District's Planning &amp; Green Port Department</u>. Prior to the annual vessel calls reaching <del>5291</del> calls (<del>3776</del> new calls over existing) for dry bulk, <del>77117</del> calls (<del>2060</del> new calls over existing) for refrigerated containers, and <del>6896</del> calls (<del>4068</del> new calls over existing) for multi-purpose general cargo <u>under the MPC scenario or 79 calls [64 new calls over existing] for dry bulk, 98 calls [41 new calls over existing] for refrigerated containers, and 78 calls [50 new calls over existing] for multi-purpose general cargo under the STC Alternative, or beginning January 1, 2030 for all vessels irrespective of the number of calls occurring on an annual basis, whichever occurs first,</u> the project proponent shall implement <del>VSR</del><u>vessel speed reduction</u> measures to reduce the project's criteria pollutant emissions. The program shall require that 90 percent of the vessels calling at the project site reduce their speeds to 12 knots starting at 40 nautical miles from Point Loma. <u>Due to the international border to the south and ARB limit for rulemaking 24 nautical miles from the coastline, some vessel calls travel within the San Diego Air Basin for less than 40 nautical miles. For those vessel calls that travel within the San Diego Air Basin for less than 40 nautical miles, vessel operators are required to reduce their speeds to 12 knots at the point those vessels enter the San Diego Air Basin and</u></p>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p><u>maintain speeds of 12 knots over the entire distance to/from Point Loma. To be compliant with the vessel speed limit, the vessel's weighted average speed shall be 12 knots or less from the 40-nautical-mile latitude and longitude positions on each respective route to/from Point Loma.</u></p> <p>Implementation of this <del>VSR</del><u>vessel speed reduction</u> program will be required as part of any discretionary action and/or Coastal Development Permit(s) associated with the TAMT plan. Evidence of implementation and compliance with this mitigation measure shall be provided to the <u>San Diego Unified Port District's Planning &amp; Green Port Department</u> on <del>an annual</del><u>a quarterly</u> basis through 2035 (buildout of the TAMT plan). <u>The San Diego Unified Port District will verify compliance through analysis of Automatic Identification System data or by requesting a vessel's Electronic Chart Display Identification System log from the captain.</u></p> <p><b>MM-GHG-6: Implement a Renewable Energy Project or Purchase the Equivalent Greenhouse Gas Offsets from a California Air Resources Board Approved Registry or a Locally Approved Equivalent Program for Future Operations Associated with the TAMT Plan.</b> Prior to the any discretionary approvals and/or issuance of a Coastal Development Permit(s), the project proponents of future components considered in the TAMT plan shall incorporate renewable energy within the TAMT or within <del>other</del><u>adjacent</u> to areas of the San Diego Unified Port District's jurisdiction; otherwise, the project proponents shall purchase greenhouse gas reduction credits as specified herein to achieve requisite reductions to meet the 2035 reduction target. This requirement may include a micro-grid or similar type of energy management system to help distribute the loads and/or assist in energy storage. To meet the 2035 reduction target at full TAMT plan</p>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>buildout (using full-buildout throughput numbers listed in Table 3-3 of Chapter 3, <i>Project Description</i>), the renewable energy project must offset <del>34,044</del><u>27,625</u> metric tons of carbon dioxide equivalent (MTCO<sub>2</sub>e) per year or <del>161,134</del><u>130,751</u> megawatt-hours per year (MWh/year) or the equivalent amount of greenhouse gas offsets <u>under the MPC scenario or 18,206 MTCO<sub>2</sub>e per year or 86.172 MWh/year or the equivalent amount of greenhouse gas offsets under the STC Alternative.</u></p> <p>Because it is unknown if the full buildout will ever be achieved given it is based on market demand, the amount of greenhouse gas offsets (whether from renewable energy or purchasing of offsets) per project proposed under the TAMT plan must reduce its fair share of the full buildout GHG emissions amount (i.e., fair share of <del>34,044</del><u>27,625</u> MTCO<sub>2</sub>e <u>under the MPC scenario or 18,206 MTCO<sub>2</sub>e under the STC Alternative</u>), which shall be calculated over the entire life of the project proponent's lease agreement with the District or (if no lease) over the life of the project. As such, a calculation of the greenhouse gas emissions that would be generated by a project proponent's project over the life of the lease at the TAMT or the project life is required to determine the sufficient amount of renewable energy mitigation or greenhouse gas offsets. This proportion shall be based on anticipated throughput of the project proposed under the TAMT plan and shall include all potential emission sources (e.g., trucks, vessels, employees, cargo handling equipment). Evidence shall be submitted to the District prior to the commencement of construction activities. Because it is unknown how "solar ready" the available rooftop areas are within the TAMT, once at the design phase, the renewable energy project may be determined infeasible. Should this determination of infeasibility be made by the San Diego Unified Port District after considering evidence submitted by the project</p>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>proponent related to any structural limitations (i.e., the rooftops cannot support a renewable energy system), then <del>two</del><u>three</u> additional options are available, <u>listed here in order of priority</u>. The San Diego Unified Port District shall either require the renewable energy project to be built off site <del>(i.e., at a location not within the TAMT but within the San Diego Unified Port District's jurisdiction), or within the adjacent community (City of San Diego)</del>, or shall require the proponent to purchase the equivalent amount of greenhouse gas offsets from <del>sources listed on the American Carbon Registry and/or the Climate Action Reserve (or any other such registry approved by the California Air Resources Board), approved registry, or a locally approved equivalent program</del>. The selected option or a combination of the above-mentioned options must achieve a total annual reduction of <del>34,044</del><u>27,625</u> MTCO<sub>2</sub>e at full TAMT plan buildout <u>under the MPC scenario or 18,206 MTCO<sub>2</sub>e under the STC Alternative</u> assuming throughput numbers are reached by this point in time. Otherwise, the reduction amount will be proportional to the growth experienced at the TAMT, achieve the same reductions noted in the analysis, and scaled to the actual growth that occurs.</p> <p><b>MM-GHG-7: <u>Annual Inventory Submittal and Periodic Technology Review.</u></b> <del>To promote new emission control technologies, each tenant who seeks a discretionary action approval and/or Coastal Development Permit(s) shall perform an investigation into emerging zero and near-zero technologies and submit a report to the District on an annual basis, beginning on the date such construction, occupancy, or use commences and continuing through 2035 (buildout of the TAMT plan). The</del><u>The San Diego Unified Port District regularly monitors technologies for reducing air emissions as part of its Climate Action Plan (CAP) and</u></p>	



Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>long-range sustainability goals, which <del>require</del><u>encourage</u>s the San Diego Unified Port District and its tenants to use cleaner technologies over time as they become available and feasible. <del>The Annual Technology Review shall identify any</del><u>As a condition of approval of any new or amended real estate agreement or Coastal Development Permit, the San Diego Unified Port District shall require the project proponent to submit to the San Diego Unified Port District an annual inventory of all equipment that generates criteria pollutant, toxic air contaminant, and greenhouse gas emissions operated by the project proponent at the TAMT throughout the life of the lease up to 2035 (buildout of the TAMT plan). The equipment inventory shall include the year, make, and model of the equipment that was used in the previous year, including annual hours of operation for each piece of equipment, including but not limited to heavy duty drayage and non-drayage trucks, yard equipment, assist and ocean going tugs, ocean going vessels, bulk material handling equipment, and/or any other type of cargo handling equipment. The purpose of the inventory is to track emissions and equipment at TAMT and to assist in technological reviews, as described below.</u></p> <p><u>To promote new emission control technologies, the San Diego Unified Port District will perform a Periodic Technology Review (PTR) annually. The PTR will coincide with monitoring and reporting pursuant to the San Diego Unified Port District's CAP, and will include the following:</u></p> <ol style="list-style-type: none"> <li><u>1. Develop and maintain an inventory of equipment in operation at the TAMT that generates criteria pollutant, toxic air contaminant, and greenhouse gas emissions, including the equipment model year, model name, and annual hours of operation, based on the annual tenant inventories submitted to the San Diego Unified Port District as described above.</u></li> </ol>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>2. <u>Identify and assist with enforcement of changes to emission regulations for heavy-duty trucks, yard equipment, tugs, vessels, bulk handling equipment, and other equipment that generates criteria pollutant, toxic air contaminant, and greenhouse gas emissions.</u></p> <p>3. <u>Identify, and assist with implementation of, any feasible new emissions-reduction technologies that may reduce emissions at the project site, including technologies applicable to heavy-duty trucks, yard equipment, tugs, vessels, and bulk handling equipment.</u></p> <p>4. <u>Collaborate with the California Air Resources Board and San Diego Air Pollution Control District to ensure these technologies are available and to identify funding opportunities, including funding from the Prop 1B: Good Movement Emission Reduction Program, among others.</u></p> <p>5. <u>Prioritize older equipment in operation at the TAMT that generates the highest levels of criteria pollutant, toxic air contaminant, and greenhouse gas emissions to be replaced based on the level of emissions and cost effectiveness of the emissions reduction (i.e., biggest reduction per dollar), and identify implementation mechanisms including, but not limited to, tenant-based improvements, grant programs, and/or a combination thereof, based on regulatory requirements and the feasibility analyses specified in paragraph 3 above. Utilize the Carl Moyer Program, or similar cost-effectiveness criteria, to assess the economic feasibility (e.g., cost effectiveness) of zero and near zero emissions the identified new technologies for heavy-duty trucks, yard,</u></p> <p>6. <u>Ensure that any upgraded and/or retired equipment, tugs, vessels, is accounted for as part of</u></p>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p><u>the San Diego Unified Port District's Maritime Emissions Inventory and bulk handling equipment Climate Action Plan.</u></p> <p><u>If the Periodic Technology Review demonstrates the identifies new technology that will be effective in reducing emissions and the compared to the equipment in operation at the time of the review, and the San Diego Unified Port District determines that installation or use of the technology is feasible, the tenant San Diego Unified Port District shall require the use of such technology as a condition of any discretionary approval issued by the San Diego Unified Port District for any new, expanded, or extended operations at the TAMT. Furthermore, the District and/or project proponent must demonstrate that emissions of volatile organic compounds (VOCs) would be less than 75 pounds per day on a peak day once cargo throughput exceeds 4,000,000 metric tons annually. If technological advancements are unable to reduce VOC emissions to 75 pounds per day or less on a peak day, then the District shall limit the number of vessels allowed to no more than three on a peak day once total throughput exceeds 4,000,000 metric tons annually. These operational restrictions will ensure that VOC emissions do not exceed threshold standards established by the San Diego Air Pollution Control District. Verification of compliance with this measure is the responsibility of the District.</u></p> <p><u><b>MM-GHG-8: Exhaust Emissions Reduction Program at the Tenth Avenue Marine Terminal.</b> The San Diego Unified Port District shall implement such technology within 12 months of the District's determination a program at the TAMT by January 1, 2020 to further reduce emissions from terminal-wide emissions sources.</u></p> <p><u><b>A. MM-GHG-8: Implement a Sustainable Leasing</b></u></p>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p><del><b>Program.</b> The District shall work with tenants to develop and implement a policy incentive-based sustainable</del><u>The program shall be implemented through the Coastal Development Permit process, the tenant leasing program to achieve the District's goals to attract the cleanest ships, ships process, including the issuance of new, extended or amended leases, and other short-term real estate agreements at the TAMT.</u></p> <p><u>B. The program shall be focused on incentives to reduce criteria pollutant, toxic air contaminant, and greenhouse gas emissions by attracting clean vessels, trucks, and equipment to the TAMT, including but not limited to vessels that utilize shore power while at berth, zero and near-zero emission cargo handling equipment technologies, energy efficiency measures and/or renewable energy, and by otherwise incorporate technology incorporating technological and operational practices that reduce criteria pollutant emissions. The, toxic air contaminant, and greenhouse gas emissions from terminal operations beyond existing regulatory requirements. The program shall include specific incentives for existing and future tenants, which may include but is not limited to an extended lease term, expedited permit processing, reduced permit fees, and eligibility for grants or other financial assistance. The nature and extent of such incentives will be based on an emissions reduction schedule established by the San Diego Unified Port District for criteria pollutants, toxic air contaminants, and greenhouse gas emissions.</u></p> <p><u>C. The program shall identify specific emission-reduction equipment and practices that may qualify for incentives, including but not limited to the following.</u></p>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<ul style="list-style-type: none"> <li>○ <u>Vessels: Demonstrate that at least 50% of annual vessel calls will be equipped with Tier II or better main and auxiliary engines, as defined by the International Convention for the Prevention of Pollution from Ships Annex VI 2008 regulations or other standards set forth by the International Convention for the Prevention of Pollution from Ships, the U.S. Environmental Protection Agency, and/or California Air Resources Board in the future.</u></li> <li>○ <u>Vessel Hoteling: Demonstrate that vessel calls will utilize shore power or a California Air Resources Board-approved alternative emission capture and control system or install a shore power or California Air Resources Board-approved alternative emission capture and control system for the purpose of reducing ocean-going vessel hoteling emissions.</u></li> <li>○ <u>Heavy-Duty Trucks: Demonstrate that at least 50% of annual cargo throughput will be transported with zero/near-zero emission trucks, hybrid trucks, and/or other alternative truck technologies. To qualify, the trucks must result in emission reductions greater than those required by state and federal regulatory agencies at the time of project approval.</u></li> <li>○ <u>Switch and Line Haul Locomotives: Demonstrate that at least 50% of annual cargo will be transported with Tier 3 or above locomotive engines for line haul, as defined by the U.S. Environmental Protection Agency in 2008 (73 <i>Federal Register</i> 88 25098–25352), and a Tier 3 or above switcher or railcar mover for switching activity at both the terminal and yard.</u></li> <li>○ <u>Terminal Infrastructure: Install electric</u></li> </ul>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<u>charging stations and/or other terminal infrastructure and equipment that support and facilitate zero or near-zero emission technologies.</u>	
			<p><b><u>MM-GHG-9: Use of At-Berth Emission Capture and/or Control System to Reduce Vessel Hoteling Emissions.</u></b> The San Diego Unified Port District shall <u>require the use of an At-Berth Emission Capture and/or Control System (i.e., bonnet system) to reduce vessel hoteling emissions prior to terminal-related emissions reaching a cancer risk of 10 per million at the maximally exposed sensitive receptor location. Based on the Health Risk Assessment, located in Section 4.2 of the TAMT Redevelopment Plan Environmental Impact Report, an At-Berth Emission Capture and/or Control System shall be required prior to reaching an annual throughput of 691,418 metric tons for dry bulk assuming no growth in multi-purpose general cargo, or an annual throughput of 356,666 metric tons for multi-purpose general cargo (includes break bulk, neobulk, roll-on/roll-off, and other non-container, non-dry bulk cargo, and non-liquid bulk cargo) assuming no growth in dry bulk, or a combined annual throughput of 691,418 metric tons for the dry bulk and multi-purpose/general cargo nodes, whichever occurs first. The San Diego Unified Port District shall either install directly or enter into a contract with an entity that provides the Emission Capture and/or Control System or an equivalent alternative technology, to reduce emissions from vessels that are unable to cold iron at TAMT and/or are exempt from the California Air Resources Board's at-berth regulation. The San Diego Unified Port District may charge a fee for the use of an Emissions Capture and Control System (or an alternative at-berth system that reduces vessel hoteling emissions) based on the vessel type and the length of its</u></p>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p><u>stay. The system shall be a technology that has been approved by the California Air Resources Board, and meets the requirements set forth in the California Air Resources Board's at-berth regulations. If the San Diego Unified Port District determines the need for an Emissions Capture and Control System (or an alternative at-berth system that reduces vessel hoteling emissions) prior to, or later than, the throughput figures listed above, or if shore power or other future regulatory requirements are able to reduce vessel hoteling emissions, then the requirement for the At-Berth Emission Capture and/or Control System shall be updated and adjusted accordingly, at the San Diego Unified Port District's Climate Action Plan identifies the development of a Sustainable Leasing Policy as one of the GHG reduction measures prioritized for implementation, and future components under the TAMT plan shall be subject to the Sustainable Leasing Policy discretion.</u></p> <p><u>All vessels that are not shore-power equipped shall use the Emission Capture and Control System (or an alternative at-berth system that reduces vessel hoteling emissions at an equivalent level), provided there are no operational limitations and it is not being used by another vessel. If the Emission Capture and Control System is operationally unable to connect to an at-berth vessel, or if it is being used by another vessel, multi-purpose/general cargo and/or dry bulk vessels will be allowed to berth without it.</u></p>	
Effects from Climate Change on Project	Buildout of the TAMT plan, including the Demolition and Initial Rail Component) would not place people or structures at substantial risk of harm due to predicted climate change effects, including sea level rise.	STC: LS MPC: LS	No mitigation is required.	N/A

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
<b>Cumulative Impacts</b>				
Direct and Indirect Generation of GHGs through 2020	<p><i>Demolition and Initial Rail Component</i></p> <p><b>Impact-C-GHG-1: Demolition and Initial Rail Component GHG Emissions through 2020.</b> Demolition and Initial Rail Component GHG emissions during combined project construction and operational activities, before mitigation, would not achieve the CAP's reduction target of 33 percent below unmitigated levels in 2020 and would only partially comply with plans, policies, and regulatory programs outlined in the Scoping Plan and adopted by ARB or other California agencies for the purpose of reducing the emissions of GHGs.</p>	<u>STC: PS</u> <u>MPC: PS</u>	Implement <b>MM-GHG-1</b> through <b>MM-GHG-3</b> , as described above.	<u>STC: LS</u> <u>MPC: LS</u>
Direct and Indirect Generation of GHGs Beyond 2020	<p><i>Full TAMT Plan Buildout</i></p> <p><b>Impact-C-GHG-2: Full TAMT Plan Buildout GHG Emissions Beyond 2020.</b> Although full TAMT plan buildout emissions would be on a downward trajectory in the post-2020 period, the proposed project's reduction in GHG emissions during combined project construction and operational activities, before mitigation, may not contribute sufficiently to post-2020 progress toward statewide 2030 and 2050 reduction targets and would be in non-compliance with plans, policies, and regulatory programs adopted by ARB or other California agencies for post-2020 for the purpose of reducing the emissions of GHGs.</p>	<u>STC: PS</u> <u>MPC: PS</u>	Implement <b>MM-GHG-1</b> through <b>MM-GHG-89</b> , as described above.	<u>STC: SU</u> <u>MPC: SU</u>



Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
<b>4.7 Hazards and Hazardous Materials</b>				
<b>Project Impacts</b>				
Routine Transport, Use, or Disposal of Hazardous Materials	<i>Demolition and Initial Rail Component</i>			
	Implementation of the Demolition and Initial Rail Component would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	<u>STC: LS</u> <u>MPC: LS</u>	No mitigation is required.	N/A
	<i>Full TAMT Plan Buildout</i>			
	Buildout of TAMT plan would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	<u>STC: LS</u> <u>MPC: LS</u>	No mitigation is required.	N/A
Possible Onsite Soil Contamination	<i>Demolition and Initial Rail Component</i> <b>Impact-HAZ-1: Possible Onsite Soil Contamination.</b> Historical information compiled from previous site assessments and database searches indicates that TPH, benzene, toluene, PAHs, SVOCs, metals (copper, zinc, and lead), and diesel may be encountered during construction activities on the project site. Construction and grading activities within the project site would potentially result in a release of hazardous materials and create a potentially significant hazard to workers, the public, and environment.	<u>STC: PS</u> <u>MPC: PS</u>	<b>MM-HAZ-1: Compliance with Soil Management Plan.</b> Prior to approval of the project grading plans and the commencement of any construction activities that would disturb the soil, the District or tenant, whichever is appropriate, and the contractor (collectively "Contractor") shall demonstrate compliance with the <i>10th Avenue Marine Terminal, San Diego, CA, Soil Management Plan, prepared by Tetra Tech EM, Inc., November 24, 2010</i> (Appendix J-1 of the Draft EIR) and consider the existing presence of the permitted underground storage tank on site (shown on Figure 4.7-1). Specifically, the Contractor shall demonstrate compliance with the following specific requirements of the plan including, but not limited to, the following. Conduct Soil Testing. The Contractor shall comply with the excavated soil management techniques specified in the plan. The Contractor shall follow the soil sampling protocol and soil sampling objectives, and shall comply with the soil characterization methodology identified within the plan. <i>Prepare and Implement a Community Health and Safety</i>	<u>STC: LS</u> <u>MPC: LS</u>

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p><i>Program.</i> The Contractor shall develop and implement a site-specific Community Health and Safety Program (Program) that addresses the chemical constituents of concern for the project site. The guidelines of the Program shall be in accordance with <u>California Code the County of Regulations Title 23, Division 3, Chapter 16 regulations. The San Diego's Department of Environmental Health's Site Assessment and Mitigation Manual (2009) and Environmental Protection Agency.</u> Program shall include detailed plans on air monitoring and other appropriate construction means and methods to minimize the public's and site workers' exposure to the chemical constituents. The contractor shall utilize a Certified Industrial Hygienist with significant experience with chemicals of concern on the project site to approve the Program and actively monitor compliance with the Program during construction activities.</p> <p><i>Complete Soil Disposal.</i> Any soil disturbed by construction activities shall be profiled and disposed of in accordance with California Administrative Code, Title 22, Division 4.5 requirements. If soils are determined to be appropriate for reuse, they may be exported to Chula Vista Bayfront Harbor District area for use as fill material, provided the area is not previously developed and not classified as an environmentally sensitive area. Several Chula Vista Bayfront Harbor District parcels that have been cleared through the environmental review process to be used as streets and surface parking and to support subsequent development have been identified as appropriate locations to receive soils deemed suitable for reuse in Appendix J-3.</p> <p>If soils are determined to be hazardous and not suitable for reuse, they shall be disposed of at a regulated Class I landfill. Soils shall be transported in accordance with the Soil Management Plan. Soils to be loaded into trucks for offsite disposal at a Class I landfill shall be</p>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>moistened with a water spray or mist for dust control in accordance with Section 4.7, Dust Control, of the Soil Management Plan. If dust is visible, positive means shall be applied immediately to prevent airborne dust. Care shall be used to minimize the amount of water applied to soils that may contain elevated concentrations of contaminants.</p> <p>Loaded truck beds shall be covered with a tarp or similar covering device during transportation to the disposal facility. The truck shall be decontaminated after the soil has been removed. The Contractor shall minimize excess water generated during truck decontamination to the extent possible and shall be responsible for proper disposal of any contaminated water generated during truck cleanout.</p> <p><b>MM-HAZ-2: Implement Engineering Controls and Best Management Practices during Construction.</b></p> <p>Prior to construction, a site-specific Health and Safety Plan shall be prepared by the contractor and approved by a licensed California Certified Industrial Hygienist. The Health and Safety Plan shall be prepared per the requirements of 29 Code of Regulations 1910.120 and California Code of Regulations, Title 8, along with applicable federal, state, and local regulations and statutes. During construction, the contractor shall employ engineering controls and BMPs to minimize human exposure to potential contaminants, if encountered. Engineering controls and construction BMPs shall include but not be limited to the following.</p> <ul style="list-style-type: none"> <li>• Where required by the Health and Safety Plan, the contractor employees working on site shall be certified in the Occupational Health and Safety Administration's 40-hour Hazardous Waste Operations and Emergency Response training.</li> <li>• Contractor shall monitor the area around the construction site for fugitive vapor emissions with</li> </ul>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>appropriate field screening instrumentation.</p> <ul style="list-style-type: none"> <li>Contractor shall monitor excavation through visual observation by a qualified hazardous materials specialist to look for readily noticeable evidence of contamination, such as staining or odor.</li> <li>Contractor shall water/mist soil as it is being excavated and loaded onto transportation trucks.</li> <li>Contractor shall place any stockpiled soil in areas shielded from prevailing winds and shall cover all stockpiles to prevent soil from eroding.</li> <li>Contractor shall thoroughly decontaminate all construction equipment that has encountered and/or handled lead-impacted soil prior to leaving the work site.</li> </ul>	
	<p><i>Full TAMT Plan Buildout</i></p> <p>See <b>Impact-HAZ-1</b></p>	<p><u>STC: PS</u> <u>MPC: PS</u></p>	Implement <b>MM-HAZ-1</b> and <b>MM-HAZ-2</b> .	<p><u>STC: LS</u> <u>MPC: LS</u></p>
Existing or Proposed Schools	<p><i>Demolition and Initial Rail Component</i></p> <p>Implementation of the Demolition and Initial Rail Component would potentially emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.</p> <p><i>Full TAMT Plan Buildout</i></p> <p>Buildout of the TAMT plan would potentially emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.</p>	<p><u>STC: PS</u> <u>MPC: PS</u></p>	Implement <b>MM-HAZ-1</b> and <b>MM-HAZ-2</b> , as described above.	<p><u>STC: LS</u> <u>MPC: LS</u></p>
		<p><u>STC: PS</u> <u>MPC: PS</u></p>	Implement <b>MM-HAZ-1</b> and <b>MM-HAZ-2</b> , as described above.	<p><u>STC: LS</u> <u>MPC: LS</u></p>

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
Hazardous Materials Site	<i>Demolition and Initial Rail Component</i> The Demolition and Initial Rail Component would be located near a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would potentially create a significant hazard to the public or the environment.	<u>STC: PS</u> <u>MPC: PS</u>	Implement <b>MM-HAZ-1</b> and <b>MM-HAZ-2</b> , as described above.	<u>STC: LS</u> <u>MPC: LS</u>
	<i>Full TAMT Plan Buildout</i> Buildout of the TAMT plan would be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would potentially create a significant hazard to the public or the environment.	<u>STC: PS</u> <u>MPC: PS</u>	Implement <b>MM-HAZ-1</b> and <b>MM-HAZ-2</b> , as described above.	<u>STC: LS</u> <u>MPC: LS</u>
<b>4.8 Hydrology and Water Quality</b>				
<b>Project Impacts</b>				
Water Quality Standards and Requirements	<i>Demolition and Initial Rail Component</i> Implementation of the Demolition and Initial Rail Component would not violate any water quality standards or waste discharge requirements.	<u>STC: LS</u> <u>MPC: LS</u>	No mitigation is required.	N/A
	<i>Full TAMT Plan Buildout</i> Buildout of the TAMT plan would not violate any water quality standards or waste discharge requirements.	<u>STC: LS</u> <u>MPC: LS</u>	No mitigation is required.	N/A
Degrade Water Quality	<i>Demolition and Initial Rail Component</i> Implementation of the Demolition and Initial Rail Component would not otherwise substantially degrade water quality.	<u>STC: LS</u> <u>MPC: LS</u>	No mitigation is required.	N/A
	<i>Full TAMT Plan Buildout</i> Buildout of the TAMT plan would not otherwise substantially degrade water quality.	<u>STC: LS</u> <u>MPC: LS</u>	No mitigation is required.	N/A

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
100-Year Flood Hazard Area	<i>Demolition and Initial Rail Component</i> Implementation of the Demolition and Initial Rail Component would not place within a 100-year flood hazard area structures that would impede or redirect flood flows such that the existing environment is substantially affected.	<u>STC: LS</u> <u>MPC: LS</u>	No mitigation is required.	N/A
	<i>Full TAMT Plan Buildout</i> Buildout of the TAMT plan would not place within a 100-year flood hazard area structures that would impede or redirect flood flows such that the existing environment is substantially affected.	<u>STC: LS</u> <u>MPC: LS</u>	No mitigation is required.	N/A
<b>4.9 Noise and Vibration</b>				
<b>Project Impacts</b>				
Generate noise levels in excess of established standards	<i>Demolition and Initial Rail Component</i> The Demolition and Initial Rail Component would not expose persons to or generate noise levels in excess of standards established in the City of San Diego's Significance Determination Thresholds and/or the City's Noise Ordinance.	<u>STC: LS</u> <u>MPC: LS</u>	No mitigation is required.	N/A
	<i>Full TAMT Plan Buildout</i> <b>Impact-NOI-1: Exceedance of an Adopted Noise Standard During Plan Operation.</b> Noise levels from operation of the TAMT plan buildout would exceed the City of San Diego's noise ordinance standard of 60 dBA $L_{eq}$ at two parks in the vicinity of the project site.	<u>STC: PS</u> <u>MPC: PS</u>	<b>MM-NOI-1: Design and Implement Feasible Acoustical Treatments for Future Systems and Equipment to Reduce Operational Noise Levels at Nearby Noise-Sensitive Land Uses.</b> Because the potential components described in the buildout condition may only be analyzed at a program level at this time, the District shall retain a qualified acoustical professional, which is defined as someone who is practiced in the science of noise transmission and abatement for a minimum of 5 years in a professional capacity, to evaluate and design acoustical treatments for project facilities once system design plans are available. This shall include design plans for any	<u>STC: SU</u> <u>MPC: SU</u>

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>proposed cranes, dry bulk discharge system, conveying system, loading systems, and buildings added to the terminal under the TAMT plan. The acoustical professional shall evaluate acoustical treatment measures for each piece of equipment or system described herein, individually and in combination with one another (to the extent design plans are available for others), to determine feasibility and the potential to reduce overall noise levels at nearby noise-sensitive receptors. Measures that are available (but not necessarily feasible) include, but are not limited to, the following.</p> <ul style="list-style-type: none"> <li>• Installing equipment inside of acoustical enclosures, where feasible</li> <li>• Installing intake and/or exhaust silencers, where feasible</li> <li>• Using low-noise motors</li> <li>• Placing sound barriers around noise-generating equipment</li> </ul> <p>Each of these measures will be designed and evaluated for design feasibility, achievable noise reduction, and economic feasibility at noise-sensitive receiver locations, all of which are to be determined by the District and not any tenants. If one or more acoustical treatments are incorporated into the facility design, verification noise monitoring shall be conducted at each affected location to determine the effectiveness of acoustical treatments, and to evaluate whether compliance with applicable noise standards is achieved.</p> <p><b>MM-NOI-2: Initiate and Maintain a Complaint and Response Tracking Program.</b> Prior to the commencement of operations of the TAMT plan, the District shall designate a noise disturbance coordinator. The coordinator will be responsible for responding to complaints regarding noise from project operations, will investigate the cause of the complaint, and will</p>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			ensure that reasonable measures are implemented to correct the problem, where feasible. A contact telephone number for the noise disturbance coordinator will be conspicuously posted at the main entrance to the project site and in other reasonable locations, as appropriate, to ensure the contact information is easily obtained. This measure shall be implemented in combination with MM-NOI-1, which provides several examples of what type of noise attenuation measures may be feasible. The goal of this measure is to provide additional information regarding the sources of loud noises and to assist in the design and implementation of measures to reduce the noise to a level that would be at or below the applicable noise standards for the land use experiencing the excessive noise.	
Groundborne Noise	<i>Demolition and Initial Rail Component</i> Implementation of the Demolition and Initial Rail Component would not expose persons to or generate excessive groundborne vibration or groundborne noise levels.	<u>STC: LS</u> <u>MPC: LS</u>	No mitigation is required.	N/A
	<i>Full TAMT Plan Buildout</i> Buildout of the TAMT plan would not expose persons to or generate excessive groundborne vibration or groundborne noise levels.	<u>STC: LS</u> <u>MPC: LS</u>	No mitigation is required.	N/A
Permanent Increase in Ambient Noise Levels	<i>Demolition and Initial Rail Component</i> Implementation of the Demolition and Initial Rail Component would not result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.	<u>STC: LS</u> <u>MPC: LS</u>	No mitigation is required.	N/A
	<i>Full TAMT Plan Buildout</i> <b>Impact-NOI-2: Substantial Permanent Increase in Ambient Noise Levels in the Project Site Vicinity from Buildout of the</b>	<u>STC: PS</u> <u>MPC: PS</u>	Implement <b>MM-NOI-1</b> and <b>MM-NOI-2</b> , as described above.	<u>STC: SU</u> <u>MPC: SU</u>



Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	<b>TAMT Plan.</b> The TAMT plan would result in a substantial permanent increase of 5 dB or more above average existing noise levels at Cesar Chavez Park, Bayfront Park, Embarcadero Marine Park, and Hilton Bayfront Hotel, due to added cranes and unloading systems under the TAMT plan buildout.			
Substantial Temporary or Periodic Increase in Ambient Noise Levels	<i>Demolition and Initial Rail Component</i> <b>Impact-NOI-3: Substantial Temporary Increase in Ambient Noise Levels During Construction of the Demolition and Initial Rail Component.</b> Construction of the Demolition and Initial Rail Component would result in a substantial temporary increase of 5 dB or more above average existing noise levels at two parks. This impact would be significant.	<u>STC: PS</u> <u>MPC: PS</u>	<b>MM-NOI-3: Implement a Construction Noise Reduction Plan.</b> Prior to the commencement of demolition or construction activity, the District shall prepare and implement a noise reduction plan including best practices to reduce construction noise at noise-sensitive land uses, such that a temporary increase of more than 5 dB in noise levels does not occur at adjacent noise-sensitive uses. Measures to be included in the noise reduction plan to limit construction noise include the following. <ul style="list-style-type: none"> <li>• Locating stationary equipment (e.g., generators, compressors, rock crushers, cement mixers, idling trucks) as far as possible from noise-sensitive land uses</li> <li>• Prohibiting gasoline or diesel engines from having unmuffled exhaust</li> <li>• Requiring that all construction equipment powered by gasoline or diesel engines have sound-control devices that are at least as effective as those originally provided by the manufacturer and that all equipment be operated and maintained to minimize noise generation</li> <li>• Preventing excessive noise by limiting idle times for vehicles or equipment to 3 minutes, consistent with MM-AQ-2</li> <li>• Using noise-reducing enclosures around stationary noise-generating equipment</li> </ul>	<u>STC: SU</u> <u>MPC: SU</u>

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	<p><i>Full TAMT Plan Buildout</i></p> <p><b>Impact-NOI-4: Substantial Temporary Increase in Ambient Noise Levels During Construction of the Full TAMT Plan Buildout.</b> Construction of the other future components associated with the TAMT plan buildout would result in a substantial temporary increase of 5 dB or more above average existing noise levels at three parks.</p>	<p><u>STC: PS</u> <u>MPC: PS</u></p>	<ul style="list-style-type: none"> <li>Constructing temporary barriers between noise sources and noise-sensitive land uses or taking advantage of existing barrier features (e.g., terrain, structures) to block sound transmission to noise-sensitive land uses. The barriers shall be designed to obstruct the line of sight between the noise-sensitive land use and onsite construction equipment.</li> </ul> <p>Implement <b>MM-NOI-3</b>, as described above.</p>	<p><u>STC: SU</u> <u>MPC: SU</u></p>
<b>Cumulative Impacts</b>				
Operational Noise	<p><i>Demolition and Initial Rail Component</i></p> <p>The Demolition and Initial Rail Component's incremental contribution to cumulative noise impacts would not be cumulatively considerable.</p>	<p><u>STC: LS</u> <u>MPC: LS</u></p>	No mitigation is required.	N/A
	<p><i>Full TAMT Plan Buildout</i></p> <p><b>Impact-C-NOI-1: Cumulative Contribution to Cumulative Operational Noise.</b> The incremental operational noise contribution from the proposed project combined with operational noise from cumulative projects would result in an exceedance of City standards.</p>	<p><u>STC: PS</u> <u>MPC: PS</u></p>	Implement <b>MM-NOI-1</b> and <b>MM NOI-2</b> , as described above.	<p><u>STC: SU</u> <u>MPC: SU</u></p>

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
<b>4.10 Transportation, Circulation, and Parking</b>				
<b>Project Impacts</b>				
Performance of the Circulation System	<p><i>Demolition and Initial Rail Component</i></p> <p><b>Impact-TRA-1: Construction-Related Impact on an Intersection: Norman Scott Road/32nd Street/Wabash Boulevard from Demolition and Initial Rail Component Construction.</b> Construction activities associated with the Demolition and Initial Rail Component, particularly during demolition of Transit Sheds #1 and #2, would generate construction-related traffic that would worsen the existing delay experienced at the Norman Scott Road/32nd Street/Wabash Boulevard intersection by 8.7 seconds in the AM peak hour and by 4.2 seconds in the PM peak hour. The increase in delay at this intersection would exceed the threshold of 1.0 second of additional delay for intersections operating at LOS F and threshold of 2.0 seconds of additional delay for intersections operating at LOS E, resulting in a significant construction-related traffic impact.</p> <p><b><del>Impact-TRA-2: Operation-Related Impact on an Intersection: Norman Scott Road/32nd Street/Wabash Boulevard from Demolition and Initial Rail Component Operations.</del></b> Operation of the Demolition and Initial Rail Component would worsen the existing delay experienced during the peak hours at the Norman Scott Road/32nd Street/Wabash Boulevard intersection by 4.8 seconds in the AM peak hour and by 2.3 seconds in the PM peak hour, where a threshold of 1.0 second of additional delay</p>	<p><u>STC: PS</u></p> <p><u>MPC: PS</u></p>	<p><del><b>For Impact-TRA-1:</b></del></p> <p><b>MM-TRA-1: Transportation Demand Management (TDM) Plan During Demolition and Initial Rail Component Construction.</b> Prior to commencing construction activities associated with the Demolition and Initial Rail Component, the District shall prepare a TDM plan to reduce potential significant temporary construction-related transportation and parking impacts at the intersection of Norman Scott Road/32nd Street/Wabash Boulevard. The TDM plan shall be implemented during construction to reduce congestion at the Norman Scott Road/32nd Street/Wabash Boulevard intersection by limiting the number of construction worker trips that travel through the affected intersection during peak hours. The TDM plan shall incorporate TDM strategies to be implemented during construction, including, but not limited to, the following.</p> <ul style="list-style-type: none"> <li>• Implementation of a ride-sharing program to encourage carpooling among workers.</li> <li>• Adjusting work schedules so workers do not access the site during the peak hours.</li> <li>• Provide offsite parking locations for workers outside of the area with shuttle services to bring them on site.</li> <li>• Provide subsidized transit passes for construction workers.</li> <li>• <u>Coordinate with the City of San Diego (which may also include coordination with the local planning group) for additional ideas.</u></li> </ul> <p><del><b>For Impact-TRA-2:</b></del></p> <p>○ <b>MM-TRA-2: Westbound Right-Turn Overlap</b></p>	<p><u>STC: SU</u></p> <p><u>MPC: SU</u></p>

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	applies to LOS F and a threshold of 2.0 seconds of additional delay applies to LOS E.		<p><b>Phase at Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard Intersection.</b> The District currently has an established program to track the number of trucks that enter and exit the terminal each year associated with TAMT operations. Prior to generating an additional 276 new daily trips, the District shall coordinate with Caltrans to determine the District's fair share payment to fund the addition of a westbound right-turn overlap phase to the intersection of Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard, a Caltrans-controlled intersection, to improve the delay caused by the proposed project. This would reduce the delay associated with the project by 6.0 seconds during the AM peak hour and by 12.8 seconds during the PM peak hour compared to unmitigated conditions, and would effectively reduce delay at this intersection to below current levels. In order to ensure the significant impact does not occur before the District has paid its fair share to Caltrans, the District shall initiate payment once approximately 200 new daily trips are reached under the proposed project. The trigger will be determined by the District by examining the ADT over a 1-month timeframe and comparing the ADT to the baseline of 93 daily trucks generating 186 trips per day (33,349 trucks per year divided by 360 days multiplied by 2 trips for each truck) and 935 daily employee trips (315 existing employees multiplied by 3 trips per day). At the District's discretion, the District may seek reimbursement from tenants that would contribute new daily trips in proportion to their contribution.</p>	
	<p><i>Full TAMT Plan Buildout</i></p> <p><b>Impact-TRA-32: Construction Traffic from Future TAMT Plan Construction Projects.</b></p>	<p><u>STC: PS</u> <u>MPC: PS</u></p>	<p><b>MM-TRA-32: Traffic Study and Transportation Demand Management (TDM) for Specific</b></p>	<p><u>STC: SU</u> <u>MPC: SU</u></p>

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	Because the timing and details of future construction projects are not yet known, it is possible that two or more construction projects may overlap (the timing of which depends on market need). Because it is not known if the overlap would generate a sufficient number of peak hour trips to result in a significant impact, a worst case is conservatively assumed that several construction projects could occur at the same time, resulting in temporary but significant traffic congestion in the project study area.		<p><b>Construction Projects.</b> Prior to the approval of any construction activities associated with future components of the TAMT plan, the District shall retain a qualified traffic engineer to prepare a traffic study to analyze the potential transportation impacts associated with the specific construction project. The report shall consider any overlapping construction projects on the TAMT. If the traffic study determines that the proposed construction activity may have a significant impact, the traffic study shall recommend mitigation measures to avoid or reduce the potential impact.</p> <p>The traffic study shall specifically consider if a TDM plan is required to address potential temporary traffic impacts from construction vehicles and equipment. If determined necessary, the TDM plan shall incorporate TDM strategies to be implemented during construction, including, but not limited to, the following.</p> <ul style="list-style-type: none"> <li>• Implementation of a ride-sharing program to encourage carpooling among workers.</li> <li>• Adjusting work schedules so workers do not access the site during the peak hours.</li> <li>• Provide offsite parking locations for workers outside of the area with shuttle services to bring them on site.</li> <li>• Provide subsidized transit passes for construction workers.</li> <li>• <u>Coordinate with the City of San Diego (which may also include coordination with the local planning group) for additional ideas.</u></li> </ul>	
	<p><b>Impact-TRA-43: Operation-Related Impact on a Roadway Segment: 28<sup>th</sup> Street between Boston Avenue and National Avenue from TAMT Plan Operations.</b> The proposed project would add approximately <del>847891</del> <u>647</u> daily trips <u>(647 daily trips for STC Alternative)</u> to the roadway segment of 28<sup>th</sup></p>	<p><u>STC: PS</u> <u>MPC: PS</u></p>	<p><b>MM-TRA-43: Widen the Segment of 28<sup>th</sup> Street between Boston Avenue and National Avenue to a Four-Lane Major Arterial Classification Consistent with the Barrio Logan Community Plan.</b> The District currently has an established program to track the number of trucks that enter and exit the terminal each year associated with TAMT operations. Prior to</p>	<p><u>STC: SU</u> <u>MPC: SU</u></p>

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	<p>Street between Boston Avenue and National Avenue within the project study area, which would degrade the operations of a roadway segment that is already operating at an unacceptable level under existing conditions (LOS E) to LOS F) by increasing volume to capacity ratio by 0.036, which is more than the threshold of 0.040 (0.01-0.029 for STC Alternative). The initial impact is anticipated to occur at 29% of the TAMT plan buildout, or when 1,175,161 new daily truck trips are being generated, at which point the proposed project would result in a change in V/C ratio greater than 0.01 along the roadway segment of 28<sup>th</sup> Street between Boston Avenue and National Avenue. Therefore, impacts would be significant.</p>		<p>generating an additional 1,175,161 new daily truck trips (approximately 29% of buildout of the TAMT plan), the District shall pay a fair-share contribution (MPC would be responsible for 3.79% and STC would be responsible for 2.8%) of the cost to widen the roadway segment of 28<sup>th</sup> Street between Boston Avenue and National Avenue to a Four-Lane Major Arterial classification. The improvement is identified within the draft Barrio Logan Community Plan, and therefore would be paid to the City of San Diego in accordance with Section 142.0640 of the San Diego Municipal Code. Payment of the District's fair share shall be completed prior to reaching 1,175,161 new daily truck trips. In order to ensure the significant impact does not occur before the District has paid its fair share to the City, the District shall initiate payment once approximately 1,000,150 new daily truck trips are reached under the proposed project. The trigger will be determined by the District by examining the ADT over a 1-month timeframe and comparing the ADT to the baseline of 93 daily trucks generating 186 trips per day (33,349 trucks per year divided by 360 days multiplied by 2 trips for each truck) and 935 daily employee trips (315 existing employees multiplied by 3 trips per day). At the District's discretion, the District may seek reimbursement from tenants that would contribute new daily trips in proportion to their contribution.</p>	
	<p><b>Impact-TRA-54: Operation-Related Impact on an Intersection: Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard from TAMT Plan Operations.</b> The proposed project would worsen the existing delay experienced during the peak hours at the Norman Scott Road/32<sup>nd</sup> Street/Wabash</p>	<p>STC: PS MPC: PS</p>	<p><b>MM-TRA-4: Westbound Right-Turn Overlap Phase at Norman Scott Road/32<sup>nd</sup> Street/ Wabash Boulevard Intersection.</b> The San Diego Unified Port District currently has an established program to track the number of trucks that enter and exit the terminal each year associated with TAMT operations. Prior to generating an additional 331,195 new daily trips, the</p>	<p>STC: SU MPC: SU</p>

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	<p>Boulevard intersection by <del>32.6</del><u>19.1</u> seconds in the AM peak hour (<u>17.7 seconds for STC Alternative</u>) and by <del>13.3</del><u>7.8</u> seconds in the PM peak hour; (<u>7.2 seconds for STC Alternative</u>), where a threshold of 1.0 second of additional delay applies to LOS F and a threshold of 2.0 seconds of additional delay applies to LOS E. The initial impact is anticipated to occur <del>at 7% of the TAMT plan buildout, or when 276</del><u>when 195</u> new daily trips are being generated, at which point the proposed project would contribute more than 1.0 second of delay in the AM peak hour period at the Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard study area intersection. Therefore, impacts would be significant.</p>		<p><u>San Diego Unified Port District shall coordinate with the California Department of Transportation to determine the San Diego Unified Port District's fair share payment to fund the addition of a westbound right-turn overlap phase to the intersection of Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard, a California Department of Transportation-controlled intersection, to improve the delay caused by the proposed project. This would reduce the delay associated with the project by 20.8 seconds during the AM peak hour and by 19.9 seconds during the PM peak hour compared to unmitigated conditions, and would effectively reduce delay at this intersection to below current levels. (Note, for the STC Alternative, this mitigation measure would reduce the unmitigated delay associated with this alternative by 19.4 seconds during the AM peak hour and by 19.3 seconds during the PM peak hour.) In order to ensure the significant impact does not occur before the San Diego Unified Port District has paid its fair share to the California Department of Transportation, the San Diego Unified Port District shall initiate payment once approximately <del>200</del><u>150</u> new daily trips are reached under the proposed project. The trigger will be determined by the San Diego Unified Port District by examining the average daily trips over a 1-month timeframe and comparing the average daily trips to the baseline of 93 daily trucks generating 186 trips per day (33,349 trucks per year divided by 360 days multiplied by 2 trips for each truck) and 935 daily employee trips (315 existing employees multiplied by 3 trips per day). At the San Diego Unified Port District's discretion, the San Diego Unified Port District may seek reimbursement from tenants that would contribute new daily trips in proportion to their contribution.</u></p>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
Congestion Management Plan	<i>Demolition and Initial Rail Component</i> Implementation of the Demolition and Initial Rail Component would not conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.	<u>STC: LS</u> <u>MPC: LS</u>	No mitigation is required.	N/A
	<i>Full TAMT Plan Buildout</i> Buildout of the TAMT plan would not conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.	<u>STC: LS</u> <u>MPC: LS</u>	No mitigation is required.	N/A
Hazards Because of a Design Feature or Incompatible Uses	<i>Demolition and Initial Rail Component</i> Implementation of the Demolition and Initial Rail Component would not substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).	<u>STC: LS</u> <u>MPC: LS</u>	No mitigation is required.	N/A
	<i>Full TAMT Plan Buildout</i> Buildout of the TAMT plan would not substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).	<u>STC: LS</u> <u>MPC: LS</u>	No mitigation is required.	N/A
Conflict with Alternative Transportation	<i>Demolition and Initial Rail Component</i> Implementation of the Demolition and Initial Rail Component would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities,	<u>STC: LS</u> <u>MPC: LS</u>	No mitigation is required.	N/A



Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	<p>or otherwise decrease the performance or safety of such facilities.</p> <p><i>Full TAMT Plan Buildout</i></p> <p>Buildout of the TAMT plan would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.</p>	<p><u>STC: LS</u></p> <p><u>MPC: LS</u></p>	No mitigation is required.	N/A
Insufficient Parking	<i>Demolition and Initial Rail Component</i>			
	Implementation of the Demolition and Initial Rail Component of the TAMT plan would not result in an inadequate parking supply, either on site or off site.	<p><u>STC: LS</u></p> <p><u>MPC: LS</u></p>	No mitigation is required.	N/A
	<p><i>Full TAMT Plan Buildout</i></p> <p><b>Impact-TRA-65: Insufficient Parking at Full TAMT Plan Buildout.</b> Full buildout of the TAMT plan may result in a long-term parking shortage, which could increase if future components are implemented in areas that currently serve as parking.</p>	<p><u>STC: PS</u></p> <p><u>MPC: PS</u></p>	<p><b>MM-TRA-5: District Shall Inform All TAMT Workers to Park at the TAMT Facility or at an Authorized Offsite Parking Lot or Parking Garage.</b> All TAMT workers, employees, and contractors are prohibited from using on-street parking or from parking at the neighboring Cesar Chavez Park. If no parking is available on the project site, the District's marine terminal supervisors shall inform all dock workers that they shall park within a parking garage or surface parking lot.</p> <p><b>MM-TRA-6: District to Maintain a Parking Inventory of TAMT.</b> The inventory shall be initiated once the District's maritime operations staff identifies that an average of 475 employees are present at the project site during any single 8-hour shift, or the inventory shall be initiated if any future components of the TAMT plan remove any of the parking areas identified within the EIR to come within 50 parking spaces of an onsite parking deficit. The inventory of the parking supply and demand at the TAMT shall be created and maintained by the District. The inventory shall include the following</p>	<p><u>STC: LS</u></p> <p><u>MPC: LS</u></p>

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>considerations and requirements:</p> <ul style="list-style-type: none"> <li>i. The inventory shall include all existing tenants, including tenant-specific parking lots or parking spaces identified in their lease and all non-exclusive parking spaces available at the TAMT.</li> <li>ii. The inventory shall include any parking required by the District's existing operations.</li> <li>iii. Once the trigger to prepare an inventory occurs, the inventory shall be updated for each new project component, new lease, or lease renewal where additional parking is required.</li> <li>iv. The inventory shall account for both construction- and operation-related parking supply and demand, but shall update the inventory once construction is completed and construction parking is no longer necessary.</li> <li>v. A determination of the surplus or deficit of parking on TAMT.</li> </ul> <p><b>MM-TRA-7: Proponents for Future Project Components, New Leases, or Lease Renewals Shall Prepare a Parking Management Plan.</b> Prior to approval of any new project component or any new lease/lease renewal at TAMT, the project proponent (e.g., tenant) shall submit a Parking Management Plan to the District for review and approval, demonstrating that there would be adequate parking to accommodate all projected operational parking within their tenant's leasehold or within an area available for use as parking. The Parking Management Plan shall consider the following.</p> <ul style="list-style-type: none"> <li>i. The identification of areas within the tenant's leasehold to accommodate the new project component's, new lease's, or renewed lease's parking needs.</li> <li>ii. Reserved parking spaces outside the tenants</li> </ul>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>leasehold at the TAMT, as authorized by the District through formal agreement signed by the District's Director of Maritime or his/her designee.</p> <p>iii. Alternative transportation options to reduce parking demand such as subsidized transit passes, bicycle racks, employee vanpools, or other carpooling incentive programs.</p> <p>iv. Preferential parking for carpools/vanpools.</p> <p>v. Employee shuttles to/from the union hall at shift changes, as feasible.</p> <p>vi. Reserved parking spaces with an offsite parking provider at either a parking garage or parking lot for the duration of the tenant's lease, which shall include a shuttle program. The offsite parking spaces shall be authorized through a formal agreement with a parking provider and is subject to approval by the District.</p> <p>vii. Employer Coordination with SANDAG's iCommute Program.</p> <p>The TAMT Parking Management Plan requires review and approval from the District's Director of Maritime, which shall be based on consultation with the TAMT Superintendent. All TAMT Parking Management Plans shall be enforced by the TAMT Superintendent.</p>	

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
<b>Cumulative Impacts</b>				
Performance of the Circulation System	<p><i>Demolition and Initial Rail Component</i></p> <p><b>Impact-C-TRA-1: Construction-Related Impact on an Intersection: Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard from Demolition and Initial Rail Component.</b> Construction activities associated with the Demolition and Initial Rail Component, particularly during demolition of Transit Sheds #1 and #2, would generate construction-related traffic that would worsen the existing delay experienced at the Norman Scott Road/32<sup>nd</sup> Street/ Wabash Boulevard intersection by 7.3 seconds in the AM peak hour and 2.6 seconds in the PM peak hour. The increase in delay at this intersection would exceed the threshold of 1.0 second of additional delay for intersections operating at LOS F and threshold of 2.0 seconds of additional delay for intersections operating at LOS E. Because construction-related traffic for the Demolition and Initial Rail Component would cause greater than a 1-second delay at the intersection of Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard within the project study area, the Demolition and Initial Rail Component would result in a cumulatively considerable significant impact on this intersection.</p> <p><b>Impact-C-TRA-2: Contribute to an Unacceptable Level of Operation at an Intersection: Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard from Demolition and Initial Rail Component.</b> Operation of the Demolition and Initial Rail Component would worsen the delay experienced during the peak</p>	<p><u>STC: PS</u></p> <p><u>MPC: PS</u></p>	<p>Implement <del>MM-TRA-1 and MM-TRA-2</del>, as described above.</p>	<p><u>STC: SU</u></p> <p><u>MPC: SU</u></p>

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	<p>hours at the Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard intersection by 1.9 seconds in the AM peak hour and 0.8 second in the PM peak hour under near term cumulative conditions, where a threshold of 1.0 second of additional delay applies to intersections operating at LOS F and a threshold of 2.0 seconds of additional delay applies to intersections operating at LOS E. Because the addition of Demolition and Initial Rail Component traffic would cause greater than a 1-second delay at the intersection of Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard within the project study area, the Demolition and Initial Rail Component would result in a cumulatively considerable significant impact on this intersection during the AM peak hour.</p> <p><i>Full TAMT Plan Buildout</i></p> <p><b>Impact-C-TRA-32: Contribute to Temporary Traffic Congestion from Construction of Full TAMT Plan Buildout.</b></p> <p>Given the lack of construction and schedule details at this time, it is not known if construction of the full TAMT plan buildout would overlap with construction of cumulative projects in the project study area. As a result, it is unknown whether construction associated with full TAMT plan buildout, when combined with construction traffic from past, present, and reasonably foreseeable future projects, would result in temporary but cumulatively considerable traffic congestion in the project study area.</p>	<p><u>STC: PS</u></p> <p><u>MPC: PS</u></p>	<p><u>Implement MM-TRA-2.</u></p>	<p><u>STC: SU</u></p> <p><u>MPC: SU</u></p>

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	<b>Impact-C-TRA-43: Contribute to an Unacceptable Level of Operation at a Roadway Segment: 28<sup>th</sup> Street between Boston Avenue and National Avenue from TAMT Plan Buildout.</b> Operation of the full TAMT plan buildout would result in a considerable contribution to the cumulative impact at the roadway segment of 28 <sup>th</sup> Street between Boston Avenue and National Avenue within the project study area, which would degrade the operations of a roadway segment that would already operate at an unacceptable level under cumulative conditions (LOS F). The proposed project would increase the V/C ratio by <del>0.0360</del> <u>0.040</u> , which exceeds the City's threshold of 0.01 for roadway segments operating at LOS F. Therefore, full TAMT plan buildout would result in a cumulatively considerable significant impact on this roadway segment.	<u>STC: SU</u> <u>MPC: SU</u>	<u>Implement MM-TRA-3.</u>	<u>STC: SU</u> <u>MPC: SU</u>
	<b>Impact-C-TRA-45: Contribute to an Unacceptable Level of Operation at an Intersection: Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard from TAMT Plan Buildout.</b> Operation of the full TAMT plan buildout would worsen the delay experienced during the peak hours at the Norman Scott Road/32 <sup>nd</sup> Street/Wabash Boulevard intersection by <del>25.0</del> <u>17.5</u> seconds in the AM peak hour and by <del>14.28</del> <u>2</u> seconds in the PM peak hour under Future Year 2035 cumulative conditions, where a threshold of 1.0 second of additional delay applies to intersections operating at LOS F and a threshold of 2.0 seconds of additional delay applies to intersections operating at LOS E. Because the proposed project would cause greater than a	<u>STC: SU</u> <u>MPC: SU</u>	<u>Implement MM-TRA-4.</u>	<u>STC: SU</u> <u>MPC: SU</u>

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	<p>1-second delay on the intersection of Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard within the project study area, full buildout of the TAMT plan would result in a cumulatively considerable significant impact on this intersection.</p> <p><b>Impact-C-TRA-65: Contribute to an Unacceptable Level of Operation at Four Freeway Segments from TAMT Plan Buildout.</b> Operation of the full TAMT plan buildout would result in a considerable contribution to the cumulative impact at the freeway segments of I-5 northbound between SR-94 and Imperial Avenue, I-5 northbound between 28th Street and I-15, I-5 northbound between I-15 and Main Street, and I-15 southbound between Market Street and Ocean View Boulevard, which are projected to operate at LOS F. Operation of the full TAMT plan buildout would result in a change in V/C ratio greater than 0.005 for freeway segments operating at LOS F, and therefore would result in cumulatively considerable significant impact on these freeway segments.</p>	<p><del>LS</del>STC: SU</p> <p>MPC: SU</p>	<p>Implement <del>MM-TRA-2</del> through <del>MM-TRA-5</del>.</p> <p><b>MM-C-TRA-1: Construct Managed Lanes on I-5 and I-15.</b> SANDAG currently has plans to construct two managed lanes (one in each direction) on I-5 between I-15 and Palomar Street by the year 2030 as well as two additional multi-purpose lanes and two managed lanes on SR-15 between I-5 and SR-94 by the year 2050. The District shall coordinate with SANDAG and Caltrans to determine the proposed project's fair share contribution. Because this mitigation measure is far into the future, the exact amount will need to be determined at a future date and prior to the project's contribution to the affected freeway mainline sections reaching 0.005 change in V/C ratio. The following fair-share percentages <u>under the MPC scenario analyzed for the proposed project</u>, per affected freeway facility, should serve as guidance to the amount the District should pay toward a program or plan for the aforementioned freeway facility improvements to be constructed.</p> <ul style="list-style-type: none"> <li>I-5 northbound between SR-94 &amp; Imperial Avenue: 5 percent of the total cost for improvements to this segment.</li> <li>I-5 northbound between 28<sup>th</sup> Street &amp; SR-15: <del>7</del>13 percent of the total cost for improvements to this segment.</li> <li>I-5 northbound between <del>I</del>SR-15 &amp; Main Street: <del>14</del>6 percent of the total cost for improvements at this segment.</li> <li>SR-15 southbound between Market Street &amp; Ocean View Boulevard: <del>25</del>11 percent of the total cost for</li> </ul>	<p><del>N/A</del>STC: SU</p> <p>MPC: SU</p>

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>improvements to this segment.</p> <p><u>The following fair-share percentages under the STC Alternative scenario, per affected freeway facility, should serve as guidance to the amount the District should pay toward a program or plan for the aforementioned freeway facility improvements to be constructed.</u></p> <ul style="list-style-type: none"> <li>• <u>I-5 northbound between SR-94 &amp; Imperial Avenue: 5 percent of the total cost for improvements to this segment.</u></li> <li>• <u>I-5 northbound between SR-15 &amp; Main Street: 6 percent of the total cost for improvements at this segment.</u></li> <li>• <u>SR-15 southbound between Market Street &amp; Ocean View Boulevard: 11 percent of the total cost for improvements to this segment.</u></li> </ul>	
<b>Utilities and Energy</b>				
Project Impacts				
Water supplies and treatment facilities	<p><i>Demolition and Initial Rail Component</i></p> <p>Implementation of the Demolition and Initial Rail Component would:</p> <p>a) Not result in insufficient water supplies from existing entitlements and resources, resulting in the need for new or expanded entitlements;</p> <p>b) Not require or result in the construction of new water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.</p> <p><i>Full TAMT Plan Buildout</i></p> <p>Buildout of the TAMT plan would:</p> <p>a) Not result in insufficient water supplies from existing entitlements and resources, resulting in the need for new or expanded entitlements;</p>	<p><u>STC: LS</u></p> <p><u>MPC: LS</u></p>	No mitigation is required.	N/A
		<p><u>STC: LS</u></p> <p><u>MPC: LS</u></p>	No mitigation is required.	N/A



Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
	b) Not require or result in the construction of new water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.			
Stormwater drainage	<i>Demolition and Initial Rail Component</i>			
	The Demolition and Initial Rail Component would not result in or require the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effect.	<u>STC: LS</u> <u>MPC: LS</u>	No mitigation is required.	N/A
	<i>Full TAMT Plan Buildout</i>			
	Buildout of the TAMT plan would not result in or require the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effect.	<u>STC: LS</u> <u>MPC: LS</u>	No mitigation is required.	N/A
Landfills	<i>Demolition and Initial Rail Component</i>			
	Implementation of the Demolition and Initial Rail Component would be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs.	<u>STC: LS</u> <u>MPC: LS</u>	No mitigation is required.	N/A
	<i>Full TAMT Plan Buildout</i>			
	Buildout of the TAMT plan would be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs.	<u>STC: LS</u> <u>MPC: LS</u>	No mitigation is required.	N/A

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
Wasteful, Inefficient, and Unnecessary Usage of Direct or Indirect Energy	<i>Demolition and Initial Rail Component</i> Implementation of the Demolition and Initial Rail Component would not result in the wasteful, inefficient, and unnecessary usage of direct or indirect energy	<u>STC: LS</u> <u>MPC: LS</u>	No mitigation is required, but <b>MM-GHG-1</b> through <b>MM-GHG-7</b> would further reduce the project's energy demand and reduce fossil fuel use.	N/A
	<i>Full TAMT Plan Buildout</i> Buildout of the TAMT plan would not result in the wasteful, inefficient, and unnecessary usage of direct or indirect energy	<u>STC: LS</u> <u>MPC: LS</u>	No mitigation is required, but <b>MM-GHG-1</b> through <b>MM-GHG-7</b> would further reduce the project's energy demand and reduce fossil fuel use.	N/A
<b>Cumulative Impacts</b>				
Solid waste	<i>Demolition and Initial Rail Component</i> <b>Impact-C-UTIL-1: The Demolition and Initial Rail Component would Generate Solid Waste that Would Exceed the City Threshold.</b> The Demolition and Initial Rail Component would exceed an annual generation of 60 tons of solid waste, which would exceed the City's cumulative solid waste threshold. Therefore, this is considered to be a significant cumulative impact.	<u>STC: PS</u> <u>MPC: PS</u>	<b>MM-C-UTIL-1: Prepare a Waste Management Plan.</b> Prior to issuance of the construction permits, a waste management plan shall be prepared by the Applicant and submitted to the City's Environmental Services Department for approval. The plan shall address the demolition, construction, and operation phases of the proposed project as applicable, and shall include the following.  1. A timeline for each of the main phases of the proposed plan and near-term improvements (construction and operation). 2. Tons of waste anticipated to be generated (construction and operation). 3. Type of waste to be generated (construction and operation). 4. Description of how the proposed project will reduce the generation of construction and demolition (C&D) debris. 5. Description of how C&D material will be reused on site. 6. The name and location of recycling, reuse, and landfill facilities where recyclables and waste will	<u>STC: LS</u> <u>MPC: LS</u>

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>be taken if not reused on site.</p> <p>7. Description of how the C&amp;D waste will be separated if a mixed C&amp;D facility is not used for recycling.</p> <p>8. Description of how the waste reduction and recycling goals will be communicated to subcontractors.</p> <p>9. Description of how a “buy recycled” program for green construction products will be incorporated into the proposed project.</p> <p>10. Description of any ISO or other certification, if any.</p>	
	<p><i>Full TAMT Plan Buildout</i></p> <p><b>Impact-C-UTIL-2: The TAMT Plan would Generate Solid Waste that Would Exceed the City Threshold.</b> The TAMT plan would exceed an annual generation of 60 tons of solid waste, which would exceed the City’s cumulative solid waste threshold. Therefore, this is considered to be a significant cumulative impact.</p>	<p><u>STC: PS</u></p> <p><u>MPC: PS</u></p>	<p>Implement <b>MM-C-UTIL-1</b></p>	<p><u>STC: LS</u></p> <p><u>MPC: LS</u></p>
<p>Notes: PS = Potentially significant; LS = Less than significant; SU = Significant and Unavoidable; N/A = Not applicable; <u>STC = Sustainable Terminal Capacity Alternative scenario</u>; <u>MPC = Maximum Practical Capacity scenario</u>.</p>				

## 3.2.2 Changes to Chapter 3, *Project Description*

### Page 3-1

Given the flexibility that has been built into the TAMT plan, this Draft EIR evaluates the scenario that would result in the “worst-case” effect on the environment. Consequently, the “worst-case scenario” assumes that the project site would operate at its maximum practical capacity (MPC) for each operating node during the long-term planning horizon and all potential structures that are identified in the TAMT plan would be developed. In addition, the Draft EIR evaluates the Sustainable Terminal Capacity (STC) Alternative, which is approximately a 25 percent% reduction in throughput from the MPC scenario and represents a more sustainable level of operations over a consistent basis at the terminal. Other than the Demolition and Initial Rail Component, this Draft EIR evaluates potential impacts at the program level because specific information about future actions is not yet known.

### Page 3-9

#### Long-Term Operations with the Proposed Plan

The TAMT plan identifies the MPC, which is the highest theoretical activity level at which the project site, or node, could operate if all physical improvements were made and if market conditions allowed. The environmental analysis uses MPC because it represents the “worst case,” or most impactful environmental scenario. However, there is no specific time horizon associated with the MPC. Rather, MPC is a theoretical figure that assumes all of the physical improvements identified in the TAMT plan are constructed, and that favorable market conditions are in place. Assuming strong market conditions, MPC is oftentimes governed by terminal equipment, equipment conditions, operations, and vessel/train/truck arrival and departure schedules. It is also important to note that, typically, MPC can only be achieved for relatively short periods of time because Terminal operators can rarely tolerate the level of stress MPC puts on the terminal system for any prolonged period. Therefore, although it is unlikely that project site would continue to attain the identified MPC for each node year after year, it is used in the programmatic EIR to evaluate the most environmentally impactful scenario.

Additionally, the Draft EIR evaluates the impacts associated with the STC Alternative. Unlike the MPC scenario, the STC Alternative proposes to achieve a lower throughput amount that can be maintained over sustained periods of time. The STC Alternative would include all of the proposed components that have been identified with the MPC, only throughput would be limited to 75 percent of the throughput associated with the MPC scenario. The STC Alternative is covered in Chapter 7, *Alternatives to the Proposed Project*.

### Pages 3-11 and 3-12

Table 3-3 below compares the TAMT plan’s “worst case” MPC scenario and STC scenario for each of the nodes with the project site’s existing environmental baseline condition by cargo type. The project site’s existing environmental baseline condition is based on actual throughput calculations from July 2013 to June 2014, with June 2014 being the point in time at which the environmental analysis was initiated. The table also provides the MPC identified in the 2008 Plan as a reference point to illustrate the MPC that could occur under the existing plan if the proposed TAMT plan were

not approved. However, the 2008 Plan MPC is not used as the baseline for the environmental analysis because it represents the project site's theoretical capacity as opposed to the actual environmental conditions that occurred when the environmental analysis commenced. Although it is highly unlikely and improbable that all three nodes would be able to operate at their maximum levels for a sustained period of time, this approach is analyzed to provide the most conservative environmental analysis. However, the recommended scenario is the STC Alternative, which would reflect an approximately 25 percent% reduction in throughput compared to the MPC scenario.

**Table 3-3. TAMT Cargo Throughput Comparisons in Metric Tons**

<b>Node</b>	<b>Existing Conditions – July 2013 to June 2014</b>	<b>2008 Plan Maximum Practical Capacity</b>	<b>TAMT Redevelopment Plan Maximum Practical Capacity “Worst-Case” Scenario<sup>a</sup></b>	<b><u>TAMT Redevelopment Plan Sustainable Terminal Capacity Alternative Scenario</u></b>
<b>Improvements or Capacity Enhancements Identified in TAMT Plan</b>				
Dry Bulk	289,864 <sup>b</sup>	2,250,000	2,650,000 <sup>c</sup>	<u>1,987,500</u>
Refrigerated Containers	637,931	730,000	2,288,000	<u>1,716,000</u>
Multi-Purpose General Cargo	85,131 <sup>e</sup>	1,670,000	977,400	<u>733,050</u>
<b>No Improvements or Capacity Enhancements Identified in TAMT Plan</b>				
Liquid Bulk	31,520	220,000	239,017 <sup>d</sup>	<u>239,017</u>
<b>Total</b>	<b>1,044,446</b>	<b>4,870,000</b>	<b>6,154,417</b>	<b><u>4,675,567</u></b>

Notes:

<sup>a</sup> The infrastructure improvements identified in the TAMT plan are required to attain the MPCs identified. To provide for a “worst case” environmental impact scenario, this Draft EIR analyzes the highest MPC of each of the three cargo nodes as well as the throughput associated with the STC Alternative.

<sup>b</sup> Vessels brought in approximately 158,205 MT of dry bulk, whereas dry bulk tenants trucked in approximately 131,659 MT of dry bulk.

<sup>c</sup> For the purposes of the analysis, two additional dry bulk customers were assumed over existing tenant volume, which resulted in a forecast of approximately 2,146,645 MT. However, the MPC indicates that additional dry bulk volume could be accommodated.

<sup>d</sup> The TAMT plan acknowledges the existing liquid bulk facility; however, it does not propose any operational or infrastructure changes to the existing facility. Current capacity is sufficient to handle market demand and operations at the MPC, and is projected to remain sufficient throughout the plan horizon.

<sup>e</sup> In addition to 33,666 MT of neo-bulk material, the project site also processed 51,465 metric revenue tons of other miscellaneous cargo, yielding a total of 85,131 MT.

## Pages 3-12 and 3-13

In order to be as conservative as possible, the maximum number of dock workers is calculated based on berth capacity at the project site. Assuming that four large vessels are berthed simultaneously at project site in 2035, which would be the maximum that the project site could accommodate, the maximum number of dock workers to service the most intensive cargo at each one of the four berths within a 24-hour period would be 611 dock workers. Subtracting today's existing baseline average of 150 dock workers over a 24-hour period would allow for an additional 461 new dock workers by plan buildout. Therefore, the maximum workforce estimated for the TAMT plan is 524 new daily

employees, of which 63 would be new District or tenant employees and 461 would be new dock workers. Given that the number of employees is based on berth capacity at TAMT, the number of employees in either the MPC scenario or the STC Alternative scenario would be similar.

### 3.2.3 Changes to Chapter 4, Section 4.1, *Aesthetics and Visual Resources*

#### Page 4.1-6

Other significant sources of nighttime lighting include commercial, residential, and transit-related development in the downtown community. Several high-rise hotels and residential buildings contribute to ambient night lighting conditions in the form of spillover light from exterior and interior security and operational lighting. Also, Petco Park, just north of the project site, is a major contributor to nighttime lighting during the baseball season (normal stadium lighting and fireworks displays). Finally, transitory nighttime lighting from vehicle and transit-related (i.e., buses and trolley) headlights further contributes to ambient lighting conditions in the area. Overall, because the area is highly urbanized, existing ambient lighting levels are considered to be high.

~~In addition, because the project site operates 24 hours per day, 7 days per week, lighting is required for nighttime activities. Sources of nighttime lighting at the project site include boom lighting and mast lighting for security and operational activities as well as floodlights on the bottom of crane booms and the sides of crane structures for illuminating during nighttime loading and off-loading of vessels, barges, and containers.~~

### 3.2.4 Changes to Chapter 4, Section 4.2, *Air Quality and Health Risks*

#### Pages 4.2-1 and 4.2-2

Table 4.2-1. Summary of Significant Impacts and Mitigation Measures

Summary of Potentially Significant Impact(s)	Summary of Mitigation Measure(s)	Level of Significance After Mitigation	Rationale for Finding After Mitigation
<b>Impact-AQ-1:</b> Emissions in Excess of Criteria Pollutant Thresholds During TAMT Plan Buildout Construction	<b>MM-AQ-1:</b> Implement Best Management Practices During Construction of Future TAMT Plan Components	Significant and Unavoidable	Mitigation would reduce project-related construction emissions but, without quantification, emissions would remain above thresholds.
<b>Impact-AQ-2:</b> Emissions in Excess of Criteria Pollutant Thresholds During TAMT Plan	<b>MM-AQ-2:</b> Implement Diesel-Reduction Measures During Construction and Operations of Future TAMT Plan Components	<u>Less than Significant and Unavoidable</u>	Mitigation would reduce project-related operational emissions, but VOC, NO <sub>x</sub> , CO, SO <sub>x</sub> ,

Summary of Potentially Significant Impact(s)	Summary of Mitigation Measure(s)	Level of Significance After Mitigation	Rationale for Finding After Mitigation
Buildout Operations	<b>MM-AQ-3:</b> Comply with San Diego Unified Port District Climate Action Plan Measures <b>MM-AQ-4:</b> Implement Best Available Control Technologies for Conveyor System and Bulk Discharge Unloader for Future Dry Bulk Operations associated with the TAMT Plan <b>MM-AQ-5:</b> Implement Vessel Speed Reduction Program Beyond Climate Action Plan Compliance for Future Operations Associated with the TAMT Plan <b>MM-AQ-6:</b> Electric Cargo Handling Equipment Upgrades <b>MM-AQ-7:</b> <u>Annual Inventory Submittal and Periodic Technology Review</u> <b>MM-AQ-8:</b> <u>Implement a Sustainable Leasing Exhaust Emissions Reduction Program at the Tenth Avenue Marine Terminal</u> <b>MM-AQ-9:</b> <u>Use of At-Berth Capture and/or Control System to Reduce Vessel Emissions</u>		PM10, and PM2.5 emissions <del>would remain above</del> <u>would remain below</u> thresholds.
<b>Impact-AQ-3:</b> Cumulative Emissions in Excess of Criteria Pollutant Thresholds during TAMT Plan Buildout Operations.	<b>MM-AQ-2 through MM-AQ-89</b>	<u>Less than Significant and Unavoidable</u>	Mitigation would reduce project-related operational emissions, but VOC, NO <sub>x</sub> , CO, SO <sub>x</sub> , PM10, and PM2.5 <u>cumulative emissions would remain above thresholds below the threshold.</u>
<b>Impact-AQ-4:</b> Health Risk in Excess of NO <sub>x</sub> Thresholds During Full TAMT Plan Buildout Operations	<b>MM-AQ-1 through MM-AQ-89</b>	Significant and Unavoidable	Mitigation would reduce incremental health risk but not to a level below thresholds.

## Pages 4.2-11 through 4.2-15

### Local Emissions at the Project Site

Activity at the project site generates criteria pollutant and TAC emissions. Specifically, criteria pollutant and TAC emissions result from activity associated with existing cargo throughput,

including OGV activity; assist tug activity; tug and fuel barge activity; BNSF rail activity; truck travel; cargo handling equipment; worker trips; and loading and unloading of dry bulk. A description of each of these sources and associated emissions modeling are provided in Section 4.2.4.1 below. Emissions associated with existing activity at the daily time scale (pounds per day) are presented in Table 4.2-6 and emissions associated with existing activity at the annual time scale (tons per year) are presented in Table 4.2-7. Note that the estimate of baseline emissions was revised based on two sets of assumptions that changed. First, the baseline emission estimates in the Draft EIR assumed one vessel call on a peak day. However, during the baseline period, there were five separate instances where three vessels called on TAMT at the same time. These three vessels represent the peak day under existing condition. Second, the baseline emission estimates in the Draft EIR assumed BNSF-owned GP-60 switchers perform all of the switching and rail activity between the yard and the terminal. However, through discussions with District staff, this assumption was revised to assume an existing railcar mover splits the rail activity between the yard and the terminal with the switchers. These revised assumptions change the estimate of emissions during the baseline period, as reflected in Table 4.2-7.

## Local Health Risk near the Project Site

Activity at the project site generates TAC emissions that may affect neighboring communities. Specifically, TAC emissions result from activity associated with existing cargo throughput, including OGV activity, assist tug activity, tug and fuel barge activity, BNSF rail activity, truck travel, cargo handling equipment, worker trips, and loading and unloading of dry bulk. A description of each of these sources and associated emissions modeling are provided in Section 4.2.4.1 below. A summary of existing cancer risk, chronic hazard, and acute hazard indices at nearby sensitive receptor locations is presented in Table 4.2-8. At the maximum residential and school receptors, the greatest contributors to cancer risk are terminal equipment (49–50% of maximum risk), vessel hoteling (42–43%), and (to a lesser extent) vessel activity (2–3%), rail activity (2–3%), and trucks (2–3%). The greatest contributors to cancer risk associated with existing terminal operations at the maximum park receptor are terminal equipment (41%), vessel hoteling (35%), and trucks (21%). The maximally exposed residential areas, parks (namely Cesar Chavez Park), and school receptor locations (namely Perkins Elementary and Monarch School) are all close to the terminal and the railyard. Trucks entering and existing the main gate pass by Cesar Chavez Park, which explains the higher impact trucks have on those receptors. A breakdown of source contribution under existing conditions is provided in Appendix F. Table 4.2-8 reflects revisions to the assumptions regarding baseline rail activity, as discussed in the preceding paragraph that discusses baseline criteria pollutant and TAC emissions.



**Table 4.2-6. Estimate of Existing Conditions at the Project Site (pounds per day)**

<b>Operational Element</b>	<b>VOC</b>	<b>NO<sub>x</sub></b>	<b>CO</b>	<b>SO<sub>x</sub></b>	<b>PM10</b>	<b>PM2.5</b>
<b>Dry Bulk (289,864 MT)</b>						
Ocean-Going Vessels	<del>1029</del>	<del>17452</del> 3	<del>1443</del>	<del>516</del>	<del>310</del>	<del>39</del>
Assist Tugs	<1	<del>310</del>	<del>39</del>	<1	<1	<1
Tugs and Fuel Barges	<del>310</del>	<del>3398</del>	<del>2574</del>	<1	<del>43</del>	<del>43</del>
Trucks	2	85	5	<1	2	1
Worker Trips	<1	1	11	<1	1	<1
Rail - Regional Line Haul	9	247	29	1	6	6
Rail - Switching between Terminal and Yard	<del>21</del>	<del>5831</del>	2	<1	1	<del>≤1</del>
Cargo Handling Equipment	1	12	6	<1	<1	<1
Bulk Loading	-	-	-	-	583	172
<b>Dry Bulk Existing Daily</b>	<b><del>2853</del></b>	<b><del>6131</del> <del>077</del></b>	<b><del>9718</del> <del>1</del></b>	<b><del>717</del></b>	<b><del>59960</del> <del>8</del></b>	<b><del>18419</del> <del>2</del></b>
<b>Refrigerated Containers (637,931 MT)</b>						
Ocean-Going Vessels	<del>53158</del>	<del>1,145</del> <del>3,436</del>	<del>95284</del>	<del>3610</del> 9	<del>2164</del>	<del>2056</del>
Assist Tugs	<del>25</del>	<del>1237</del>	<del>1235</del>	<1	<1	<1
Tugs and Fuel Barges	<del>1338</del>	<del>12537</del> 4	<del>94281</del>	<1	<del>413</del>	<del>413</del>
Trucks	4	187	12	<1	5	2
Worker Trips	1	3	24	<1	3	1
Cargo Handling Equipment	2	27	14	0	1	1
<b>Refrigerated Containers Existing Daily</b>	<b><del>74207</del></b>	<b><del>1,499</del> <del>4,064</del></b>	<b><del>2506</del> <del>51</del></b>	<b><del>371</del> <del>10</del></b>	<b><del>3587</del></b>	<b><del>2877</del></b>
<b>Multi-Purpose General Cargo (85,131 MT)</b>						
Ocean-Going Vessels	<del>1854</del>	<del>33099</del> 0	<del>2884</del>	<del>1132</del>	<del>619</del>	<del>618</del>
Assist Tugs	<del>12</del>	<del>618</del>	<del>617</del>	<1	<1	<1
Tugs and Fuel Barges	<del>618</del>	<del>61184</del>	<del>46138</del>	<1	<del>26</del>	<del>26</del>
Trucks	<1	9	1	<1	<1	<1
Worker Trips	<1	<1	3	<1	<1	<1
Rail - Regional Line Haul	9	247	29	1	6	6
Rail - Switching between Terminal and Yard	<del>51</del>	<del>123</del>	<del>56</del>	<1	<del>2&lt;1</del>	<del>2&lt;1</del>
Cargo Handling Equipment	<1	4	2	<1	<1	<1
<b>Multi-Purpose General Cargo Existing Daily</b>	<b><del>4085</del></b>	<b><del>7801</del> <del>463</del></b>	<b><del>1202</del> <del>81</del></b>	<b><del>123</del> <del>4</del></b>	<b><del>1833</del></b>	<b><del>1631</del></b>
<b>Total Daily Pounds from all cargo types</b>	<b><del>14134</del> <del>6</del></b>	<b><del>2,892</del> <del>6,534</del></b>	<b><del>4671</del> <del>113</del></b>	<b><del>561</del> <del>61</del></b>	<b><del>65272</del> <del>8</del></b>	<b><del>22930</del> <del>0</del></b>

Source: Appendix F.

Notes: Totals may not add exactly due to rounding.

**Table 4.2-7. Estimate of Existing Conditions at the Project Site (tons per year)**

<b>Operational Element</b>	<b>VOC</b>	<b>NO<sub>x</sub></b>	<b>CO</b>	<b>SO<sub>x</sub></b>	<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub></b>
<b>Dry Bulk (289,864 MT)</b>						
Ocean-Going Vessels	0.5	10.2	0.9	0.3	0.2	0.2
Assist Tugs	<0.0	0.2	0.2	<0.0	<0.0	<0.0
Tugs and Fuel Barges	<0.0	0.4	0.3	<0.0	<0.0	<0.0
Trucks	0.3	15.2	1.0	<0.0	0.1	0.1
Worker Trips	0.1	0.2	2.0	<0.0	0.0	<0.0
Rail - Regional Line Haul	0.1	2.78	0.3	<0.0	0.1	0.1
Rail - Switching between Terminal and Yard	<0.0	0.63	<0.0	<0.0	<0.0	<0.0
Cargo Handling Equipment	0.2	2.2	1.1	<0.0	0.1	0.1
Bulk Loading	-	-	-	-	105.0	30.9
<b>Dry Bulk Existing Annual</b>	<b>1.3</b>	<b>31.85</b>	<b>5.8</b>	<b>0.4</b>	<b>105.5</b>	<b>31.3</b>
<b>Refrigerated Containers (637,931 MT)</b>						
Ocean-Going Vessels	5.1	121.012 0.8	9.98	4.0	2.3	2.1
Assist Tugs	0.1	0.6	0.6	<0.0	<0.0	<0.0
Tugs and Fuel Barges	0.2	1.7	1.3	<0.0	0.1	0.1
Trucks	0.7	36.5	2.3	<0.0	0.2	0.2
Worker Trips	0.1	0.5	4.4	<0.0	0.1	<0.0
Cargo Handling Equipment	0.4	4.8	2.5	<0.0	0.1	0.1
<b>Refrigerated Containers Existing Annual</b>	<b>6.6</b>	<b>164.9</b>	<b>20.9</b>	<b>4.1</b>	<b>2.8</b>	<b>2.5</b>
<b>Multi-Purpose General Cargo (85,131 MT)</b>						
Ocean-Going Vessels	1.0	19.5	1.7	0.7	0.4	0.4
Assist Tugs	<0.0	0.3	0.3	<0.0	<0.0	<0.0
Tugs and Fuel Barges	0.1	0.8	0.6	<0.0	<0.0	<0.0
Trucks	0.1	2.7	0.2	<0.0	<0.0	<0.0
Worker Trips	<0.0	0.1	0.6	<0.0	<0.0	<0.0
Rail - Regional Line Haul	0.1	1.5	0.2	<0.0	<0.0	<0.0
Rail - Switching between Terminal and Yard	≤0.0	0.95	≤0.0	<0.0	<0.0	<0.0
Cargo Handling Equipment	≤0.1	0.6	0.3	<0.0	<0.0	<0.0
<b>Multi-Purpose General Cargo Existing Annual</b>	<b>1.43</b>	<b>26.40</b>	<b>3.9</b>	<b>0.7</b>	<b>0.5</b>	<b>0.5</b>
<b>Total Annual Tons from all cargo types</b>	<b>9.2</b>	<b>223.122 2.4</b>	<b>30.5</b>	<b>5.2</b>	<b>108.8</b>	<b>34.3</b>

Source: Appendix F.

Notes: Totals may not add exactly due to rounding.

**Table 4.2-8. Estimate of Maximum Existing Health Risk at Nearby Receptors**

Receptor Type	Cancer Risk Per Million	Chronic Hazard Index	Acute Hazard Index
<b><i>Dry Bulk</i></b>			
Residential	<del>8</del> 7	<0.01	<0.01
Park	1	<0.01	<0.01
School	<del>2</del> 1	<0.01	<0.01
<b><i>Refrigerated Containers</i></b>			
Residential	<del>31</del> 28	0.01	<0.01
Park	3	0.01	<0.01
School	5	0.01	<0.01
<b><i>Multi-Purpose General Cargo</i></b>			
Residential	<del>5</del> 3	<0.01	<0.01
Park	<0	<0.01	<0.01
School	1	<0.01	<0.01
<b><i>Total for all cargo</i></b>			
Residential	<del>43</del> 38	0.01	<0.01
Park	5	0.02	<0.01
School	7	0.01	<0.01

Note that risk for the various receptor types is not additive and the risk is not the sum of all the risks shown here; rather, the risk at each receptor type is already the sum of emissions.

Source: Appendix F.

## Page 4.2-31

~~Under~~ There were five separate instances where three vessels called on TAMT during the baseline period. These three vessels represent the peak day under existing condition. In estimating existing conditions, it was assumed that a given vessel these three vessels would arrive, hotel, and depart on the same day, because it is feasible that a given vessel would depart on the same day that another vessel arrives. This three daily round-trip assumption was scaled up by the projected increase in throughput, which averages out to approximately ~~1.04~~3.11 calls per day under the Demolition and Initial Rail Component based on the increase in throughput. Under full TAMT plan buildout, it was assumed that the project site could handle up to four vessels at a time. Therefore, daily activity under full TAMT plan buildout assumes up to four round-trip calls on a given day. The analysis includes round-trip vessel emissions within the air basin based on the last and next port of call in the vessel call data. Trip distances for each direction (north, south, and west) within the VSR zone and air basin were assigned based on information in the District's inventory, which set the basin consistent with the ARB limit for rulemaking and the National Oceanic and Atmospheric Administration Contiguous Zone at 24 nautical miles from the California baseline and the VSR zone at 20 nautical miles from the tip of Point Loma. This analysis assumes the number of vessel calls increases and the hotel time for the larger Dole vessels increases, but does not assume the at-berth hotel time for other vessels would increase. A detailed methodology describing vessel activity assumptions and emission calculations is provided in Appendix F.

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### Rail

Trains servicing the project site are operated by BNSF. Rail activity is split between switching (or switch-duty) and regional travel (or line-haul). BNSF switching locomotives are used to break and assemble trains adjacent to the project site at the BNSF yard. Line haul refers to the movement of cargo over long distances (e.g., from the project site north to Los Angeles) and occurs within the Port as the initiation or termination of a line-haul trip. Switching refers to the assembling and disassembling of trains, sorting of the cars of inbound cargo trains into contiguous “fragments” for subsequent delivery to terminals, and the short-distance hauling of rail cargo within the Port (District 2008).

Most of the current train activity involves importing soda ash from Searles Valley and exporting some multi-purpose general cargo, including vehicles and windmill parts. Rail switching occurs when soda ash is delivered and switchers and railcar movers pull the cargo from the BNSF yard to the project site, while all switching at the project site for other cargo types is done by the line-haul locomotives.

As a result of project implementation, rail activity would increase as throughput increases and the mix of cargo type changes. The emission calculation methodologies are adapted from the emission inventories at the Port of San Diego (District 2014) and Port of Long Beach (Port of Long Beach 2014), using switch duty and Class 1 line-haul notch time and power fraction emissions from EPA’s locomotive rulemaking support document (EPA 1998). Emissions associated with the railcar mover were estimated based on engine specifications (ShuttleWagon SW605C car mover equipped with a Tier 3 8.3-liter Cummins QSC, rated at 300 horsepower), assuming the railcar mover operates at full load while in use. The simplified methodology for estimating both onsite switching and regional travel emissions is as follows.

- Emissions = locomotive hours x total locomotive horsepower x load factor x emission factors (in grams per horsepower-hour [g/hp-hr]).

The increase in activity (locomotive hours) is based on the assumption that loaded trains include four active (running) locomotives and empty trains include one active (running) locomotive while up to three locomotives idle to save fuel. BNSF line-haul locomotives are 4,400 horsepower on average and the GP-60 switchers include 3,600 horsepower engines. Currently, up to one train on a maximum day and 72 trains per year arrive and then exit the BNSF yard. All activity from the BNSF yard to the project site is done by switchers, and a railcar mover. For regional line-haul activity, all inbound and outbound trains were assumed to operate along the main line within San Diego County, with emissions based on what was determined to be a one-way distance of 61 miles to the Orange County border. Locomotive travel time is based on a 10 mph travel speed through downtown and a 2-hour travel time from just north of Santa Fe Depot to the Orange County line (based on a 30 mph travel speed).

The Demolition and Initial Rail Component would increase annual visits from 72 per year under existing conditions to up to 82 trains per year due to the increase in multi-purpose general cargo, but maximum daily visitation would remain at one trip. Full TAMT plan buildout would increase annual visits from 72 per year under existing conditions to up to 684 trains per year due to the increase in dry bulk and multi-purpose general cargo, and maximum daily visitation would increase

to two trips on the peak day. Rail emissions are based to the extent possible on BNSF-specific emission factors for the 1998 MOU (ARB 2015c) and EPA engine certification data (EPA 2015b), with the remainder of the emission factors based on the Port of Long Beach inventory (Port of Long Beach 2014). Railcar mover emissions are based on the EPA's Engine and Vehicle Compliance Information System (for ROG, NO<sub>x</sub>, CO, and PM<sub>10</sub>) (EPA 2015). EPA non-road emissions factors (for CO<sub>2</sub> and SO<sub>x</sub>) (EPA 2009), and the Climate Registry (for CH<sub>4</sub> and N<sub>2</sub>O). Maximum daily emissions under existing conditions are based on an average of BNSF's 2013 and 2014 locomotive fleets while emissions associated with new train activity from the Demolition and Initial Rail Component and full TAMT plan buildout are based on the BNSF locomotive fleet expected in years 2020 and 2035, respectively (see locomotive fleet turnover and emission factor calculations in Appendix F).

## Page 4.2-40

### Health-Based Thresholds for Project-Generated Pollutants of Human Health Concern

An EIR should disclose and evaluate the public health consequences associated with increasing air pollutants. As discussed above, all criteria pollutants are associated with some form of health risk (e.g., asthma, asphyxiation). Adverse health effects associated with criteria pollutant emissions are highly dependent on a multitude of interconnected variables (e.g., cumulative concentrations, local meteorology and atmospheric conditions, and the number and character of exposed individuals [e.g., age, gender]). Moreover, O<sub>3</sub> precursors (ROG and NO<sub>x</sub>) affect air quality on a regional scale. Health effects related to O<sub>3</sub> are therefore the product of emissions generated by numerous sources throughout a region. As part of the setting and updating of the NAAQS, EPA develops and considers quantitative characterizations of exposures and associated risks to human health or the environment, known as a Health Risk and Exposure Assessment (HREA), with recent air quality conditions and with air quality estimated to just meet the current or alternative standard(s) under consideration (EPA 2016a). The HREA estimates population exposure to and resulting mortality and morbidity health risks associated with the full range of observed pollutant concentrations, as well as incremental changes in exposures and risks associated with ambient air quality adjusted to just meeting the existing NAAQS and just meeting potential alternative NAAQS under consideration (EPA 2014). However, existing models have limited sensitivity to small changes in criteria pollutant concentrations and, as such, translating project-generated criteria pollutants to specific health effects would produce meaningless results. In other words, minor increases in regional air pollution from project-generated ROG and NO<sub>x</sub> would have nominal or negligible impacts on human health.<sup>7</sup>

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### Asbestos-Containing Materials

There are no quantitative thresholds related to receptor exposure to asbestos. However, SDAPCD Rule 40 requires the demolition or renovation of asbestos-containing building materials to comply

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<sup>7</sup> As an example, the Bay Area Air Quality Management District's Multi-Pollutant Evaluation Method requires a 3 to 5% increase in regional ozone precursors to produce a material change in modeled human health impacts. Based on 2008 ROG and NO<sub>x</sub> emissions in the Bay Area, a 3 to 5% increase equates to over 20,000 pounds per day of ROG and NO<sub>x</sub>.

with the limitations of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) regulations as listed in the Code of Federal Regulations.

## Pages 4.2-50 through 4.2-54

### Operation

Table 4.2-15 shows the anticipated criteria pollutant emissions associated with Demolition and Initial Rail Component operations relative to existing conditions. “Net new” emissions refer to the extent to which emissions from Demolition and Initial Rail Component operations would exceed emissions from existing daily (Table 4.2-6) and annual (Table 4.2-7) conditions. As shown in Table 4.2-15, daily emissions during Demolition and Initial Rail Component operations are anticipated to increase but this increase would be below San Diego County’s SLTs for all pollutants. Therefore, the Demolition and Initial Rail Component would not violate any air quality standards or contribute substantially to an existing or projected air quality violation; impacts would be less than significant.

Note that although the Demolition and Initial Rail Component would increase throughput and activity, port-related equipment emissions per unit of activity (i.e., emissions factors) generally decline over time in response to existing air quality regulations and equipment fleet turnover. As shown in Table 4.2-15, emissions associated with Demolition and Initial Rail Component operations would decrease relative to existing conditions, particularly because the new Tier 2 Dole vessels are cleaner during transit and maneuvering and the new vessels will shift hoteling activity that is currently mostly diesel-powered to electricity-based hoteling. Additionally, BNSF line haul, ~~which currently averages Tier 2 NO<sub>x</sub> rates, but as~~ As their locomotive engines reach the end of their useful life (approximately 40 years), newly built after being placed into operation), they will be replaced by new, cleaner locomotives. The result will come online, reducing BNSF’s ~~be a reduction in line haul emissions over time.~~

Additionally, as shown in Table 4.2-16, annual operational emissions would be below the appropriate *de minimis* levels for the region for each pollutant. Therefore, operation of the Demolition and Initial Rail Component would not result in an adverse regional air quality effect.

**Table 4.2-15. Estimate of Operational Emissions under Unmitigated-Existing Plus Demolition and Initial Rail Component Unmitigated Conditions (pounds per day)**

Operational Element	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Dry Bulk (289,864 MT)</b>						
<b>Project Daily</b>						
Ocean-Going Vessels	<del>1029</del>	<del>174523</del>	<del>1443</del>	<del>516</del>	<del>310</del>	<del>39</del>
Assist Tugs	<1	310	39	<10	<10	<10
Tugs and Fuel Barges	310	3399	2575	<10	13	13
Trucks	2	85	5	<10	2	1
Worker Trips	<10	1	11	<10	21	10
Rail - Regional Line Haul	8	212	25	1	5	5
Rail - Switching between Terminal and Yard	21	5831	2	<10	1	10
Cargo Handling Equipment	1	12	6	<10	<10	<10

Operational Element	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM10	PM2.5
Bulk Loading	-	-	-	-	583	172
<b>Dry Bulk Existing Plus Project Daily</b>	<b><u>2752</u></b>	<b><u>578972</u></b>	<b><u>93177</u></b>	<b><u>717</u></b>	<b><u>598607</u></b>	<b><u>184192</u></b>
Dry Bulk Existing Daily <sup>1</sup>	<u>2853</u>	<u>6131,007</u>	<u>97181</u>	<u>717</u>	<u>599608</u>	<u>184192</u>
Net New Over Existing	-1	<u>-3534</u>	-4	<u>&lt;-10</u>	-1	-1
<i>Exceed Significant Threshold?</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>
<b>Refrigerated Containers (685,931 MT)</b>						
<b>Project Daily</b>						
Ocean-Going Vessels	<u>49146</u>	<u>7222,165</u>	<u>82247</u>	<u>3296</u>	<u>1956</u>	<u>1751</u>
Assist Tugs	<u>14</u>	<u>1433</u>	<u>1031</u>	<u>&lt;10</u>	<u>&lt;1</u>	<u>&lt;1</u>
Tugs and Fuel Barges	<u>1333</u>	<u>134330</u>	<u>101249</u>	<u>&lt;10</u>	<u>512</u>	<u>511</u>
Trucks	4	195	13	<u>&lt;10</u>	5	2
Worker Trips	1	3	27	<u>&lt;10</u>	4	<u>21</u>
Cargo Handling Equipment	3	28	15	<u>&lt;10</u>	1	1
<b>Refrigerated Containers Existing Plus Project Daily</b>	<b><u>71190</u></b>	<b><u>1,0932,755</u></b>	<b><u>249582</u></b>	<b><u>3397</u></b>	<b><u>3478</u></b>	<b><u>2668</u></b>
Refrigerated Containers Existing Daily <sup>1</sup>	<u>74207</u>	<u>1,4994,064</u>	<u>250651</u>	<u>37110</u>	<u>3587</u>	<u>2877</u>
Net New Over Existing	<u>-317</u>	<u>-4061,309</u>	<u>-269</u>	<u>-413</u>	<u>-49</u>	<u>-29</u>
<i>Exceed Significant Threshold?</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>
<b>Multi-Purpose General Cargo (124,078 MT)</b>						
<b>Project Daily</b>						
Ocean-Going Vessels	<u>2574</u>	<u>4511,354</u>	<u>38115</u>	<u>1544</u>	<u>926</u>	<u>824</u>
Assist Tugs	<u>13</u>	<u>825</u>	<u>824</u>	<u>&lt;10</u>	<u>&lt;1</u>	<u>&lt;1</u>
Tugs and Fuel Barges	<u>925</u>	<u>89250</u>	<u>67189</u>	<u>&lt;10</u>	<u>39</u>	<u>38</u>
Trucks	<u>&lt;10</u>	12	1	<u>&lt;10</u>	<u>&lt;10</u>	<u>&lt;10</u>
Worker Trips	<u>&lt;10</u>	1	6	<u>&lt;10</u>	1	<u>&lt;10</u>
Rail - Regional Line Haul	8	212	25	1	5	5
Rail - Switching between Terminal and Yard	<u>51</u>	<u>123</u>	<u>56</u>	<u>&lt;10</u>	<u>20</u>	<u>20</u>
Cargo Handling Equipment	<u>&lt;10</u>	5	3	<u>&lt;10</u>	<u>&lt;10</u>	<u>&lt;10</u>
<b>Multi-Purpose General Cargo Existing Plus Project Daily</b>	<b><u>48112</u></b>	<b><u>9011,871</u></b>	<b><u>152368</u></b>	<b><u>1646</u></b>	<b><u>2143</u></b>	<b><u>1939</u></b>
Multi-Purpose General Cargo Existing Daily <sup>1</sup>	<u>4085</u>	<u>7801,463</u>	<u>120281</u>	<u>1234</u>	<u>1733</u>	<u>1631</u>
Net New Over Existing	<u>826</u>	<u>100408</u>	<u>3187</u>	<u>312</u>	<u>310</u>	<u>28</u>
<i>Exceed Significant Threshold?</i>	<i>No</i>	<i>No/Yes</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>
<b>All Cargo Types (1,131,393 MT)</b>						
<b>All Cargo Types Existing Plus Project Daily</b>	<b><u>146354</u></b>	<b><u>2,5725,598</u></b>	<b><u>4931,127</u></b>	<b><u>55160</u></b>	<b><u>653728</u></b>	<b><u>2298</u></b>
All Cargo Types Existing Daily <sup>1</sup>	<u>141346</u>	<u>2,8926,534</u>	<u>4671,113</u>	<u>56161</u>	<u>652728</u>	<u>229300</u>
Net New Over Existing	<u>59</u>	<u>-320936</u>	<u>2714</u>	<u>&lt;-1</u>	<u>10</u>	<u>&lt;-1</u>

Operational Element	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM10	PM2.5
<i>Exceed Significant Threshold?</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>
Significance Thresholds	75	250	550	150	100	55

<sup>1</sup> Existing daily emissions shown in Table 4.2-6.

Notes: Totals may not add exactly due to rounding.

Source: Appendix F.

**Table 4.2-16. Estimate of Operational Emissions under Unmitigated-Existing Plus Demolition and Initial Rail Component Unmitigated Conditions (tons per year)**

Operational Element	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM10	PM2.5
<b>Dry Bulk (289,864 MT)</b>						
<b>Project Annual</b>						
Ocean-Going Vessels	0.5	10.2	0.9	0.3	0.2	0.2
Assist Tugs	<0.0	0.2	0.2	<0.0	<0.0	<0.0
Tugs and Fuel Barges	<0.0	0.4	0.3	<0.0	<0.0	<0.0
Trucks	0.3	15.2	1.0	<0.0	0.1	0.1
Worker Trips	0.1	0.2	2.0	<0.0	<0.0	<0.0
Rail - Regional Line Haul	0.1	2.3	0.3	<0.0	0.1	0.1
Rail - Switching between Terminal and Yard	<0.0	0.64	<0.0	<0.0	<0.0	<0.0
Cargo Handling Equipment	0.2	2.2	1.1	<0.0	0.1	<0.0
Bulk Loading	-	-	-	-	105.0	30.9
<b>Dry Bulk Existing Plus Project Annual</b>	<b>1.3</b>	<b>31.41</b>	<b>5.7</b>	<b>0.4</b>	<b>105.5</b>	<b>31.3</b>
Dry Bulk Existing Annual <sup>1</sup>	1.3	31.85	5.8	0.4	105.5	31.3
Net New	<0.0	-0.4	<0.0	<0.0	<0.0	<0.0
<i>Exceed de minimis levels?</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>N/A</i>	<i>N/A</i>	<i>N/A</i>
<b>Refrigerated Containers (685,931 MT)</b>						
<b>Project Annual</b>						
Ocean-Going Vessels	4.0	66.2	7.4	3.4	1.8	1.6
Assist Tugs	0.1	0.5	0.5	<0.0	<0.0	<0.0
Tugs and Fuel Barges	0.21	1.85	1.41	<0.0	0.1	0.1
Trucks	0.8	37.8	2.5	0.1	0.2	0.2
Worker Trips	0.2	0.5	4.9	<0.0	0.1	0.1
Cargo Handling Equipment	0.5	5.1	2.7	<0.0	0.1	0.1
<b>Refrigerated Containers Existing Plus Project Annual</b>	<b>5.6</b>	<b>112.0</b>	<b>19.41</b>	<b>3.5</b>	<b>2.3</b>	<b>2.1</b>
		<b>111.7</b>				
Refrigerated Containers Existing Annual <sup>1</sup>	6.6	164.9	20.9	4.1	2.8	2.5
Net New Over Existing	-1.09	-52.9	-1.57	-0.6	-0.5	-0.4
		<b>53.2</b>				
<i>Exceed de minimis levels?</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>N/A</i>	<i>N/A</i>	<i>N/A</i>



Operational Element	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM10	PM2.5
<b>Multi-Purpose General Cargo (124,078 MT)</b>						
<b>Project Annual</b>						
Ocean-Going Vessels	1.4	26.6	2.3	1.0	0.5	0.5
Assist Tugs	0.1	0.4	0.4	<0.0	<0.0	<0.0
Tugs and Fuel Barges	0.9	9.2	6.9	<0.0	0.3	0.3
Trucks	0.1	3.3	0.2	<0.0	<0.0	<0.0
Worker Trips	<0.0	0.1	1.0	<0.0	<0.0	<0.0
Rail - Regional Line Haul	0.1	1.7	0.2	<0.0	<0.1	<0.1
Rail - Switching between Terminal and Yard	<0.0	<del>1.20.6</del>	<0.0	<0.0	<0.0	<0.0
Cargo Handling Equipment	0.1	0.9	0.5	<0.0	<0.0	<0.0
<b>Multi-Purpose General Cargo Existing Plus Project Annual</b>	<b>2.76</b>	<b>43.4</b>	<b>11.6</b>	<b>1.0</b>	<b>1.0</b>	<b>0.9</b>
		<b>42.9</b>				
Multi-Purpose General Cargo Existing Annual <sup>1</sup>	1.43	26.40	3.9	0.7	0.5	0.5
Net New Over Existing	1.3	<del>17.0</del> 16.8	7.7	0.3	0.5	0.4
<i>Exceed de minimis levels?</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>N/A</i>	<i>N/A</i>	<i>N/A</i>
<b>All Cargo Types</b>						
<b>All Cargo Types Existing Plus Project Annual Total</b>	<b>9.65</b>	<b>186.8</b>	<b>36.75</b>	<b>4.8</b>	<b>108.8</b>	<b>34.3</b>
		<b>185.7</b>				
All Cargo Types Existing Annual Total <sup>1</sup>	9.2	<del>223.1</del> 222.4	30.5	5.2	108.8	34.3
Net New Over Existing	0.43	-36.37	<del>6.25.9</del>	-0.3	<0.1	<0.1
<i>Exceed de minimis levels?</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>N/A</i>	<i>N/A</i>	<i>N/A</i>
<i>de minimis levels</i>	100	100	100	N/A	N/A	N/A

<sup>1</sup> Existing annual emissions shown in Table 4.2-7.

Notes: Totals may not add exactly due to rounding.

Source: Appendix F.

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### Operation

Table 4.2-17 shows the anticipated criteria pollutant emissions associated with operation of full TAMT plan buildout relative to existing conditions. Existing conditions are shown in Table 4.2-6. As shown in Table 4.2-17, emissions during full TAMT plan operations are anticipated to exceed San Diego County's SLTs for multiple cargo types for VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM10, and PM2.5. The VOC, NO<sub>x</sub>, CO, and SO<sub>x</sub> exceedances would primarily be due to fossil fuel combustion from OGV, trucks, fuel tugs, and rail activities, while the PM10, and PM2.5 exceedance would primarily be due to bulk loading and material handling, and in particular to the uncontrolled nature of current soda ash and bauxite handling at the project site. **Impact-AQ-2** would be significant and mitigation is required.

Mitigation has been added to require the District to implement alternative control measures in order to reduce health risk in the surrounding community. The alternative control technique assumed in the analysis is the most recently approved technology by the ARB, which is the

Advanced Marine Emissions Control System (AMECS) developed by Advanced Cleanup Technologies, Inc. AMECS is equipped with barge-mounted Tier 4 auxiliary engines, which are smaller and require less energy than the previous ARB-approved technology. Based on a recent analysis by the EPA (EPA 2016b) it is assumed that roughly 2 hours is necessary to install and remove the AMECS from a given vessel, during which time both the barge and ship auxiliary engines are operating and producing emissions. AMECS captures 90% of the exhaust from vessels with a single stack and 80% and from vessels with a two stacks. However, based on the power ratings, it was assumed that dry bulk and general cargo vessels contain a single stack. Once applied, the AMECS reduces NO<sub>x</sub> emissions by 90% and all other pollutants by 95%. Overall, the AMECS system reduces dry bulk and multi-purpose general cargo at-berth emissions by approximately 77% for NO<sub>x</sub> and 80% for DPM per call.

**Table 4.2-17. Estimate of Operational Emissions under ~~Unmitigated~~ Existing Plus Full TAMT Buildout ~~Unmitigated~~ Conditions (pounds per day)**

Operational Element	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM10	PM2.5
<b>Dry Bulk (2,650,000 MT)</b>						
<b>Project Daily</b>						
Ocean-Going Vessels	39	706	58	21	13	12
Assist Tugs	2	13	12	<1	<1	<1
Tugs and Fuel Barges	22	221	166	<1	8	7
Trucks	7	190	39	1	17	6
Worker Trips	1	2	18	<1	6	2
Rail - Regional Line Haul	5	142	13	1	3	3
Rail - Switching between Terminal and Yard	<del>21</del>	<del>5833</del>	<del>23</del>	<1	1	1
Cargo Handling Equipment	10	111	59	<1	3	2
Bulk Loading	-	-	-	-	5,933	1,666
<b>Dry Bulk Existing plus Project Daily</b>	<b><del>8786</del></b>	<b><del>1,4417</del></b>	<b><del>3689</del></b>	<b><del>24</del></b>	<b><del>5,984</del></b>	<b><del>1,700699</del></b>
Dry Bulk Existing Daily <sup>1</sup>	<del>2853</del>	<del>6131,077</del>	<del>97181</del>	<del>717</del>	<del>599608</del>	<del>184192</del>
Net New Over Existing	<del>6033</del>	<del>829410</del>	<del>272188</del>	<del>177</del>	<del>5,385376</del>	<del>1,515507</del>
<i>Exceed Significant Threshold?</i>	<i>No</i>	<i>Yes</i>	<i>No</i>	<i>No</i>	<i>Yes</i>	<i>Yes</i>
<b>Refrigerated Containers (2,288,000 MT)</b>						
<b>Project Daily</b>						
Ocean-Going Vessels	188	2,785	318	124	72	66
Assist Tugs	5	42	40	<1	1	1
Tugs and Fuel Barges	18	181	136	<1	6	6
Trucks	8	261	36	1	15	6
Worker Trips	1	3	27	<1	4	1
Cargo Handling Equipment	9	96	51	<1	2	2
<b>Refrigerated Containers Existing plus Project Daily</b>	<b>228</b>	<b>3,369</b>	<b>607</b>	<b>125</b>	<b>101</b>	<b>82</b>
Refrigerated Containers Existing	<del>74207</del>	<del>1,4994,064</del>	<del>250651</del>	<del>37110</del>	<del>3587</del>	<del>2877</del>

Operational Element	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Daily <sup>1</sup>						
Net New Over Existing	<del>155</del> <u>21</u>	<del>1,870-695</del>	<del>357-43</del>	<del>88</del> <u>15</u>	<del>66</del> <u>15</u>	<del>54</del> <u>6</u>
Exceed Significant Threshold?	<del>Yes</del> <u>No</u>	<del>Yes</del> <u>No</u>	No	No	No	No
<b>Multi-Purpose General Cargo (977,400 MT)</b>						
<b>Project Daily</b>						
Ocean-Going Vessels	95	1,742	148	57	34	31
Assist Tugs	4	32	30	<1	1	1
Tugs and Fuel Barges	47	473	356	<1	17	16
Trucks	1	23	5	<1	2	1
Worker Trips	<1	1	6	<1	2	1
Rail - Regional Line Haul	8	249	23	2	5	5
Rail - Switching between Terminal and Yard	<del>5</del> <u>3</u>	<del>123</del> <u>63</u>	<del>5</del> <u>3</u>	<1	<del>2</del> <u>1</u>	<del>2</del> <u>1</u>
Cargo Handling Equipment	4	41	22	<1	1	1
<b>Multi-Purpose General Cargo Existing plus Project Daily</b>	<del>164</del> <u>2</u>	<del>2,68</del> <u>23</u>	<del>59</del> <u>53</u>	<del>60</del>	<del>64</del> <u>63</u>	<del>57</del>
Multi-Purpose General Cargo Existing Daily <sup>1</sup>	<del>40</del> <u>85</u>	<del>780</del> <u>1,463</u>	<del>120</del> <u>281</u>	<del>12</del> <u>34</u>	<del>17</del> <u>33</u>	<del>16</del> <u>31</u>
Net New Over Existing	<del>125</del> <u>76</u>	<del>1,903</del> <u>160</u>	<del>475</del> <u>312</u>	<del>48</del> <u>26</u>	<del>47</del> <u>30</u>	<del>41</del> <u>26</u>
Exceed Significant Threshold?	<del>Yes</del>	<del>Yes</del>	No	No	No	No
<b>All Cargo Types (<del>6.154</del><u>417</u> MT)</b>						
<b>All Cargo Types Existing plus Project Daily Total</b>	<del>480</del> <u>476</u>	<del>7,493</del> <u>408</u>	<del>1,570</del>	<del>209</del>	<del>6,149</del>	<del>1,839</del> <u>8</u>
All Cargo Types Existing Daily Total <sup>1</sup>	<del>141</del> <u>346</u>	<del>2,892</del> <u>6,534</u>	<del>467</del> <u>1,113</u>	<del>56</del> <u>161</u>	<del>652</del> <u>728</u>	<del>229</del> <u>300</u>
Net New Over Existing	<del>339</del> <u>131</u>	<del>4,601</del> <u>875</u>	<del>1,104</del> <u>457</u>	<del>15</del> <u>348</u>	<del>5,497</del> <u>421</u>	<del>1,610</del> <u>539</u>
Exceed Significant Threshold?	<del>Yes</del>	<del>Yes</del>	<del>Yes</del> <u>No</u>	<del>Yes</del> <u>No</u>	<del>Yes</del>	<del>Yes</del>
Significance Thresholds	75	250	550	150	100	55

<sup>1</sup> Existing daily emissions shown in Table 4.2-6.

Notes: Totals may not add exactly due to rounding.

Source: Appendix F.

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### Full TAMT Plan Buildout

**MM-AQ-1: Implement Best Management Practices During Construction of Future TAMT Plan Components.** All proponents of future projects shall implement Best Management Practices (BMPs) to reduce air emissions from all construction activities implemented as part of full TAMT plan buildout. The following measures are required to limit construction equipment exhaust from on-road trucks and heavy-duty equipment used during construction.

- ~~Use diesel oxidation catalysts and catalyzed diesel particulate traps.~~

- Ensure that all off-road diesel-powered equipment used during construction between 2020 and 2025 is equipped with the U.S. Environmental Protection Agency (EPA) Tier 3 or cleaner engines, except for specialized construction equipment for which an EPA Tier 3 engine is not available.
- Ensure that all off-road diesel-powered equipment used during construction beyond 2025 is equipped with the EPA Tier 4 Final or cleaner engines, except for specialized construction equipment for which an EPA Tier 4 Final engine is not available.
- Maintain all construction vehicles and equipment according to manufacturers' specifications.
- Restrict idling of construction vehicles and equipment to a maximum of 3 minutes when not in use (see MM-AQ-2 for definition of "not in use").
- Install high-pressure fuel injectors on construction equipment vehicles.

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**MM-AQ-4: Implement Best Available Control Technologies for Conveyor System and Bulk Discharge Unloader for Future Dry Bulk Operations associated with the TAMT Plan.** ~~Prior to the first discretionary action approval and/or Coastal Development Permits related to dry bulk operations associated with the TAMT plan, any project proponent shall upgrade the existing or install a new Conveyor System and Bulk Discharge Unloader that shall include best available control technologies (BACT) that achieve a minimum 95 percent control efficiency. The project proponent that finances the system may be reimbursed, based on anticipated percent usage, by future users of the system. Alternatively, other funding mechanisms may be developed. However, under no circumstance shall the upgrade or new system that includes BACT not be implemented prior to the first discretionary action approval and/or Coastal Development Permits related to dry bulk operations.~~

~~Implementation~~As a condition of BACT will be a part of any discretionary action approval and/or any new or amended real estate agreement or Coastal Development Permit(s) associated with for dry bulk operations that would result in an increase in daily or annual throughput over baseline conditions, the TAMT plan. Evidence~~San Diego Unified Port District shall require the project proponent to install and use the best available control technologies to achieve a minimum 95 percent control efficiency for particulate matter in one of the following ways:~~

- Upgrade the existing Conveyor System and Bulk Discharge Unloader (if proposed for use) to meet the minimum 95 percent control efficiency.
- Replace the existing Conveyor System and Bulk Discharge Unloader with a new Conveyor System and Bulk Discharge Unloader that meets the minimum 95 percent control efficiency and properly dispose of the existing system in compliance with all applicable laws and regulations, including any permits from the San Diego Air Pollution Control District.
- Bypass the existing Conveyor System and Bulk Discharge Unloader and install a new Conveyor System and Bulk Discharge Unloader that meets the minimum 95 percent control efficiency and properly dispose of the existing system in compliance with all applicable laws and regulations, including any permits from the San Diego Air Pollution Control District.

The project proponent that finances an upgrade or replacement to the new system may be reimbursed, based on anticipated percent usage, by future users of the system. The San Diego Unified Port District will assist such reimbursement by conditioning its approval of other users of the system during the first 5 years of its operation on reimbursement of the cost of the system on a "fair share" basis.

Under no circumstance shall a project proponent seeking discretionary approval for dry bulk operations be allowed to increase daily or annual throughput of dry bulk operations without first completing the upgrade or replacement of the existing system, or installation of a new system required above.

The recipient of a discretionary approval by the San Diego Unified Port District subject to this mitigation measure shall provide written evidence of implementation and compliance with this mitigation measure ~~shall be provided~~ to the San Diego Unified Port District on an annual basis through 2035 (buildout of the TAMT plan).

**MM-AQ-5: Implement Vessel Speed Reduction Program Beyond Climate Action Plan**

**Compliance for Future Operations Associated with the TAMT Plan.** Every quarter following approval of the first discretionary action approval and/or issuance of the first Coastal Development Permit associated with a future project proposed under the TAMT plan, whichever occurs first, the project proponent shall provide a report of the annual vessel activity and throughput by cargo node to date and the projected total throughput for the previous 6 months to the District's Planning & Green Port Department. Prior to the annual vessel calls reaching ~~5291~~ 3776 new calls over existing) for dry bulk, ~~77117~~ 2060 new calls over existing) for refrigerated containers, and ~~6896~~ 4068 new calls over existing) for multi-purpose general cargo under the MPC scenario, 79 calls (64 new calls over existing) for dry bulk, 98 calls (41 new calls over existing) for refrigerated containers, and 78 calls (50 new calls over existing) for multi-purpose general cargo under the STC Alternative, or beginning January 1, 2030 for all vessels irrespective of the number of calls occurring on an annual basis, whichever occurs first, the project proponent shall implement ~~VSR~~ vessel speed reduction measures to reduce the project's criteria pollutant emissions. The program shall require that 90 percent of the vessels calling at the project site reduce their speeds to 12 knots starting at 40 nautical miles from Point Loma. Due to the international border to the south and California Air Resources Board limit for rulemaking being 24 nautical miles from the coastline, some vessel calls travel within the San Diego Air Basin for less than 40 nautical miles. For those vessel calls, vessel operators are required to reduce their speeds to 12 knots at the point those vessels enter the San Diego Air Basin and maintain speeds of 12 knots over the entire distance to/from Point Loma. To be compliant with the vessel speed limit, the vessel's weighted average speed shall be 12 knots or less from the 40 nautical mile latitude and longitude positions on each respective route to/from Point Loma.

Implementation of this ~~VSR~~ vessel speed reduction program will be required as part of any discretionary action and/or Coastal Development Permit(s) associated with the TAMT plan. Evidence of implementation and compliance with this mitigation measure shall be provided to the San Diego Unified Port District's Planning & Green Port Department on an annual ~~quarterly~~ basis through 2035 (buildout of the TAMT plan). The San Diego Unified Port District will verify compliance through analysis of Automatic Identification System data or by requesting a vessel's Electronic Chart Display Identification System log from the captain.

**MM-AQ-6: Electric Cargo Handling Equipment Upgrades.** As a condition of any Coastal Development Permit, the project proponent, or the District, shall secure funding for and operate one piece of CHE associated with each node. Operation of such equipment on the leasehold shall occur by January 1, 2020 through the expected operating life of the equipment, and evidence of operation shall be provided to the District upon request. Equipment shall be replaced if alternative technologies (i.e., advancements in electric equipment) are identified and determined to be feasible pursuant to MM-AQ-7. For purposes of the analysis, it was assumed that each node would operate one electric yard truck. This mitigation is similar to MM-GHG-3, and the number of CHE equipment required between the two mitigation measures does not aggregate to more than one piece of CHE per node.

**MM-AQ-7: Periodic Technology Review.** To promote new emission control technologies, each tenant who seeks **MM-AQ-6: Electric Cargo Handling Equipment Upgrades.** This measure has multiple steps for compliance, as specified below.

- A. Prior to January 1, 2020, the San Diego Unified Port District shall ensure that at least three pieces of existing non-electric cargo handling equipment at the terminal are replaced by electric cargo handling equipment, none of which were previously operating at the terminal during the 2013/2014 baseline year of the EIR analysis. Possible ways the electric cargo handling equipment may be obtained include, but are not limited to, the following:
1. Purchased, leased, or otherwise acquired, in whole or in part, through funding provided to a tenant by the San Diego Unified Port District;
  2. Purchased, leased, or otherwise acquired, in whole or in part, through funding provided to a tenant by other sources; or
  3. Purchased, leased, or otherwise acquired, in whole or in part, by the tenant in compliance with a condition of a discretionary action approval and/or Coastal Development Permit(s) shall perform an investigation into emerging zero and near-zero technologies and submit a report to issued by the San Diego Unified Port District on an annual basis, beginning on:

Written evidence of the date such construction, occupancy, or use commences and continuing through 2035 (buildout of the TAMT plan). The District regularly monitors technologies as part of its CAP and long-range sustainability goals, which require the acquisition of the electric cargo handling equipment and the equipment it will replace and remove from further operation at the terminal must be provided to the San Diego Unified Port District. The San Diego Unified Port District shall further ensure that the electric cargo handling equipment is in use at each of the three nodes throughout the expected operating life. This will be accomplished by requiring each tenant that employs electric cargo handling equipment pursuant to this measure to report the equipment's annual number of hours of operation to the San Diego Unified Port District and by requiring the San Diego Unified Port District to monitor use of the electric cargo handling equipment as part of the San Diego Unified Port District's TAMT equipment inventory.

- B. Prior to January 1, 2025, the San Diego Unified Port District also shall ensure that no fewer than 20 non-electric yard trucks in operation are replaced at the TAMT by 20 electric yard trucks. Possible ways the electric yard trucks may be obtained include, but are not limited to, the following:

1. Purchased, leased, or otherwise acquired, in whole or in part, through funding provided to a tenant by the San Diego Unified Port District;
2. Purchased, leased, or otherwise acquired, in whole or in part, through funding provided to a tenant by other sources; or
3. Purchased, leased, or otherwise acquired, in whole or in part, by the tenant in compliance with a condition of a discretionary approval issued by the San Diego Unified Port District.

Written evidence of the acquisition of the electric yard trucks, and the non-electric yard trucks they will replace and remove from further operation at the terminal, must be provided to the San Diego Unified Port District. The San Diego Unified Port District shall further ensure that the electric yard trucks are in use at the TAMT throughout the expected operating life of the equipment. Each tenant that employs electric trucks pursuant to this measure shall report the equipment's annual number of hours of operation to the San Diego Unified Port District, and the San Diego Unified Port District shall monitor use of the electric trucks as part of the San Diego Unified Port District's TAMT equipment inventory.

- C. Prior to January 1, 2030, the San Diego Unified Port District also shall ensure that no fewer than three existing non-electric reach stackers and ten non-electric forklifts in operation are replaced at the TAMT by three fully electric reach stackers and ten fully electric forklifts. Possible ways the electric reach stackers and forklifts may be obtained include, but are not limited to:

1. Purchased, leased, or acquired, in whole or in part, through funding provided to the tenant by the San Diego Unified Port District;
2. Purchased, leased, or acquired, in whole or in part, through funding provided to the tenant by other sources; or
3. Purchased, leased, or otherwise acquired, in whole or in part, by the tenant in compliance with a condition of a discretionary approval issued by the San Diego Unified Port District.

Written evidence of the acquisition of the three electric reach stackers and ten electric forklifts and the conventional equipment they will replace and remove from further operation at the terminal must be provided to the San Diego Unified Port District. The San Diego Unified Port District shall further ensure that the electric reach stackers and forklifts are in use at the TAMT throughout the expected operating life of the equipment. Each tenant that employs electric reach stackers or electric forklifts pursuant to this measure shall report the equipment's annual number of hours of operation to the San Diego Unified Port District, and the San Diego Unified Port District shall monitor use of the electric reach stackers and forklifts as part of the San Diego Unified Port District's TAMT equipment inventory.

- D. The electric equipment employed pursuant to paragraphs A, B, and C of this mitigation measure may be replaced by other technologies or other types of cargo handling equipment as long as the replacement equipment achieves the same or greater criteria pollutant, toxic air contaminant, and greenhouse gas emission reductions as compared to the equipment required by paragraphs A, B, and C of this mitigation measure.

**MM-AQ-7: Annual Inventory Submittal and Periodic Technology Review.** The San Diego Unified Port District regularly monitors technologies for reducing air emissions as part of its Climate Action Plan and long-range sustainability goals, which encourage the San Diego Unified Port District and its tenants to use cleaner technologies over time as they become available and feasible. The Annual Technology Review shall identify any As a condition of approval of any new or amended real estate agreement or Coastal Development Permit, the San Diego Unified Port District shall require the project proponent to submit to the San Diego Unified Port District an annual inventory of all equipment that generates criteria pollutant, toxic air contaminant, and greenhouse gas emissions operated by the project proponent at the TAMT throughout the life of the lease up to 2035 (buildout of the TAMT plan). The equipment inventory shall include the year, make, and model of the equipment that was used in the previous year, including annual hours of operation for each piece of equipment, including but not limited to heavy-duty drayage and non-drayage trucks, yard equipment, assist and ocean-going tugs, ocean-going vessels, bulk material handling equipment, and any other type of cargo handling equipment. The purpose of the inventory is to track emissions and equipment at TAMT and to assist in technological reviews, as described below.

To promote new emission control technologies, the San Diego Unified Port District will perform a Periodic Technology Review annually. The Periodic Technology Review will coincide with monitoring and reporting pursuant to the San Diego Unified Port District's Climate Action Plan, and will include the following:

1. Develop and maintain an inventory of equipment in operation at the TAMT that generates criteria pollutant, toxic air contaminant, and greenhouse gas emissions, including the equipment model year, model name, and annual hours of operation, based on the annual tenant inventories submitted to the San Diego Unified Port District as described above.
2. Identify and assist with enforcement of changes to emission regulations for heavy-duty trucks, yard equipment, tugs, vessels, bulk handling equipment, and other equipment that generates criterial pollutant, toxic air contaminant, and greenhouse gas emissions.
3. Identify, and assist with implementation of, any feasible new emissions-reduction technologies that may reduce emissions at the project site, including the feasibility of zero and near-zero emissions technologies applicable to heavy-duty trucks, yard equipment, tugs, vessels, and bulk handling equipment.
4. Collaborate with the California Air Resources Board and San Diego Air Pollution Control District to ensure these technologies for heavy-duty trucks, yard equipment, tugs, vessels, and bulk handling equipment. If the Periodic Technology Review demonstrates the new technology are available and to identify funding opportunities, including funding from the Prop 1B: Good Movement Emission Reduction Program, among others.
5. Prioritize older equipment in operation at the TAMT that generates the highest levels of criterial pollutant, toxic air contaminant, and greenhouse gas emissions to be replaced based on the level of emissions and cost-effectiveness of the emissions reduction (i.e., biggest reduction per dollar), and identify implementation mechanisms including, but not limited to, tenant-based improvements, grant programs, or a combination thereof, based on regulatory requirements and the feasibility analyses specified in paragraph 3 above. Use the Carl Moyer Program, or similar cost-effectiveness criteria, to assess the economic feasibility (e.g., cost effectiveness) of the identified new technologies.



6. Ensure that any upgraded or retired equipment is accounted for as part of the San Diego Unified Port District's Maritime Emissions Inventory and Climate Action Plan.

If Periodic Technology Review identifies new technology that will be effective in reducing emissions and the compared to the equipment in operation at the time of the review, and the San Diego Unified Port District determines that installation or use of the technology is feasible, the tenant San Diego Unified Port District shall implement require the use of such technology within 12 months of the District's determination as a condition of any discretionary approval issued by the San Diego Unified Port District for any new, expanded, or extended operations at the TAMT. Furthermore, the District and/or project proponent must demonstrate that emissions of Volatile Organic Compounds (VOCs) would be less than 75 pounds per day on a peak day once cargo throughput exceeds 4,000,000 metric tons annually. If technological advancements are unable to reduce VOC emissions to 75 pounds per day or less on a peak day, then the District shall limit the number of vessels allowed to no more than three on a peak day once total throughput exceeds 4,000,000 metric tons annually. These operational restrictions will ensure that VOC emissions do not exceed threshold standards established by the San Diego Air Pollution Control District. Verification of compliance with this measure is the responsibility of the District.

**MM-AQ-8: Implement a Sustainable Leasing Exhaust Emissions Reduction Program at the Tenth Avenue Marine Terminal.** The San Diego Unified Port District shall work with tenants to develop and implement a policy incentive-based sustainable program at the TAMT by January 1, 2020 to further reduce emissions from terminal-wide emissions sources.

- A. The program shall be implemented through the Coastal Development Permit process; the tenant leasing program to achieve the District's goals to attract the cleanest ships, ships that utilize process, including the issuance of new, extended, or amended leases; and other short-term real estate agreements at the TAMT.
- B. The program shall be focused on incentives to reduce criteria pollutant, toxic air contaminant, and greenhouse gas emissions by attracting clean vessels, trucks, and equipment to the TAMT—including but not limited to vessels that use shore power while at berth, zero and near-zero emission cargo handling equipment technologies, energy efficiency measures, or renewable energy—and by otherwise incorporating technological and operational practices that reduce criteria pollutant emissions. The District's CAP identifies the development of a Sustainable Leasing Policy as one of the GHG reduction measures prioritized for implementation, toxic air contaminant, and greenhouse gas emissions from terminal operations beyond existing regulatory requirements. The program shall include specific incentives for existing and future components under the TAMT plan shall be subject to the Sustainable Leasing Policy tenants, which may include but are not limited to: an extended lease term, expedited permit processing, reduced permit fees, and eligibility for grants or other financial assistance. The nature and extent of such incentives will be based on an emissions reduction schedule established by the San Diego Unified Port District for criteria pollutants, toxic air contaminants, and greenhouse gas emissions.
- C. The program shall identify specific emission reduction equipment and practices that may qualify for incentives, which may include but not be limited to the following.
  - o Vessels: Demonstrate that at least 50 percent of annual vessel calls will be equipped with Tier II or better main and auxiliary engines, as defined by International Convention for the Prevention of Pollution from Ships Annex VI 2008 regulations or other standards

set forth by the International Convention for the Prevention of Pollution from Ships, U.S. Environmental Protection Agency, or the California Air Resources Board in the future.

- Vessel Hoteling: Demonstrate that vessel calls will use shore power or a California Air Resources Board–approved alternative emission capture and control system or install a shore power or California Air Resources Board–approved alternative emission capture and control system for the purpose of reducing ocean-going vessel hoteling emissions.
- Heavy-Duty Trucks: Demonstrate that at least 50 percent of annual cargo throughput will be transported with zero/near-zero emission trucks, hybrid trucks and/or other alternative truck technologies. To qualify, the trucks must result in emission reductions greater than those required by state and federal regulatory agencies at the time of project approval.
- Switch and Line Haul Locomotives: Demonstrate that at least 50 percent of annual cargo will be transported with Tier 3 or above locomotive engines for line-haul, as defined by the U.S. Environmental Protection Agency in 2008 (73 Federal Register 88 25098–25352), and a Tier 3 or above switcher or railcar mover for switching activity at both the terminal and yard.
- Terminal Infrastructure: Install electric charging stations and/or other terminal infrastructure and equipment that support and facilitate zero or near-zero emission technologies.

**MM-AQ-9: Use of At-Berth Emission Capture and/or Control System to Reduce Vessel Hoteling Emissions.** The San Diego Unified Port District shall require the use of an At-Berth Emission Capture and/or Control System (i.e., Bonnet System) to reduce vessel hoteling emissions prior to terminal-related emissions reaching a cancer risk of 10 per million at the maximally exposed sensitive receptor location. Based on the Health Risk Assessment for the TAMT Redevelopment Plan Environmental Impact Report, an At-Berth Emission Capture and/or Control System shall be required prior to reaching an annual throughput of 691,418 metric tons for dry bulk, assuming no growth in multi-purpose general cargo; an annual throughput of 356,666 metric tons for multi-purpose general cargo (including break bulk, neobulk, roll-on/roll-off, and other non-container, non-dry bulk cargo, and non-liquid bulk cargo), assuming no growth in dry bulk; or any combination of dry bulk and multi-purpose general cargo throughput of 691,418 metric tons, whichever occurs first. The San Diego Unified Port District shall either install directly or enter into a contract with an entity that provides the emission capture and/or control system or an equivalent alternative technology, to reduce emissions from vessels that are unable to cold iron at TAMT or are exempt from the California Air Resources Board’s at-berth regulation. The San Diego Unified Port District may charge a fee for the use of an Emission Capture and/or Control System (or an alternative at-berth system that reduces vessel hoteling emissions) based on the vessel type and the length of its stay. The system shall be a technology that has been approved by the California Air Resources Board and meets the requirements set forth in the California Air Resources Board’s at-berth regulations. If the San Diego Unified Port District determines the need for an Emission Capture and/or Control System (or an alternative at-berth system that reduces vessel hoteling emissions) prior to, or later than, the throughput figures listed above, or if shore power or other future regulatory requirements are able to reduce vessel hoteling emissions, then the requirement for the At-

Berth Emission Capture and/or Control System shall be updated and adjusted accordingly, at the San Diego Unified Port District's discretion.

All vessels that are not shore-power equipped shall use the Emission Capture and/or Control System (or an alternative at-berth system that reduces vessel hoteling emissions at an equivalent level), provided there are no operational limitations and it is not being used by another vessel. If the Emission Capture and/or Control System is operationally unable to connect to an at-berth vessel or if it is being used by another vessel, multi-purpose/general cargo or dry bulk vessels will be allowed to berth without it.

## Level of Significance after Mitigation

### Demolition and Initial Rail Component

No mitigation is required, and impacts would be less than significant.

### Full TAMT Plan Buildout

**Impact-AQ-1** would remain significant after implementation of **MM-AQ-1** and **MM-AQ-2** because it is unknown if construction of individual project components would result in emissions that would violate any air quality standard or contribute substantially to an existing or projected air quality violation and to what extent mitigation would reduce the effects. As such, it is conservatively assumed that construction of the full TAMT plan buildout would potentially violate an air quality standard or contribute substantially to an existing or projected air quality standard during construction. Construction impacts associated with buildout of the TAMT plan on air quality standards (**Impact-AQ-1**) would be considered significant and unavoidable.

As shown in Table 4.2-18, ~~**Impact-AQ-2** would remain significant after implementation of **MM-AQ-2** through **MM-AQ-8** because emissions of VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions from~~ would remain in excess of the reduced to below San Diego County SLTs during operations; of full TAMT plan buildout after mitigation. As such, operation at full buildout of the TAMT plan would not violate an air quality standard or contribute substantially to an existing or projected air quality standard during operation; **Impact-AQ-2** would be considered ~~significant and unavoidable~~ less than significant after mitigation. Operation at full buildout of the TAMT plan would not violate an air quality standard or contribute substantially to an existing or projected air quality standard during operation for all criteria pollutants (VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>).

Note that the CO ~~exceedance~~ emissions shown in Table 4.2-18 is not a localized CO hot-spot concern. CO hot-spots typically (and rarely) occur at congested roadways with high traffic volumes near sensitive receptors. In the case of congested intersections, vehicle emissions occur within a small area relatively close to receptors (i.e., only a few feet). In the case of the full TAMT plan buildout, emissions occur over a large area (in the open ocean, within the bay, at the terminal, on the roadways), and sensitive receptors are rarely if ever as close as a few feet away. A localized analysis of CO hot-spots is contained under Threshold 4 and localized CO concentrations are presented in Table 4.2-2423.

**Table 4.2-18. Estimate of Operational Emissions under Mitigated Existing Plus Full TAMT Buildout Conditions (pounds per day)**

Operational Element	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM10	PM2.5
<b>Dry Bulk (2,650,000 MT)</b>						
<b><i>Unmitigated Emissions</i></b>						
Ocean-Going Vessels	39	706	58	21	13	12
Assist Tugs	2	13	12	<1	<1	<1
Tugs and Fuel Barges	22	221	166	<1	8	7
Trucks	7	190	39	1	17	6
Worker Trips	1	2	18	<1	6	2
Rail - Regional Line Haul	5	142	13	1	3	3
Rail - Switching between Terminal and Yard	<del>21</del>	<del>5833</del>	<del>23</del>	<1	1	1
Cargo Handling Equipment	10	111	59	<1	3	2
Bulk Loading	-	-	-	-	5,933	1,666
<b><i>Mitigated Reductions</i></b>						
MM-AQ-2 Idling <sup>1</sup>	<-1	<-1	<-1	<-1	<-1	<-1
MM-AQ-3 CAP Measures <sup>2</sup>	-1	-11	-1	<-1	<-1	<-1
MM-AQ-4 Dry Bulk BACT <sup>3</sup>	<del>&lt;-1</del>	<del>&lt;-1</del>	<del>&lt;-1</del>	<del>&lt;-1</del>	<del>&lt;-1</del> 5,648	<del>&lt;-1</del> 1,571
MM-AQ-5 VSR Beyond CAP <sup>4</sup>	-5	-97	-7	-2	-2	-2
MM-AQ-6 Electric CHE	<del>-5</del>	<del>-84</del>	<del>-53</del>	<del>&lt;-1</del>	<del>-3</del>	<del>-3</del>
MM-AQ-6 Electric CHE 9 At-Berth Emissions Capture	<del>&lt;-1</del>	<del>&lt;-1</del> 25	<del>&lt;-1</del>	<del>&lt;-1</del>	<del>&lt;-1</del>	<-1
<b>Dry Bulk Existing Plus Project Daily</b>	<b><del>6775</del></b>	<b><del>1,334</del> 200</b>	<b><del>3608</del></b>	<b><del>2120</del></b>	<b><del>5,982</del> 331</b>	<b><del>1,698</del> 123</b>
Dry Bulk Existing Daily	<del>2853</del>	<del>6131</del> 007	<del>97181</del>	<del>717</del>	<del>5996</del> 08	<del>1841</del> 92
Net New Over Existing	<del>3922</del>	<del>721</del> 193	<del>264</del> 128	<del>153</del>	<del>5,383</del> 277	<del>1,514</del> 69
Exceed Significant Threshold?	No	<del>Yes</del> No	No	No	<del>Yes</del> No	<del>Yes</del> No
<b>Refrigerated Containers (2,288,000 MT)</b>						
<b><i>Unmitigated Emissions</i></b>						
Ocean-Going Vessels	<del>281</del> 188	<del>4,567</del> 2,785	<del>516</del> 318	<del>196</del> 124	<del>117</del> 72	<del>107</del> 66
Assist Tugs	5	42	40	<1	1	1
Tugs and Fuel Barges	18	181	136	<1	6	6
Trucks	8	261	36	1	15	6
Worker Trips	1	3	27	<1	4	1
Cargo Handling Equipment	9	96	51	<1	2	2
<b><i>Mitigated Reductions</i></b>						
MM-AQ-2 Idling <sup>1</sup>	<-1	<-1	<-1	<-1	<-1	<-1
MM-AQ-3 CAP Measures <sup>2</sup>	<del>-941</del>	<del>-1,792</del> 11	<del>-1991</del>	<del>-72</del> <1	<del>-45</del> <1	<del>-42</del> <1
MM-AQ-5 VSR Beyond CAP <sup>4</sup>	-1	-16	-1	<-1	<-1	<-1

Operational Element	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM10	PM2.5
<i>MM-AQ-6 Electric CHE</i>	<del>&lt;1.5</del>	<del>&lt;1.84</del>	<del>&lt;1.53</del>	<del>&lt;1</del>	<del>&lt;1.3</del>	<del>&lt;1.3</del>
<b>Refrigerated Containers Existing Plus Project Daily</b>	<b>2272</b>	<b>3,342,258</b>	<b>605,553</b>	<b>124</b>	<b>100,99</b>	<b>8279</b>
Refrigerated Containers Existing Daily <sup>5</sup>	<del>74207</del>	<del>1,499,406</del>	<del>250,651</del>	<del>37110</del>	<del>3587</del>	<del>2877</del>
Net New Over Existing	153	<del>1,843,806</del>	<del>355,98</del>	<del>8814</del>	<del>6512</del>	<del>533</del>
<i>Exceed Significant Threshold?</i>	<del>Yes</del> No	<del>Yes</del> No	No	No	No	No
<b>Multi-Purpose General Cargo (977,400 MT)</b>						
<b>Unmitigated Emissions</b>						
Ocean-Going Vessels	95	1,742	148	57	34	31
Assist Tugs	4	32	30	<1	1	1
Tugs and Fuel Barges	47	473	356	<1	17	16
Trucks	1	23	5	<1	2	1
Worker Trips	<1	1	6	<1	2	1
Rail - Regional Line Haul	8	249	23	2	5	5
Rail - Switching between Terminal and Yard	<del>53</del>	<del>123,63</del>	<del>53</del>	<1	<del>21</del>	<del>21</del>
Cargo Handling Equipment	4	41	22	<1	1	1
<b>Mitigated Reductions</b>						
<i>MM-AQ-42 Idling<sup>1</sup></i>	<-1	<-1	<-1	<-1	<-1	<-1
<i>MM-AQ-23 CAP Measures<sup>2</sup></i>	-4	-74	-5	-1	-1	-1
<i>MM-AQ-45 VSR Beyond CAP<sup>4</sup></i>	-14	-266	-19	-6	-4	-4
<i>MM-AQ-6 Electric CHE</i>	<del>&lt;1.5</del>	<del>&lt;1.84</del>	<del>&lt;1.53</del>	<-1	<del>&lt;1.3</del>	<del>&lt;1.3</del>
<i>MM-AQ-9 At-Berth Emissions Capture</i>	<del>-4</del>	<del>-97</del>	<del>&lt;-1</del>	<del>-3</del>	<del>-2</del>	<del>-2</del>
<b>Multi-Purpose General Cargo Existing Plus Project Daily</b>	<del>147,136</del>	<b>2,343,102</b>	<b>5717</b>	<b>5349</b>	<b>5953</b>	<b>5247</b>
Multi-Purpose General Cargo Existing Daily <sup>5</sup>	<del>4085</del>	<del>780,146</del>	<del>120,281</del>	<del>1234</del>	<del>1833</del>	<del>1631</del>
Net New Over Existing	<del>10851</del>	<del>1,563,639</del>	<del>451,236</del>	<del>4415</del>	<del>4120</del>	<del>3616</del>
<i>Exceed Significant Threshold?</i>	<del>Yes</del> No	Yes	No	No	No	No
<b>All Cargo Types</b>						
<b>All Cargo Types Daily Existing Plus Project Total</b>	<b>4341</b>	<b>7,019,656</b>	<b>1,536,379</b>	<b>1984</b>	<b>6,141,483</b>	<b>1,832,250</b>
All Cargo Types Existing Daily Total <sup>5</sup>	<del>141,346</del>	<del>2,892,653</del>	<del>467,111</del>	<del>56161</del>	<del>652,728</del>	<del>229,300</del>
Net New Over Existing	<del>300,756</del>	<del>4,128,26</del>	<del>1,070,265</del>	<del>14333</del>	<del>5,490,245</del>	<del>1,603,50</del>
<i>Exceed Significant Threshold?</i>	<del>Yes</del> No	<del>Yes</del> No	<del>Yes</del> No	<del>Yes</del> No	<del>Yes</del> No	<del>Yes</del> No
Significance Thresholds	75	250	550	150	100	55

Source: Appendix F. Totals may not add exactly due to rounding.

<sup>1</sup> Reductions from idling are not quantified because reductions would be speculative, as it is not fully known whether long

Operational Element	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
trucks currently idle at any given location.						
<sup>2</sup> Includes VSR compliance with the CAP target of 80% (12 knot speed within 20 nautical miles of Point Loma) and 80% compliance with at-berth regulations.						
<sup>3</sup> Dry Bulk BACT reductions <del>are not quantified because reductions would be speculative.</del> <u>assume 95% reduction with controls. Any concrete handling will require an APCD permit, which may require up to 99% reduction.</u>						
<sup>4</sup> Includes VSR compliance of 90% (12 knot speed within 40 nautical miles of Point Loma).						
<sup>5</sup> Existing daily emissions shown in Table 4.2-6.						
<sup>6</sup> <u>Net new daily emissions will not exceed 75 pounds on a peak day at TAMT plan buildout under the MPC because MM-AQ-7 requires the use of advanced technologies to limit VOC emissions to no more than 75 pounds on a peak day once throughput exceeds 4,000,000 MT annually, OR to limit the number of vessels to no more than three vessels on a peak day once throughput exceeds 4,000,000 metric tons annually, if advanced technologies are not available.</u>						

## Page 4.2-72

Recently, SCAQMD published a white paper that describes a number of potential scenarios for reducing emissions from the goods movement sector. The SCAQMD paper focused on various ozone precursors (VOC and NO<sub>x</sub>) reduction scenarios accounting for varying degrees of technology deployment and future rulemaking. The scenarios included the following: (1) Equal Share Reduction in NO<sub>x</sub> (e.g., overall basin-wide reduction needed to achieve the ozone standard); (2) 100% (or full) implementation of existing exhaust standards (e.g., all locomotives and CHE achieve Tier 4 standard; all OGVs are Tier 3; all trucks are ~~MY~~model year 2010 and newer); (3) 90 percent Cleaner Combustion Technologies Scenario (e.g., all locomotives, CHE, OGVs, and trucks 90 percent cleaner than existing standards); (4) 25 percent penetration of zero-emission technologies; (5) 50 percent penetration of zero-emission technologies, and; (6) 75 percent penetration of zero-emission technologies. A summary of the emission reductions associated with these various scenarios is presented in Table 4.2-19.

## Page 4.2-73

Aggressive regulatory actions and deployment of zero- and near-zero technologies would drastically reduce emissions associated with TAMT operations. As shown in Table 4.2-20, reductions from the most aggressive scenario SCAQMD investigated result in a 53 percent reduction from unmitigated NO<sub>x</sub> associated with full TAMT plan buildout, while reductions from the least aggressive scenario (full implementation of existing regulations) result in a 25 percent reduction from unmitigated NO<sub>x</sub> associated with full TAMT plan buildout. Under either scenario, emissions of all pollutants from full TAMT plan buildout would be reduced, which would act to reduce ozone precursors, reduce DPM emissions and risk in neighboring communities, and help the District attain its CAP targets. This analysis has been provided for illustrative purposes only to highlight to potential long-term effects of international (e.g., vessel emission standard updates), federal (e.g., locomotive emission standard updates, and state (e.g., at-berth vessels regulation and deployment of zero emission technologies) actions on full TAMT plan buildout NO<sub>x</sub> emissions (SCAQMD 2015b). After implementation of all mitigation, the District would be deploying various zero- and near-zero technologies that would drastically reduce emissions associated with TAMT operations.

## Pages 4.2-74 and 4.2-75

**Table 4.2-20. Summary of Goods Movement Reduction Scenarios on Full TAMT Plan Buildout**

Operational Element	Unmitigated NO <sub>x</sub> <sup>1</sup>	Maximum Reduction <sup>2</sup>	Mitigated NO <sub>x</sub> <sup>3</sup>	Minimum Reduction <sup>4</sup>	Mitigated NO <sub>x</sub> <sup>3</sup>
<b>Dry Bulk (2,650,000 MT)</b>					
<b>Project Daily</b>					
Ocean-Going Vessels	706	52%	340	28%	509
Assist Tugs	13	-	13	-	13
Tugs and Fuel Barges	221	-	221	-	221
Trucks	190	98%	5	4%	183
Worker Trips	2	85%	0	41%	1
Rail - Regional Line Haul	142	99%	2	56%	63
Rail - Switching between Terminal and Yard	<del>5833</del>	99%	≤1	56%	<del>2614</del>
Cargo Handling Equipment	111	98%	2	21%	88
Bulk Loading	-	-	-	-	-
<b>Dry Bulk Existing plus Project Daily</b>	<b><del>1,4417</del></b>	-	<b><del>5843</del></b>	--	<b><del>1,403092</del></b>
Dry Bulk Existing Daily <sup>1</sup>	<del>6131,007</del>	-	<del>6131,007</del>	--	<del>6131,007</del>
Net New Over Existing	<del>829410</del>	-	<del>-29423</del>	--	<del>49186</del>
<i>Exceed Significant Threshold?</i>	<b>Yes</b>	-	<i>No</i>	--	<del>Yes</del> <b>No</b>
<b>Refrigerated Containers (2,288,000 MT)</b>					
<b>Project Daily</b>					
Ocean-Going Vessels	2,785	52%	1,344	28%	2,009
Assist Tugs	42	-	42	-	42
Tugs and Fuel Barges	181	-	181	-	181
Trucks	261	98%	6	4%	251
Worker Trips	3	85%	<1	41%	2
Cargo Handling Equipment	96	98%	2	21%	76
<b>Refrigerated Containers Existing plus Project Daily</b>	<b>3,369</b>	-	<b>1,576</b>	-	<b>2,561</b>
Refrigerated Containers Existing Daily <sup>1</sup>	<del>1,4994,064</del>	-	<del>1,4994,064</del>	-	<del>1,4994,064</del>
Net New Over Existing	<del>1,870-695</del>	-	<del>77-2,488</del>	-	<del>-1,5062</del>
<i>Exceed Significant Threshold?</i>	<del>Yes</del> <b>No</b>	-	No	-	Yes
<b>Multi-Purpose General Cargo (977,400 MT)</b>					
<b>Project Daily</b>					
Ocean-Going Vessels	1,742	52%	841	28%	1,256
Assist Tugs	32	-	32	-	32
Tugs and Fuel Barges	473	-	473	-	473
Trucks	23	98%	1	4%	23

Operational Element	Unmitigated NO <sub>x</sub> <sup>1</sup>	Maximum Reduction <sup>2</sup>	Mitigated NO <sub>x</sub> <sup>3</sup>	Minimum Reduction <sup>4</sup>	Mitigated NO <sub>x</sub> <sup>3</sup>
Worker Trips	1	85%	<del>0</del> <u>≤1</u>	41%	<del>0</del> <u>≤1</u>
Rail - Regional Line Haul	249	99%	3	56%	110
Rail - Switching between Terminal and Yard	<del>123</del> <u>63</u>	99%	1	56%	<del>55</del> <u>28</u>
Cargo Handling Equipment	41	98%	1	21%	33
<b>Multi-Purpose General Cargo Existing plus Project Daily</b>	<b>2,683</b>	-	<b>1,354</b> <u>0</u>	-	<b>1,981</b> <u>955</u>
Multi-Purpose General Cargo Existing Daily <sup>1</sup>	<del>780</del> <u>1,463</u>	-	<del>780</del> <u>1,463</u>	-	<del>780</del> <u>1,463</u>
Net New Over Existing	<del>1,903</del> <u>160</u>	-	<del>574</del> <u>113</u>	-	<del>1,201</del> <u>491</u>
<i>Exceed Significant Threshold?</i>	<b>Yes</b>	-	<del>Yes</del> <u>No</u>	-	<b>Yes</b>
<b>All Cargo Types</b>					
<b>All Cargo Types Existing plus Project Daily Total</b>	<b>7,493</b> <u>408</u>	-	<b>3,511</b> <u>0</u>	-	<b>5,646</b> <u>608</u>
All Cargo Types Existing Daily Total <sup>1</sup>	<del>2,882</del> <u>6,534</u>	-	<del>2,892</del> <u>6,534</u>	-	<del>2,892</del> <u>6,534</u>
Net New Over Existing	<del>4,601</del> <u>875</u>	-	<del>619</del> <u>3,024</u>	-	<del>2,754</del> <u>926</u>
<i>Exceed Significant Threshold?</i>	<b>Yes</b>	-	<del>Yes</del> <u>No</u>	-	<del>Yes</del> <u>No</u>
Significance Threshold	250	-	250	-	250

Source: Appendix F. Totals may not add exactly due to rounding.

<sup>1</sup> Unmitigated NO<sub>x</sub> emissions are shown in Table 4.2-17.

<sup>2</sup> Represents the maximum reductions from SCAQMD's White Paper as shown in Table 4.2-19 ("75% Zero/25% Near-Zero").

<sup>3</sup> Mitigated NO<sub>x</sub> estimated by multiplying unmitigated NO<sub>x</sub> from table 4.2-17 by the appropriate maximum and minimum reductions.

<sup>4</sup> Represents the minimum reductions from SCAQMD's White Paper as shown in Table 4.2-19 ("100% Existing Standards").

## Pages 4.2-76 through 4.2-77

### Full TAMT Plan Buildout

Operation of full TAMT plan buildout, when combined with cumulative projects, would exceed the thresholds for non-attainment pollutants including VOC, NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> (**Impact-AQ-3**). As such, full buildout of the TAMT plan is expected to result in a cumulatively considerable net increase in a nonattainment pollutant. With mitigation measures **MM-AQ-2** through **MM-AQ-82** incorporated, VOC, NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions would remain above the County's ~~reduced below County~~ SLTs. Therefore, after mitigation, full TAMT plan buildout operational air quality impacts would be less than significant and ~~unavoidable~~.

### Level of Significance Prior to Mitigation

#### Demolition and Initial Rail Component

Impacts related to implementation of the Demolition and Initial Rail Component would be less than significant.



### Full TAMT Plan Buildout

Full TAMT plan buildout would result in a cumulatively considerable net increase of VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM10, and PM2.5, which are nonattainment pollutants (**Impact-AQ-3**). Potentially significant impact(s) include:

**Impact-AQ-3: Cumulative Emissions in Excess of Criteria Pollutant Thresholds During TAMT Plan Buildout Operations.** Project emissions during operations, before mitigation, would exceed the San Diego County SLTs for VOC, NO<sub>x</sub>, ~~CO~~, PM10, and PM2.5, and when combined with other nearby past, present, and probable future projects, the full TAMT plan buildout's contribution would be cumulatively considerable. The contribution of project-related emissions is considered significant because full TAMT plan buildout would exceed thresholds that have been set by SDAPCD to attain the NAAQS and CAAQS, the purpose of which is to provide for the protection of public health.

### Mitigation Measures

#### Demolition and Initial Rail Component

No mitigation is required.

#### Full TAMT Plan Buildout

Implement **MM-AQ-2** through **MM-AQ-82**, as described under Threshold 2.

### Level of Significance after Mitigation

#### Demolition and Initial Rail Component

Impacts would be less than significant.

#### Full TAMT Plan Buildout

As shown in Table 4.2-18, **Impact AQ-3** would ~~remain be reduced to a less-than-significant level~~ after implementation of Mitigation Measures **MM-AQ-2** through **MM-AQ-82**, because mitigation would reduce operations-related emissions ~~but not to a level below County SLTs for all pollutants~~. Therefore, when combined with contributions of nonattainment pollutant emissions of past, present, and probable future projects, buildout of the full TAMT plan's contribution of ~~a~~ nonattainment ~~pollutants (VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM10, and PM2.5)~~ pollutant would be less than cumulatively considerable during operations and impacts are considered less than significant.

## Page 4.2-79

At the maximum residential receptor, the greatest contributors to cancer risk are terminal equipment, vessel hoteling, and (to a lesser extent) rail activity. The greatest contributors to unmitigated cancer risk at the maximum residential, park, and school receptors are terminal equipment (47–48% of risk), vessel hoteling (42–45%), and (to a lesser extent) rail activity (4–7%). The maximally exposed residential areas, parks (namely Cesar Chavez Park), and school receptor locations (namely Perkins Elementary and Monarch School) are all close to the terminal and the

railyard. Receptor locations further away from the terminal show dramatically lower health risk values.

## Page 4.2-81

Table 4.2-22. Estimate of Health Risk at Nearby Receptors during Existing Plus Full TAMT Plan Build Operations

Receptor Type	Full TAMT Plan Build (unmitigated)			Net Over Existing <sup>1</sup>			Full TAMT Plan Build (mitigated)			Net Over Existing <sup>1</sup>		
	Cancer Risk Per Million	Chronic Hazard Index	Acute Hazard Index	Cancer Risk Per Million	Chronic Hazard Index	Acute Hazard Index	Cancer Risk Per Million	Chronic Hazard Index	Acute Hazard Index	Cancer Risk Per Million	Chronic Hazard Index	Acute Hazard Index
<b><i>Dry Bulk</i></b>												
Residential	<del>7366</del>	0.02	<0.01	<b>6559</b>	0.02	<0.01	<del>7336</del>	0.02	<0.01	<b>6529</b>	0.02	<0.01
Park	8	0.03	<0.01	<del>67</del>	0.03	<0.01	<del>85</del>	0.03	<0.01	<del>64</del>	0.03	<0.01
School	<del>1412</del>	0.03	<0.01	<del>1211</del>	0.02	<0.01	<del>147</del>	0.03	<0.01	<del>125</del>	0.02	<0.01
<b><i>Refrigerated Containers</i></b>												
Residential	<del>121136</del>	0.03	<0.01	<b>90109</b>	0.02	<0.01	<del>5328</del>	0.01	<0.01	<b>221</b>	0.01	<0.01
Park	<del>1312</del>	0.05	<0.01	<del>87</del>	0.03	<0.01	<del>63</del>	0.03	<0.01	<del>3&lt;1</del>	0.01	<0.01
School	<del>2122</del>	0.04	<0.01	<b>1314</b>	0.02	<0.01	<del>95</del>	0.02	<0.01	<del>4&lt;1</del>	0.01	<0.01
<b><i>Multi-Purpose General Cargo</i></b>												
Residential	<del>4936</del>	0.01	<0.01	<b>4433</b>	0.01	<0.01	<del>4916</del>	0.01	<0.01	<b>4413</b>	0.01	<0.01
Park	4	0.02	<0.01	<del>43</del>	0.02	<0.01	<del>42</del>	0.02	<0.01	<del>42</del>	0.02	<0.01
School	<del>96</del>	0.02	<0.01	<del>85</del>	0.02	<0.01	<del>93</del>	0.02	<0.01	<del>82</del>	0.02	<0.01
<b><i>Total for all cargo</i></b>												
Residential	<del>240225</del>	0.01	<0.01	<b>197188</b>	0.05	<0.01	<del>17480</del>	0.05	<0.01	<b>13242</b>	0.03	<0.01
Park	<del>2524</del>	0.02	<0.01	<b>1817</b>	0.07	<0.01	<del>199</del>	0.08	<0.01	<b>145</b>	0.06	<0.01
School	<del>4340</del>	0.02	<0.01	<b>3330</b>	0.06	<0.01	<del>3215</del>	0.06	<0.01	<b>258</b>	0.05	<0.01
Threshold	--	--	--	10	1.0	1.0	--	--	--	10	1.0	1.0
Exceed Threshold?	--	--	--	Yes	No	No	--	--	--	Yes	No	No

Source: Appendix F.

Note that risk for the various receptor types is not additive and the risk is not the sum of all the risks shown here; rather, the risk at each receptor type is already the sum of emissions.

**Bold** = exceedance.

<sup>1</sup> Existing health risk is shown in Table 4.2-8.

## Page 4.2-82

### Demolition and Initial Rail Component and Full TAMT Plan Buildout

#### Carbon Monoxide Hot-spots

The following analysis considers both the Demolition and Initial Rail Component and the full buildout of the TAMT plan. Additional traffic created by the proposed project would have the potential to create CO hot-spots at nearby roadways and intersections. Multiple intersections would operate at LOS D or worse under existing, existing plus Demolition and Initial Rail Component, and existing plus full TAMT plan buildout conditions (Appendix G). The intersection that shows the most congestion and highest volumes across the various scenarios is the Harbor Drive and 32<sup>nd</sup> Street intersection, which has 2,642 vehicles and operates at LOS D during the PM peak hour under existing conditions and would increase to 3,418 vehicles and continue to operate at LOS D during the PM peak hour under ~~future TAMT plan buildout year-with project conditions~~. To provide a conservative analysis, CO concentrations were modeled to estimate pollutant concentrations at the Harbor Drive and 32<sup>nd</sup> Street intersection based on existing and full TAMT plan buildout volumes assuming existing year emission rates remain consistent over time. Table 4.2-23 presents the results of the CO hot-spot modeling and indicates that implementation of the proposed project would not result in violations of the state or federal 1- or 8-hour CO standards during the existing plus project, near term, and future year conditions. Consequently, the impact of traffic conditions from the proposed project on ambient CO levels is considered less than significant.

**Table 4.2-23. Modeled CO Levels Concentrations Measured at Receptors in the Vicinity of the Affected Intersection (parts per million)**

Intersection	Existing Plus Demolition and Initial Rail Component <sup>a</sup>		Existing Plus TAMT Plan Buildout <sup>a</sup>	
	1-Hr	8-Hr	1-Hr	8-Hr
Harbor Drive and 32 <sup>nd</sup> Street <u>concentrations</u> (ppm)	4.2	3.2	4.1	3.1
<u>Ambient Air Quality Standards (NAAQS/CAAQS)</u> <u>in ppm</u>	35/20	9/9.0	35/20	9/9.0
<u>Exceed Threshold?</u>	No	No	No	No

<sup>a</sup> Background concentrations of 3.0 and 2.4 ppm were added to the modeling 1- and 8-hour results, respectively.  
Source: Appendix F.

## Pages 4.2-83 through 4.2-85

As shown in Table 4.2-15, operation of the Demolition and Initial Rail Component by itself would not significantly increase emissions of ozone precursors (VOC and NO<sub>x</sub>), as emissions would be below thresholds, but as shown in Table 4.2-17, full TAMT plan buildout would significantly increase emissions of ozone precursors (VOC and NO<sub>x</sub>) (**Impact-AQ-2**). After implementation of Mitigation Measures **MM-AQ-2** through **MM-AQ-82**, VOC<sub>i</sub> and NO<sub>x</sub> emissions would ~~remain in excess of the~~ reduced below the applicable County SLT thresholds (Table 4.2-18). Project-generated ozone precursors could increase photochemical reactions and the formation of tropospheric ozone, which,

at certain concentrations, could lead to respiratory symptoms (e.g., coughing), decreased lung function, and inflammation of airways. Although these health effects are associated with ozone, the impacts are a result of cumulative and regional VOC and NO<sub>x</sub> emissions. However, the incremental contribution of the project to specific health outcomes related to criteria pollutant emissions would be limited and any effects thereof would be below any health-based significance threshold (e.g., NAAQS and CAAQS). ~~Furthermore, while the incremental contribution could not be traced solely to the proposed project, the contribution of project-related emissions is considered less than significant because the project would result in emissions below thresholds that have been set by SDAPCD and adopted by the County to attain the NAAQS and CAAQS, which are designed to provide public health protection.~~ However, because the project would result in emissions ~~above~~below health-based thresholds (SDAPCD Trigger Levels and County SLTs) for VOC and NO<sub>x</sub> emissions after mitigation, operation of full TAMT plan buildout would not result in adverse health effects associated with criteria pollutant emissions-~~Therefore, after mitigation, Impact AQ-3)- would be less than significant.~~

As shown in Table 4.2-22, operation of the proposed project would result in adverse health effects on the nearby populations from localized DPM exhaust at full TAMT plan buildout. Thus, the health-related impacts of the full TAMT plan buildout's localized DPM emissions are considered significant (**Impact AQ-4**). Note that the increase in operations at the project site would not occur immediately and all at once, but would instead occur incrementally over time as regional air quality improves and regulations to reduce emissions from Port-related sources take effect. Also note that fugitive particulate matter dust from soda ash and bauxite handling is not considered in the localized DPM exhaust analysis because particulate matter dust is not listed as a carcinogen by OEHHA. As shown in Table 4.2-23, operation of the proposed project would not result in adverse health effects on the nearby populations associated with localized CO at nearby roadways.

### **Asbestos-Containing Materials**

Demolition of existing structures results in fugitive dust and other particulates that may disperse to adjacent sensitive receptor locations. Asbestos-containing materials (ACMs) were commonly used as fireproofing and insulating agents prior the 1977, which is when the U.S. Consumer Product Safety Commission banned most ACM use due to their link to mesothelioma. However, buildings constructed prior to 1977 that would be demolished by the project may have used ACM and could expose receptors to asbestos, which may become airborne with other particulates during demolition.

A discussion of asbestos-related impacts is presented in Section 4.7 of the Draft EIR, *Hazards and Hazardous Materials*. As discussed therein, compliance with Title 8, Industrial Relations, of the California Code of Regulations would ensure that removal of any asbestos-containing materials and lead-based paints would be conducted in a safe manner, including proper disposal in an approved facility, and includes mitigation (MM-HAZ-1 and MM-HAZ-2) related to removal of any contaminated materials.

## **Level of Significance Prior to Mitigation**

### **Demolition and Initial Rail Component**

Impacts would be less than significant.

**Full TAMT Plan Buildout**

Implementation of full buildout of the TAMT plan would expose sensitive receptors to substantial pollutant concentrations. Potentially significant impact(s) include:

**Impact-AQ-4: Health Risk During Full TAMT Plan Buildout Operations.** Project TAC emissions during full TAMT plan buildout operations, before mitigation, would result in a significant incremental health risk by exceeding thresholds for incremental cancer risk at nearby receptors.

**Mitigation Measures****Demolition and Initial Rail Component**

No mitigation is required.

**Full TAMT Plan Buildout**

Implement **MM-AQ-2** through **MM-AQ-89**, as described under Threshold 2.

**Level of Significance after Mitigation****Demolition and Initial Rail Component**

Impacts would be less than significant.

**Full TAMT Plan Buildout**

As shown in Table 4.2-22, **Impact-AQ-4** would remain significant after implementation of **MM-AQ-2** through **MM-AQ-89** because mitigation would not reduce emissions to incremental risk thresholds. As such, the contribution of project-related TAC emissions would exceed thresholds that have been set by OEHHA and adopted by various agencies to protect public health. The proposed project's operational impact related to exposing sensitive receptors to substantial pollutant concentrations would be significant and unavoidable.

**Page 4.2-86**

Similar to the Goods Movement Reduction Scenarios discussed in Table 4.2-19 and Table 4.2-20, the Final EIR includes additional mitigation that, after implementation, would result in emissions and health risk far below the levels that were presented in the Draft EIR. Specifically, the District is deploying various zero- and near-zero CHE and at-berth technologies that would drastically reduce health risk similar to the levels shown in the "Full TAMT Plan Build (Shore Power for All Vessels plus CHE Turnover) numbers shown in Table 4.2-24. The plausible future scenario analysis shown in Table 4.2-24 has not been updated but remains to illustrate that the promotion of zero- and near-zero technologies reduce health risk in surrounding communities.

### 3.2.5 Changes to Chapter 4, Section 4.4, *Cultural Resources*

#### Pages 4.4-29 and 4.4-30

##### Full TAMT Plan Buildout

**MM-CUL-1: Archaeological Monitoring in Areas of Sensitivity.** To reduce potential impacts on CA-SDI-5931, all proposed grading, ~~and excavating, and geotechnical testing~~ for the proposed project in the area of potential archaeological sensitivity shall be monitored by a qualified archaeologist(s), who meets the Secretary of the Interior's Professional Qualifications Standards, as promulgated in 36 CFR 61, and a Native American cultural monitor, the latter of which has been requested by the Viejas Band of Kumeyaay Indians. The sensitive portion of the project area, where it is possible that artifacts associated with CA-SDI-5931 could be buried, is immediately east of Warehouse C and south and east of the silo complex and the rail car unloading building, as indicated on Figure 4.4-1. The sensitive area includes the molasses tanks, truck scale building, spur lines north, east, and south of the molasses tanks, and paved and unpaved parking areas near the Crosby Road entrance. The following additional conditions shall only apply to the sensitive portion of the project area indicated on Figure 4.4-1 during earthwork activities, including grading and trenching.

## 3.2.6 Changes to Chapter 4, Section 4.6, *Greenhouse Gas Emissions and Climate Change*

### Page 4.6-2

**Table 4.6-1. Summary of Significant Impacts and Mitigation Measures**

Potentially Significant Impact(s)	Summary of Mitigation Measure(s)	Level of Significance After Mitigation	Rationale for Finding After Mitigation
<b>Impact-GHG-1:</b> GHG Emissions in Excess of 2020 Target During Demolition and Initial Rail Component	<b>MM-GHG-1:</b> Implement Diesel-Reduction Measures During Construction and Operations of Future TAMT Plan Components <b>MM-GHG-2:</b> Comply with San Diego Unified Port District Climate Action Plan Measures <b>MM-GHG-3:</b> Electric Cargo Handling Equipment Upgrades	Less than Significant	Project GHG emissions with mitigation achieve the CAP's reduction target for maritime projects (33%) and the project would comply with plans, policies, and regulatory programs outlined in the Scoping Plan and adopted by ARB or other California agencies for the purpose of reducing the emissions of GHGs.
<b>Impact-GHG-2:</b> GHG Emissions in excess of post-2020 Target During TAMT Plan Buildout	<b>MM-GHG-1</b> through <b>MM-GHG-3</b> <b>MM-GHG-4:</b> Electric Cargo Handling Equipment Upgrades <b>MM-GHG-5:</b> Implement Vessel Speed Reduction Program Beyond Climate Action Plan Compliance for Future Operations Associated with the TAMT Plan <b>MM-GHG-6:</b> Implement a Renewable Energy Project or Purchase the Equivalent Greenhouse Gas Offsets from a California Air Resources Board Approved Registry <u>or a Locally Approved Equivalent Program for Future Operation Associated with the TAMT Plan</u> <b>MM-GHG-7:</b> <u>Annual Inventory Submittal and Periodic Technology Review</u> <b>MM-GHG-8:</b> <u>Implement a Sustainable Leasingan Exhaust Emissions Reduction Program at the Tenth Avenue Marine Terminal</u> <b>MM-GHG-9:</b> <u>Use of At-Berth Emission Capture and/or Control System to Reduce Vessel Emissions</u>	Significant and Unavoidable	Mitigation would reduce project-related operational emissions, but there are no known reduction targets that apply to the project based on its location and development type. In addition, there is no statewide guidance document to indicate how to achieve the deep reductions set by EO S-03-05 and EO B-30-15.



## Page 4.6-5

**Table 4.6-3. Global, National, State, and Local GHG Emissions Inventories**

<b>Emissions Inventory</b>	<b>CO<sub>2</sub>e (metric tons)</b>
2010 IPCC Global GHG Emissions Inventory	52,000,000,000
2014 EPA National GHG Emissions Inventory	6,870,000,000
2014 ARB State GHG Emissions Inventory	441,500,000
2012 County of San Diego GHG Emissions Inventory	34,670,000
2010 City of San Diego GHG Emissions Inventory	13,091,591
2006 Port of San Diego GHG Emissions Inventory <sup>1</sup>	826,429
Sources: IPCC 2014; EPA 2016a; ARB 2016a; Energy Policy Initiatives Center 2015; City of San Diego 2015; District 2013.	
<sup>1</sup> The Port of San Diego's GHG emissions inventory is based on the 2013 Climate Action Plan, rather than the District's 2012 Maritime Air Emissions Inventory, because the Climate Action Plan provides a more comprehensive inventory of the Port's activities and GHG emissions profile.	

## Page 4.6-6

**Table 4.6-4. Estimate of Existing GHG Emissions at the Project Site (metric tons per year)**

Operational Element	CO <sub>2</sub> e
<b>Dry Bulk (289,864 MT)</b>	
Ocean-Going Vessels	519
Assist Tugs	17
Tugs and Fuel Barges	36
Trucks	2,373
Worker Trips	352
Rail - Regional Line Haul	232
Rail - Switching between Terminal and Yard	<del>3726</del>
Cargo Handling Equipment	<del>337</del> <u>305</u>
Electricity	194
Water	57
<b>Dry Bulk Baseline</b>	<b><del>4,153</del><u>110</u></b>
<b>Refrigerated Containers (637,931 MT)</b>	
Ocean-Going Vessels	6,202
Shore Power	997
Assist Tugs	64
Tugs and Fuel Barges	137
Trucks	5,677
Worker Trips	775
Cargo Handling Equipment	<del>741</del> <u>672</u>
Electricity	323
Water	128
Refrigerants	15
<b>Refrigerated Containers Baseline</b>	<b><del>15,059</del><u>14,990</u></b>
<b>Multi-Purpose General Cargo (85,131 MT)</b>	
Ocean-Going Vessels	1,062
Assist Tugs	31
Tugs and Fuel Barges	67
Trucks	424
Worker Trips	103
Rail - Regional Line Haul	125
Rail - Switching between Terminal and Yard	<del>5030</del>
Cargo Handling Equipment	<del>9990</del>
Water	17
<b>Multi-Purpose General Cargo Baseline</b>	<b><del>1,9850</del></b>
<b>Total Baseline from all cargo types</b>	<b><del>21,191</del><u>050</u></b>
Source: Appendix F. Totals may not add up exactly due to rounding.	

## Page 4.6-10

### Council on Environmental Quality Draft NEPA Guidance (2010/2014)

On February 19, 2010, the Council on Environmental Quality (CEQ) issued draft National Environmental Policy Act (NEPA) guidance on the consideration of the effects of climate change and GHG emissions. This guidance advises federal agencies that they should consider opportunities to reduce GHG emissions caused by federal actions, adapt their actions to climate change effects throughout the NEPA process, and address these issues in their agency NEPA procedures. Where applicable, the scope of the NEPA analysis should cover the GHG emissions effects of a proposed action and alternative actions, as well as the relationship of climate change effects on a proposed action or alternatives. The guidance identified a reference point of 25,000 metric tons per year of direct CO<sub>2e</sub> as an indicator that further NEPA review may be warranted. This reference point, however, is not intended to be used as a threshold for determining a significant impact or effect on the environment due to GHG emissions (Council on Environmental Quality 2010).

The draft guidance was updated in 2014 to further refine the scope of NEPA analyses. The 2014 guidance recommends that analyses should include the potential effects of a proposed action on climate change as indicated by its GHG emissions, as well as the implication of climate change for the environmental effects of the proposed action (Council on Environmental Quality 2014). ~~The 2014 CEQ guidance is still considered draft as of the writing of this document and is not an official CEQ policy document.~~ This CEQ guidance was adopted in August 2016.

## Page 4.6-11

### EPA and NHTSA Fuel Economy for Medium and Heavy Duty Engines and Vehicles (2011/2015)

On August 9, 2011, EPA and NHTSA announced a new national program to reduce GHG emissions and improve fuel economy for new medium- and heavy-duty engines and vehicles sold in the U.S. EPA and NHTSA finalized a joint rule (Phase 1) that established a national program consisting of new standards for engines in model years 2014 through 2018, which would reduce CO<sub>2</sub> emissions by about 270 million metric tons and save about 530 million barrels of oil over the life of vehicles built for the 2014 to 2018 model years.

~~EPA and NHTSA are currently working on adopted the Phase 2 standards in August 2016, which would will reduce CO<sub>2</sub> emissions associated with model year 2018 and beyond, reducing fuel consumption and GHG emissions from tractor trailers as much as 24 percent once fully implemented. The Notice of Proposed Rulemaking was issued in June 2015, and the final rule is expected to be issued in spring of 2016.~~ for certain truck types.

## Pages 4.6-12 through 4.6-13

### Assembly Bill 32—California Global Warming Solutions Act (2006)

AB 32 codified the State's GHG emissions target by requiring California's global warming emissions to be reduced to 1990 levels by 2020. Since being adopted, ARB, CEC, the California Public Utilities Commission, and the California Building Standards Commission have been developing regulations that will help the State meet the goals of AB 32 and EO S-03-05. The scoping plan for AB 32 identifies

specific measures to reduce GHG emissions to 1990 levels by 2020 and requires ARB and other State agencies to develop and enforce regulations and other initiatives to reduce GHG emissions. The AB 32 Scoping Plan, first adopted in 2008, comprises the State's roadmap for meeting AB 32's reduction target. Specifically, the scoping plan articulates a key role for local governments by recommending that they establish GHG emissions-reduction goals for both their municipal operations and the community that are consistent with those of the State (i.e., approximately 15 percent below current levels) (ARB 2008).

ARB re-evaluated its emissions forecast in light of the economic downturn and updated the projected 2020 emissions to 545 million metric tons of carbon dioxide equivalent (MTCO<sub>2</sub>e). Two reduction measures (Pavley I and RPS [12–20 percent]) that were not previously included in the 2008 scoping plan baseline were incorporated into the updated baseline, further reducing the 2020 statewide emissions projection to 507 million MTCO<sub>2</sub>e. The updated forecast of 507 million MTCO<sub>2</sub>e is referred to as the AB 32 2020 baseline. An estimated reduction of 80 million MTCO<sub>2</sub>e is necessary to lower statewide emissions to the AB 32 target of 427 million MTCO<sub>2</sub>e by 2020 (ARB 2014).

ARB approved the *First Update to the Scoping Plan* on May 22, 2014 (ARB 2014). The first update includes both a 2020 element and a post-2020 element. The 2020 element focuses on the state, regional, and local initiatives that are being implemented now to help the State meet the 2020 goal. ARB is currently working on a second update to the Scoping Plan to reflect the 2030 target established in EO B-30-15, noting that "California has already made great progress in driving the development of clean technologies thanks to programs developed under AB 32 and other important Legislation; the 2030 target will ensure that success continues beyond 2020" (ARB 2015a). ~~ARB is expecting to present the final 2030 Target Scoping Plan to the board in late 2016.~~

~~ARB recently released a 2030 Target Scoping Plan Concept Paper within which ARB lays out four concepts or paths to achieving the 2030 target. The four concepts include: (1) Complementary Policies with a Cap and Trade Program; (2) Ambitious Complementary Policies without Cap and Trade: a Focus on Industrial Sources; (3) Ambitious Complementary Policies without Cap and Trade: a Focus on Transportation; and (4) Complementary Policies with a Carbon Tax. ARB will host various stakeholder workshops in 2016 and early 2017 (ARB 2016b).~~

ARB recently began publishing workshop presentations that lay out the vision for the 2030 scoping plan. Of particular note is that ARB's preliminary policy scenario evaluations include recommendations for local action that include a community-wide efficiency target of 6 MTCO<sub>2</sub>e per capita by 2030 and 2 MTCO<sub>2</sub>e per capita by 2050 to be used in local climate action planning. These efficiency targets would replace the "15 percent from 2008 levels by 2020" approach recommended in the initial Scoping Plan, which would allow for local governments to grow in a sustainable manner. The preliminary policy scenario evaluations also presents alternatives to extending the cap-and-trade program beyond 2020, including a no-cap-and-trade alternative as well as a carbon tax. The modeled scenarios include extending RPS to 80% by 2050, increasing the low carbon fuel standard to 25% by 2030, and increasing the number of zero-emission freight vehicles up to 4.7 million pieces by 2030. ARB will hold various public workshops over the next few months.

## **Senate Bill 32, California Global Warming Solutions Act of 2006: Emissions Limit, and Assembly Bill 197, State Air Resources Board, Greenhouse Gases, Regulations (2016)**

SB 32 (Pavley) bill requires ARB to ensure that statewide GHG emissions are reduced to at least 40% below the 1990 level by 2030, consistent with the target set forth in EO B-30-15. The bill specifies that SB 32 shall become operative only if AB 197 (Garcia) is enacted and becomes effective on or before January 1, 2017. AB 197 creates requirements to form the Joint Legislative Committee on Climate Change Policies; requires ARB to prioritize direct emission reductions from stationary sources, mobile sources, and other sources and consider social costs when adopting regulations to reduce GHG emissions beyond the 2020 statewide limit; requires ARB to prepare reports on sources of GHGs, criteria air pollutants, and toxic air contaminants; establishes 6-year terms for voting members of ARB; and adds two legislators as non-voting members of ARB. Both bills were signed by Governor Brown in September 2016.

## **Assembly Bill 1383 (2016), Short-Lived Climate Pollutants: Methane Emissions: Dairy and Livestock: Organic Waste: Landfills**

AB 1383 requires ARB to approve and implement a plan to reduce methane by 40%, fluorinated gases (F-gases) by 40%, and anthropogenic black carbon by 50% below 2013 levels by 2030. AB 1383 establishes specific targets for reducing organic waste in landfills (50% by 2020 and 75% by 2025 compared to 2014). The legislation also adopted regulations to reduce methane emissions from livestock manure management operations and dairy management operations that would take effect in 2024.

## **Pages 4.6-25 and 4.6-26**

### **Rail**

Trains servicing the project site are operated by BNSF. Rail activity is split between switching (or switch-duty) and regional travel (or line-haul). BNSF switching locomotives are used to break and assemble trains adjacent the project site at the BNSF yard. Line haul refers to the movement of cargo over long distances (e.g., from the project site north to Los Angeles) and occurs within the Port as the initiation or termination of a line-haul trip. Switching refers to the assembling and disassembling of trains, sorting of the cars of inbound cargo trains into contiguous “fragments” for subsequent delivery to terminals, and the short-distance hauling of rail cargo within the Port (District 2008).

Most of the current train activity involves importing soda ash from Searles Valley and exporting some multi-purpose general cargo, including vehicles and windmill parts. Rail switching occurs when soda ash is delivered and switchers and railcar movers pull the cargo from the BNSF yard to the project site, while all switching at the project site for other cargo types is done by the line-haul locomotives.

As a result of project implementation, rail activity would increase as throughput increases and the mix of cargo type changes. The emission calculation methodologies are adapted from the emission inventories at the Port of San Diego (District 2014) and Port of Long Beach (Port of Long Beach 2014), using switch duty and Class 1 line-haul notch time and power fraction emissions from EPA’s locomotive rulemaking support document (EPA 1998). Emissions associated with the railcar mover were estimated based on engine specifications (ShuttleWagon SW605C car mover equipped with a

Tier 3 8.3-liter Cummins QSC, rated at 300 horsepower), assuming the railcar mover operates at full load while in use. The simplified methodology for estimating both onsite switching and regional travel emissions is as follows.

- Emissions = locomotive hours x total locomotive horsepower x load factor x emission factors (in grams per horsepower-hour [g/hp-hr]).

The increase in activity (locomotive hours) is based on the assumption that loaded trains include four active (running) locomotives and empty trains include one active (running) locomotive while up to three locomotives idle to save fuel. BNSF line-haul locomotives are 4,400 horsepower on average and the GP-60 switchers include 3,600 horsepower engines. Additionally, a Tier 3 railcar mover helps with switching duties. Approximately half of the switching activity is performed by the GP-60 switchers and half is done by the railcar mover. Currently, up to one train on a maximum day and 72 trains per year arrive and then exit the BNSF yard. Switchers and railcar movers are active between the BNSF yard and the project site. For regional line-haul activity, all inbound and outbound trains were assumed to operate along the main line within San Diego County, with emissions based on what was determined to be a one-way distance of 61 miles to the Orange County border. Locomotive travel time is based on a 10 mph travel speed through downtown and a 2-hour travel time from just north of Santa Fe Depot to the Orange County line (based on a 30 mph travel speed).

Annual train activity would increase from 72 per year under existing conditions to up to 82 trains per year under the Demolition and Initial Rail Component and up to 684 trains per year under full TAMT plan buildout. Rail emissions are based on line-haul and switcher GHG emission factors from the Port of Long Beach inventory (Port of Long Beach 2015) (see locomotive activity and emission factor calculations in Appendix F).

## Trucks

Truck activity is split into three groups: idling at or near the project site, driving between the project site and nearest freeway entrance, and driving regionally on public roadways. Emissions associated with truck trips were estimated using trip generation from the traffic analysis (Appendix G) and idling and running exhaust GHG emission factors from ARB's EMFAC model. Emissions from idling at the terminal are based on an average total idling time on the entire terminal area of 15 minutes (0.25 hour) per truck per trip, consistent with the District's air emissions inventory (District 2014). Note that 15 minutes (0.25 hour) per truck per trip is the sum of all idling at and near the project site in the District's inventory, and not the idling time at a given location, which is restricted to 5 minutes by ARB (13 CCR 1956.8 and 2485). Emissions from truck travel between the project site and nearest freeway entrance are based on the assumption that trucks travel along Harbor Drive and enter and exit the freeway at 28<sup>th</sup> Street. Emissions from regional travel are based on the assumption that all trucks travel the 60-mile one-way travel distance from the project site to the Riverside County line.<sup>8</sup> Emission factors for running exhaust and idling were obtained from the EMFAC 2014 software for annual average heavy-duty drayage trucks operating at the Port (i.e., "T7 other port") assuming a baseline year of 2013, operational year of 2020 for the Demolition and Initial Rail Component, and operational year of 2035 for full TAMT plan buildout. Annual truck activity was based on the 33,840 one-way truck trips per day under existing conditions, with the

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<sup>8</sup> As the CEQA thresholds used in the impact analysis are regional and relate to the attainment status of air quality standards within San Diego County, haul truck trip emissions were confined to those occurring within the county.

Demolition and Initial Rail Component adding 2,520 new one-way truck trips per day for all nodes, and full TAMT plan buildout adding 152,280 new one-way truck trips per day for all nodes under maximum practicable buildout. A breakdown of trips by node is included in Appendix G.

Phase 2 heavy-duty truck standards were adopted by the Federal Highway Administration and EPA following release of the Draft EIR. The Phase 2 standards phase in beginning in model year 2021 and culminate in model year 2027. Because the Phase 2 standards are not included in the statewide and CAP BAU calculations, reductions are included in the revised mitigated analysis herein. The standards are phased in over time, incrementally increasing strength and compliance between 2021 and 2027. The reductions under full TAMT plan buildout in 2035 were estimated based on vehicle miles traveled by model year from EMFAC and the Class 7 and Class 8 reductions per ton-mile from the Phase 2 (MDHD2) Final EIS (NHTSA 2016), which increases from approximately 10% for model years 2021–2023, 15% for model years 2024–2026, and 19% for model years 2027 and beyond. The GHG reductions for each model year were weighted by the vehicle population in EMFAC, resulting in a 15.9% reduction in GHG emissions per mile in 2035. A breakdown of these reductions is included in Appendix F.

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Feasible mitigation measures have been identified for both 2020 and post-2020. For 2020, mitigation measures are based primarily on the measures presented in the CAP that can be implemented at the project level. For post-2020, mitigation measures are based, in part, on the measures presented in the CAP, as well as measures and potential action items presented in ARB's Sustainable Freight Action Plan and supporting E3 Pathways analysis (2015)<sup>9</sup> document (ARB 2015c), which aims to improve goods movement and freight efficiency, transition to zero-emission technologies, and increase competitiveness of California's freight system. This analysis relies on adopted standards and remains valid regardless if the State adopts a long-term reduction plan (e.g., 2030 Scoping Plan) in the near future, because any approved plan will only provide a framework to meet long-term targets using measures (e.g., RPS 50 percent) already known at the time of this analysis. ~~The mitigated analysis includes adopted statewide measures and does not take credit for any prospective measures that are not yet adopted. For example~~ Since the Draft EIR was released, the Phase 2 heavy-duty truck standards are likely to be approved ~~were adopted by the Federal Highway Administration and EPA on August 16, 2016. The Phase 2 standards phase in 2016 or 2017, but they remain~~ beginning in draft form model year 2021 and culminate in model year 2027. Therefore, ~~the GHG- and fuel-related reductions from Phase 2 are not~~ included in the analysis herein even though ~~because~~ reductions will likely be realized over the life of the project.

<sup>9</sup>The E3 Pathways documentation can be found here and is incorporated by reference:  
[https://ethree.com/public\\_projects/energy\\_principals\\_study.php/](https://ethree.com/public_projects/energy_principals_study.php/)

## Pages 4.6-41 through 4.6-43

**Table 4.6-7. Estimate of Existing Plus Demolition and Initial Rail Component GHG Emissions in 2020 (Metric Tons of CO<sub>2</sub>e per Year)**

Operational Element	Project MTCO <sub>2</sub> e without Mitigation	Project MTCO <sub>2</sub> e With Mitigation
<b>Dry Bulk (289,864 MT)</b>		
<b><i>Unmitigated Emissions</i></b>		
Ocean-Going Vessels <sup>1</sup>	519	519
Assist Tugs	17	17
Fuel Tug and Barge	36	36
Trucks <sup>2</sup>	2,373	2,373
Worker Trips	352	352
Rail - Regional Line Haul	232	232
Rail - Switching between Terminal and Yard	<del>3726</del>	<del>3726</del>
Cargo Handling Equipment	<del>337305</del>	<del>337305</del>
Electricity	194	171
Water	57	53
<b><i>Mitigated Reductions</i></b>		
MM GHG-1 Idling <sup>3</sup>	--	<-1
MM-GHG-2 CAP Measures <sup>4</sup>	--	-5
MM-GHG-3 Electric CHE <sup>45</sup>	--	<del>-2456</del>
<b>Dry Bulk Existing Plus Project Annual</b>	<b><del>4,153110</del></b>	<b><del>4,098023</del></b>
Dry Bulk Existing Annual <sup>5</sup>	<del>4,132110</del>	<del>4,132110</del>
Net New over Existing	0	<del>-5588</del>
Reduction from Unmitigated	--	<del>-5588</del>
Percentage Reduction with Mitigation Measures	--	--
<b>Refrigerated Containers (685,931 MT)</b>		
<b><i>Unmitigated Emissions</i></b>		
Ocean-Going Vessels <sup>1</sup>	12,893	12,893
Shore Power	1,493	1,394
Assist Tugs	56	56
Fuel Tug and Barge	<del>147121</del>	<del>147121</del>
Trucks <sup>2</sup>	<del>60966,096</del>	6,079
Worker Trips	974	946
Cargo Handling Equipment	<del>794721</del>	<del>794721</del>
Electricity	347	306
Water	137	128
Refrigerants	23	23
<b><i>Mitigated Reductions</i></b>		
MM GHG-1 Idling <sup>3</sup>	--	<-1
MM-GHG-2 CAP Measures <sup>4</sup>	--	-3,730



Operational Element	Project MTCO <sub>2</sub> e without Mitigation	Project MTCO <sub>2</sub> e With Mitigation
<i>MM-GHG-3 Electric CHE<sup>45</sup></i>	--	<del>-2456</del>
<b>Refrigerated Containers Existing Plus Project Annual</b>	<b><del>23,960</del><u>22,860</u></b>	<b><del>19,013</del><u>18,881</u></b>
Refrigerated Containers Existing Annual <sup>56</sup>	<del>15,059</del> <u>14,990</u>	<del>15,059</del> <u>14,990</u>
Net New over Existing	<del>7,901</del> <u>870</u>	<del>3,954</del> <u>890</u>
Reduction from Unmitigated	--	-3,4979
<i>Percentage Reduction with Mitigation Measures</i>	--	<del>50</del> <u>51</u> %
<b>Multi-Purpose General Cargo (124,078 MT)</b>		
<b><i>Unmitigated Emissions</i></b>		
Ocean-Going Vessels <sup>1</sup>	1,446	1,446
Assist Tugs	43	43
Fuel Tug and Barge	<del>9892</del>	<del>9892</del>
Trucks <sup>2</sup>	591	584
Worker Trips	265	242
Rail - Regional Line Haul	169	169
Rail - Switching between Terminal and Yard	<del>6840</del>	<del>6840</del>
Cargo Handling Equipment	<del>1441</del> <u>130</u>	<del>1441</del> <u>130</u>
Water	25	23
<b><i>Mitigated Reductions</i></b>		
<i>MM GHG-1 Idling<sup>3</sup></i>	--	<-1
<i>MM-GHG-2 CAP Measures<sup>4</sup></i>	--	-16
<i>MM-GHG-3 Electric CHE<sup>45</sup></i>	--	<del>-2456</del>
<b>Multi-Purpose General Cargo Existing Plus Project Annual</b>	<b><del>2,848</del><u>800</u></b>	<b><del>2,777</del><u>697</u></b>
Multi-Purpose General Cargo Existing Annual <sup>56</sup>	<del>1,985</del> <u>0</u>	<del>1,985</del> <u>0</u>
Net New over Existing	<del>868</del> <u>850</u>	<del>798</del> <u>747</u>
Reduction from Unmitigated	--	<del>-71</del> <u>103</u>
<i>Percentage Reduction with Mitigation Measures</i>	--	<del>81</del> <u>2</u> %
<b>All Cargo Types</b>		
<b>All Cargo Types Daily Existing Plus Project Annual</b>	<b><del>29,961</del><u>770</u></b>	<b><del>25,888</del><u>600</u></b>
All Cargo Types Daily Existing Annual <sup>56</sup>	<del>21,191</del> <u>050</u>	<del>21,191</del> <u>050</u>
Net New over Existing	<del>8,769</del> <u>720</u>	<del>4,697</del> <u>550</u>
Reduction from Unmitigated	-	<del>-4,073</del> <u>170</u>
<i>Percentage Reduction with Mitigation Measures</i>	-	<del>46</del> <u>48</u> %
Reduction Target	-	33% <sup>67</sup>

Source: Appendix F. Totals may not add up exactly due to rounding.

<sup>1</sup> Includes compliance with VSR similar to existing condition.

<sup>2</sup> Truck travel does not include the proposed Phase 2 truck standards, which would improve truck fuel economy and reduce emissions by approximately 24% by 2030. This would translate to approximately 628 MTCO<sub>2</sub>e per year for the proposed project if implemented during the life of the project over what is shown above. EPA and NHTSA issued a Notice of Proposed Rulemaking for Phase 2 in June 2015 and Notice of Data Availability in March 2016, and are expected to issue a final rule by August 2016. Upon EPA's adoption of Phase 2, ARB staff plan to bring a proposed California Phase 2 program before the ARB Board, most likely in late 2016 or 2017. Once Phase 2 is adopted and implemented, GHG emissions from truck travel would be reduced, and the mitigation requirements would be reduced by this same amount recently adopted Phase 2 truck standards because the standards would not take effect for most trucks until model

Operational Element	Project MTCO <sub>2</sub> e without Mitigation	Project MTCO <sub>2</sub> e With Mitigation
<u>year 2021.</u> However, truck travel under mitigated scenarios does include reductions associated with Phase 1 truck standards.		
<sup>3</sup> Reductions from idling are not quantified because reductions would be speculative, as it is not fully known whether long trucks currently idle at any given location.		
<sup>4</sup> Includes VSR compliance with the CAP target of 80% (12 knot speed within 20 nautical miles of Point Loma) compliance with at-berth regulations for eligible vessels. Each Dole vessel will use shore power.		
<sup>55</sup> <u>Reductions associated with electric CHE assume one yard truck per node.</u>		
<sup>6</sup> Existing annual emissions shown in Table 4.6-4.		
<sup>6</sup> The District's CAP uses a "10% below existing levels" target, which translates into 28% below BAU in 2020 for the Port as a whole and 33% below BAU for maritime-related emissions in 2020.		

## Pages 4.6-44 through 4.6-46

**Table 4.6-8. Demolition and Initial Rail Component Consistency with Applicable Port CAP Measures for 2020**

No.	Measure Description	Project Consistency Analysis
TA1	Support and promote the use of alternate fueled, electric or hybrid Port owned vehicles and vessels (also includes cargo handling equipment, terminal and stationary equipment).	<b>Consistent After Mitigation.</b> As a project feature, additional shore power infrastructure would be added to Berths 10-5/10-6, which would allow two vessels to cold iron simultaneously. Also, new refrigerated container OGVs would completely utilize shore power (minus idle time to clear customs). Accordingly, 100% of vessel calls would use shore power while at berth, which goes beyond the ARB requirement of 80% of vessel calls included in the CAP. Coupled with expanded RPS that reduces the carbon intensity of grid electricity, GHG emissions would be reduced along with criteria pollutant and TAC emissions. MM-GHG-3 includes the requirement for <del>Multi-Purpose Cargo</del> tenants to attempt to secure and operate one new electric CHE piece <u>for each node (three total)</u> by 2020 by working with ARB, CEC, and other agencies that can assist in providing funding and availability. Moreover, as a feature of the project, demolition of the transit sheds would allow for more efficient movement around the terminal.
TA2	Support and promote non-Port owned vehicles and vessels to achieve the lowest emissions possible, using a mix of alternative fueled, electric or hybrid technology.	<b>Consistent After Mitigation.</b> See also TA1. New, larger, and cleaner Tier 2 refrigerated container OGVs will start calling on TAMT in 2016.
TA3	Implement emissions reduction strategies at loading docks through electrification of docks or idling-reduction systems for use while at loading docks	<b>Consistent After Mitigation.</b> See TA1 and TA2. MM-GHG-1 requires all commercial vehicles, including delivery and drayage trucks, to limit idling times to 3 minutes, which is beyond that required by State law.

No.	Measure Description	Project Consistency Analysis
TE1	Use of technology and strategies to reduce fuel consumption.	<b>Consistent After Mitigation.</b> See TA1, TA2, and TA3. MM-GHG-1 requires all commercial vehicles, including delivery and drayage trucks, to limit idling times to 3 minutes. Electric CHE per MM-GHG-3 would reduce fuel consumption, which is directly tied to GHG emissions. Moreover, as a feature of the project, demolition of the transit sheds would allow for more efficient movement around the terminal.
TE2	Implement Vessel Speed Reduction for ocean going vessels.	<b>Consistent After Mitigation.</b> The project proponent's vessels comply with the District's voluntary VSR program, which targets 80% compliance. Vessels that call on TAMT are at 72%. The Port's VSR goes beyond State requirement because ARB has not formally adopted a VSR program. MM-GHG-2 requires the project proponent's vessels to achieve 80% compliance starting in 2020 in compliance with the CAP.
TE7	Support and promote the use of advanced technologies for rail locomotives: advanced technology diesel-fuel injectors; Tier 2 or Tier 3 locomotive engines; gen-set engines; and, hybrid or LNG locomotives.	<b>Consistent Prior to Mitigation.</b> BNSF's locomotives are not controlled by the project proponent and, therefore, the project proponent has limited influence over the ability to enact technological changes to BNSF's fleet. BNSF locomotives that serve the Port currently average between Tier 1 and Tier 2 standards, and the locomotive fleet will continue to turn over with more advanced technologies over time. By 2020, the BNSF fleet is expected to average Tier 2 or better.
TR2	Implement traffic and roadway management strategies to improve mobility and efficiency, and reduce associated emissions at maritime facilities.	<b>Consistent After Mitigation.</b> The project proponent would adhere to the designated haul route, which prohibits heavy trucks from traveling down Caesar Chavez Parkway, and which is required and enforced by local City ordinance and MM-GHG-2.
TR3	Vehicle Idling: Enforce state idling laws for commercial vehicles, including delivery and construction vehicles.	<b>Consistent After Mitigation.</b> MM-GHG-1 requires all commercial vehicles, including delivery and drayage trucks, to limit idling times to 3 minutes, which is beyond that required by State law.
TR4	Encourage rail freight utilization over trucks to reduce vehicle miles traveled.	<b>Consistent Prior to Mitigation.</b> As a feature of the project, the project would install an automatic rail lubricator system and air brake testing equipment, which would allow trains to bypass the stop at the adjacent railyard facility, which would reduce unnecessary rail idling at the BNSF yard and allow for more rail use at the project site. Moreover, the terminal currently distributes a portion of its cargo via rail; however, the nature of the operations dictates that the percentage remain fairly constant unless cargo types change. As market conditions allow, rail freight would be utilized because rail freight is more cost effective over long distances.

No.	Measure Description	Project Consistency Analysis
TL3	Restrict the location of drive-through businesses.	<b>Consistent Prior to Mitigation.</b> The project does not propose any drive-through uses and, therefore, would adhere to this measure.
EB6	Replace light fixtures in non-Port facilities with lower energy bulbs such as fluorescent, LEDs, or CFLs.	<b>Consistent After Mitigation.</b> The project proponent would install lower-energy lighting. See MM-GHG-2.
SW1	Increase the diversion of solid waste from landfill disposal.	<b>Consistent After Mitigation.</b> The project would comply with AB 939 and the City of San Diego's Recycling Ordinance by recycling at least 50% of solid waste. In addition, the proponent would be required to comply with the City of San Diego's Construction and Demolition Debris Deposit Ordinance by recycling at least 50% of all construction debris. See MM-GHG-2.
MP5	Require Port and encourage Port tenants to purchase goods and services that embody or create fewer GHG emissions.	<b>Consistent After Mitigation.</b> The project would facilitate use of new and more efficient vessels that would create fewer emissions per unit of activity by adding more shore power infrastructure and by maximizing the operational efficiency at the terminal by removing or upgrading outdated facilities.

Source: District 2013.

Notes:

TA: Transportation and Land Use CAP measures – Alternative Powered Vehicles; TE: Transportation and Land Use CAP measures – Alternative Technologies/Miscellaneous; TL: Transportation and Land Use CAP measures – Land Use; EB: Energy Conservation and Efficiency CAP measures – Building Energy Use; SW: Waste Reduction and Recycling; TR: Roadway System Management.

### ***2020 – Demolition and Initial Rail Component Consistency with Regulations and Regulatory Programs Adopted by ARB or Other State Agencies***

As shown in Table 4.6-9, the Demolition and Initial Rail Component would implement several applicable measures from the Scoping Plan, as well as other measures being implemented by ARB. However, without mitigation, the Demolition and Initial Rail Component would ultimately be inconsistent with some state measures (**Impact-GHG-1**). When coupled with features of the project that allow for more efficient terminal movements and increased shore power, along with mitigation measures (**MM-GHG-1** through **MM-GHG-43**), each of which are proposed to be incorporated as conditions of approval in the CDP for the project to ensure implementation and any future agreements with the applicant, the Demolition and Initial Rail Component would be consistent with AB 32's Scoping Plan and other ARB measures.

## **Page 4.6-51**

**MM-GHG-3: Electric Cargo-Handling Equipment Upgrades.** ~~As a condition of any Coastal Development Permit, the project proponent, or the District, shall secure funding for and operate one piece of CHE associated with each node. Operation of such equipment on TAMT shall occur by January 1, 2020 through the expected operating life of the equipment, and evidence of operation shall be provided to the District upon request. Equipment shall be replaced if alternative technologies (i.e., advancements in electric equipment) are identified and determined to be feasible pursuant to MM-AQ-7. For purposes of the analysis, it was assumed~~

~~that each node would operate one electric yard truck. This mitigation is similar to MM-AQ-6, and the number of CHE equipment required between the two mitigation measures does not aggregate to more than one piece of CHE per node. Prior to January 1, 2020, the San Diego Unified Port District shall ensure that at least three pieces of existing non-electric cargo-handling equipment (CHE) at the terminal are replaced by electric CHE, none of which were previously operating at the terminal during the 2013/2014 baseline year of the EIR analysis. Possible ways the electric CHE may be obtained include, but are not limited to, the following:~~

- ~~1. Purchased, leased, or otherwise acquired, in whole or in part, through funding provided to a tenant by the San Diego Unified Port District; or~~
- ~~2. Purchased, leased, or otherwise acquired, in whole or in part, through funding provided to a tenant by other sources; or~~
- ~~3. Purchased, leased, or otherwise acquired, in whole or in part, by the tenant in compliance with the condition of a discretionary approval issued by the San Diego Unified Port District.~~

~~Written evidence of the acquisition of the electric CHE equipment and the equipment it will replace and remove from further operation at the terminal must be provided to the San Diego Unified Port District. The San Diego Unified Port District shall further ensure that the electric CHE is in use at each of the three nodes throughout the expected operating life. This will be accomplished by requiring each tenant that employs electric CHE pursuant to this measure to report the equipment's annual number of hours of operation to the San Diego Unified Port District and by requiring the San Diego Unified Port District to monitor use of the electric CHE as part of the San Diego Unified Port District's TAMT equipment inventory.~~

~~The electric equipment employed pursuant to this mitigation measure may be replaced by other technologies or other types of CHE as long as the replacement equipment achieves the same or greater criteria pollutant, toxic air contaminant, and greenhouse gas emission reductions as compared to the equipment required by this mitigation measure.~~

## Pages 4.6-52 and 4.6-53

### Consistency with Post-2020 Reduction Targets and "Substantial Progress"

Although the District's CAP and ARB's Scoping Plan mention some potential post-2020 strategies, as of the date this analysis was prepared, emission savings from these post-2020 strategies are not quantified. While there has been activity at the legislative, executive, and judicial levels, there are currently no adopted plans or measures that specifically prescribe how the ambitious post-2020 targets will be met. ~~Proposals at the State level such as the proposed~~ The state recently adopted SB 32 legislation (adopting, which adopts interim 2030 GHG targets consistent with EO B-30-15) have recently been considered; AB 197, which supports its implementation; and are anticipated to be considered again in 2016 SB 1383, which aims to reduce short-lived climate pollutants. Regardless, no plan to achieve these 2030 targets has been prepared and adopted by the California legislature; however, to date they have not been adopted into law ARB. Various guidance and white paper documents are in circulation that discuss potential near- and long-term strategies to reduce emissions from all sources, including sources associated with the proposed project (e.g., electricity, OGVs, heavy-duty trucks, locomotives). ~~The~~ and most recently ARB hosted workshops and released materials that present some paths and alternative approaches being considered for the 2030 Scoping Plan. Much of what ARB is considering is a continuation and further implementation of existing measures (for example, increase RPS 80% by 2050, increase low carbon fuels to 18% or

25% by 2030, etc.) as well Cap and Trade alternatives. However, because no 2030 Scoping Plan has been adopted, the District's CAP, ARB's Scoping Plan First Update, and other State programs (e.g., ARB's Sustainable Freight Strategy) are some recent and relevant examples that include proposed, recommended, or adopted actions that will reduce emissions over the long term.

### ***2020 to 2040 – Consistency with the District CAP***

As the District's CAP was completed in 2013, it does include some strategies and shows some progress toward meeting post-2020 statewide targets and does prescribe a 25 percent reduction goal (below 2006 levels) for 2035, but does not yet include prescribed reduction measures to achieve a post-2020 target. Because the CAP did not estimate reductions from these strategies beyond 2020, emphasis is placed on consistency with the overarching goals of the CAP (to reduce GHG emissions) rather than the specific reductions attached to each strategy. In this sense, it is not considered a qualifying plan for post-2020 purposes, as described in State CEQA Guidelines Section 15183.5; therefore, the post-2020 analysis does not rely on compliance with the CAP to determine whether the project's impacts would be cumulatively considerable for post-2020 GHG emissions. However, for informational purposes, the project's compliance with CAP measures post-2020 is provided below. Prior to mitigation, full TAMT plan buildout would not be entirely consistent with the post-2020 CAP measures (**Impact-GHG-2**). As noted in Table 4.6-11, however, once Mitigation Measures (**MM-GHG-1** through **MM-GHG-82**) are incorporated, the project would be consistent with the CAP measures in the post-2020 period.

## **Pages 4.6-55 and 4.6-56**

In qualitatively evaluating the project's emissions for consistency with EO S-03-05 and EO B-30-15, it is important to note that some of these broad-scale shifts in how energy is produced and used are outside of the control of the project. The changes necessitated by the State's long-term climate policy will require additional policy and regulatory changes, which are unknown at this time. As a consequence, the extent to which the project's emissions and resulting impacts will be mitigated through implementation of such changes is not known. Furthermore, implementation of such additional policy and regulatory changes is in the jurisdiction of State-level agencies (e.g., ARB), not the District or the project. However, some of these measures (e.g., decarbonization, energy efficiency, and reduced fossil-fuel-based vehicle miles traveled) can be facilitated, at least to some extent, through implementation of specific GHG reduction measures for developments such as the proposed project. Under this same rationale, if the proposed project did not implement measures to maximize energy efficiency or utilize renewable energy, the reductions may not be sufficient for an individual project to meet the aggressive 2030 and 2050 cumulative reduction goals (**Impact-GHG-2**). Mitigation Measures **MM-GHG-1** through **MM-GHG-82** are required to support progress toward the 2030 and 2050 GHG reduction goals of EO S-03-05 and EO B-30-15,<sup>10</sup> but project emissions would remain significant due to the lack of a known project-specific reduction target.

Estimates of GHG emissions associated with the existing activity at the project site are shown in Table 4.6-4 above. Estimates of GHG emissions associated with operation of the full TAMT plan buildout in 2035 plus existing conditions are presented in Table 4.6-11. As shown, full TAMT plan buildout in 2035 would not achieve the requisite emission reductions before mitigation (**Impact-GHG-2**). Emissions would decline through the life of the project, and GHG emissions would trend

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<sup>10</sup>It would be speculative to attempt to identify the exact amount of project-level mitigation needed to meet a 2030 goal without an updated AB 32 Scoping Plan for 2030 that identifies the state reductions.

downward over time, consistent with the need for deeper reductions post-2020 promulgated in EO B-30-15 and EO S-03-05.

As discussed above, in order to demonstrate “substantial progress” toward long-term targets, the project would need to demonstrate that emissions would be consistent with the 48 percent performance benchmark (below 2020 levels) in 2030 and the 57 percent performance benchmark (below baseline levels) in 2035. As shown in Table 4.6-11, buildout of the TAMT plan would achieve the 2035 performance target. However, as mentioned in Section 4.6.4.2, the framework to achieve post-2020 targets (e.g., 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050) at the State level is unknown until ARB develops such a framework. The project and District as a whole cannot meet these long-term targets by themselves without statewide efforts. Further implementation of adopted statewide measures, particularly the RPS of 50 percent per SB 350, would reduce project-related electricity, as shown in Table 4.6-11. Proposed and recently adopted regulations and measures, including Phase 2 truck standards, will further reduce emissions in the post-2020 timeframe ~~once adopted~~. Moreover, the Port has not yet adopted a framework to meet long-term (i.e., post-2020) reduction targets. As such, it is possible that the proposed project’s needed reductions would have to be even greater (or less) than the statewide targets in order to achieve the statewide targets. For example, an appropriate project target would need to take into account: (1) existing development that may not be able to achieve the deeper reductions and thus place a higher reduction burden on new development; (2) the level of reductions necessary for a maritime terminal project (as compared to other land use types such as residential, commercial, and institutional or other sectors such as agriculture, industrial point source emitters, etc.), which may be greater or less than other development projects or sectors, and (3) the project’s location, such as which regions or jurisdictions need to have greater reduction targets that are proportionate to their overall contribution to statewide GHG emissions.

## Pages 4.6-57 through 4.6-61

**Table 4.6-11. Estimate of Existing Plus Full TAMT Plan Buildout GHG Emissions in 2035 (Metric Tons of CO<sub>2</sub>e per Year)**

Operational Element	Plan MTCO <sub>2</sub> e Without Mitigation	Plan MTCO <sub>2</sub> e With Mitigation
<b>Dry Bulk (2,650,000 MT)</b>		
<i><b>Unmitigated Emissions</b></i>		
Ocean-Going Vessels <sup>1</sup>	5,033	5,033
Assist Tugs	164	164
Fuel Tug and Barge	350	350
Trucks <sup>2</sup>	20,893	<del>18,290</del> 15,387
Worker Trips	1,219	946
Rail - Regional Line Haul	2,105	2,105
Rail - Switching between Terminal and Yard	<del>2,337</del>	<del>2,337</del>
Cargo Handling Equipment	<del>3,104</del> 2,816	<del>3,104</del> 2,816
Electricity	1,778	1,169
Water	237	165
<i><b>Mitigated Reductions</b></i>		
MM GHG-1 Idling <sup>3</sup>	--	<-1

Operational Element	Plan MTCO <sub>2</sub> e Without Mitigation	Plan MTCO <sub>2</sub> e With Mitigation
<i>MM-GHG-2 CAP Measures<sup>4</sup></i>	--	-45
<i>MM-GHG-4 Electric CHE<sup>5</sup></i>	--	<del>-28,564</del>
<i>MM-GHG-5 VSR Beyond CAP<sup>6</sup></i>	--	-755
<i>MM-GHG-6 PV<sup>7</sup></i>	--	<del>-13,340,915</del>
<i>MM-GHG-9 At-Berth Emissions Capture</i>	--	<u>+214</u>
<b>Dry Bulk Existing Plus Project Annual</b>	<b><u>32,219,34,826</u></b>	<b><u>17,495,302</u></b>
Dry Bulk Existing Annual <sup>5</sup>	<b><u>4,153,110</u></b>	<b><u>4,153,110</u></b>
Net New over Existing	<u>31,066,30,716</u>	<u>13,342,182</u>
Reduction from Unmitigated	--	-17,7524
<i>Percentage Reduction with Mitigation Measures</i>	--	57%
<b>Refrigerated Containers (2,288,000 MT)</b>		
<b><i>Unmitigated Emissions</i></b>		
Ocean-Going Vessels <sup>1</sup>	30,943	30,943
Shore Power	3,582	2,498
Assist Tugs	135	135
Fuel Tug and Barge	288	288
Trucks <sup>2</sup>	18,560	<del>16,826</del> <u>14,156</u>
Worker Trips	1,153	1,034
Cargo Handling Equipment	<del>2,680</del> <u>432</u>	<del>2,680</del> <u>432</u>
Electricity	<u>1,744,020</u>	<u>1,299,762</u>
Water	210	147
Refrigerants	<del>5954</del>	<del>5954</del>
New Gantry Cranes	97	64
<b><i>Mitigated Reductions</i></b>		
<i>MM GHG-1 Idling<sup>3</sup></i>	--	<-1
<i>MM-GHG-2 CAP Measures<sup>4</sup></i>	--	<del>-8,951</del> <u>7,733</u>
<i>MM-GHG-4 Electric CHE<sup>5</sup></i>	--	<del>-28,564</del>
<i>MM-GHG-5 VSR Beyond CAP<sup>6</sup></i>	--	-16
<i>MM-GHG-6 PV<sup>7</sup></i>	--	<del>-12,816</del> <u>10,493</u>
<b>Refrigerated Containers Existing Plus Project Annual</b>	<b><u>59,538,58,563</u></b>	<b><u>34,161,33,703</u></b>
Refrigerated Containers Existing Annual <sup>8</sup>	<u>15,059,14,990</u>	<u>15,059,14,990</u>
Net New over Existing	<u>44,479,43,573</u>	<u>19,102,18,173</u>
Reduction from Unmitigated	--	<del>-25,377</del> <u>24,860</u>
<i>Percentage Reduction with Mitigation Measures</i>	--	57%
<b>Multi-Purpose General Cargo (977,400 MT)</b>		
<b><i>Unmitigated Emissions</i></b>		
Ocean-Going Vessels <sup>1</sup>	11,926	11,926
Assist Tugs	351	351
Fuel Tug and Barge	750	750
Trucks <sup>2</sup>	2,953	2,597



Operational Element	Plan MTCO <sub>2e</sub> Without Mitigation	Plan MTCO <sub>2e</sub> With Mitigation
Worker Trips	444	372
Rail - Regional Line Haul	1,265	1,265
Rail - Switching between Terminal and Yard	<del>512</del> 301	<del>512</del> 301
Cargo Handling Equipment	<del>1,145</del> 039	<del>1,145</del> 039
Water	90	63
New Gantry and Rubber Tired Cranes	486	471
<b>Mitigated Reductions</b>		
<i>MM GHG-1 Idling<sup>3</sup></i>	--	<-1
<i>MM-GHG-2 CAP Measures<sup>4</sup></i>	--	-200
<i>MM-GHG-4 Electric CHE<sup>5</sup></i>	--	<del>-28</del> 564
<i>MM-GHG-5 VSR Beyond CAP<sup>6</sup></i>	--	-1,616
<i>MM-GHG-6 PV<sup>7</sup></i>	--	<del>-7,888</del> 216
<i>MM-GHG-9 At-Berth Emissions Capture</i>	--	<del>+440</del>
<b>Multi-Purpose General Cargo Existing Plus Project Annual</b>	<b><del>19,921</del>604</b>	<b>9,685</b>
Multi-Purpose General Cargo Existing Annual <sup>8</sup>	1,9850	1,9850
Net New over Existing	<del>17,941</del> 654	<del>7,706</del> 582
Reduction from Unmitigated	--	<del>-10,235</del> 072
<i>Percentage Reduction with Mitigation Measures</i>	--	57%
<b>All Cargo Types</b>		
<b>All Cargo Types Daily Existing Plus Project Annual</b>	<b><del>114,677</del>112,994</b>	<b><del>61,341</del>60,537</b>
All Cargo Types Daily Existing Annual <sup>8</sup>	<del>21,191</del> 050	<del>21,191</del> 050
Net New over Existing	<del>93,486</del> 91,944	<del>40,150</del> 39,487
Reduction from Unmitigated	--	<del>-53,336</del> 52,456
<i>Percentage Reduction with Mitigation Measures</i>	--	57%
Reduction Target	--	57% <sup>7</sup>

Source: Appendix F. Totals may not add up exactly due to rounding.

<sup>1</sup> Includes compliance with VSR similar to existing condition.

<sup>2</sup> Truck travel does not include the proposed recently adopted Phase 2 truck standards, which would reduce improve truck fuel economy and reduce emissions by approximately 24% by 2030. This would translate to approximately 628 MTCO<sub>2e</sub> per year for the proposed project if up 25% once fully implemented during the life. For purposes of the project over what is shown above. EPA and NHTSA issued a Notice of Proposed Rulemaking for Phase 2 reductions in June 2015 and Notice of Data Availability in March 2016, and are expected to issue a final rule by August 2016. Upon EPA's adoption of Phase 2, ARB staff plan to bring a proposed California Phase 2 program before the ARB Board, most likely in late 2016 or 2017. Once Phase 2 is adopted and implemented, 2035, it was estimated that GHG emissions from truck travel emission factors would be reduced, and the mitigation requirements would be reduced by this same amount. However, truck travel under mitigated scenarios does include approximately 16% related to the rates in EMFAC, which reductions associated with Phase 1 truck standards.

<sup>3</sup> Reductions from idling are not quantified because reductions would be speculative, as it is not fully known whether long trucks currently idle at any given location.

<sup>4</sup> Includes VSR compliance with the CAP target of 80% (12 knot speed within 20 nautical miles of Point Loma) compliance with at-berth regulations for eligible vessels. Each Dole vessel will use shore power.

<sup>5</sup> Reductions from electric CHE assumes one electric loader for the Dry Bulk node, one container handler for the Refrigerated Container node, and one replacement of 36 pieces of diesel equipment with 36 pieces of electric equipment by 2030, including 20 new electric yard truck for trucks by 2025 as well as 3 electric reach stackers and 10 electric forklifts by 2030. The reductions are split evenly between the three cargo nodes affected by the Multi-Purpose General Cargo node proposed project.

Operational Element	Plan MTCO <sub>2</sub> e Without Mitigation	Plan MTCO <sub>2</sub> e With Mitigation
<sup>7</sup> Includes VSR compliance of 90% (12 knot speed within 40 nautical miles of Point Loma). Reductions are shown relative to CAP compliance (MM-GHG-2).		
<sup>8</sup> The reduction targets identified in the post-2020 period (i.e., 2035) is based on statewide reduction targets identified in EO S-3-2005 and EO B-30-2015. Because there are no project-specific targets based on location and project type as is the case in the 2020 period, these targets are used as a general guide for the level of reductions needed, but it is understood that the State will need to play a major role to meet these aggressive targets.		
<sup>8</sup> Existing annual emissions shown in Table 4.6-4.		

### **2020 to 2040 – Consistency with Regulations and Regulatory Programs Adopted by ARB or Other State Agencies**

Specifically, at the State level, ARB’s Scoping Plan and the Sustainable Freight Strategy provide insight into the strategies that will likely be included and adopted into long-term planning documents in the near future.

#### *Post-2020 Scoping Plan Strategies*

The Scoping Plan First Update discusses the fact that there are a number of strategies underway that have led to significant emission reductions and provides a summary of recommended actions the State could take to meet long-term reduction goals. For purposes of discussing post-2020 GHG emissions, the quantified unmitigated emissions presented in Table 4.6-11 only include the project features, adopted State measures, and proposed mitigation measures. For the consistency analysis, adopted measures (like SB 350) are reviewed in order to disclose the project’s consistency with such regulations. For informational purposes only, the project’s consistency with conceptual strategies under consideration but not yet adopted is also provided, but is not relied on in determining whether the project would have significant GHG emission impacts. The upcoming post-2020 Scoping Plan update will include a detailed roadmap by accelerating the focus on zero and near-zero technologies for moving freight, continued investment in renewables, greater use of low-carbon fuels including electricity and hydrogen, stronger efforts to reduce emissions of short-lived climate pollutants (methane, black carbon, and fluorinated gases), and further efforts to create walkable communities with expanded mass transit and other alternatives to traveling by car. Continuing the cap-and-trade program and ensuring that natural lands become carbon sinks provide additional emissions reductions and flexibility in meeting the target (ARB 2014). Project consistency with post-2020 Scoping Plan strategies is discussed in Table 4.6-12 and project consistency with anticipated regulations is discussed in Table 4.6-13. Project impacts before mitigation would be significant and, after implementation of Mitigation Measures **MM-GHG-1** through **MM-GHG-69**, would remain significant and unavoidable.

**Table 4.6-12. Project Consistency with AB 32 Scoping Plan Strategy Beyond 2020**

No.	Strategy Description	Project Consistency Analysis
T-3	Regional Transportation-Related Greenhouse Gas Targets	<b>Consistent Prior to Mitigation.</b> State program that requires no action at the local or project level. Benefits to project-related employee car travel will be realized.

No.	Strategy Description	Project Consistency Analysis
T-6	<p>Goods Movement Efficiency</p> <ol style="list-style-type: none"> <li>1. Port Drayage Trucks (2020 strategy)</li> <li>2. Transportation Refrigeration Units Cold Storage Prohibition</li> <li>3. Cargo Handling Equipment, Anti-Idling, Hybrid, Electrification</li> <li>4. Goods Movement Systemwide Efficiency Improvements</li> <li>5. Commercial Harbor Craft Maintenance and Design Efficiency</li> <li>6. Clean Ships</li> <li>7. Vessel Speed Reduction</li> </ol>	<p><b>Consistent After Mitigation.</b> Project trucks are compliant with ARB's Drayage Truck Rule and consistent with Scoping Plan measure T-6-1. MM-GHG-3 requires that the project proponent purchase electric yard trucks, consistent with T-6-3 and T-6-4. Project proponent vessels comply with the District's voluntary VSR program (currently 72% compliance at TAMT), MM-GHG-2 requires 80% compliance, consistent with the CAP, and MM-GHG-5 requires compliance beyond the CAP (90%) at 40 nautical miles. Thus, the project is consistent with T-6-7. Measures T-6-2, T-6-4, and T-6-6 are now being considered in the Sustainable Freight Strategy instead of the Scoping Plan, while ARB is still evaluating the need to develop T-6-7. The project is consistent with T-6-4 and T-6-6 because it aims to improve the overall efficiency of the terminal and promotes growth in zero and near-zero technologies (T-6-4), and would require increased compliance with VSR (T-6-7).</p>
E1 and CR1	1. Building Energy Efficiency – Electricity and Natural Gas	<b>Consistent Prior to Mitigation.</b> The project does not propose construction of buildings.
W2	Water Recycling	<b>Consistent Prior to Mitigation.</b> The project proposes minimal water use associated with new employees. State program that requires no action at the local or project level. Benefits will be realized.
Recommended Transportation Action	Propose "Phase 2" heavy-duty truck GHG standard standards.	<b>Consistent Prior to Mitigation.</b> State program that requires no action at the local or project level. Benefits to project-related truck travel will be realized independently.
Recommended Transportation Action	Complete the first phase of the Sustainable Freight Strategy, which will identify and prioritize actions through 2020 to move California toward a sustainable freight system.	<b>Consistent After Mitigation.</b> See Table 4.6-13. The project would implement various strategies included in the draft Strategy, including MM-GHG-2 and MM-GHG-5 (CAP and VSR compliance), MM-GHG-3 and MM-GHG-4 (electric CHE), MM-GHG-7 ( <u>equipment inventory and periodic review of technologies</u> ), and MM-GHG-8 ( <u>sustainable leasingexhaust reduction program</u> ), and MM-GHG-9 ( <u>alternative at-berth reductions</u> ).
Source: ARB 2014.		
Notes:		
T = Transportation; E = Electricity; W = Water		

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ARB developed the existing at-berth regulation to capture the vessels where retrofitting vessels was most cost effective given the at-berth power requirements for container, refrigerated container, and passenger vessels. Moreover, container vessels tend to be frequent callers to California ports (i.e., call on California ports multiple times per year), thus making retrofits more cost effective. Given that the 2020 milestone under the existing regulation will soon pass, ARB is currently considering extending the at-berth regulation to all vessels (bulk carriers, general cargo, vehicle carriers, and tankers). Bulk carriers, general cargo, and vehicle carriers currently call on the project site and would presumably continue to do so in the future. If implemented, vessels that call on the project site would be subject to any new at-berth reductions, whether they turn off auxiliary engines and connect to a grid- or terminal-based source of power, or use alternative control technique(s) that achieve equivalent emission reductions. The TAMT plan would install infrastructure at the project site that would help facilitate additional cold ironing at Berths 10-5/10-6 at a future date. Over time, adoption of this regulation as well as development of infrastructure would help reduce emissions from vessel activities. Mitigation has been added to require the District to implement alternative control techniques in order to reduce health risk in the surrounding community. The alternative control technique assumed in the analysis is the mostly approved technology approved by ARB, which is the Advanced Marine Emissions Control System (AMECS) developed by Advanced Cleanup Technologies, Inc. The AMECS is equipped with barge-mounted Tier 4 auxiliary engines, which are smaller and require less energy than the previous ARB-approved technology. Based on a recent analysis by EPA (EPA 2016b) it is assumed that roughly 2 hours are necessary to install and remove the AMECS from a given vessel, during which time both the barge and ship auxiliary engines are operating and producing emissions. While the AMECS is designed to reduce criteria pollutant and TAC emissions, overall energy demand increases with use of the AMECS, resulting in increased GHG emissions. While the AMECS reduces dry bulk and multi-purpose general cargo at-berth emissions by approximately 77% for NO<sub>x</sub> and 80% for DPM per call, CO<sub>2</sub> emissions are estimated to increase by approximately 36%. This increase is reflected in Table 4.6-11. Before mitigation, full TAMT plan buildout would not be completely consistent with the Sustainable Freight Strategy and Action Plan (Impact-GHG-2). As shown in Table 4.6-13, however, after incorporating Mitigation Measures MM-GHG-1 through MM-GHG-72, the project would implement technologies that help achieve the relevant strategies of the Sustainable Freight Strategy while supporting the guiding principles of the Freight Action Plan. These mitigation measures would also be incorporated into the CDP and any real estate agreements between the District and the project proponent to ensure implementation.

**Table 4.6-13. Project Consistency with Sustainable Freight Strategy and other ARB Strategies Post-2020**

Strategy	Strategy Description	Project Consistency Analysis
<i>Near-Term</i>		
Incentive programs	Develop modifications to existing incentive programs to increase the emphasis on and support for zero and near-zero equipment used in freight operations, including introduction of truck engines certified to optional low-NO <sub>x</sub> standards.	<b>Consistent After Mitigation.</b> Action was expected by ARB in 2015 and 2016 with implementation between 2016 and 2020, but action has not occurred. Operations associated with the proposed project include conventional freight equipment like yard trucks, forklifts, and cargo stackers. MM-GHG-4 requires the purchase and operation of electric equipment. <u>MM-GHG-8 requires the District to incentivize tenant activities that utilize equipment and activities that reduce emissions.</u>
<i>Long-Term “Vision for the Future”</i>		
Short haul—Heavy Duty (e.g., Drayage)	Provide incentives to demonstrate viability of zero emission technology and hybrids capable of zero emission miles.	<b>Consistent After Mitigation.</b> MM-GHG-4 would require zero-emissions electric CHE to be operated on site, and this equipment would continue to operate through full TAMT plan buildout.
Potential Incentives	Develop incentives to attract cleaner more efficient ships to California seaports by leveraging port and air agency funds.	<b>Consistent After Mitigation.</b> The project proponent would require VSR compliance (see MM-GHG-2 and MM-GHG-5) <u>as well as incentivize equipment and activities that reduce emissions (MM-GHG-8).</u>
Cargo Handling Equipment	Support programs for technology demonstrations including battery electric, fuel cell, and pathway hybrids.	<b>Consistent After Mitigation.</b> Action was expected by ARB in 2015 and 2016 with implementation between 2016 and 2020, but action has not occurred. MM-GHG-3 and MM-GHG-4 require the project proponent to secure and operate electric CHE.
50 Percent Renewables Portfolio Standard	State program that requires large utilities to meet this 50% by 2030.	<b>Consistent Prior to Mitigation.</b> State program that requires no action at the local or project level. Benefits to project-related electricity consumption will be realized.
Phase 2 Truck Efficiency	<del>Draft</del> <u>Final</u> EPA and NHTSA program to reduce GHG emissions from heavy-duty vehicles starting in model year 2021.	<b>Consistent Prior to Mitigation.</b> State and federal program that requires no action at the local or project level. Benefits to project-related truck travel will be realized <del>once approved.</del>
Source: ARB 2015c, 2016d		

**Impact Determination for 2020 to 2040**

As discussed above, further implementation of major statewide measures (particularly RPS of 50 percent) along with mitigation measures for the project would reduce annual project operational

GHG emissions. As shown in Table 4.6-11, project emissions would not align with substantial progress toward the statewide reductions set by EO B-30-15 and EO S-03-05 before mitigation. However, after mitigation, the proposed project's GHG emission reductions demonstrate substantial progress on a downward trajectory relative to unmitigated emissions. This downward trend over time would be consistent with the need for deeper reductions post-2020 consistent with long-term reduction targets promulgated in EO B-30-15 and EO S-03-05. However, because the project and District as a whole are reliant on the State to develop regulations and guidance, and to cooperate with and petition other agencies to reduce emissions from the largest sources, it is not certain if the project's post-2020 emissions through 2040 would meet the specific reduction targets required by the project in order to achieve the overall state targets promulgated in EO B-30-15 and EO S-03-05.

Therefore, post-2020 project GHG emission impacts are considered significant (**Impact-GHG-2**). As mentioned, after implementation of Mitigation Measures **MM-GHG-1** through **MM-GHG-82**, project emissions would be substantially reduced and would be on a downward trajectory, but would remain significant because there is no certainty that the project's reduced emissions, after mitigation, would represent its fair share of the requisite reductions to achieve statewide post-2020 targets. Consequently, the project may not result in sufficient progress toward long-term local, regional, and statewide reduction targets and its contribution of GHG emissions to global climate change in the post-2020 period would still be considered cumulatively considerable after mitigation is incorporated.

### Level of Significance prior to Mitigation

For the years between 2020–2040, the proposed project would not parallel the State's overall reduction targets identified in EO S-03-05 and EO B-30-15 and would not be in compliance with all plans, policies, and regulatory programs adopted by ARB or other California agencies for post-2020 for the purpose of reducing the emissions of GHGs. Potentially significant impact(s) include:

**Impact-GHG-2: Project GHG Emissions Beyond 2020.** Although proposed project emissions would be on a downward trajectory in the post-2020 period, the proposed project's reduction in GHG emissions during combined project construction and operational activities, before mitigation, may not contribute sufficiently to post-2020 progress toward statewide 2030 and 2050 reduction targets and would not always be in compliance with plans, policies, and regulatory programs adopted by ARB or other California agencies for post-2020 for the purpose of reducing the emissions of GHGs.

### Mitigation Measures

Implement **MM-GHG-1** through **MM-GHG-3**.

**MM-GHG-4: Electric Cargo-Handling Equipment Upgrades.** ~~As a condition of any Coastal Development Permit, the project proponent, or the District, shall secure funding for and operate one piece of CHE associated with each node. Operation of such equipment on TAMT shall occur by January 1, 2030 through the expected operating life of the equipment, and evidence of operation shall be provided to the District upon request. Equipment shall be replaced if alternative technologies (i.e., advancements in electric equipment) are identified and determined to be feasible pursuant to MM-AQ-7. For purposes of the analysis, it was assumed that each node would operate one electric yard truck. This mitigation is similar to MM-GHG-3, which requires a purchase by 2020, but the number of CHE equipment required by MM-GHG-4 is~~

~~in addition to MM-GHG-3.~~In addition to the requirements in MM-GHG-3, this measure has multiple steps for compliance, as specified below.

- ~~A. Implement MM-GHG-3. The three electric cargo-handling equipment pieces required in MM-GHG-3 will continue to be operational through 2035.~~
- ~~B. Prior to January 1, 2025, the San Diego Unified Port District also shall ensure that no fewer than 20 non-electric yard trucks in operation are replaced at the TAMT by 20 electric yard trucks. Possible ways the electric yard trucks may be obtained include, but are not limited to, the following:~~
- ~~1. Purchased, leased, or otherwise acquired, in whole or in part, through funding provided to a tenant by the San Diego Unified Port District; or~~
  - ~~2. Purchased, leased, or otherwise acquired, in whole or in part, through funding provided to a tenant by other sources; or~~
  - ~~3. Purchased, leased, or otherwise acquired, in whole or in part, by the tenant in compliance with the condition of a discretionary approval issued by the San Diego Unified Port District.~~

~~Written evidence of the acquisition of the electric yard trucks, and the non-electric yard trucks they will replace and remove from further operation at the terminal, must be provided to the San Diego Unified Port District. The San Diego Unified Port District shall further ensure that the electric yard trucks are in use at the TAMT throughout the expected operating life of the equipment. Each tenant that employs electric trucks pursuant to this measure shall report the equipment's annual number of hours of operation to the San Diego Unified Port District and the San Diego Unified Port District shall monitor use of the electric trucks as part of the San Diego Unified Port District's TAMT equipment inventory.~~

- ~~C. Prior to January 1, 2030, the San Diego Unified Port District also shall ensure that no fewer than three existing non-electric reach stackers and ten non-electric forklifts in operation are replaced at the TAMT by three fully electric reach stackers and ten fully electric forklifts. Possible ways the electric reach stackers and forklifts may be obtained include, but are not limited to:~~
- ~~1. Purchased, leased, or acquired, in whole or in part, through funding provided to the tenant by the San Diego Unified Port District; or~~
  - ~~2. Purchased, leased, or acquired, in whole or in part, through funding provided to the tenant by other sources; or~~
  - ~~3. Purchased, leased, or otherwise acquired, in whole or in part, by the tenant in compliance with a condition of a discretionary approval issued by the San Diego Unified Port District.~~

~~Written evidence of the acquisition of the three electric reach stackers and ten electric forklifts and the conventional equipment they will replace and remove from further operation at the terminal must be provided to the San Diego Unified Port District. The San Diego Unified Port District shall further ensure that the electric reach stackers and forklifts are in use at the TAMT throughout the expected operating life of the equipment. Each tenant that employs electric reach stackers or electric forklifts pursuant to this measure shall report the equipment's annual number of hours of operation to the San Diego Unified Port~~

District and the San Diego Unified Port District shall monitor use of the electric reach stackers and forklifts as part of the San Diego Unified Port District's TAMT equipment inventory.

- D. The electric equipment employed pursuant to paragraphs A, B, and/or C of this mitigation measure may be replaced by other technologies or other types of cargo-handling equipment as long as the replacement equipment achieves the same or greater criteria pollutant, toxic air contaminant, and greenhouse gas emission reductions as compared to the equipment required by paragraphs A, B, and/or C of this mitigation measure.

**MM-GHG-5: Implement Vessel Speed Reduction Program Beyond Climate Action Plan Compliance for Future Operations Associated with the TAMT Plan.** Every quarter following approval of the first discretionary action approval and/or issuance of the first Coastal Development Permit associated with a future project proposed under the TAMT plan, whichever occurs first, the project proponent shall provide a report of the annual vessel activity and throughput by cargo node to date and the projected total throughput for the previous 6 months to the San Diego Unified Port District's Planning & Green Port Department. Prior to the annual vessel calls reaching 5291 calls (3776 new calls over existing) for dry bulk, 77117 calls (2060 new calls over existing) for refrigerated containers, and 6896 calls (4068 new calls over existing) for multi-purpose general cargo under the MPC scenario, 79 calls (64 new calls over existing) for dry bulk, 98 calls (41 new calls over existing) for refrigerated containers, and 78 calls (50 new calls over existing) for multi-purpose general cargo under the STC Alternative, or beginning January 1, 2030 for all vessels irrespective of the number of calls occurring on an annual basis, whichever occurs first, the project proponent shall implement VSRvessel speed reduction measures to reduce the project's criteria pollutant emissions. The program shall require that 90 percent of the vessels calling at the project site reduce their speeds to 12 knots starting at 40 nautical miles from Point Loma. Due to the international border to the south and ARB limit for rulemaking 24 nautical miles from the coastline, some vessel calls travel within the San Diego Air Basin for less than 40 nautical miles. For those vessel calls that travel within the San Diego Air Basin for less than 40 nautical miles, vessel operators are required to reduce their speeds to 12 knots at the point those vessels enter the San Diego Air Basin and maintain speeds of 12 knots over the entire distance to/from Point Loma. To be compliant with the vessel speed limit, the vessel's weighted average speed shall be 12 knots or less from the 40-nautical-mile latitude and longitude positions on each respective route to/from Point Loma.

Implementation of this VSRvessel speed reduction program will be required as part of any discretionary action and/or Coastal Development Permit(s) associated with the TAMT plan. Evidence of implementation and compliance with this mitigation measure shall be provided to the San Diego Unified Port District's Planning & Green Port Department on an annuala quarterly basis through 2035 (buildout of the TAMT plan). The San Diego Unified Port District will verify compliance through analysis of Automatic Identification System data or by requesting a vessel's Electronic Chart Display Identification System log from the captain.

**MM-GHG-6: Implement a Renewable Energy Project or Purchase the Equivalent Greenhouse Gas Offsets from a California Air Resources Board Approved Registry or a Locally Approved Equivalent Program for Future Operations Associated with the TAMT Plan.** Prior to the any discretionary approvals and/or issuance of a Coastal Development Permit(s), the project proponents of future components considered in the TAMT plan shall incorporate renewable energy within the TAMT or within other/adjacent to areas of the San



Diego Unified Port District's jurisdiction; otherwise, the project proponents shall purchase greenhouse gas reduction credits as specified herein to achieve requisite reductions to meet the 2035 reduction target. This requirement may include a micro-grid or similar type of energy management system to help distribute the loads and/or assist in energy storage. To meet the 2035 reduction target at full TAMT plan buildout (using full-buildout throughput numbers listed in Table 3-3 of Chapter 3, *Project Description*), the renewable energy project must offset 34,044,27,625 metric tons of carbon dioxide equivalent (MTCO<sub>2</sub>e) per year or 161,134,130,751 megawatt-hours per year (MWh/year) or the equivalent amount of greenhouse gas offsets under the MPC scenario or 18,206 MTCO<sub>2</sub>e per year or 86,172 MWh/year or the equivalent amount of greenhouse gas offsets under the STC Alternative.

Because it is unknown if the full buildout will ever be achieved given it is based on market demand, the amount of greenhouse gas offsets (whether from renewable energy or purchasing of offsets) per project proposed under the TAMT plan must reduce its fair share of the full buildout GHG emissions amount (i.e., fair share of 34,044,27,625 MTCO<sub>2</sub>e under the MPC scenario or 18,206 MTCO<sub>2</sub>e under the STC Alternative), which shall be calculated over the entire life of the project proponent's lease agreement with the District or (if no lease) over the life of the project. As such, a calculation of the greenhouse gas emissions that would be generated by a project proponent's project over the life of the lease at the TAMT or the project life is required to determine the sufficient amount of renewable energy mitigation or greenhouse gas offsets. This proportion shall be based on anticipated throughput of the project proposed under the TAMT plan and shall include all potential emission sources (e.g., trucks, vessels, employees, cargo handling equipment). Evidence shall be submitted to the District prior to the commencement of construction activities.

Because it is unknown how "solar ready" the available rooftop areas are within the TAMT, once at the design phase, the renewable energy project may be determined infeasible. Should this determination of infeasibility be made by the San Diego Unified Port District after considering evidence submitted by the project proponent related to any structural limitations (i.e., the rooftops cannot support a renewable energy system), then ~~two~~three additional options are available, listed here in order of priority. The San Diego Unified Port District shall either require the renewable energy project to be built off site ~~(i.e., at a location not within the TAMT but within the San Diego Unified Port District's jurisdiction), or within the adjacent community (City of San Diego)~~, or shall require the proponent to purchase the equivalent amount of greenhouse gas offsets from ~~sources listed on the American Carbon Registry and/or the Climate Action Reserve (or any other such registry approved by the California Air Resources Board)~~, approved registry, or a locally approved equivalent program. The selected option or a combination of the above-mentioned options must achieve a total annual reduction of 34,044,27,625 MTCO<sub>2</sub>e at full TAMT plan buildout under the MPC scenario or 18,206 MTCO<sub>2</sub>e under the STC Alternative assuming throughput numbers are reached by this point in time. Otherwise, the reduction amount will be proportional to the growth experienced at the TAMT, achieve the same reductions noted in the analysis, and scaled to the actual growth that occurs.

**MM-GHG-7: Annual Inventory Submittal and Periodic Technology Review.** ~~To promote new emission control technologies, each tenant who seeks a discretionary action approval and/or Coastal Development Permit(s) shall perform an investigation into emerging zero and near-zero technologies and submit a report to the District on an annual basis, beginning on the date such construction, occupancy, or use commences and continuing through 2035 (buildout of the TAMT plan). The~~ The San Diego Unified Port District regularly monitors technologies for reducing air

emissions as part of its Climate Action Plan (CAP) and long-range sustainability goals, which require encourages the San Diego Unified Port District and its tenants to use cleaner technologies over time as they become available and feasible. The Annual Technology Review shall identify any As a condition of approval of any new or amended real estate agreement or Coastal Development Permit, the San Diego Unified Port District shall require the project proponent to submit to the San Diego Unified Port District an annual inventory of all equipment that generates criteria pollutant, toxic air contaminant, and greenhouse gas emissions operated by the project proponent at the TAMT throughout the life of the lease up to 2035 (buildout of the TAMT plan). The equipment inventory shall include the year, make, and model of the equipment that was used in the previous year, including annual hours of operation for each piece of equipment, including but not limited to heavy duty drayage and non-drayage trucks, yard equipment, assist and ocean going tugs, ocean going vessels, bulk material handling equipment, and/or any other type of cargo handling equipment. The purpose of the inventory is to track emissions and equipment at TAMT and to assist in technological reviews, as described below.

To promote new emission control technologies, the San Diego Unified Port District will perform a Periodic Technology Review (PTR) annually. The PTR will coincide with monitoring and reporting pursuant to the San Diego Unified Port District's CAP, and will include the following:

1. Develop and maintain an inventory of equipment in operation at the TAMT that generates criteria pollutant, toxic air contaminant, and greenhouse gas emissions, including the equipment model year, model name, and annual hours of operation, based on the annual tenant inventories submitted to the San Diego Unified Port District as described above.
2. Identify and assist with enforcement of changes to emission regulations for heavy-duty trucks, yard equipment, tugs, vessels, bulk handling equipment, and other equipment that generates criteria pollutant, toxic air contaminant, and greenhouse gas emissions.
3. Identify, and assist with implementation of, any feasible new emissions-reduction technologies that may reduce emissions at the project site, including technologies applicable to heavy-duty trucks, yard equipment, tugs, vessels, and bulk handling equipment.
4. Collaborate with the California Air Resources Board and San Diego Air Pollution Control District to ensure these technologies are available and to identify funding opportunities, including funding from the Prop 1B: Good Movement Emission Reduction Program, among others.
5. Prioritize older equipment in operation at the TAMT that generates the highest levels of criteria pollutant, toxic air contaminant, and greenhouse gas emissions to be replaced based on the level of emissions and cost effectiveness of the emissions reduction (i.e., biggest reduction per dollar), and identify implementation mechanisms including, but not limited to, tenant-based improvements, grant programs, and/or a combination thereof, based on regulatory requirements and the feasibility analyses specified in paragraph 3 above. Utilize the Carl Moyer Program, or similar cost-effectiveness criteria, to assess the economic feasibility (e.g., cost effectiveness) of zero and near-zero emissions the identified new technologies for heavy-duty trucks, yard,
6. Ensure that any upgraded and/or retired equipment, tugs, vessels, is accounted for as part of the San Diego Unified Port District's Maritime Emissions Inventory and bulk handling equipment. Climate Action Plan.

~~If the Periodic Technology Review demonstrates the PTR identifies new technology that will be effective in reducing emissions and the compared to the equipment in operation at the time of the review, and the San Diego Unified Port District determines that installation or use of the technology is feasible, the tenant San Diego Unified Port District shall require the use of such technology as a condition of any discretionary approval issued by the San Diego Unified Port District for any new, expanded, or extended operations at the TAMT. Furthermore, the District and/or project proponent must demonstrate that emissions of volatile organic compounds (VOCs) would be less than 75 pounds per day on a peak day once cargo throughput exceeds 4,000,000 metric tons annually. If technological advancements are unable to reduce VOC emissions to 75 pounds per day or less on a peak day, then the District shall limit the number of vessels allowed to no more than three on a peak day once total throughput exceeds 4,000,000 metric tons annually. These operational restrictions will ensure that VOC emissions do not exceed threshold standards established by the San Diego Air Pollution Control District. Verification of compliance with this measure is the responsibility of the District.~~

**MM-GHG-8: Exhaust Emissions Reduction Program at the Tenth Avenue Marine Terminal.**

~~The San Diego Unified Port District shall implement such technology within 12 months of the District's determination a program at the TAMT by January 1, 2020 to further reduce emissions from terminal-wide emissions sources. Furthermore, the District and/or Project Proponent must demonstrate that VOC emissions would be less than 75 pounds per day on a peak day once cargo throughput exceeds 4,000,000 metric tons annually. If technological advancements are unable to reduce VOC emissions to 75 pounds per day or less on a peak day, then the District shall limit the number of vessels allowed to no more than three on a peak day once total throughput exceeds 4,000,000 metric tons annually. These operational restrictions will ensure that VOC emissions do not exceed threshold standards established by the San Diego Air Pollution Control District.~~

- ~~A. **MM-GHG-8: Implement a Sustainable Leasing Program.** The District shall work with tenants to develop and implement a policy incentive based sustainable. The program shall be implemented through the Coastal Development Permit process, the tenant leasing program to achieve the District's goals to attract the cleanest ships, ships process, including the issuance of new, extended or amended leases, and other short-term real estate agreements at the TAMT.~~
- B. ~~The program shall be focused on incentives to reduce criteria pollutant, toxic air contaminant, and greenhouse gas emissions by attracting clean vessels, trucks, and equipment to the TAMT, including but not limited to vessels that utilize shore power while at berth, zero and near-zero emission cargo handling equipment technologies, energy efficiency measures and/or renewable energy, and by otherwise incorporate technology incorporating technological and operational practices that reduce criteria pollutant emissions. The, toxic air contaminant, and greenhouse gas emissions from terminal operations beyond existing regulatory requirements. The program shall include specific incentives for existing and future tenants, which may include but is not limited to an extended lease term, expedited permit processing, reduced permit fees, and eligibility for grants or other financial assistance. The nature and extent of such incentives will be based on an emissions reduction schedule established by the San Diego Unified Port District for criteria pollutants, toxic air contaminants, and greenhouse gas emissions.~~

- C. The program shall identify specific emission-reduction equipment and practices that may qualify for incentives, which may include but not limited to the following.
- Vessels: Demonstrate that at least 50% of annual vessel calls will be equipped with Tier II or better main and auxiliary engines, as defined by the International Convention for the Prevention of Pollution from Ships Annex VI 2008 regulations or other standards set forth by the International Convention for the Prevention of Pollution from Ships, the U.S. Environmental Protection Agency, and/or California Air Resources Board in the future.
  - Vessel Hoteling: Demonstrate that vessel calls will utilize shore power or a California Air Resources Board-approved alternative emission capture and control system or install a shore power or California Air Resources Board-approved alternative emission capture and control system for the purpose of reducing ocean-going vessel hoteling emissions.
  - Heavy-Duty Trucks: Demonstrate that at least 50% of annual cargo throughput will be transported with zero/near-zero emission trucks, hybrid trucks, and/or other alternative truck technologies. To qualify, the trucks must result in emission reductions greater than those required by state and federal regulatory agencies at the time of project approval.
  - Switch and Line Haul Locomotives: Demonstrate that at least 50% of annual cargo will be transported with Tier 3 or above locomotive engines for line haul, as defined by the U.S. Environmental Protection Agency in 2008 (73 *Federal Register* 88 25098–25352), and a Tier 3 or above switcher or railcar mover for switching activity at both the terminal and yard.
  - Terminal Infrastructure: Install electric charging stations and/or other terminal infrastructure and equipment that support and facilitate zero or near-zero emission technologies.

**MM-GHG-9: Use of At-Berth Emission Capture and/or Control System to Reduce Vessel Hoteling Emissions.** The San Diego Unified Port District shall require the use of an At-Berth Emission Capture and/or Control System (i.e., bonnet system) to reduce vessel hoteling emissions prior to terminal-related emissions reaching a cancer risk of 10 per million at the maximally exposed sensitive receptor location. Based on the Health Risk Assessment, located in Section 4.2 of the TAMT Redevelopment Plan Environmental Impact Report, an At-Berth Emission Capture and/or Control System shall be required prior to reaching an annual throughput of 691,418 metric tons for dry bulk assuming no growth in multi-purpose general cargo, or an annual throughput of 356,666 metric tons for multi-purpose general cargo (includes break bulk, neobulk, roll-on/roll-off, and other non-container, non-dry bulk cargo, and non-liquid bulk cargo) assuming no growth in dry bulk, or a combined annual throughput of 691,418 metric tons for the dry bulk and multi-purpose/general cargo nodes, whichever occurs first. The San Diego Unified Port District shall either install directly or enter into a contract with an entity that provides the Emission Capture and/or Control System or an equivalent alternative technology, to reduce emissions from vessels that are unable to cold iron at TAMT and/or are exempt from the California Air Resources Board's at-berth regulation. The San Diego Unified Port District may charge a fee for the use of an Emissions Capture and Control System (or an alternative at-berth system that reduces vessel hoteling emissions) based on the vessel type and the length of its stay. The system shall be a technology that has been approved by the California Air Resources Board, and meets the requirements set forth in the California Air Resources Board's at-berth regulations. If the San Diego Unified Port District determines the need for an

Emissions Capture and Control System (or an alternative at-berth system that reduces vessel hoteling emissions) prior to, or later than, the throughput figures listed above, or if shore power or other future regulatory requirements are able to reduce vessel hoteling emissions, then the requirement for the At-Berth Emission Capture and/or Control System shall be updated and adjusted accordingly, at the San Diego Unified Port District's Climate Action Plan identifies the development of a Sustainable Leasing Policy as one of the GHG reduction measures prioritized for implementation, and future components under the TAMT plan shall be subject to the Sustainable Leasing Policy discretion.

All vessels that are not shore-power equipped shall use the Emission Capture and Control System (or an alternative at-berth system that reduces vessel hoteling emissions at an equivalent level), provided there are no operational limitations and it is not being used by another vessel. If the Emission Capture and Control System is operationally unable to connect to an at-berth vessel, or if it is being used by another vessel, multi-purpose/general cargo and/or dry bulk vessels will be allowed to berth without it.

### Level of Significance after Mitigation

Even after implementation of **MM-GHG-1** through **MM-GHG-82**, **Impact-GHG-2** would remain significant due to the lack of a known project type and location-specific reduction target; therefore, it cannot be stated with certainty that the project would result in emissions that would represent a fair share of the requisite reductions to achieve post-2020 targets.

Mitigation Measure **MM-GHG-6** includes installation of solar panels on available rooftop space within the TAMT ~~or~~, off site but within the District's jurisdiction, or within the adjacent community. It is assumed that minimal construction activities would be required and would consist of installing poles or infrastructure on the rooftops to mount the solar arrays, electrical connections to the existing grid, potential minor upgrades to the existing onsite electrical system (pending consultation with SDG&E), possible minor structural improvements to the buildings and roofs, and a few associated material deliveries for the solar hardware. Once operational, the solar arrays would not create any glare issues because they are designed and coated to absorb light, not reflect it, require very little maintenance, and in general would not cause any significant impacts on the environment. Therefore, environmental impacts associated with the implementation of the solar option under **MM-GHG-6** would be less than significant.

## 3.2.7 Changes to Chapter 4, Section 4.7, *Hazards and Hazardous Materials*

### Page 4.7-3

#### 4.7.2.3 Onsite Hazardous Materials (Contamination)

The site is a known area of soil contamination due to the historical disposal and burning of municipal solid waste (Appendix J-2). Based on previous site assessments, hazardous materials within the project area identified through previous sampling actions may be present in the soil, including total petroleum hydrocarbons (TPH), benzene, toluene, PAHs, semi-volatile organic compounds (SVOCs), dioxins and furans, and metals (copper, zinc, and lead) (Appendix J-1). In addition, soil sampling was conducted by Ninyo & Moore in 2013, 2014, and 2015 for Transit Shed

#1, Transit Shed #2, and Warehouse C. The hazardous material conditions of the subject buildings and their respective areas are as follows.

## Pages 4.7-21 and 4.7-22

### Mitigation Measures

#### Demolition and Initial Rail Component

**MM-HAZ-1: Compliance with Soil Management Plan.** Prior to approval of the project grading plans and the commencement of any construction activities that would disturb the soil, the District or tenant, whichever is appropriate, and the contractor (collectively “Contractor”) shall demonstrate compliance with the *10th Avenue Marine Terminal, San Diego, CA, Soil Management Plan, prepared by Tetra Tech EM, Inc., November 24, 2010* (Appendix J-1 of the Draft EIR) and consider the existing presence of the permitted underground storage tank on site (shown on Figure 4.7-1). Specifically, the Contractor shall demonstrate compliance with the following specific requirements of the plan including, but not limited to, the following.

*Conduct Soil Testing.* The Contractor shall comply with the excavated soil management techniques specified in the plan. The Contractor shall follow the soil sampling protocol and soil sampling objectives, and shall comply with the soil characterization methodology identified within the plan.

*Prepare and Implement a Community Health and Safety Program.* The Contractor shall develop and implement a site-specific Community Health and Safety Program (Program) that addresses the chemical constituents of concern for the project site. The guidelines of the Program shall be in accordance with ~~California Code the County of Regulations Title 23, Division 3, Chapter 16 regulations.~~ San Diego’s Department of Environmental Health’s Site Assessment and Mitigation Manual (2009) and Environmental Protection Agency. The Program shall include detailed plans on air monitoring and other appropriate construction means and methods to minimize the public’s and site workers’ exposure to the chemical constituents. The contractor shall utilize a Certified Industrial Hygienist with significant experience with chemicals of concern on the project site to approve the Program and actively monitor compliance with the Program during construction activities.

## 3.2.8 Changes to Chapter 4, Section 4.8, *Hydrology and Water Quality*

### Page 4.8-11

#### San Diego Integrated Regional Water Management Plan

In the San Diego region, there is a complex array of water supply, water management, water quality protection, pollution prevention, habitat protection, flood protection, and recreational needs. Water management plans have been developed within the region to address these needs. However, jurisdictional and water management conflicts exist among the individual water management plans, and many challenges exist to identifying, addressing, and resolving water management issues. The Integrated Regional Water Management Plan (IRWMP) was developed in 2007 to bring stakeholders

together and coordinate a regional approach to water management issues, pursuant to statewide IRWMP Guidelines established by the SWRCB and State of California Department of Water Resources in 2004, ~~and updated in 2007, and again in 2013.~~

The 2013 IRWMP presents an overarching assessment of the San Diego Region's water supply, water quality, and ecosystem challenges and provides recommendations for sustainable answers. The Final Draft 2013 IRWMP was finalized on September 11, 2013 and was formally adopted by the Regional Water Management Group agencies on the following dates:

- San Diego County Water Authority Board of Directors: September 26, 2013
- City of San Diego City Council: October 8, 2013
- County of San Diego Board of Supervisors: October 9, 2013 ~~In addition, the 2013 Final Draft IRWMP is now available.~~

## 3.2.9 Changes to Chapter 4, Section 4.9, *Noise and Vibration*

### Page 4.9-16

#### Noise from Adjacent Stationary Uses (Noise Generators)

A project that would generate noise levels at the property line that exceed the City's Noise Ordinance Standards is considered potentially significant. The sound level limit along the boundary line between two zoning districts is the arithmetic mean of the respective limits for the two districts. ~~If a non-residential use, such as commercial, industrial, or school use, is proposed to abut an existing residential use, the decibel limit at the property line should be the arithmetic mean of the decibel levels allowed for each use as set forth in Section 59.5.0401 of the Municipal Code.~~ It is noted that, even if project noise levels comply with the arithmetic mean noise limits permitted by the City's Noise Ordinance Standards, it is still possible that daily noise levels could exceed 65 dBA CNEL at the residential property line, which could be considered a significant environmental impact. For the purposes of this analysis, hotels are considered a commercial use in the context of the City's noise ordinance.

### Page 4.9-23

**Table 4.9-11. Worst-case Noise Emissions from TAMT Plan Operations**

Receptor Location	City Noise Ordinance Standard (dBA Leq)	Measured Existing Noise Level (dBA Leq)	Nearest Measured Location	TAMT Plan Noise Levels <sup>7</sup> (dBA Leq)	Significant?
Cesar Chavez Park	60 <sup>1</sup>	57 <sup>5</sup>	ST-1	69	Yes
Monarch School	62.5 <sup>2</sup>	64 <sup>5</sup>	ST-3	56	No
Residences – Newton Avenue	60 <sup>3</sup>	53 <sup>5</sup>	ST-4	52	No
Residences – Sigsbee Row	60 <sup>3</sup>	53 <sup>5</sup>	ST-4	52	No
Hilton Bayfront Hotel	67.5 <sup>4</sup>	53 <sup>6</sup>	LT-2	64	No
Bayfront Park	60 <sup>1</sup>	53 <sup>6</sup>	LT-2	63	Yes
Embarcadero Marina Park South	60 <sup>1</sup>	53 <sup>6</sup>	LT-2	60	No
Residences – Broadstone Coronado on the Bay	60 <sup>3</sup>	55 <sup>6</sup>	LT-1	56	No

Receptor Location	City Noise Ordinance Standard (dBA Leq)	Measured Existing Noise Level (dBA Leq)	Nearest Measured Location	TAMT Plan Noise Levels <sup>7</sup> (dBA Leq)	Significant?
Apartments					
<u>Perkins Elementary School</u>	<u>62.5</u> <sup>2</sup>	<u>64</u> <sup>5</sup>	<u>ST-3</u>	<u>56</u>	<u>No</u>
<u>Residences – Mercado Apartments</u>	<u>60</u> <sup>3</sup>	<u>53</u> <sup>5</sup>	<u>ST-4</u>	<u>55</u>	<u>No</u>

<sup>1</sup> Based on arithmetic mean of City noise ordinance standards of 75 dBA Leq for industrial use and 45 dBA Leq for single-family residential use (i.e., most stringent standard because there is no City Municipal Code standard for park use) and park closing hour of 10:00 p.m.

<sup>2</sup> Based on arithmetic mean of City noise ordinance standards of 75 dBA Leq for industrial use and 50 dBA Leq for single-family residential use (i.e., most stringent standard because there is no City Municipal Code standard for school use) and use of school during daytime hours.

<sup>3</sup> Based on arithmetic mean of City noise ordinance standards of 75 dBA Leq for industrial use and 45 dBA Leq for multi-family residential use during nighttime hours (between 10 p.m. and 7 a.m.)

<sup>4</sup> Based on arithmetic mean of City noise ordinance standards of 75 dBA Leq for industrial use and 60 dBA Leq for commercial use during nighttime hours (between 10 p.m. and 7 a.m.)

<sup>5</sup> Estimated based on short-term measurements taken in the vicinity of this location.

<sup>6</sup> Average Leq, based on long-term measurements taken in the vicinity of this location (daytime and nighttime hours).

<sup>7</sup> The project contribution to noise levels at the receptor locations, as specified in ordinance 59.5.0401.

## Page 4.9-29

**Table 4.9-13. Increase in Noise Levels during TAMT Plan Operation**

Receptor Location	Measured Existing Noise Level (dBA Leq)	Nearest Measured Location	TAMT Plan Noise Levels <sup>3</sup> (dBA Leq)	Increase above Existing Levels (dB)	Significant?
Cesar Chavez Park	57 <sup>1</sup>	ST-1	69	+ 12	Yes
Monarch School	64 <sup>1</sup>	ST-3	56	- 12	No
Residences – Newton Avenue	53 <sup>1</sup>	ST-4	52	- 1	No
Residences – Sigsbee Row	53 <sup>1</sup>	ST-4	52	- 1	No
Hilton Bayfront Hotel	53 <sup>2</sup>	LT-2	64	+ 11	Yes
Bayfront Park	53 <sup>2</sup>	LT-2	63	+ 10	Yes
Embarcadero Marina Park South	53 <sup>2</sup>	LT-2	60	+ 7	Yes
Residences – Broadstone Coronado on the Bay Apartments	55 <sup>2</sup>	LT-1	56	+ 1	No
<u>Perkins Elementary School</u>	<u>64</u> <sup>5</sup>	<u>ST-3</u>	<u>56</u>	<u>-8</u>	<u>No</u>
<u>Residences – Mercado Apartments</u>	<u>53</u> <sup>5</sup>	<u>ST-4</u>	<u>55</u>	<u>+2</u>	<u>No</u>

<sup>1</sup> Estimated based on short-term measurements taken in the vicinity of this location.

<sup>2</sup> Average Leq, based on long-term measurements taken in the vicinity of this location (daytime and nighttime hours).

<sup>3</sup> The project contribution to noise levels at the receptor locations, as specified in ordinance 59.5.0401.



## Page 4.9-31

**Table 4.9-14. Increase in Noise Levels from Demolition and Initial Rail Component Construction**

Receptor Location	Measured Existing Noise Level (dBA Leq)	Nearest Measured Location	Project Construction Noise Levels (dBA Leq)	Increase above Existing Levels (dB)	Significant?
Cesar Chavez Park	57 <sup>1</sup>	ST-1	59	+2	No
Monarch School	64 <sup>1</sup>	ST-3	50	-14	No
Residences – Newton Avenue	53 <sup>1</sup>	ST-4	48	-5	No
Residences – Sigsbee Row	53 <sup>1</sup>	ST-4	48	-5	No
Hilton Bayfront Hotel	53 <sup>2</sup>	LT-2	63	+10	No <sup>3</sup>
Bayfront Park	53 <sup>2</sup>	LT-2	62	+9	<b>Yes</b>
Embarcadero Marina Park South	53 <sup>2</sup>	LT-2	59	+6	<b>Yes</b>
Residences – Broadstone Coronado on the Bay Apartments	55 <sup>2</sup>	LT-1	55	0	No
<u>Perkins Elementary School</u>	<u>64 <sup>5</sup></u>	<u>ST-3</u>	<u>50</u>	<u>-14</u>	<u>No</u>
<u>Residences – Mercado Apartments</u>	<u>53 <sup>5</sup></u>	<u>ST-4</u>	<u>45</u>	<u>-8</u>	<u>No</u>

<sup>1</sup> Estimated based on short-term measurements taken in the vicinity of this location.

<sup>2</sup> Average Leq based on long-term measurements taken in the vicinity of this location (daytime and nighttime hours).

<sup>3</sup> Note that hotels are only considered noise sensitive during nighttime hours and would not be sensitive to daytime construction noise.

## Page 4.9-32

**Table 4.9-15. Increase in Noise Levels during TAMT Plan Construction**

Receptor Location	Measured Existing Noise Level (dBA Leq)	Nearest Measured Location	Program Construction Noise Levels (dBA Leq)	Increase above Existing Levels (dB)	Significant?
Cesar Chavez Park	57 <sup>1</sup>	ST-1	69	+ 12	<b>Yes</b>
Monarch School	64 <sup>1</sup>	ST-3	54	- 10	No
Residences – Newton Avenue	53 <sup>1</sup>	ST-4	52	- 1	No
Residences – Sigsbee Row	53 <sup>1</sup>	ST-4	52	- 1	No
Hilton Bayfront Hotel	53 <sup>2</sup>	LT-2	64	+ 11	No <sup>3</sup>
Bayfront Park	53 <sup>2</sup>	LT-2	63	+ 10	<b>Yes</b>
Embarcadero Marina Park South	53 <sup>2</sup>	LT-2	61	+ 8	<b>Yes</b>
Residences – Broadstone Coronado on the Bay Apartments	55 <sup>2</sup>	LT-1	56	+ 1	No
<u>Perkins Elementary School</u>	<u>64 <sup>5</sup></u>	<u>ST-3</u>	<u>54</u>	<u>-10</u>	<u>No</u>
<u>Residences – Mercado Apartments</u>	<u>53 <sup>5</sup></u>	<u>ST-4</u>	<u>56</u>	<u>+3</u>	<u>No</u>

<sup>1</sup> Estimated based on short-term measurements taken in the vicinity of this location.

<sup>2</sup> Average Leq based on long-term measurements taken in the vicinity of this location (daytime and nighttime hours).

<sup>3</sup> Note that hotels are only considered noise sensitive during nighttime hours and would not be sensitive to daytime construction noise.

## 3.2.10 Changes to Chapter 4, Section 4.10, *Transportation, Circulation, and Parking*

### Page 4.10-1

The information provided in this section is summarized from the *Tenth Avenue Marine Terminal Redevelopment Plan Transportation Impact Analysis* (TIA) prepared by Chen Ryan Associates in ~~June~~ August 2016 (Appendix G). Table 4.10-1 summarizes the significant impacts and mitigation measures discussed in Section 4.10.4.3, *Project Impacts and Mitigation*.

### Pages 4.10-2 and 4.10-3

**Table 4.10-1. Summary of Significant Transportation Impacts and Mitigation Measures**

Summary of Potentially Significant Impact(s)	Summary of Mitigation Measure(s)	Level of Significance After Mitigation	Rationale for Finding After Mitigation
<b>Impact-TRA-1:</b> Construction-Related Impact on an Intersection: Norman Scott Road/32 <sup>nd</sup> Street/Wabash Boulevard from Demolition and Initial Rail Component Construction	<b>MM-TRA-1:</b> Transportation Demand Management (TDM) Plan <del>During Construction</del> During Demolition and Initial Rail Component Construction	Significant and unavoidable	Implementation of a TDM Plan during construction would reduce potential impacts at the Norman Scott Road/32 <sup>nd</sup> Street/Wabash Boulevard intersection; however, it cannot be determined with certainty that the impacts would be reduced to less-than-significant levels.
<b>Impact-TRA-2:</b> <del>Operation-Related Impact on an Intersection: Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard from Demolition and Initial Rail Component Operations</del>	<b>MM-TRA-2:</b> Westbound Right Turn Overlap Phase at Norman Scott Road/32 <sup>nd</sup> Street/Wabash Boulevard Intersection	Significant and unavoidable	<del>Although mitigation is required that could reduce the impact to a less-than-significant level, timing and the implementation of the recommended improvements are uncertain because they are outside the jurisdiction of the District.</del>
<b>Impact-TRA-23:</b> Construction Traffic from Future TAMT Plan Construction Projects	<b>MM-TRA-23:</b> Traffic Study and Transportation Demand Management (TDM) for Specific Construction Projects	Significant and unavoidable	Uncertainty of timing of future construction activities and the potential that projects may overlap; impacts may remain significant even after the adoption of all feasible mitigation measures

Summary of Potentially Significant Impact(s)	Summary of Mitigation Measure(s)	Level of Significance After Mitigation	Rationale for Finding After Mitigation
<b>Impact-TRA-34:</b> Operation-Related Impact on a Roadway Segment: 28 <sup>th</sup> Street between Boston Avenue and National Avenue from TAMT Plan Operations	<b>MM-TRA-34:</b> Widen the Segment of 28 <sup>th</sup> Street between Boston Avenue and National Avenue to a Four-Lane Major Arterial Classification Consistent with the Barrio Logan Community Plan	Significant and unavoidable	Although mitigation is required that could reduce the impact to a less-than-significant level, timing and the implementation of the recommended improvements are uncertain because they are outside the jurisdiction of the District.
<b>Impact-TRA-45:</b> Operation-Related Impact on an Intersection: Norman Scott Road/32 <sup>nd</sup> Street/Wabash Boulevard from TAMT Plan Operations	<b>MM-TRA-4:</b> <u>Westbound Right-Turn Overlap Phase at Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard Intersection</u> <b>MM-TRA-2</b>	Significant and Unavoidable	<u>Although mitigation is required that would reduce the impact to a less-than-significant level, timing and the implementation of the recommended improvements are uncertain because they are outside the jurisdiction of the District.</u> <del>The District cannot ensure that the improvements would be made when needed because the timing and implementation of the necessary improvement is within the exclusive jurisdiction of Caltrans, and not the District.</del>
<b>Impact-TRA-56:</b> Insufficient Parking at Full TAMT Plan Buildout	<b>MM-TRA-5:</b> District Shall Inform All TAMT Workers to Park at the TAMT Facility or at an Authorized Offsite Parking Lot or Parking Garage <b>MM-TRA-6:</b> District to Maintain a Parking Inventory of TAMT <b>MM-TRA-7:</b> Proponents for Future Project Components, New Leases, or Lease Renewals Shall Prepare a Parking Management Plan	Less than significant	District would ensure sufficient parking would be available for all District staff, tenants, and their employees, as well as necessary dock workers to load/unload cargo vessels. At no point would TAMT employees be permitted to park outside of authorized locations. Either available parking would always be provided on the terminal or authorized parking locations would be

Summary of Potentially Significant Impact(s)	Summary of Mitigation Measure(s)	Level of Significance After Mitigation	Rationale for Finding After Mitigation
			identified and formalized through signed agreements with tenants.

## Page 4.10-4

### 28<sup>th</sup> Street

Within the project study area, 28<sup>th</sup> Street is configured as:

- a four-lane raised median roadway between Harbor Drive and Main Street;
- a four-lane roadway with a continuous two-way left-turn lane between Main Street and Boston Avenue; and
- a three-lane roadway (two northbound and one southbound) with a continuous two-way left-turn lane between Boston Avenue and National Avenue.

Roadway width ranges from 64 to 76 feet, with a posted speed limit of 30 mph. Parking is allowed on both sides of the roadway between Harbor Drive and Main Street, but is prohibited between Main Street and National Avenue. Sidewalks are present on both sides of the roadway, but bicycle facilities are not. The Metropolitan Transit System (MTS) Bus Route 929, located at Main Street and Cesar Chavez, is a public transit stop within 0.3 mile of the project site. In addition, MTS Bus Route 11, located at the intersection of 28<sup>th</sup> Street and National Avenue, is the ~~only~~ other public transit stop within the project study area.<sup>11</sup>

## Page 4.10-15

### Blue Line

The MTS Blue Line was the first light-rail line constructed in San Diego and was the start of the MTS Trolley System. In operation since 1981, the Blue Line began with service between downtown San Diego and the San Ysidro Port-of-Entry. Blue Line service has been expanded four times since its inception and now provides service between the San Ysidro Port-of-Entry to the south and the Old Town Transit Center to the north. In all, it services 15.4 miles and includes 18 stations.

The Blue Line currently runs at 7- to 8-minute headways during peak periods and 15-minute headways in off-peak periods. Existing ridership along the Blue Line is estimated at 145 and 151 passengers per train during the AM and PM peak hours, respectively, or about half of the current capacity of 300 passengers per train. The Blue Line stops at the Barrio Logan Trolley Station, which is approximately 0.3 mile walking distance from the project site, and the 12<sup>th</sup> and Imperial Station, which is approximately 0.4 mile walking distance from the north access point to the project site.

<sup>11</sup> Although Cesar Chavez Boulevard provides freeway access from the project site, truck traffic is expressly prohibited from using this road. Therefore, 28<sup>th</sup> Street is the next closet roadway that provides access to Interstate 5 and is a designated truck route.

## Page 4.10-16

### Local/Express Bus Services

There ~~is one~~ are two bus routes that currently makes stops within the project study area: MTS Bus Routes 929 and 11. The MTS Bus Route 44-929 stop is at the corner of Main Street and Cesar Chavez Boulevard, approximately 0.3 mile from the project site. The MTS Bus Route 11 stop is at the corner of 28<sup>th</sup> Street and National Avenue, approximately 1 mile from the project site.

## Page 4.10-27

### Trip Distribution and Assignment

Project trip distribution for trucks was determined based on the *Port Access Projects – 10th Avenue Marine Terminal Truck O-D Study* (CH2M Hill 2011) and existing truck routes. This study analyzed both existing truck trip generation and distribution associated with trucks entering and leaving the project site. Project trip distribution for employees was based on SANDAG's San Diego Region Major Statistical Areas ~~and, as well as maritime operations staff input.~~ Based on the assumed project trip distribution, daily and AM/PM peak hour project trips were assigned to the adjacent roadway network. Both studies are included as appendices to Appendix G. Figures 4.10-12 and 4.10-13 show the estimated employee and truck trip assignments used for the Demolition and Initial Rail Component, whereas Figures 4.10-5 through 4.10-8, as shown above, display the estimated employee and truck trip distributions and assignments for the full TAMT plan buildout.

## Page 4.10-34

### Intersections

Table 4.10-25 shows existing and existing plus Demolition and Initial Rail Component peak hour LOS conditions for the intersections in the project study area, while Figure 4.10-15 illustrates the existing plus Demolition and Initial Rail Component volumes on study area intersections. As indicated, all intersections in the project study area operate at LOS D or better under existing conditions with the exception of Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard, which currently operates at LOS F in the AM peak hour and LOS E in the PM peak hour. With the addition of Demolition and Initial Rail Component traffic, operations at this intersection would remain at LOS F and E in the AM and PM peak hour, respectively, and the project would not result in an increase in delay that would exceed the City's thresholds. Therefore, a less-than-significant impact would occur, and no mitigation is required.

~~Once operational, the Demolition and Initial Rail Component's traffic at this intersection would worsen the existing delay by 4.8 seconds in the AM peak hour and by 2.3 seconds in the PM peak hour. Because the threshold is 1.0 second of additional delay for intersections operating at LOS F and 2.0 seconds of additional delay for intersections operating at LOS E, impacts at the Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard intersection would be significant (Impact TRA-2). The Demolition and Initial Rail Component's impact on the Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard intersection would be mitigated by adding a westbound right turn overlap phase (MM-TRA-2). This would reduce the unmitigated delay associated with the project by 6.0 seconds during the AM peak hour and by 12.8 seconds during the PM peak hour and would effectively reduce delay at this intersection to below current levels.~~

## Page 4.10-35

Table 4.10-24. Peak Hour Roadway Segment LOS Results – Existing Plus Demolition and Initial Rail Component

Roadway	Segment	Cross-Section	Threshold (LOS E)	Existing + Demolition and Initial Rail Component			Existing			$\Delta$	S?
				ADT	V/C	LOS	ADT	V/C	LOS		
Harbor Drive	Between Beardsley Street and Cesar Chavez Parkway	4 lanes w/RM	40,000	20,276 <del>2</del>	0.507	B	20,194	0.505	B	0.002	N
	Between Cesar Chavez Parkway and Sampson Street	4 lanes w/RM	40,000	10,732 <del>6</del>	0.268	A	10,546	0.264	A	0.004 <del>5</del>	N
	Between Sampson Street and Schley Street	4 lanes w/RM	40,000	12,236 <del>0</del>	0.306	A	12,050	0.301	A	0.005	N
	Between Schley Street and 28 <sup>th</sup> Street	4 lanes w/RM	40,000	11,812 <del>806</del>	0.295	A	11,626	0.291	A	0.004 <del>5</del>	N
	Between 28 <sup>th</sup> Street and Belt Street	4 lanes w/RM	40,000	18,215 <del>3</del>	0.455 <del>4</del>	B	18,050	0.451	B	0.004 <del>3</del>	N
	Between Belt Street and 32 <sup>nd</sup> Street	4 lanes w/RM	40,000	16,706 <del>6</del>	0.419 <del>8</del>	B	16,603	0.415	B	0.004 <del>3</del>	N
28 <sup>th</sup> Street	Between Harbor Drive and Main Street	4 lanes w/RM	40,000	16,156 <del>211</del>	0.404 <del>5</del>	B	16,134	0.403	B	0.004 <del>2</del>	N
	Between Main Street and Boston Avenue	4 lanes w/TWLT	30,000	19,585 <del>599</del>	0.653	C	19,563	0.652	C	0.001	N
	Between Boston Avenue and National Avenue	3 lanes w/TWLT	22,500 <sup>1</sup>	22,125 <del>139</del>	0.983 <del>4</del>	<b>E</b>	22,112	0.983	<b>E</b>	0.000 <del>1</del>	N
32 <sup>nd</sup> Street	Between Harbor Drive and Norman Scott Road	6 lanes w/RM	50,000	20,082 <del>3</del>	0.402 <del>0</del>	B	19,920	0.398	A	0.003 <del>2</del>	N

Source: Appendix G

Notes:

<sup>1</sup> Capacity is 75% of a 4-Lane Collector w/TWLT.**Bold** letter indicates a significant impact.ADT = average daily trips; LOS = level of service; RM = raised median; S? = Indicates if change in V/C ratio is significant; TWLT = two-way left turn; V/C = volume to capacity ratio;  $\Delta$  = change in V/C ratio.

## Page 4.10-36

Table 4.10-25. Peak Hour Intersection LOS Results – Existing Plus Demolition and Initial Rail Component

#	Intersection	AM Peak Hour		PM Peak Hour		Delay w/o Demolition and Initial Rail Component (sec.) AM/PM	LOS w/o Demolition and Initial Rail Component AM/PM	Change in Delay (sec.)	S?
		Avg. Delay (sec.)	LOS	Avg. Delay (sec.)	LOS				
1	Harbor Drive/Cesar Chavez Parkway	36.8	D	34.6	C	36.8/33.3	D/C	0.0/1.3	N
2	Harbor Drive/Sampson Street	40.4	D	41.4	D	40.4/40.9	D/D	0.0/0.21	N
3	Harbor Drive/Schley Street	16.7	B	15.0	B	16.7/15.0	B/B	0.0/0.17	N
4	Harbor Drive/28 <sup>th</sup> Street	23.56	C	20.35	C	23.1/20.3	C/C	0.45/0.02	N
5	Main Street/28 <sup>th</sup> Street	21.45	C	34.8	D	21.4/34.8	C/C	0.1/0.03	N
6	Boston Avenue/28 <sup>th</sup> Street	19.4	B	23.0	C	19.4/23.0	B/C	0.0/0.0	N
7	National Avenue/28 <sup>th</sup> Street	42.3	D	29.6	C	42.3/29.6	D/C	0.0/0.0	N
8	National Avenue/I-5 NB Off-Ramp	14.9	B	14.8	B	14.9/14.7	B/B	0.0/0.1	N
9	Harbor Drive/Belt Street	18.6	B	17.1	B	18.6/17.1	B/B	0.0/0.0	N
10	Harbor Drive/32 <sup>nd</sup> Street	28.87	C	41.96	D	28.6/39.9	C/D	0.2/2.01/1.7	N
11	Norman Scott Road/32 <sup>nd</sup> Street/Wabash Boulevard	100.1 95.5	<b>F</b>	68.5 67.4	<b>E</b>	95.3/66.2	<b>F/E</b>	4.8/0.23/1.2	<b>YN</b>

Source: Appendix G

**Bold** letter indicates a significant impact.

LOS = level of service; NB = northbound; S? = Indicates significant impact

## Page 4.10-37

**Table 4.10-26. Peak Hour Ramp Intersection Capacity Analysis – Existing Plus Demolition and Initial Rail Component**

#	Intersection	Peak Hour	ILV/Hour		Description
			Existing	Existing + Demolition and Initial Rail Component	
8	National Avenue/I-5 NB Off-Ramp	AM	636	636 <del>8</del>	Under Capacity
		PM	794	794 <del>5</del>	Under Capacity
11	Norman Scott Road/32 <sup>nd</sup> Street/Wabash Boulevard	AM	956	<del>986</del> 974	Under Capacity
		PM	1,028	<del>1,053</del> 042	Under Capacity

Source: Appendix G.

Note: less than 1,200 ILV/Hour indicates operation is Under Capacity.

NB = southbound; ILV = intersection lane volume

In sum, all potential impacts on roadway segments, intersections, and ramp intersections would be less than significant during operation of the Demolition and Initial Rail Component. ~~However, operational traffic would add more than 1 second of delay to the intersection of Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard during the AM and PM peak hours, and therefore would result in a significant direct impact on this intersection.~~ Consequently, operation of the Demolition and Initial Rail Component ~~has the potential to~~ would not conflict with applicable plans, ordinances, and policies related to the performance of the circulation system, and impacts would be less than significant.

## Page 4.10-38

**Table 4.10-27. Peak Hour Roadway Segment LOS Results – Existing Plus Demolition and Initial Rail Component Alternative Gate Scenario**

Roadway	Segment	Cross-Section	Threshold (LOS E)	Existing + Demolition and Initial Rail			Existing			Δ	S?
				ADT	V/C	LOS	ADT	V/C	LOS		
Harbor Drive	Between Beardsley Street and Cesar Chavez Parkway	4 lanes w/RM	40,000	20,288 <del>4</del>	0.507	B	20,194	0.505	B	0.002	N

Source: Appendix G

Notes:

ADT = average daily trips; LOS = level of service; RM = raised median; S? = Indicates if change in V/C ratio is significant; V/C = volume to capacity ratio; Δ = change in V/C ratio



## Page 4.10-39

**Table 4.10-28. Peak Hour Intersection LOS Results – Existing Plus Demolition and Initial Rail Component Alternative Gate Scenario**

#	Intersection	AM Peak Hour		PM Peak Hour		Delay without Demolition and Initial Rail (sec.) AM/PM	LOS without Demolition and Initial Rail AM/PM	Change in Delay (sec.)	S?
		Avg. Delay (sec.)	LOS	Avg. Delay (sec.)	LOS				
1	Harbor Drive/ Cesar Chavez Parkway	37.65	D	34.6	C	36.8/33.3	D/C	0.87/1.3	N
12	Harbor Drive/ Alternative Gate	18.2	B	24.2	C	N/A	N/A	18.2/24.2	N

Source: Appendix G

LOS = level of service; N/A = not applicable; S? = Indicates a significant impact

## Pages 4.10-40 through 4.10-42

As discussed in the construction impact analysis for the Demolition and Initial Rail Component, construction-related traffic associated with this phase has the potential to result in a significant direct impact on the Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard intersection. Consequently, any construction activities associated with full TAMT plan buildout with a similar intensity as the Demolition and Initial Rail Component have the potential to result in impacts on this intersection. Additionally, given the lack of construction and schedule details at this time and, most importantly, the potential, if somewhat unlikely, overlap of construction for several of the projects such as the demolition of Warehouse C and the molasses tanks, installation of gantry cranes and/or the dry bulk nodes improvements (i.e., conveyor and bulk discharge system), construction of all the components of the full TAMT plan buildout could result in a significant traffic impact on study area roadway facilities (**Impact-TRA-32**). Mitigation in the form of a project-specific traffic study and construction traffic control plan is required to reduce the significant impact (**MM-TRA-32**); without specific details, however, it cannot be determined with certainty that the impacts would be reduced to less-than-significant levels. Therefore, impacts associated with the project's potential to conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system would be significant and unavoidable.

### Operation

Operational impacts associated with full buildout of the proposed TAMT plan, including increased throughput that results from the use of up to five gantry cranes, new storage areas such as warehouse buildings that total up to 100,000 square feet, additional and consolidated dry bulk storage capacity, enhanced conveyor system, and an improved entry gate facility can be reasonably forecasted and analyzed at this time. The Demolition and Initial Rail Component is the initial project-level component necessary to implement all other future components of the TAMT plan and would be operational by 2020. As a result, the analysis for full buildout looks at the combined effect of operations associated with full buildout of the proposed TAMT plan, which includes the Demolition and Initial Rail Component and other future components. These improvements would substantially

increase the terminal's overall throughput capacity. As a result, the proposed project is anticipated to generate 423 additional truckloads of cargo each day and require an additional 524 employees each day at the project site. This results in a total of 4,110 ADT. The discussion below details the impacts that additional throughput and employees would have on existing roadway segments and intersections within the project study area.

#### *Existing Conditions Plus TAMT Plan Buildout*

##### Roadway Segments

Table 4.10-29 shows existing and existing plus TAMT plan buildout LOS conditions for the roadway segments in the project study area, while Figure 4.10-18 illustrates the existing plus TAMT plan buildout volumes on study area roadways. As shown, all roadway segments operate at LOS D or better under existing conditions, except 28<sup>th</sup> Street between Boston Avenue and National Avenue, which currently operates at LOS E. With the addition of TAMT plan buildout traffic, this segment would worsen to LOS F and increase the V/C ratio by 0.036040 (**Impact-TRA-43**). Therefore, this impact would be significant and mitigation is required.

This section of 28<sup>th</sup> Street is currently constructed as a three-lane collector with a daily capacity of 22,500 trips. The draft Barrio Logan Community Plan classifies this section of 28<sup>th</sup> Street as a "Four-Lane Major Arterial" with a daily capacity of 40,000 trips. Improving the roadway to its ultimate classification as a Four-Lane Major Arterial would improve the traffic operations at this affected segment to LOS C, reducing the impact to a less-than-significant level. Based on a comparison of the project traffic added to the roadway segment (~~838,891~~ daily trips) to the traffic projected to be on this segment under existing plus TAMT plan buildout conditions (~~22,924~~23,003 daily trips), the project would be responsible for a ~~3.7%~~ fair-share contribution of the cost to widen the roadway to a Four-Lane Major Arterial classification. (Note, the MPC scenario would be responsible for 3.9% and the STC Alternative would be responsible for 2.9%.)

The project's impact would occur when the project generates ~~1,175,161~~ new daily truck trips, which would occur at approximately 29% of the TAMT plan's buildout. This is the point at which the project would add more than 0.01 V/C to the failing segment. To reduce impacts to a less-than-significant level, the proposed project would be responsible for a ~~3.7%~~ fair-share contribution of the cost to widen the roadway to a Four-Lane Major Arterial classification (**MM-TRA-4-3**). (Note, the MPC scenario would be responsible for 3.9% and the STC Alternative would be responsible for 2.9%.)

##### Intersections

Table 4.10-30 shows existing and existing plus TAMT plan buildout peak hour LOS conditions for the intersections in the project study area, while Figure 4.10-19 illustrates the existing plus TAMT plan buildout volumes on study area intersections. As indicated, all intersections in the project study area operate at LOS D or better under existing conditions with the exception of Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard, which currently operates at LOS F in the AM peak hour and LOS E in the PM peak hour.

At full buildout, the proposed project's operation at this intersection would worsen the existing delay by ~~32.6~~19.1 seconds in the AM peak hour and by ~~13.3~~7.8 seconds in the PM peak hour, where a threshold of 1.0 second of additional delay applies to LOS F and a threshold of 2.0 seconds of additional delay applies to LOS E (**Impact-TRA-54**). The initial impact is anticipated to occur at ~~70%~~

~~buildout, or when 276,195~~ new daily trips are being generated, at which point the proposed project would contribute more than 1.0 second of delay in the AM peak hour period. Therefore, impacts on the Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard study area intersection segment would be significant and mitigation is required.

The proposed project's impact on the Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard intersection would be mitigated by adding a westbound right-turn overlap phase (**MM-TRA-24**). This would reduce the unmitigated delay associated with the project by ~~33.020.8~~ seconds during the AM peak hour and by ~~23.619.9~~ seconds during the PM peak hour and would effectively reduce delay at this intersection to below current levels.

Notably, Caltrans is currently working on a truck access improvement study that will identify several potential improvements to this intersection, including a potential grade separation. It is recommended that the District coordinate with Caltrans as the TAMT plan is implemented to determine if the proposed mitigation measure is relevant at the time of implementation or if the District can participate in a larger improvement program for the intersection.

#### Ramp Intersection Capacity

As discussed, the signalized ramp intersections of National Avenue/I-5 northbound off-ramp and Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard were analyzed under ILV procedures. Both signalized ramp intersections would continue to operate "~~At~~Under Capacity" ~~or better~~ during both the AM and PM peak hours with implementation of the proposed project, as shown in Table 4.10-31. Therefore, impacts on signalized ramp intersections at the National Avenue/I-5 northbound off-ramp and Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard would be less than significant, and no mitigation is required.

## Page 4.10-43

Table 4.10-29. Peak Hour Roadway Segment LOS Results – Existing Plus TAMT Plan Buildout

Roadway	Segment	Cross-Section	Threshold (LOS E)	Existing + TAMT Plan Buildout			Existing			$\Delta$	S?
				ADT	V/C	LOS	ADT	V/C	LOS		
Harbor Drive	Between Beardsley Street and Cesar Chavez Parkway	4 lanes w/RM	40,000	21,536 <del>512</del>	0.538	C	20,194	0.505	B	0.034 <del>3</del>	N
	Between Cesar Chavez Parkway and Sampson Street	4 lanes w/RM	40,000	13,901 <del>870</del>	0.348 <del>7</del>	A	10,546	0.264	A	0.084 <del>3</del>	N
	Between Sampson Street and Schley Street	4 lanes w/RM	40,000	15,405 <del>374</del>	0.385 <del>4</del>	B	12,050	0.301	A	0.084 <del>3</del>	N
	Between Schley Street and 28 <sup>th</sup> Street	4 lanes w/RM	40,000	14,981 <del>950</del>	0.375 <del>4</del>	A	11,626	0.291	A	0.084 <del>3</del>	N
	Between 28 <sup>th</sup> Street and Belt Street	4 lanes w/RM	40,000	20,060 <del>19,714</del>	0.502 <del>493</del>	B	18,050	0.451	B	0.050 <del>042</del>	N
	Between Belt Street and 32 <sup>nd</sup> Street	4 lanes w/RM	40,000	18,613 <del>267</del>	0.465 <del>7</del>	B	16,603	0.415	B	0.050 <del>042</del>	N
28 <sup>th</sup> Street	Between Harbor Drive and Main Street	4 lanes w/RM	40,000	17,479 <del>4</del>	0.437 <del>445</del>	B	16,134	0.403	B	0.034 <del>1</del>	N
	Between Main Street and Boston Avenue	4 lanes w/TWLT	30,000	20,908 <del>7</del>	0.697 <del>700</del>	D	19,563	0.652	C	0.045 <del>7</del>	N
	Between Boston Avenue and National Avenue	3 lanes w/TWLT	22,500 <sup>1</sup>	22,924 <del>23,003</del>	1.019 <del>022</del>	<b>F</b>	22,112	0.983	<b>E</b>	0.036 <del>040</del>	<b>Y</b>
32 <sup>nd</sup> Street	Between Harbor Drive and Norman Scott Road	6 lanes w/RM	50,000	21,930 <del>584</del>	0.439 <del>2</del>	B	19,920	0.398	A	0.040 <del>033</del>	N

Source: Appendix G

Notes:

<sup>1</sup> Capacity is 75% of a 4-Lane Collector w/TWLT.**Bold** letter indicates a significant impact.ADT = average daily trips; LOS = level of service; RM = raised median; S? = Indicates if change in V/C ratio is significant; TWLT = two-way left turn; V/C = volume to capacity ratio;  $\Delta$  = change in V/C ratio

## Page 4.10-44

Table 4.10-30. Peak Hour Intersection LOS Results – Existing Plus TAMT Plan Buildout

#	Intersection	AM Peak Hour		PM Peak Hour		Delay w/o TAMT Plan Buildout (sec.) AM/PM	LOS w/o TAMT Plan Buildout AM/PM	Change in Delay (sec.)	S?
		Avg. Delay (sec.)	LOS	Avg. Delay (sec.)	LOS				
1	Harbor Drive/Cesar Chavez Parkway	<del>50.4</del> <u>49.3</u>	D	<del>45.4</del> <u>43.8</u>	D	36.8/33.3	D/C	<del>13.6/12.4</del> <u>15/10.5</u>	No
2	Harbor Drive/Sampson Street	<del>41.2</del> <u>1</u>	D	<del>42.5</del> <u>4</u>	D	40.4/40.9	D/D	<del>0.8</del> <u>7</u> /1.6 <u>5</u>	No
3	Harbor Drive/Schley Street	16.7	B	15.2	B	16.7/15.0	B/B	0.0/0.2	No
4	Harbor Drive/28 <sup>th</sup> Street	<del>26.5</del> <u>32.4</u>	C	<del>22.2</del> <u>23.3</u>	C	23.1/20.3	C/C	<del>9.3</del> <u>4/1.9</u> /3.0	No
5	Main Street/28 <sup>th</sup> Street	<del>21.6</del> <u>9</u>	C	<del>35.6</del> <u>38.0</u>	D	21.4/34.8	C/C	<del>0.5</del> <u>3.2</u> /0.8	No
6	Boston Avenue/28 <sup>th</sup> Street	19.4	B	<del>23.1</del> <u>2</u>	C	19.4/23.0	B/C	0.0/0.4 <u>2</u>	No
7	National Avenue/28 <sup>th</sup> Street	<del>42.3</del> <u>4</u>	D	<del>30.1</del> <u>4</u>	C	42.3/29.6	D/C	<del>0.1</del> <u>0/0.5</u> <u>8</u>	No
8	National Avenue/I-5 NB Off-Ramp	15.4 <u>7</u>	B	<del>15.2</del> <u>4</u>	B	14.9/14.7	B/B	<del>0.5</del> <u>8</u> /0.5 <u>7</u>	No
9	Harbor Drive/Belt Street	<del>19.1</del> <u>18.9</u>	B	<del>17.4</del> <u>2</u>	B	18.6/17.1	B/B	<del>0.5</del> <u>3</u> /0.3 <u>1</u>	No
10	Harbor Drive/32 <sup>nd</sup> Street	<del>38.7</del> <u>32.1</u>	D	<del>49.4</del> <u>7.4</u>	D	28.6/39.9	C/D	<del>10.1</del> <u>9</u> /3.5/7.5	No
11	Norman Scott Road/32 <sup>nd</sup> Street/Wabash Boulevard	<del>127.9</del> <u>114.4</u>	<b>F</b>	<del>79.5</del> <u>74.0</u>	<b>E</b>	95.3/66.2	<b>F/E</b>	<del>32.6</del> <u>13.3</u> <u>19.1</u> /7.8	<b>Yes</b>

Source: Appendix G

**Bold** letter indicates a significant impact.

LOS = level of service; NB = northbound; S? = Indicates a significant impact

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**Table 4.10-31. Peak Hour Ramp Intersection Capacity Analysis – Existing Plus TAMT Plan Buildout**

#	Intersection	Peak Hour	ILV/Hour		Description
			Existing	Existing + TAMT Plan Buildout	
8	National Avenue/I-5 NB Off-Ramp	AM	636	<del>658</del> 669	Under Capacity
		PM	794	<del>815</del> 823	Under Capacity
11	Norman Scott Road/32 <sup>nd</sup> Street/Wabash Boulevard	AM	956	<del>1,148</del> 083	Under Capacity
		PM	1,028	<del>1,202</del> 143	At Under Capacity

Source: Appendix G.

Note: less than 1,200 ILV/Hour indicates operation is “Under Capacity” and 1,200 to 1,500 ILV/Hour indicates “At Capacity.”

ILV = intersection lane volume; NB = southbound

**Table 4.10-32. Freeway Mainline LOS Analysis – Existing Plus TAMT Plan Buildout**

Freeway	Segment	ADT	Direction	Peak Hour Volume	With Project		Base		Δ V/C	S?
					V/C	LOS	V/C	LOS		
I-5	SR-94 & Imperial Avenue	180,700	NB	9,600	0.890	D	0.890	D	0.000	N
			SB	8,400	0.780	C	0.780	C	0.000	N
	Imperial Avenue & SR-75	170,700	NB	9,100	0.840	D	0.840	D	0.000	N
			SB	8,500	0.790	C	0.780	C	0.010	N
	SR-75 & 28 <sup>th</sup> Street	167,600	NB	10,400	0.850	D	0.850	D	0.000	N
			SB	8,300	0.770	C	0.770	C	0.000	N
	28 <sup>th</sup> Street & SR-15	166,200	NB	10,300	1.100	F	1.100	F	0.000	N
			SB	8,300	0.880	D	0.870	D	0.010	N
SR-15	SR-15 & Main Street	196,200	NB	12,200	1.000	E	0.990	E	0.010	N
			SB	11,700	1.000	E	0.990	E	0.010	N
	SR-94 & Market Street	128,000	NB	6,500	0.770	C	0.760	C	0.010	N
			SB	7,200	0.850	D	0.840	D	0.010	N
	Market Street & Ocean View Boulevard	116,000	NB	<del>6,400</del> 0	<del>0.875</del> 0	D	0.840	D	<del>0.031</del> 0	N
			SB	6,500	0.920	D	0.910	D	0.010	N
	Ocean View Boulevard & I-5	105,000	NB	4,700	0.560	B	0.540	B	0.020	N
			SB	4,800	0.440	B	0.430	B	0.010	N
	I-5 & Norman Scott Road	9,300	NB	400	0.090	A	0.060	A	0.030	N
			SB	400	0.090	A	0.060	A	0.030	N

Notes:

The capacity, Directional split, Peak hour % and Heavy vehicle % are assumed to be the same as Existing conditions.

Bold letter indicates substandard LOS E or F.

Freeway	Segment	ADT	Direction	Peak Hour Volume	With Project		Base		$\Delta$ V/C	S?
					V/C	LOS	V/C	LOS		

ADT = average daily traffic; LOS = level of service; NB = northbound; SB = southbound; V/C = volume to capacity ratio;  $\Delta$  = change in V/C ratio; S? = Indicates if change in V/C ratio is significant

In sum, the operations associated with the buildout of the TAMT plan would result in a significant impact along the roadway segment of 28<sup>th</sup> Street between Boston Avenue and National Avenue (**Impact-TRA-43**) and at the intersection of Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard during the peak hours (**Impact-TRA-54**). All other potential impacts on roadway segments, intersections, ramp intersections, and freeway mainline segments would be less than significant from project operation.

#### *Existing Conditions Plus TAMT Plan Buildout – Alternative Gate Scenario*

As mentioned, the proposed TAMT plan identifies an alternative gate concept that would serve as the primary entry and exit location for the Refrigerated Container node and the Multi-Purpose General Cargo node. The alternative gate would be located in the northeast corner of the project site and would provide access directly onto Harbor Drive. According to the proposed TAMT plan, the Dry and Liquid Bulk nodes would continue to utilize the existing gate off Caesar Chavez Parkway, particularly for domestic bulk shipments. It is also assumed that employee traffic would continue to use the existing Crosby Street gate.

Implementation of the alternative gate concept would result in a redistribution of both existing and proposed project truck traffic from the Refrigerated Container and Multi-Purpose General Cargo nodes. Figure 4.10-20 displays the assumed redistribution of both existing and project truck traffic between the two gate locations, while Figure 4.10-21 displays the anticipated traffic volumes at both gates and along Harbor Drive.

#### Roadway Segments

Based on the assumed redistribution of truck trips, Harbor Drive between Beardsley Street and Cesar Chavez Parkway is the only study roadway segment that is anticipated to experience a change in ADT due to the alternative gate location. As shown in Table 4.10-33, the roadway segment of Harbor Drive between Beardsley Street and Cesar Chavez Parkway is anticipated to operate at LOS C with the addition of the TAMT plan buildout traffic utilizing the alternative gate location.

**Table 4.10-33. Peak Hour Roadway Segment LOS Results – Existing Plus TAMT Plan Buildout Alternative Gate Scenario**

Roadway	Segment	Cross-Section	Threshold (LOS E)	Existing + TAMT Plan Buildout			Existing			Δ	S?
				ADT	V/C	LOS	ADT	V/C	LOS		
Harbor Drive	Between Beardsley Street and Cesar Chavez Parkway	4 lanes w/RM	40,000	22,246 <u>223</u>	0.556	C	20,194	0.505	B	0.051	N

Source: Appendix G

Notes:

ADT = average daily trips; LOS = level of service; RM = raised median; S? = Indicates if change in V/C ratio is significant; V/C = volume to capacity ratio; Δ = change in V/C ratio

Based on the City of San Diego's Significance Criteria, the traffic associated with the proposed alternative gate would not cause any additional roadway segments to operate at LOS E or F. Therefore, implementation of the proposed alternative gate location would not result in any roadway segment impacts.

Intersections

Based on the assumed redistribution of truck trips, the Harbor Drive/Cesar Chavez Parkway intersection (Main Gate) is the only study intersection that is anticipated to experience a change in peak hour volumes due to the alternative gate. All other key study intersections are anticipated to operate at the same conditions as under the existing plus TAMT plan buildout conditions. Table 4.10-34 shows intersection LOS and average vehicle delay resulting from implementation of full TAMT plan buildout with the alternative gate location.

**Table 4.10-34. Peak Hour Intersection LOS Results – Existing Plus TAMT Plan Buildout Alternative Gate Scenario**

#	Intersection	AM Peak Hour		PM Peak Hour		Delay w/o TAMT Plan Buildout (sec.) AM/PM	LOS w/o TAMT Plan Buildout AM/PM	Change in Delay (sec.)	S?
		Avg. Delay (sec.)	LOS	Avg. Delay (sec.)	LOS				
1	Harbor Drive/Cesar Chavez Parkway	<del>38.4</del> <u>37.9</u>	D	<del>40.34</del>	D	36.8/33.3	D/C	<del>1.61/7.01</del>	N
12	Harbor Drive/Alternative Gate	19.78	B	26.5	C	N/A	N/A	19.78/ 26.5	N

Source: Appendix G

LOS = level of service; N/A = not applicable; S? = Indicates significant impact



## Page 4.10-47 through 4.10-53

### Level of Significance Prior to Mitigation

#### Demolition and Initial Rail Component

Construction and operation of the Demolition and Initial Rail Component would have the potential to conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system. Potentially significant impact(s) include:

**Impact-TRA-1: Construction-Related Impact on an Intersection: Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard from Demolition and Initial Rail Component Construction.**

Construction activities associated with the Demolition and Initial Rail Component, particularly during demolition of Transit Sheds #1 and #2, would generate construction-related traffic that would worsen the existing delay experienced at the Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard intersection by 8.7 seconds in the AM peak hour and by 4.2 seconds in the PM peak hour. The increase in delay at this intersection would exceed the threshold of 1.0 second of additional delay for intersections operating at LOS F and threshold of 2.0 seconds of additional delay for intersections operating at LOS E, resulting in a significant construction-related traffic impact.

**Impact-TRA-2: Operation-Related Impact on an Intersection: Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard from Demolition and Initial Rail Component Operations.**

~~Operation of the Demolition and Initial Rail Component would worsen the existing delay experienced during the peak hours at the Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard intersection by 4.8 seconds in the AM peak hour and by 2.3 seconds in the PM peak hour, where a threshold of 1.0 second of additional delay applies to LOS F and a threshold of 2.0 seconds of additional delay applies to LOS E. Therefore, impacts would be significant.~~

#### Full TAMT Plan Buildout

Construction and operation of the full buildout of the TAMT plan would have the potential to conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system. Potentially significant impact(s) include:

**Impact-TRA-32: Construction Traffic from Future TAMT Plan Construction Projects.**

Because the timing and details of future construction projects are not yet known, it is possible that two or more construction projects may overlap (the timing of which depends on market need). Because it is not known if the overlap would generate a sufficient number of peak hour trips to result in a significant impact, a worst case is conservatively assumed that several construction projects could occur at the same time, resulting in temporary but significant traffic congestion in the project study area.

**Impact-TRA-43: Operation-Related Impact on a Roadway Segment: 28<sup>th</sup> Street between Boston Avenue and National Avenue from TAMT Plan Operations.** The proposed project would add approximately 847891 daily trips (647 daily trips for STC Alternative) to the roadway segment of 28<sup>th</sup> Street between Boston Avenue and National Avenue within the project study area, which would degrade the operations of a roadway segment that is already operating at an unacceptable level under existing conditions (LOS E) to LOS F by increasing volume to capacity ratio by 0.036-040 (0.029 for STC Alternative). The initial impact is anticipated to occur

~~at 29% of the TAMT plan buildout, or when 1,175,161 new daily truck trips are being generated,~~  
 at which point the proposed project would result in a change in V/C ratio greater than 0.01  
 along the roadway segment of 28<sup>th</sup> Street between Boston Avenue and National Avenue.  
 Therefore, impacts would be significant.

**Impact-TRA-54: Operation-Related Impact on an Intersection: Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard from TAMT Plan Operations.** The proposed project would worsen the existing delay experienced during the peak hours at the Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard intersection by ~~32.619.1~~ seconds in the AM peak hour (17.7 seconds for STC Alternative) and by ~~13.37.8~~ seconds in the PM peak hour, (7.2 seconds for STC Alternative), where a threshold of 1.0 second of additional delay applies to LOS F and a threshold of 2.0 seconds of additional delay applies to LOS E. The initial impact is anticipated to occur ~~at 7% of the TAMT plan buildout, or when 276~~ when 195 new daily trips are being generated, at which point the proposed project would contribute more than 1.0 second of delay in the AM peak hour period at the Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard study area intersection. Therefore, impacts would be significant.

## Mitigation Measures

### Demolition and Initial Rail Component

#### For Impact-TRA-1:

**MM-TRA-1: Transportation Demand Management (TDM) Plan During Demolition and Initial Rail Component Construction.** Prior to commencing construction activities associated with the Demolition and Initial Rail Component, the District shall prepare a TDM plan to reduce potential significant temporary construction-related transportation and parking impacts at the intersection of Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard. The TDM plan shall be implemented during construction to reduce congestion at the Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard intersection by limiting the number of construction worker trips that travel through the affected intersection during peak hours. The TDM plan shall incorporate TDM strategies to be implemented during construction, including, but not limited to, the following.

- Implementation of a ride-sharing program to encourage carpooling among workers.
- Adjusting work schedules so workers do not access the site during the peak hours.
- Provide offsite parking locations for workers outside of the area with shuttle services to bring them on site.
- Provide subsidized transit passes for construction workers.
- Coordinate with the City of San Diego (which may also include coordination with the local planning group) for additional ideas.

#### For Impact-TRA-2:

**MM-TRA-2: Westbound Right-Turn Overlap Phase at Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard Intersection.** The District currently has an established program to track the number of trucks that enter and exit the terminal each year associated with TAMT operations. Prior to generating an additional 276 new daily trips, the District shall coordinate with Caltrans to determine the District's fair share payment to fund the addition of a westbound

~~right turn overlap phase to the intersection of Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard, a Caltrans-controlled intersection, to improve the delay caused by the proposed project. This would reduce the delay associated with the project by 6.0 seconds during the AM peak hour and by 12.8 seconds during the PM peak hour compared to unmitigated conditions, and would effectively reduce delay at this intersection to below current levels. In order to ensure the significant impact does not occur before the District has paid its fair share to Caltrans, the District shall initiate payment once approximately 200 new daily trips are reached under the proposed project. The trigger will be determined by the District by examining the ADT over a 1-month timeframe and comparing the ADT to the baseline of 93 daily trucks generating 186 trips per day (33,349 trucks per year divided by 360 days multiplied by 2 trips for each truck) and 935 daily employee trips (315 existing employees multiplied by 3 trips per day). At the District's discretion, the District may seek reimbursement from tenants that would contribute new daily trips in proportion to their contribution.~~

### Full TAMT Plan Buildout

#### For Impact-TRA-32:

**MM-TRA-32: Traffic Study and Transportation Demand Management (TDM) for Specific Construction Projects.** Prior to the approval of any construction activities associated with future components of the TAMT plan, the District shall retain a qualified traffic engineer to prepare a traffic study to analyze the potential transportation impacts associated with the specific construction project. The report shall consider any overlapping construction projects on the TAMT. If the traffic study determines that the proposed construction activity may have a significant impact, the traffic study shall recommend mitigation measures to avoid or reduce the potential impact.

The traffic study shall specifically consider if a TDM plan is required to address potential temporary traffic impacts from construction vehicles and equipment. If determined necessary, the TDM plan shall incorporate TDM strategies to be implemented during construction, including, but not limited to, the following.

- Implementation of a ride-sharing program to encourage carpooling among workers.
- Adjusting work schedules so workers do not access the site during the peak hours.
- Provide offsite parking locations for workers outside of the area with shuttle services to bring them on site.
- Provide subsidized transit passes for construction workers.
- Coordinate with the City of San Diego (which may also include coordination with the local planning group) for additional ideas.

#### For Impact-TRA-43:

**MM-TRA-43: Widen the Segment of 28<sup>th</sup> Street between Boston Avenue and National Avenue to a Four-Lane Major Arterial Classification Consistent with the Barrio Logan Community Plan.** The District currently has an established program to track the number of trucks that enter and exit the terminal each year associated with TAMT operations. Prior to generating an additional ~~1,175~~ 161 new daily truck trips ~~(approximately 29% of buildout of the TAMT plan),~~ the District shall pay a fair-share contribution (MPC would be responsible for

3.79% and STC would be responsible for 2.9%) of the cost to widen the roadway segment of 28<sup>th</sup> Street between Boston Avenue and National Avenue to a Four-Lane Major Arterial classification. The improvement is identified within the draft Barrio Logan Community Plan, and therefore would be paid to the City of San Diego in accordance with Section 142.0640 of the San Diego Municipal Code. Payment of the District's fair share shall be completed prior to reaching ~~1,175~~161 new daily truck trips. In order to ensure the significant impact does not occur before the District has paid its fair share to the City, the District shall initiate payment once approximately ~~1,000~~150 new daily truck trips are reached under the proposed project. The trigger will be determined by the District by examining the ADT over a 1-month timeframe and comparing the ADT to the baseline of 93 daily trucks generating 186 trips per day (33,349 trucks per year divided by 360 days multiplied by 2 trips for each truck) ~~and 935 daily employee trips (315 existing employees multiplied by 3 trips per day).~~ At the District's discretion, the District may seek reimbursement from tenants that would contribute new daily trips in proportion to their contribution.

**For Impact-TRA-4:**

**MM-TRA-4: Westbound Right-Turn Overlap Phase at Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard Intersection.** The San Diego Unified Port District currently has an established program to track the number of trucks that enter and exit the terminal each year associated with TAMT operations. Prior to generating an additional 195 new daily trips, the San Diego Unified Port District shall coordinate with the California Department of Transportation to determine the San Diego Unified Port District's fair share payment to fund the addition of a westbound right-turn overlap phase to the intersection of Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard, a California Department of Transportation-controlled intersection, to improve the delay caused by the proposed project. This would reduce the delay associated with the project by 20.8 seconds during the AM peak hour and by 19.9 seconds during the PM peak hour compared to unmitigated conditions, and would effectively reduce delay at this intersection to below current levels. (Note, for the STC Alternative, this mitigation measure would reduce the unmitigated delay associated with this alternative by 19.4 seconds during the AM peak hour and by 19.3 seconds during the PM peak hour.) In order to ensure the significant impact does not occur before the San Diego Unified Port District has paid its fair share to the California Department of Transportation, the San Diego Unified Port District shall initiate payment once approximately 150 new daily trips are reached under the proposed project. The trigger will be determined by the San Diego Unified Port District by examining the average daily trips over a 1-month timeframe and comparing the average daily trips to the baseline of 93 daily trucks generating 186 trips per day (33,349 trucks per year divided by 360 days multiplied by 2 trips for each truck) and 935 daily employee trips (315 existing employees multiplied by 3 trips per day). At the San Diego Unified Port District's discretion, the San Diego Unified Port District may seek reimbursement from tenants that would contribute new daily trips in proportion to their contribution.

**For Impact-TRA-5:**

**Implement MM-TRA-2.**

## Level of Significance after Mitigation

### Demolition and Initial Rail Component

Mitigation measure **MM-TRA-1** would reduce construction-related traffic impacts by requiring the District to prepare and implement a TDM plan during construction of the Demolition and Initial Rail Component. Implementation of a TDM plan during construction would reduce potential impacts at the Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard intersection; however, it cannot be determined with certainty that the impacts would be reduced to less-than-significant levels. Consequently, **Impact-TRA-1** may remain significant even after **MM-TRA-1** has been implemented.

Mitigation measure **MM-TRA-2** would reduce project impacts at the intersection of Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard by providing the District's fair share contribution toward the cost of the addition of a westbound right-turn overlap phase. With the added westbound right-turn overlap phase, the change in delay with the project would be a net negative, as shown in Table 4.10-35. However, because the timing and implementation of the necessary improvement is within the exclusive jurisdiction of Caltrans, and not the District, the District cannot ensure that the improvements would be made when needed. Therefore, while mitigation is required that could reduce the impact to a less-than-significant level, the uncertainty regarding the timing and implementation of the recommended improvement to the intersection of Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard means **Impact-TRA-2** is considered significant and unavoidable.

**Table 4.10-35. Peak Hour Intersection LOS—Mitigated Intersection Existing Plus Demolition and Initial Rail Component Conditions**

#	Intersection	AM Peak Hour		PM Peak Hour		Delay w/o Project (sec.) AM/PM	LOS w/o Project AM/PM	Change in Delay (sec.)	S?
		Avg. Delay (sec.)	LOS	Avg. Delay (sec.)	LOS				
11	Norman Scott Road/32 <sup>nd</sup> Street/Wabash Boulevard	94.1	F	55.7	E	95.3/66.2	F/E	-1.2/-10.5	N

Source: Appendix G

LOS = level of service; S? = Indicates a significant impact

### Full TAMT Plan Buildout

Mitigation measure **MM-TRA-32** would reduce construction-related traffic impacts by requiring project-specific mitigation (if needed), including a construction traffic control plan if needed. However, given the uncertainty of timing of future construction activities and the fact that it is unknown if projects may overlap, **Impact-TRA-32** may remain significant even after **MM-TRA-32** has been implemented.

Mitigation measure **MM-TRA-43** would reduce the project's impact on 28<sup>th</sup> Street between Boston Avenue and National Avenue by ensuring that the District's fair share contribution to improving the roadway segment from a three-lane to a four-lane road (as identified in the draft Barrio Logan Community Plan) is provided prior to the impact occurring. The added lane would improve LOS

from F to C, which, if implemented, would reduce this impact to a less-than-significant level. However, because the timing and implementation of the necessary improvement is within the exclusive jurisdiction of the City of San Diego, and not the District, the District cannot ensure that the improvements would be made when needed. Therefore, while mitigation is required that could reduce the impact to a less-than-significant level, the uncertainty regarding the timing and implementation of the recommended improvement to 28<sup>th</sup> Street between Boston Avenue and National Avenue means **Impact-TRA-43** is considered significant and unavoidable.

To address **Impact-TRA-54**, mitigation measure **MM-TRA-24** would reduce project impacts at the intersection of Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard by providing the District's fair-share contribution toward the cost of the addition of a westbound right-turn overlap phase. With the added westbound right-turn overlap phase, the change in delay with the project would be a net negative, as shown in Table 4.10-35. However, because the timing and implementation of the necessary improvement is within the exclusive jurisdiction of Caltrans, and not the District, the District cannot ensure that the improvements would be made when needed. Therefore, while mitigation is required that could reduce the impact to a less-than-significant level, the uncertainty regarding the timing and implementation of the recommended improvement to the intersection of Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard means **Impact-TRA-54** is considered significant and unavoidable.

**Table 4.10-35. Peak Hour Intersection LOS – Mitigated Intersection Existing Plus Project Conditions**

#	Intersection	AM Peak Hour		PM Peak Hour		Delay w/o Project (sec.) AM/PM	LOS w/o Project AM/PM	Change in Delay (sec.)	S?
		Avg. Delay (sec.)	LOS	Avg. Delay (sec.)	LOS				
11	Norman Scott Road/32 <sup>nd</sup> Street/Wabash Boulevard	<del>94.99</del> 36.6	F	<del>55.95</del> 4.1	<del>E</del> D	95.3/66.2	F/E	<del>-0.4/-</del> <del>10.31.7/-</del> 12.1	N

Source: Appendix G

LOS = level of service; S? = Indicates a significant impact

## Page 4.10-60

However, because of the fluid nature of cargo terminal operations and the flexibility generally needed for onsite parking, the lack of absolute certainty that sufficient parking would be provided would be considered a significant impact (**Impact-TRA-56**). Mitigation measures **MM-TRA-5** through **MM-TRA-7** are required to ensure that the TAMT plan, in the long term, would not exacerbate parking issues in the surrounding community.

## Page 4.10-61

**Impact-TRA-56: Insufficient Parking at Full TAMT Plan Buildout.** Full buildout of the TAMT plan may result in a long-term parking shortage, which could increase if future components are implemented in areas that currently serve as parking.

## Mitigation Measures

### Demolition and Initial Rail Component

No mitigation is required.

### Full TAMT Plan Buildout

The following mitigation measure(s) are required for **Impact-TRA-56**:

**MM-TRA-5: District Shall Inform All TAMT Workers to Park at the TAMT Facility or at an Authorized Offsite Parking Lot or Parking Garage.** All TAMT workers, employees, and contractors are prohibited from using on-street parking or from parking at the neighboring Cesar Chavez Park. If no parking is available on the project site, the District's marine terminal supervisors shall inform all dock workers that they shall park within a parking garage or surface parking lot.

## 3.2.11 Changes to Chapter 4, Section 4.11, *Utilities and Energy*

### Page 4.11-1

**Table 4.11-1. Utility Service Providers**

Utility Service	Provider
Wastewater	City of San Diego Public Utilities Department (Wastewater Branch)
Water	City of San Diego Public Utilities Department (Water Branch)
Stormwater	Port of San Diego; <u>City of San Diego</u>
Solid Waste	City of San Diego Franchise Waste Hauler (Allied Waste)/Miramar and Sycamore Landfills
Electricity and Natural Gas	San Diego Gas and Electric (SDG&E)

### Page 4.11-4

## 4.11.2.3 Storm Drainage

The project site is within the Pueblo Watershed, San Diego County's smallest and most densely populated hydrologic unit. This hydrologic unit encompasses San Diego Bay and approximately 60 square miles of predominantly urbanized land (75 percent developed) that drains into the Bay (Project Clean Water 2016). In addition to bay waters, the main hydrologic features of the watershed near the project site are the Chollas and Paleta creeks. Switzer Creek runs underground along the northern portion of the project site. No rivers, streams, or other surface drainages exist on site. Currently, drainage from the site discharges into the bay via storm drains (see Section 4.8, *Hydrology and Water Quality*). Neither the Chollas or Paleta creeks would receive any stormwater flows from the proposed project.

The District and City both own stormwater infrastructure on the project site. The City's property includes the Switzer Creek conveyance near the eastern boundary and the Water Street storm drain near the southern boundary.

### 3.2.12 Changes to Chapter 5, *Cumulative Impacts*

#### Pages 5-1 through 5-6

##### **Demolition and Initial Rail Component**

With incorporation of mitigation measures, the implementation of the Demolition and Initial Rail Component would result in less than cumulatively considerable contributions to impacts from past, present, and reasonably foreseeable future projects for the following resources.

- Greenhouse Gas Emissions (up to 2020)
- Utilities and Energy (solid waste generation)

However, even with mitigation incorporated, implementation of the Demolition and Initial Rail Component would result in cumulatively considerable and unavoidable contributions to impacts for the following resources.

- ~~Greenhouse Gas Emissions (post-2020)~~
- Transportation, Circulation, and Parking (construction and operation)

The Demolition and Initial Rail Component's contribution to all other cumulative impacts would not be cumulatively considerable.

##### **Full TAMT Plan Buildout**

With incorporation of mitigation measures, the full buildout of the TAMT plan would result in less than cumulatively considerable contributions to impacts from past, present, and reasonably foreseeable future projects for the following resources.

- ~~Greenhouse Gas Emissions (up to 2020)~~
- Utilities and Energy (solid waste generation)
- Air Quality (operational VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM10, and PM2.5)

However, even with mitigation incorporated, implementation of the full buildout of the TAMT plan would result in cumulatively considerable and unavoidable contributions to impacts for the following resources.

- ~~Air Quality (operational VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM10, and PM2.5 and operational health risk)~~
- Greenhouse Gas Emissions (post-2020)
- Noise (operations)
- Transportation, Circulation, and Parking (construction and operation)

The full buildout of the TAMT plan's contribution to all other cumulative impacts would not be cumulatively considerable.

Table 5-1 summarizes the significant cumulative impacts and mitigation measures discussed in Section 5.3, *Cumulative Impact Analysis*, below.



**Table 5-1. Summary of Significant Cumulative Impacts and Mitigation Measures**

Summary of Potentially Significant Impact(s)	Summary of Mitigation Measure(s)	Level of Significance After Mitigation	Rationale for Finding After Mitigation
Air Quality and Health Risk			
<b>Impact-C-AQ-1:</b> Emissions in Excess of Cumulative Thresholds During Full TAMT Plan Buildout Construction	<b>MM-AQ-1:</b> Implement Best Management Practices During Construction of Future TAMT Plan Components	Cumulatively Considerable and Unavoidable	Mitigation would reduce project-related emissions, but emissions would remain above cumulative thresholds during construction.
<b>Impact-C-AQ-2:</b> Emissions in Excess of Cumulative Thresholds During Full TAMT Plan Buildout Operations	<b>MM-AQ-2:</b> Implement Diesel-Reduction Measures During Construction and Operations of Future TAMT Plan Components <b>MM-AQ-3:</b> Comply with San Diego Unified Port District Climate Action Plan Measures <b>MM-AQ-4:</b> Implement Best Available Control Technologies for Conveyor System and Bulk Discharge Unloader for Future Dry Bulk Operations associated with the TAMT Plan <b>MM-AQ-5:</b> Implement Vessel Speed Reduction Program Beyond Climate Action Plan Compliance for Future Operations Associated with the TAMT Plan <b>MM-AQ-6:</b> Electric Cargo Handling Equipment Upgrades <b>MM-AQ-7:</b> <u>Annual Inventory Submittal and Periodic Technology Review</u> <b>MM-AQ-8:</b> Implement a <u>Sustainable Leasing and Exhaust Emissions Reduction Program at the Tenth Avenue Marine Terminal</u> <b>MM-AQ-9:</b> <u>Use of At-Berth Capture and/or Control System to Reduce Vessel Emissions</u>	<u>Less than</u> Cumulatively Considerable and <del>Unavoidable</del>	Mitigation would reduce project-related operational <del>emissions, but</del> VOC, NO <sub>x</sub> , CO, SO <sub>x</sub> , PM <sub>10</sub> , and PM <sub>2.5</sub> emissions <del>would remain above to</del> <u>below</u> thresholds.

Summary of Potentially Significant Impact(s)	Summary of Mitigation Measure(s)	Level of Significance After Mitigation	Rationale for Finding After Mitigation
<b>Impact-C-AQ-3:</b> Cumulative Health Risk Emissions During Full TAMT Plan Buildout Operations	Implement <b>MM-AQ-1</b> through <b>MM-AQ-89</b>	Cumulatively Considerable and Unavoidable	Mitigation would reduce operational health risk but risk would remain above thresholds.
Greenhouse Gas Emissions and Climate Change			
<b>Impact-C-GHG-1:</b> Demolition and Initial Rail Component GHG Emissions through 2020	<b>MM-GHG-1:</b> Implement Diesel-Reduction Measures During Construction and Operations of Future TAMT Plan Components <b>MM-GHG-2:</b> Comply with San Diego Unified Port District Climate Action Plan Measures <b>MM-GHG-3:</b> Electric Cargo Handling Equipment Upgrades	Less than Cumulatively Considerable	Demolition and Initial Rail Component GHG emissions achieve the CAP's reduction target for maritime projects (33%) and the project would comply with plans, policies, and regulatory programs outlined in the Scoping Plan and adopted by ARB or other California agencies for the purpose of reducing the emissions of GHGs.
<b>Impact-C-GHG-2:</b> Full TAMT Plan Buildout GHG Emissions Beyond 2020	Implement <b>MM-GHG-1 through MM-GHG-3</b> <b>MM-GHG-4:</b> Electric Cargo Handling Equipment Upgrades <b>MM-GHG-5:</b> Implement Vessel Speed Reduction Program Beyond Climate Action Plan Compliance for Future Operations Associated with the TAMT Plan <b>MM-GHG-6:</b> Implement a Renewable Energy Project or Purchase the Equivalent Greenhouse Gas Offsets from a California Air Resources Board Approved Registry <u>or a Locally Approved Equivalent Program for Future Operation Associated with the TAMT Plan</u> <b>MM-GHG-7:</b> <u>Implement a Sustainable Leasing Program Annual Inventory Submittal and Periodic Technology Review</u> <b>MM-GHG-8:</b> <u>Periodic Technology Review</u> <b>MM-</b>	Cumulatively Considerable and Unavoidable	Based on available science and the current regulatory scheme, reduction targets that would enable the full TAMT plan buildout to reduce its fair share of post-2020 GHG emission are unknown at this time. In addition, there is no statewide guidance document to indicate how to achieve the deep reductions set by EO S-03-05 and EO B-30-15.

Summary of Potentially Significant Impact(s)	Summary of Mitigation Measure(s)	Level of Significance After Mitigation	Rationale for Finding After Mitigation
	<b>GHG-8:</b> <u>Implement an Exhaust Emissions Reduction Program at the Tenth Avenue Marine Terminal</u> <b>MM-GHG-9:</b> <u>Use of At-Berth Capture and/or Control System to Reduce Vessel Emissions</u>		
Noise and Vibration			
<b>Impact-C-NOI-1:</b> Cumulative Contribution to Cumulative Operational Noise	<b>MM-NOI-1:</b> Design and Implement Acoustical Treatments for Future Systems and Equipment to Reduce Operational Noise Levels at Nearby Noise-Sensitive Land Uses <b>MM-NOI-2:</b> Initiate and Maintain a Complaint and Response Tracking Program	Cumulatively Considerable and Unavoidable	Given the lack of project-level detail at this time, individual equipment and system design specifications are not currently available; therefore, it is not known what noise reduction measures may be feasible and appropriate and, as such, it is not possible at this time to quantify the extent to which impacts may be reduced.
Transportation, Circulation, and Parking			
<b>Impact-C-TRA-1:</b> Construction-Related Impact on an Intersection: Norman Scott Road/32 <sup>nd</sup> Street/Wabash Boulevard from Demolition and Initial Rail Component Construction	<b>MM-TRA-1:</b> Transportation Demand Management (TDM) Plan During <u>Demolition and Initial Rail Component Construction</u>	Cumulatively Considerable and Unavoidable	Implementation of a TDM Plan during construction would reduce potential impacts at the Norman Scott Road/32 <sup>nd</sup> Street/Wabash Boulevard intersection; however, it cannot be determined with certainty that the cumulative impacts would be reduced to less than cumulatively considerable.
<b>Impact-C-TRA-2:</b> Contribute to an Unacceptable Level of Operation at an Intersection: Norman Scott Road/32 <sup>nd</sup> Street/Wabash Boulevard from Demolition and Initial Rail Component Operations	<b>MM-TRA-2:</b> Westbound Right-Turn Overlap Phase at Norman Scott Road/32 <sup>nd</sup> Street/Wabash Boulevard Intersection	Cumulatively Considerable and Unavoidable	Although mitigation is required that could reduce the impact to a less-than-significant level, timing and the implementation of the recommended improvements are uncertain because they are outside the jurisdiction of the District.
<b>Impact-C-TRA-32:</b> Contribute to Temporary	<b>MM-TRA-32:</b> Traffic Study and Transportation Demand	Cumulatively Considerable and	Uncertainty of timing of future construction

Summary of Potentially Significant Impact(s)	Summary of Mitigation Measure(s)	Level of Significance After Mitigation	Rationale for Finding After Mitigation
Traffic Congestion from Construction of Full TAMT Plan Buildout	Management (TDM) for Specific Construction Projects	Unavoidable	activities and the potential that projects may overlap; impacts may remain significant even after the adoption of all feasible mitigation measures.
<b>Impact-C-TRA-43:</b> Contribute to an Unacceptable Level of Operation at a Roadway Segment: 28 <sup>th</sup> Street between Boston Avenue and National Avenue from Full TAMT Plan Buildout	<b>MM-TRA-43:</b> Widen the Segment of 28 <sup>th</sup> Street between Boston Avenue and National Avenue to a Four-Lane Major Arterial Classification Consistent with the Barrio Logan Community Plan	Cumulatively Considerable and Unavoidable	Although mitigation is required that could reduce the impact to a less-than-significant level, timing and the implementation of the recommended improvements are uncertain because they are outside the jurisdiction of the District.
<b>Impact-C-TRA-54:</b> Contribute to an Unacceptable Level of Operation at an Intersection: Norman Scott Road/32 <sup>nd</sup> Street/Wabash Boulevard from Full TAMT Plan Buildout	<del>Implement MM-TRA-2</del> <b>MM-TRA-4:</b> <u>Westbound Right-Turn Overlap Phase at Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard Intersection</u>	Cumulatively Considerable and Unavoidable	The District cannot ensure that the improvements would be made when needed because the timing and implementation of the necessary improvement is within the exclusive jurisdiction of Caltrans, and not the District.
<b>Impact-C-TRA-65:</b> Contribute to an Unacceptable Level of Operation at Four Freeway Segments from Full TAMT Plan Buildout	<b>MM-C-TRA-1:</b> Construct Managed Lanes on I-5 and <del>SR</del> -15	Cumulatively Considerable and Unavoidable	Improvements to the affected freeway segments are within the exclusive jurisdiction of Caltrans, and SANDAG is responsible for their planning. The District cannot ensure that the improvements would be made when needed.
Utilities and Energy			
<b>Impact-C-UTIL-1:</b> The Demolition and Initial Rail Component would Generate Solid Waste that Would Exceed the City Threshold	<b>MM-C-UTIL-1:</b> Prepare a Waste Management Plan	Less than Cumulatively Considerable	MM-C-UTIL-1 would ensure the project limits its solid waste to a minimum and is fully compliant with all solid waste laws.
<b>Impact-C-UTIL-2:</b> The TAMT Plan would Generate Solid Waste that Would Exceed the City Threshold	Implement <b>MM-C-UTIL-1</b>	Less than Cumulatively Considerable	MM-C-UTIL-1 would ensure the project limits its solid waste to a minimum and is fully compliant with all solid waste laws.

## Pages 5-17 and 5-18

### Full TAMT Plan Buildout

As discussed under Threshold 2 of Section 4.2, construction-related emissions associated with the full TAMT plan buildout would be significant due to the unknowns regarding construction activities before mitigation (**Impact-C-AQ-1**). With Mitigation Measure **MM-AQ-1**, construction-related impacts would remain significant and unavoidable.

As discussed under Threshold 2 of Section 4.2 and shown in Table 4.2-15, operations-related emissions associated with the full TAMT plan buildout would be above threshold levels for volatile organic compounds (VOC), NO<sub>x</sub>, carbon monoxide (CO), sulfur oxides (SO<sub>x</sub>), PM<sub>10</sub>, and PM<sub>2.5</sub> before mitigation (**Impact-C-AQ-12**). As shown in Table 4.2-16, with Mitigation Measures **MM-AQ-12** through **MM-AQ-89**, operations-related emissions would ~~remain above~~ be below threshold levels for VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. As ~~with the construction phase, such, although~~ the effects from past, present, and reasonably foreseeable future projects are considered cumulatively significant, ~~and the proposed project's incremental contribution from operational emissions would result in a net increase in nonattainment pollutants, as VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> would exceed the SDAB's cumulative impact thresholds after mitigation. Consequently, the proposed project's incremental contribution to cumulative air quality impacts during its operational stage would be less than~~ cumulatively considerable after mitigation is incorporated.

As discussed under Threshold 1 of Section 4.2, full TAMT plan buildout does not propose any new land uses and is therefore deemed consistent with the most recent RAQS and SIP, which are designed to bring the SDAB into attainment status for State and federal ozone standards. Therefore, although there is a cumulative impact from past, present, and reasonably foreseeable future projects resulting in nonattainment status for some criteria pollutants in the air basin, the proposed project's incremental contribution to cumulative air emissions would not conflict with progress toward attainment of the air quality standards described in the RAQS and SIP.

As discussed under Threshold 4 and shown in Table 4.2-18 of Section 4.2, operation of full TAMT plan buildout at maximum practicable throughput would result in long-term health risks at nearby sensitive receptor locations that exceed incremental risk thresholds primarily due to vessel hoteling, diesel-powered activity at the project site, and truck travel through the region: (**Impact-C-AQ-3**). The effects from past, present, and reasonably foreseeable future projects are considered cumulatively significant, ~~and the proposed project's incremental contribution from operational emissions would result in a net increase in toxic air contaminants that contribute to existing air quality conditions in the area after mitigation. After mitigation, **Impact-C-AQ-3** would remain significant for residential receptors under the MPC scenario, but would be less than cumulatively considerable for the STC Alternative.~~ Consequently, the proposed project's incremental contribution to cumulative health impacts during its operational stage under the MPC scenario would be cumulatively considerable after mitigation is incorporated.

## Pages 5-19 and 5-20

### Mitigation Measures

#### Demolition and Initial Rail Component

No mitigation is required.

#### Full TAMT Plan Buildout

For **Impact-C-AQ-1:**

Implement **MM-AQ-1: Implement Best Management Practices During Construction of Future TAMT Plan Components**, as described in Section 4.2, *Air Quality and Health Risk*.

For **Impact-C-AQ-2 and Impact-C-AQ-3:**

Implement **MM-AQ-2: Implement Diesel-Reduction Measures During Construction and Operations of Future TAMT Plan Components**, as described in Section 4.2, *Air Quality and Health Risk*.

Implement **MM-AQ-3: Comply with San Diego Unified Port District Climate Action Plan Measures**, as described in Section 4.2, *Air Quality and Health Risk*.

Implement **MM-AQ-4: Implement Best Available Control Technologies for Conveyor System and Bulk Discharge Unloader for Future Dry Bulk Operations associated with the TAMT Plan**, as described in Section 4.2, *Air Quality and Health Risk*.

Implement **MM-AQ-5: Implement Vessel Speed Reduction Program Beyond Climate Action Plan Compliance for Future Operations Associated with the TAMT Plan**, as described in Section 4.2, *Air Quality and Health Risk*.

Implement **MM-AQ-6: Electric Cargo Handling Equipment Upgrades**, as described in Section 4.2, *Air Quality and Health Risk*.

Implement **MM-AQ-7: Annual Inventory Submittal and Periodic Technology Review**, as described in Section 4.2, *Air Quality and Health Risk*.

Implement **MM-AQ-8: Implement a Sustainable Leasingan Exhaust Emissions Reduction Program at the Tenth Avenue Marine Terminal**, as described in Section 4.2, *Air Quality and Health Risk*.

Implement **MM-AQ-9: Use of At-Berth Capture and/or Control System to Reduce Vessel Emissions**, as described in Section 4.2, *Air Quality and Health Risk*.

### Level of Significance After Mitigation

#### Demolition and Initial Rail Component

The Demolition and Initial Rail Component's incremental contribution to cumulative air quality impacts would be less than cumulatively considerable.

## Full TAMT Plan Buildout

~~The~~After mitigation, the full TAMT plan buildout's incremental contribution to cumulative air quality impacts during construction (**Impact-C-AQ-1**), ~~would be cumulatively considerable, while~~ operational criteria pollutants (**Impact-C-AQ-2**), ~~and~~ would be reduced to a level considered less than cumulatively considerable. Finally, operational health risk (**Impact-C-AQ-3**) would be cumulatively considerable and would be considered significant after implementation of Mitigation Measures **MM-AQ-1** through **MM-AQ-8** because project-related emissions could remain above cumulative thresholds during construction, and project-related VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, and PM<sub>10</sub>, and PM<sub>2.5</sub> as well as risk levels would remain above cumulative thresholds during operations.

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### Full TAMT Plan Buildout

As discussed under Threshold 1 of Section 4.6, *Greenhouse Gas Emissions and Climate Change*, the proposed full TAMT plan buildout would contribute GHG emissions to the cumulative condition. Equipment and vehicles used during construction (on-road motor vehicles and construction equipment) and operations (ocean-going vessels, harbor craft, trucks, locomotives, terminal equipment, electricity and water consumption, refrigerants, and worker trips) would result in a net increase in GHG emissions over existing conditions. Before mitigation, the proposed project would not fully demonstrate substantial progress along a downward trajectory beyond 2020 toward 2030 and 2050 reduction targets, given the uncertainty of statewide plans to achieve these targets and the amount of GHG emissions the project needs to achieve to contribute its fair share of reduction (**Impact-C-GHG-2**), as shown in Table 4.6-11 in Section 4.6. With Mitigation Measures **MM-C-GHG-1** through **MM-C-GHG-89** and further implementation of State measures by 2035, project GHG emissions demonstrate a downward trajectory and would be generally consistent with known statewide strategies to date, but the State has no framework (e.g., post-2020 Scoping Plan) to achieve these targets. Therefore, while project emissions are generally in line with statewide targets and would help facilitate, rather than impede, local and statewide efforts to achieve the post-2020 targets in EO S-3-05 and EO B-30-15, the uncertainty of statewide target implementation at the local level, and the level of effort that will be required at the Port level to achieve these targets, is unknown at this time. Therefore, after mitigation, the proposed project would result in cumulatively considerable impacts related to GHG emissions because it may still impede the achievement of long-term State reduction targets.

## Pages 5-29 and 5-30

## Mitigation Measures

### Demolition and Initial Rail Component

For **Impact-C-GHG-1**:

Implement **MM-GHG-1: Implement Diesel-Reduction Measures During Construction and Operations of Future TAMT Plan Components**, as described in Section 4.6, *Greenhouse Gas Emissions and Climate Change*.

Implement **MM-GHG-2: Comply with San Diego Unified Port District Climate Action Plan Measures**, as described in Section 4.6, *Greenhouse Gas Emissions and Climate Change*.

Implement **MM-GHG-3: Electric Cargo Handling Equipment Upgrades**, as described in Section 4.6, *Greenhouse Gas Emissions and Climate Change*.

## Full TAMT Plan Buildout

### For **Impact-C-GHG-2:**

Implement **MM-GHG-1: Implement Diesel-Reduction Measures During Construction and Operations of Future TAMT Plan Components**, as described in Section 4.6, *Greenhouse Gas Emissions and Climate Change*.

Implement **MM-GHG-2: Comply with San Diego Unified Port District Climate Action Plan Measures**, as described in Section 4.6, *Greenhouse Gas Emissions and Climate Change*.

Implement **MM-GHG-4: Electric Cargo Handling Equipment Upgrades**, as described in Section 4.6, *Greenhouse Gas Emissions and Climate Change*.

Implement **MM-GHG-5: Implement Vessel Speed Reduction Program Beyond Climate Action Plan Compliance for Future Operations Associated with the TAMT Plan**, as described in Section 4.6, *Greenhouse Gas Emissions and Climate Change*.

Implement **MM-GHG-6: Implement a Renewable Energy Project or Purchase the Equivalent Greenhouse Gas Offsets from a California Air Resources Board Approved Registry or a Locally Approved Equivalent Program for Future Operation Associated with the TAMT Plan**, as described in Section 4.6, *Greenhouse Gas Emissions and Climate Change*.

Implement **MM-GHG-7: Annual Inventory Submittal and Periodic Technology Review at the Tenth Avenue Marine Terminal**, as described in Section 4.6, *Greenhouse Gas Emissions and Climate Change*.

Implement **MM-GHG-8: Implement a Sustainable Leasing and Exhaust Emissions Reduction Program**, as described in Section 4.6, *Greenhouse Gas Emissions and Climate Change*.

Implement **MM-GHG-9: Use of At-Berth Capture and/or Control System to Reduce Vessel Emissions**, as described in Section 4.6, *Greenhouse Gas Emissions and Climate Change*.

## Level of Significance after Mitigation

### Demolition and Initial Rail Component

The Demolition and Initial Rail Component's incremental contribution to cumulative impacts related to consistency with the CAP, its reduction targets, and statewide reduction plans for 2020 (**Impact-C-GHG-1**) would not be cumulatively considerable after implementation of Mitigation Measures **MM-GHG-1** through **MM-GHG-3** because project GHG emissions would achieve the CAP's reduction target for maritime projects (33 percent) and the project would comply with plans, policies, and regulatory programs outlined in the Scoping Plan and adopted by ARB or other California agencies for the purpose of reducing the emissions of GHGs.



The project's contribution to cumulative climate change (including sea level rise) impacts would not be cumulatively considerable.

### Full TAMT Plan Buildout

The full TAMT plan buildout's incremental contribution to cumulative impacts related to GHG emissions and reduction targets and plans for post-2020 (**Impact-C-GHG-2**) would be cumulatively considerable after implementation of Mitigation Measures **MM-GHG-1** through **MM-GHG-89** because there are no known reduction targets that apply to the project based on its location and development type. In addition, there is no statewide guidance document to indicate how to achieve the deep reductions set by EO S-03-05 and EO B-30-15.

The project's contribution to cumulative climate change (including sea level rise) impacts would not be cumulatively considerable.

## Pages 5-59 and 5-60

### Intersections

Intersection geometrics under Near-Term Year 2020 Base plus Demolition and Initial Rail Component conditions were assumed to be identical to existing conditions. Table 5-18 shows Near-Term Year 2020 Base and Near-Term Year 2020 Base plus Demolition and Initial Rail Component peak hour LOS conditions for the intersections in the project study area, while Figure 5-9 illustrates the Near-Term Year 2020 Base plus Demolition and Initial Rail Component volumes on study area intersections. As indicated, all intersections in the project study area are projected to operate at LOS D or better during both peak hours under Near-Term Year 2020 Base plus Demolition and Initial Rail Component conditions, except the Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard intersection, which would operate at LOS F in the AM peak hour and LOS E in the PM peak hour. With the addition of Demolition and Initial Rail Component traffic, operations at this intersection would remain at LOS F and E in the AM and PM peak hour, respectively, and the project would not result in an increase in delay that would exceed the City's thresholds. Therefore, a less-than-significant impact would occur, and no mitigation is required.

~~The traffic associated with the Demolition and Initial Rail Component would worsen the delay at this intersection by 1.9 seconds during the AM peak hour and 0.8 second during the PM peak hour. Based on the City of San Diego's Significance Criteria, which identify a threshold of 1.0 second of additional delay for intersections operating at LOS F and 2.0 seconds of additional delay for intersections operating at LOS E, impacts at the Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard intersection would be cumulatively significant during the AM peak hour (**Impact-C-TRA-2**). The Demolition and Initial Rail Component's impact on the Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard intersection would be mitigated by adding a westbound right turn overlap phase (**MM-TRA-2**). This would reduce the unmitigated delay associated with the project by 5.0 seconds during the AM peak hour and by 10.3 seconds during the PM peak hour and would effectively reduce delay at this intersection to below current levels. The addition of Demolition and Initial Rail Component traffic would not cause any other intersections to operate at LOS E or F under Near-Term Year 2020 Base plus Demolition and Initial Rail Component conditions or cause an increase in delay of greater than 1.0 second at any other failing intersections.~~

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Table 5-17. Peak Hour Roadway Segment LOS Results: Near-Term Year 2020 Base Plus Demolition and Initial Rail Component Conditions

Roadway	Segment	Cross-Section	Threshold (LOS E)	Near-Term + Demolition and Initial Rail Component			Near-Term Year 2020 Base		
				ADT	V/C	LOS	ADT/V/C/LOS	Δ	S?
Harbor Drive	Between Beardsley Street and Cesar Chavez Parkway	4 lanes w/RM	40,000	24,543 <del>1</del>	0.614	C	24,460/0.612/C	0.002	N
	Between Cesar Chavez Parkway and Sampson Street	4 lanes w/RM	40,000	15,923 <del>0</del>	0.398	B	15,744/0.394/B	0.004	N
	Between Sampson Street and Schley Street	4 lanes w/RM	40,000	17,478 <del>1</del>	0.437	B	17,292/0.432/B	0.005	N
	Between Schley Street and 28 <sup>th</sup> Street	4 lanes w/RM	40,000	17,054 <del>7</del>	0.426	B	16,868/0.422/B	0.004	N
	Between 28 <sup>th</sup> Street and Belt Street	4 lanes w/RM	40,000	22,660 <del>5</del> 95	0.566 <del>5</del>	C	22,496/0.562/C	0.004 <del>3</del>	N
	Between Belt Street and 32 <sup>nd</sup> Street	4 lanes w/RM	40,000	21,212 <del>1</del> 47	0.530 <del>5</del> 29	C	21,048/0.526/C	0.004 <del>3</del>	N
28 <sup>th</sup> Street	Between Harbor Drive and Main Street	4 lanes w/RM	40,000	17,206 <del>4</del>	0.430 <del>2</del>	B	17,184/0.430/B	0.000 <del>2</del>	N
	Between Main Street and Boston Avenue	4 lanes w/TWLT	30,000	20,635 <del>0</del>	0.688	D	20,613/0.687/D	0.001	N
	Between Boston Avenue and National Avenue	3 lanes w/TWLT	22,500 <sup>1</sup>	23,090 <del>1</del> 04	1.026 <del>7</del>	<b>F</b>	23,076/1.026/ <b>F</b>	0.000 <del>1</del>	N
32 <sup>nd</sup> Street	Between Harbor Drive and Norman Scott Road	6 lanes w/RM	50,000	24,774 <del>7</del> 09	0.495 <del>4</del>	B	24,610/0.492/B	0.003 <del>2</del>	N

Source: Appendix G

Notes:

<sup>1</sup> Capacity is 75% of a 4-Lane Collector w/TWLT.**Bold** letter indicates a significant impact.

ADT = average daily trips; LOS = level of service; RM = raised median; S? = Indicates if change in V/C ratio is significant; TWLT = two-way left turn; V/C = volume to capacity ratio; Δ = change in V/C ratio

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Table 5-18. Peak Hour Intersection LOS Results: Near-Term Year 2020 Base Plus Demolition and Initial Rail Component Conditions

#	Intersection	AM Peak Hour		PM Peak Hour		Delay w/o Project (sec.) AM/PM	LOS w/o Project AM/PM	Change in Delay (sec.)	S?
		Avg. Delay (sec.)	LOS	Avg. Delay (sec.)	LOS				
1	Harbor Drive/Cesar Chavez Parkway	41.0	D	39.6 <del>7</del>	D	41.0/38.0	D/D	0.0/1.6 <del>7</del>	No
2	Harbor Drive/Sampson Street	44.0	D	45.5	D	43.8/44.9	D/D	0.2/0.6	No
3	Harbor Drive/Schley Street	16.4	B	15.7	B	16.3/15.7	B/B	0.1/0.0	No
4	Harbor Drive/28 <sup>th</sup> Street	28.4 <del>6</del>	C	<del>26.7</del> 27.0	C	28.2/26.6	C/C	0.24/0.14	No
5	Main Street/28 <sup>th</sup> Street	22.2	C	<del>38.8</del> 39.3	D	22.2/38.8	C/D	0.0/0.0 <del>5</del>	No
6	Boston Avenue/28 <sup>th</sup> Street	19.1	B	<del>23.9</del> 24.0	C	19.1/23.9	B/C	0.0/0.0 <del>1</del>	No
7	National Avenue/28 <sup>th</sup> Street	42.6	D	31.5	C	42.6/31.5	D/C	0.0/0.0	No
8	National Avenue/I-5 NB Off-Ramp	17.4 <del>6</del>	B	16.4	B	17.4/14.8	B/B	0.0 <del>2</del> /1.6	No
9	Harbor Drive/Belt Street	18.9 <del>8</del>	B	17.2 <del>1</del>	B	18.8/17.0	B/B	0.0/0.1/0.2	No
10	Harbor Drive/32 <sup>nd</sup> Street	<del>30.2</del> 29.7	C	<del>44.4</del> 43.5	D	29.3/43.3	C/D	0.9/1.14/0.2	No
11	Norman Scott Road/32 <sup>nd</sup> Street/Wabash Boulevard	<del>105.1</del> 103.6	<b>F</b>	<del>70.4</del> 69.6	<b>E</b>	103.2/69.6	<b>F/E</b>	1.9/0.84/0.0	<del>Yes</del> No

Source: Appendix G

**Bold** letter indicates a significant impact.

LOS = level of service; NB = northbound; S? = indicates a significant impact

## Page 5-63

**Table 5-19. Peak Hour Ramp Intersection Capacity Analysis: Near-Term Year 2020 Base Plus Demolition and Initial Rail Component Conditions**

#	Intersection	Peak Hour	ILV/Hour		Description
			Near-Term Base	Near-Term + Demolition and Initial Rail Component	
8	National Avenue/I-5 NB Off-Ramp	AM	722	723 <del>5</del>	Under Capacity
		PM	869	<del>869</del> 870	Under Capacity
11	Norman Scott Road/32 <sup>nd</sup> Street/Wabash Boulevard	AM	995	1,026 <del>0</del> 14	Under Capacity
		PM	1,061	1,086 <del>0</del> 75	Under Capacity

Source: Appendix G.

NB = northbound; ILV = Intersection Lane Volume

In sum, all potential impacts on roadway segments, intersections, and ramp intersections would be less than significant during operation of the Demolition and Initial Rail Component. ~~Moreover, the project would not change existing transit, pedestrian, or bicycle facilities, require their redesign, or result in demand that would create insufficient capacity. However, operational traffic would add more than 1 second of delay to the intersection of Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard during the AM peak hour, and therefore would result in a significant cumulative impact on this intersection (Impact C-TRA-2).~~ Consequently, operation of the Demolition and Initial Rail Component has the potential to ~~Consequently, operation of the Demolition and Initial Rail Component would not conflict with applicable plans, ordinances, and policies related to the performance of the circulation system, and impacts would be cumulatively less than significant.~~

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**Table 5-21. Peak Hour Intersection LOS Results: Near-Term Year 2020 Base Plus Demolition and Initial Rail Component – Alternate Gate Scenario**

#	Intersection	AM Peak Hour		PM Peak Hour		Delay w/o Project (sec.) AM/PM	LOS w/o Project AM/PM	Change in Delay (sec.)	S?
		Avg. Delay (sec.)	LOS	Avg. Delay (sec.)	LOS				
1	Harbor Drive/Cesar Chavez Parkway	41.9	D	38.8 <del>7</del>	D	41.0/38.0	D/D	0.9/0.8 <del>7</del>	No
12	Harbor Drive/Alternative Gate	21.7 <del>8</del>	C	<del>33.9</del> 34.4	C	N/A	N/A	21.7/ <del>33.9</del> 8/34.4	No

Source: Appendix G

**Bold** letter indicates a significant impact.

LOS = level of service; S? = indicates a significant impact

Based on the City of San Diego's Significance Criteria, outlined in Table 5-5, the traffic associated with this scenario would not cause any intersections to operate at LOS E or F. Therefore, implementation of the proposed alternative gate location would not result in any additional impacts on intersection operations not previously identified under Near-Term Year 2020 Base plus Demolition and Initial Rail Component conditions.

## Future Year 2035 Plus Full TAMT Plan Buildout Conditions

### Construction

Full buildout of the TAMT plan includes demolition of Warehouse C, demolition of the existing molasses tanks, construction of an up to 100,000-square-foot semi-permanent building, installation of up to five gantry cranes, improvements to the centralized gate, and additional improvements to the Dry Bulk node to improve storage and conveyance efficiencies. Due the programmatic and market-driven nature of the TAMT plan, the timing, potential for overlap, and specific construction plans associated with these future components, unlike those associated with the Demolition and Initial Rail Component, are unknown at the time of this analysis.

Consequently, given the lack of construction and schedule details at this time, construction activities associated with the full TAMT plan buildout could result in a cumulatively considerable traffic impact when combined with construction traffic from past, present, and reasonably foreseeable future projects (**Impact-C-TRA-23**). As discussed in Section 4.10, *Transportation, Circulation, and Parking*, without specific construction details, it cannot be determined with certainty that the project-level traffic impacts would be reduced to less-than-significant levels with the incorporation of mitigation such as a project-specific traffic study and construction traffic control plan (**MM-TRA-3**). Therefore, the full TAMT plan buildout's incremental contribution to temporary construction-related traffic congestion would be cumulatively considerable after mitigation is incorporated.

## Page 5-66

### Roadway Segments

Roadway segment geometrics under Future Year 2035 plus full TAMT plan buildout conditions were assumed to be identical to existing conditions. Table 5-22 shows Future Year 2035 Base and Future Year 2035 plus full TAMT plan buildout LOS conditions for the roadway segments in the project study area, while Figure 5-12 illustrates the Future Year 2035 plus full TAMT plan buildout volumes on study area roadways. As shown, all key study roadway segments are projected to operate at acceptable LOS D or better under Future Year 2035 plus full TAMT plan buildout conditions, except 28<sup>th</sup> Street between Boston Avenue and National Avenue, which would operate at LOS F. Based on the City of San Diego's criteria, outlined in Table 5-5 above, the addition of TAMT plan buildout traffic to this roadway segment would increase the V/C ratio by ~~0.0360~~ 0.040 where the threshold is 0.01 for roadway segments operating at LOS F, resulting in a cumulatively significant impact (**Impact-C-TRA-34**). Therefore, impacts would be cumulatively significant and mitigation is required.

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Table 5-22. Roadway Segment LOS Results: Future Year 2035 Base Plus Full TAMT Plan Buildout Conditions

Roadway	Segment	Classification	Threshold (LOS E)	Future Year 2035 + Full TAMT Plan Buildout			Future Year 2035 Base	Δ	S?
				ADT	V/C	LOS	ADT/V/C/LOS		
Harbor Drive	Between Beardsley Street and Cesar Chavez Parkway	4-Lane Major	40,000	26,392 <del>368</del>	0.660 <del>659</del>	C	25,050/0.626/C	0.034 <del>3</del>	No
	Between Cesar Chavez Parkway and Sampson Street	4-Lane Major	40,000	22,155 <del>124</del>	0.554 <del>3</del>	C	18,800/0.470/B	0.084 <del>3</del>	No
	Between Sampson Street and Schley Street	4-Lane Major	40,000	20,405 <del>374</del>	0.540 <del>9</del>	B	17,050/0.426/B	0.084 <del>3</del>	No
	Between Schley Street and 28 <sup>th</sup> Street	4-Lane Major	40,000	20,405 <del>374</del>	0.540 <del>9</del>	B	17,050/0.426/B	0.084 <del>3</del>	No
	Between 28 <sup>th</sup> Street and Belt Street	4-Lane Major	40,000	26,010 <del>25,664</del>	0.650 <del>642</del>	C	24,000/0.600/C	0.050 <del>042</del>	No
	Between Belt Street and 32 <sup>nd</sup> Street	4-Lane Major	40,000	26,010 <del>25,664</del>	0.650 <del>642</del>	C	24,000/0.600/C	0.050 <del>042</del>	No
28 <sup>th</sup> Street	Between Harbor Drive and Main Street	4-Lane Major	40,000	18,295 <del>610</del>	0.465 <del>7</del>	B	16,950/0.424/B	0.034 <del>1</del>	No
	Between Main Street and Boston Avenue	4-Lane Collector w/TWLT	30,000	21,565 <del>644</del>	0.721 <del>9</del>	D	20,220/0.674/D	0.045 <del>7</del>	No
	Between Boston Avenue and National Avenue	3-Lanes Collector w/TWLT	22,500	28,532 <del>611</del>	1.268 <del>272</del>	F	27,720/1.232/F	0.036 <del>040</del>	Yes
32 <sup>nd</sup> Street	Between Harbor Drive and Norman Scott Road	6-Lane Major	50,000	27,810 <del>464</del>	0.556 <del>549</del>	B	25,800/0.516/B	0.040 <del>033</del>	No

Source: Appendix G

ADT = average daily trips; LOS = level of service; S? = Indicates if change in V/C ratio is significant; TWLT = two-way left turn; V/C = volume to capacity ratio; Δ = change in V/C ratio.

## Page 5-68

### *Intersections*

Intersection geometrics under Future Year 2035 plus full TAMT plan buildout conditions were assumed to be identical to existing conditions. Table 5-23 shows Future Year 2035 and Future Year 2035 plus TAMT plan buildout peak hour LOS conditions for the intersections in the project study area, while Figure 5-13 illustrates the Future Year 2035 plus TAMT plan buildout volumes on study area intersections. As shown, all key study intersections are projected to operate at LOS D or better under Future Year 2035 plus full TAMT plan buildout conditions, except the following two intersections.

- National Avenue and 28<sup>th</sup> Street – LOS F during AM peak hour and LOS E during PM peak hour
- Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard – LOS F during AM peak hour and LOS E during PM peak hour

Based on the City of San Diego's criteria, the traffic associated with the proposed project would not worsen the delay by more than 1 second or result in further deterioration in peak hour intersection LOS at the intersection of National Avenue and 28<sup>th</sup> Street. However, the traffic associated with the proposed project would worsen the delay at the Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard intersection by ~~25.0~~17.5 seconds during the AM peak hour and ~~44.2~~148.2 seconds during the PM peak hour, where a threshold of 1.0 second of additional delay applies to LOS F and a threshold of 2.0 seconds of additional delay applies to LOS E. Additionally, the addition of TAMT plan buildout traffic would cause intersection operations to degrade from LOS E to LOS F during the AM and PM peak hours. Therefore, the project would have a significant cumulative impact at the Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard intersection (**Impact-C-TRA-54**).

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Table 5-23. Peak Hour Intersection LOS Results: Future Year 2035 Base Plus Full TAMT Plan Buildout Conditions

#	Intersection	AM Peak Hour		PM Peak Hour		Delay w/o Project (sec) AM/PM	LOS w/o Project AM/PM	Change in Delay (sec)	Significant Impact?
		Avg. Delay (sec.)	LOS	Avg. Delay (sec.)	LOS				
1	Harbor Drive/Cesar Chavez Parkway	53.59	D	52.453.0	D	50.6/39.6	D/D	2.9/12.83.3/13.4	No
2	Harbor Drive/Sampson Street	53.76	D	53.40	D	50.9/53.0	D/D	2.87/0.40	No
3	Harbor Drive/Schley Street	26.6	C	20.4	C	23.2/19.4	B/B	3.4/1.0	No
4	Harbor Drive/28 <sup>th</sup> Street	32.47	C	30.132.9	C	28.8/28.2	C/C	3.6/1.9/4.7	No
5	Main Street/28 <sup>th</sup> Street	22.47	C	39.942.5	D	22.2/39.2	C/D	0.2/0.75/3.3	No
6	Boston Avenue/28 <sup>th</sup> Street	28.01	C	38.739.2	D	27.7/37.4	C/D	0.34/1.38	No
7	National Avenue/28 <sup>th</sup> Street	122.5	F	72.03	E	122.5/71.4	F/E	0.0/0.69	No
8	National Avenue/I-5 NB Off-Ramp	19.720.1	B	18.25	B	18.9/17.5	B/B	1.2/1.08/0.7	No
9	Harbor Drive/Belt Street	23.222.9	C	20.119.8	C	22.3/19.1	C/B	0.9/1.6/0.7	No
10	Harbor Drive/32 <sup>nd</sup> Street	41.836.6	C	53.851.7	D	32.3/44.2	C/D	94.3/7.5/9.6	No
11	Norman Scott Road/32 <sup>nd</sup> Street/Wabash Boulevard	106.599.0	F	8175.4	F	81.5/67.2	E/E	25.0/1417.5/8.2	Yes

Source: Appendix G

LOS = level of service; NB = northbound



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**Table 5-24. Ramp Intersection Capacity Analysis: Future Year 2035 Base Plus Full TAMT Plan Buildout Conditions**

#	Intersection	Peak Hour	ILV/Hour		Description
			Future Year 2035 Base	Future Year 2035 Base + Full TAMT Plan Buildout	
8	National Avenue/I-5 NB Off-Ramp	AM	950	<del>972</del> <u>983</u>	Under Capacity
		PM	930	<del>954</del> <u>9</u>	Under Capacity
11	Norman Scott Road/32 <sup>nd</sup> Street/Wabash Boulevard	AM	1,095	<del>1,286</del> <u>221</u>	At Capacity
		PM	1,083	<del>1,257</del> <u>198</u>	<del>At</del> <u>Under</u> Capacity

Source: Appendix G

ILV = Intersection Lane Volume; NB = northbound

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**Table 5-25. Freeway Mainline Segments: Future Year 2035 Base Plus Full TAMT Plan Buildout Conditions**

Freeway	Segment	ADT	Direction	Peak Hour Volume	With Project		Base		$\Delta$	S?
					V/C	LOS	V/C	LOS		
I-5	SR-94 & Imperial Avenue	219,100	NB	11,700	1.080	F	1.070	F	0.010	Y
			SB	10,200	0.940	E	0.940	E	0.000	N
	Imperial Avenue & SR-75	196,400	NB	10,500	0.970	E	0.960	E	0.010	N
			SB	9,700	0.900	D	0.900	D	0.000	N
	SR-75 & 28 <sup>th</sup> Street	191,600	NB	11,900	0.970	E	0.970	E	0.000	N
			SB	9,500	0.880	D	0.880	D	0.000	N
	28 <sup>th</sup> Street & SR-15	178,000	NB	11,100	1.180	F	1.170	F	0.010	Y
			SB	8,800	0.940	E	0.940	E	0.000	N
SR-15	SR-94 & Market Street	122,800	NB	6,200	0.730	C	0.720	C	0.010	N
			SB	6,900	0.820	D	0.800	D	0.020	N
	Market Street & Ocean View Boulevard	131,200	NB	6,800	0.960	E	0.950	E	0.010	N
			SB	7,4300	1.0540	F	1.020	F	0.0320	Y
	Ocean View Boulevard & I-5	124,000	NB	5,600	0.660	C	0.650	C	0.010	N
			SB	5,600	0.520	B	0.510	B	0.010	N
	I-5 & Norman Scott Road	32,400	NB	1,400	0.300	A	0.300	A	0.000	N
			SB	1,400	0.300	A	0.280	A	0.020	N

ADT = average daily trips; LOS = level of service; NB = northbound; SB = southbound; S? = Indicates a significant impact; V/C = volume to capacity ratio;  $\Delta$  = change in V/C ratio

The addition of full TAMT plan buildout traffic onto Future Year 2035 Base conditions would result in a change in V/C ratio greater than 0.005 for freeway segments operating at LOS F at the following key study area freeway segments.

- I-5 northbound between SR-94 & Imperial Avenue (LOS F)
- I-5 northbound between 28<sup>th</sup> Street & SR-15 (LOS F)
- I-5 northbound between SR-15 & Main Street (LOS F)
- SR-15 southbound between Market Street & Ocean View Boulevard (LOS F)

Based on the City of San Diego's Significance Criteria, the traffic associated with full TAMT plan buildout would exceed the allowable threshold of a 0.005 V/C ratio increase for freeway segments operating at LOS F, and therefore would result in a cumulatively significant impact (**Impact-C-TRA-65**).

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**Table 5-26. Roadway Segment LOS Results: Future Year 2035 Plus Full TAMT Plan Buildout – Alternative Gate Scenario**

Roadway	Segment	Cross-Section	Threshold (LOS E)	Future Year 2035 + Alternative Gate			Future Year 2035 Base	Δ	S?
				ADT	V/C	LOS	ADT/V/C/LOS		
Harbor Drive	Between Beardsley Street and Cesar Chavez Parkway	4 Lanes w/RM	40,000	27,102 <u>079</u>	0.6787	C	25,050/0.626/C	0.0521	N

Source: Appendix G

Notes:

ADT = average daily trips; LOS = level of service; RM = raised median; S? = Indicates if change in V/C ratio is significant; V/C = volume to capacity ratio; Δ = change in V/C ratio

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**Table 5-27. Peak Hour Intersection LOS Results: Future Year 2035 Plus Full TAMT Plan Buildout – Alternative Gate Scenario**

#	Intersection	AM Peak Hour		PM Peak Hour		Delay w/o Project (sec.) AM/PM	LOS w/o Project AM/PM	Change in Delay (sec.)	S?
		Avg. Delay (sec.)	LOS	Avg. Delay (sec.)	LOS				
1	Harbor Drive/Cesar Chavez Parkway	53.4	D	50.61	D	50.6/39.6	D/D	2.8/11.0/10.5	No
12	Harbor Drive/Alternative Gate	<del>33.2</del> 34.1	C	<del>37.07</del>	D	N/A	N/A	<del>33.2</del> 34.1/ 37.07	No

Source: Appendix G

**Bold** letter indicates a significant impact.

LOS = level of service; S? = indicates a significant impact

Based on the City of San Diego's Significance Criteria, outlined in Table 5-5, the traffic associated with this scenario would not cause any intersections to operate at LOS E or F. Therefore, implementation of the proposed alternative gate location would not result in any additional impacts on intersection operations not previously identified under Future Year 2035 Base plus full TAMT plan buildout conditions.

## Level of Significance Prior to Mitigation

### Demolition and Initial Rail Component

The Demolition and Initial Rail Component's incremental contribution to cumulative transportation impacts would be cumulatively considerable prior to mitigation. Potential cumulatively considerable impacts include the following.

**Impact-C-TRA-1: Construction-Related Impact on an Intersection: Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard from Demolition and Initial Rail Component.**

Construction activities associated with the Demolition and Initial Rail Component, particularly during demolition of Transit Sheds #1 and #2, would generate construction-related traffic that would worsen the existing delay experienced at the Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard intersection by 7.3 seconds in the AM peak hour and 2.6 seconds in the PM peak hour. The increase in delay at this intersection would exceed the threshold of 1.0 second of additional delay for intersections operating at LOS F and threshold of 2.0 seconds of additional delay for intersections operating at LOS E. Because construction-related traffic for the Demolition and Initial Rail Component would cause greater than a 1-second delay at the intersection of Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard within the project study area, the Demolition and Initial Rail Component would result in a cumulatively considerable significant impact on this intersection.

~~**Impact-C-TRA-2: Contribute to an Unacceptable Level of Operation at an Intersection: Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard from Demolition and Initial Rail Component.**~~ Operation of the Demolition and Initial Rail Component would worsen the delay experienced during the peak hours at the Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard intersection by 1.9 seconds in the AM peak hour and 0.8 second in the PM peak hour under near-term cumulative conditions, where a threshold of 1.0 second of additional delay applies to intersections operating at LOS F and a threshold of 2.0 seconds of additional delay applies to intersections operating at LOS E. Because the addition of Demolition and Initial Rail Component traffic would cause greater than a 1-second delay at the intersection of Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard within the project study area, the Demolition and Initial Rail Component would result in a cumulatively considerable significant impact on this intersection during the AM peak hour.

### Full TAMT Plan Buildout

The full TAMT plan buildout's incremental contribution to cumulative transportation impacts would be cumulatively considerable prior to mitigation. Potential cumulatively considerable impacts include the following.

**Impact-C-TRA-32: Contribute to Temporary Traffic Congestion from Construction of Full TAMT Plan Buildout.** Given the lack of construction and schedule details at this time, it is not known if construction of the full TAMT plan buildout would overlap with construction of cumulative projects in the project study area. As a result, it is unknown whether construction associated with full TAMT plan buildout, when combined with construction traffic from past, present, and reasonably foreseeable future projects, would result in temporary but cumulatively considerable traffic congestion in the project study area.

**Impact-C-TRA-43: Contribute to an Unacceptable Level of Operation at a Roadway Segment: 28<sup>th</sup> Street between Boston Avenue and National Avenue from TAMT Plan Buildout.**

Operation of the full TAMT plan buildout would result in a considerable contribution to the cumulative impact at the roadway segment of 28<sup>th</sup> Street between Boston Avenue and National Avenue within the project study area, which would degrade the operations of a roadway segment that would already operate at an unacceptable level under cumulative conditions (LOS F). The proposed project would increase the V/C ratio by 0.036040, which exceeds the City's threshold of 0.01 for roadway segments operating at LOS F. Therefore, full TAMT plan buildout would result in a cumulatively considerable significant impact on this roadway segment.

**Impact-C-TRA-54: Contribute to an Unacceptable Level of Operation at an Intersection: Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard from TAMT Plan Buildout.**

Operation of the full TAMT plan buildout would worsen the delay experienced during the peak hours at the Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard intersection by 25.017.5 seconds in the AM peak hour and by 148.2 seconds in the PM peak hour under Future Year 2035 cumulative conditions, where a threshold of 1.0 second of additional delay applies to intersections operating at LOS F and a threshold of 2.0 seconds of additional delay applies to intersections operating at LOS E. Because the proposed project would cause greater than a 1-second delay on the intersection of Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard within the project study area, full buildout of the TAMT plan would result in a cumulatively considerable significant impact on this intersection.

**Impact-C-TRA-65: Contribute to an Unacceptable Level of Operation at Four Freeway Segments from TAMT Plan Buildout.**

Operation of the full TAMT plan buildout would result in a considerable contribution to the cumulative impact at the freeway segments of I-5 northbound between SR-94 and Imperial Avenue, I-5 northbound between 28<sup>th</sup> Street and I-15, I-5 northbound between I-15 and Main Street, and I-15 southbound between Market Street and Ocean View Boulevard, which are projected to operate at LOS F. Operation of the full TAMT plan buildout would result in a change in V/C ratio greater than 0.005 for freeway segments operating at LOS F, and therefore would result in cumulatively considerable significant impact on these freeway segments.

## Mitigation Measures

### Demolition and Initial Rail Component

For **Impact-C-TRA-1:**

Implement **MM-TRA-1: Transportation Demand Management (TDM) Plan During Construction**, as described in Section 4.10, *Transportation, Circulation, and Parking*.

For **Impact-C-TRA-2:**

Implement **MM-TRA-2: Westbound Right-Turn Overlap Phase at Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard Intersection**, as described in Section 4.10, *Transportation, Circulation, and Parking*.

## Full TAMT Plan Buildout

### For **Impact-C-TRA-32**:

Implement **MM-TRA-32: Traffic Study and Transportation Demand Management (TDM) for Specific Construction Projects**, as described in Section 4.10, *Transportation, Circulation, and Parking*.

### For **Impact-C-TRA-43**:

Implement **MM-TRA-43: Widen the Segment of 28<sup>th</sup> Street between Boston Avenue and National Avenue to a Four-Lane Major Arterial Classification Consistent with the Barrio Logan Community Plan**, as described in Section 4.10, *Transportation, Circulation, and Parking*.

### For **Impact-C-TRA-54**:

Implement **MM-TRA-24: Westbound Right-Turn Overlap Phase at Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard Intersection**, as described in Section 4.10, *Transportation, Circulation, and Parking*.

### For **Impact-C-TRA-65**:

**MM-C-TRA-1: Construct Managed Lanes on I-5 and I-15.** SANDAG currently has plans to construct two managed lanes (one in each direction) on I-5 between I-15 and Palomar Street by the year 2030 as well as two additional multi-purpose lanes and two managed lanes on SR-15 between I-5 and SR-94 by the year 2050. The District shall coordinate with SANDAG and Caltrans to determine the proposed project's fair share contribution. Because this mitigation measure is far into the future, the exact amount will need to be determined at a future date and prior to the project's contribution to the affected freeway mainline sections reaching 0.005 change in V/C ratio. The following fair-share percentages under the MPC scenario analyzed for the proposed project, per affected freeway facility, should serve as guidance to the amount the District should pay toward a program or plan for the aforementioned freeway facility improvements to be constructed.

- I-5 northbound between SR-94 & Imperial Avenue: 5 percent of the total cost for improvements to this segment.
- I-5 northbound between 28<sup>th</sup> Street & SR-15: ~~7~~13 percent of the total cost for improvements to this segment.
- I-5 northbound between ~~I~~SR-15 & Main Street: ~~14~~6 percent of the total cost for improvements at this segment.
- SR-15 southbound between Market Street & Ocean View Boulevard: ~~25~~11 percent of the total cost for improvements to this segment.

The following fair-share percentages under the STC Alternative scenario, per affected freeway facility, should serve as guidance to the amount the District should pay toward a program or plan for the aforementioned freeway facility improvements to be constructed.

- I-5 northbound between SR-94 & Imperial Avenue: 5 percent of the total cost for improvements to this segment.
- I-5 northbound between SR-15 & Main Street: 6 percent of the total cost for improvements at this segment.

- SR-15 southbound between Market Street & Ocean View Boulevard: 11 percent of the total cost for improvements to this segment.

## Level of Significance After Mitigation

### Demolition and Initial Rail Component

Mitigation measure **MM-TRA-1** would reduce construction-related traffic impacts by requiring the District to prepare and implement a TDM plan during construction of the Demolition and Initial Rail Component. Implementation of a TDM plan during construction would reduce potential impacts at the Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard intersection; however, it cannot be determined with certainty that the cumulative impacts would be reduced to less than cumulatively considerable. Consequently, **Impact-C-TRA-1** may remain cumulatively significant and unavoidable even after **MM-TRA-1** has been implemented.

~~Mitigation measure **MM-TRA-2** would reduce the Demolition and Initial Rail Component's incremental contribution to significant cumulative traffic impacts at the intersection of Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard to less than cumulatively considerable (**Impact-C-TRA-2**). However, as discussed further in Section 4.10, *Transportation, Circulation, and Parking*, because the timing and implementation of the necessary improvements to the intersection of Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard is within the exclusive jurisdiction of Caltrans, the District cannot ensure that the improvements would be made when needed. Therefore, while mitigation is required that could reduce the Demolition and Initial Rail Component's cumulatively considerable traffic impacts to a less-than-significant level, the uncertainty regarding the timing and implementation of the recommended improvement to the intersection of Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard is considered cumulatively significant and unavoidable.~~

### Full TAMT Plan Buildout

Mitigation measure **MM-TRA-32** would reduce construction-related traffic impacts by requiring project-specific mitigation (if needed), including a construction traffic control plan if needed. However, given the uncertainty of timing of future construction activities and the fact that it is unknown if full TAMT plan buildout and cumulative projects would overlap, **Impact-C-TRA-32** would be cumulatively considerable and would be considered cumulatively significant and unavoidable after implementation of Mitigation Measure **MM-TRA-32**.

Implementation of Mitigation Measures **MM-TRA-43** and **MM-TRA-54** would reduce the full TAMT plan buildout's incremental contribution to significant cumulative traffic impacts to less than cumulatively considerable. However, as discussed further in Section 4.10, *Transportation, Circulation, and Parking*, because the timing and implementation of the necessary improvements to the roadway segment of 28<sup>th</sup> Street between Boston Avenue and National Avenue and the intersection of Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard is within the exclusive jurisdiction of the City of San Diego and Caltrans, respectively, the District cannot ensure that the improvements would be made when needed.

Additionally, implementation of Mitigation Measure **MM-C-TRA-1** would reduce the project's incremental contribution to significant cumulative traffic impacts on freeway segments of I-5 northbound between SR-94 and Imperial Avenue, I-5 northbound between 28<sup>th</sup> Street and I-15, I-5 northbound between I-15 and Main Street, and I-15 southbound between Market Street and Ocean

View Boulevard to less than cumulatively considerable (**Impact-C-TRA-65**). However, there is no program in place into which the District would pay its fair-share contribution toward the cost of the improvements to these freeway facilities. Consequently, because these freeway segments are within the exclusive jurisdiction of Caltrans and SANDAG is responsible for planning the improvements, the District cannot ensure that the improvements would be made when needed.

Therefore, while mitigation has been identified that could reduce the full TAMT plan buildout's cumulatively considerable traffic impacts to a less-than-significant level, the uncertainty regarding the timing and implementation of the recommended improvements to these roadway facilities is considered cumulatively significant and unavoidable.

### 3.2.13 Changes to Chapter 7, *Alternatives to the Proposed Project*

#### Page 7-1

~~Four~~ Five alternatives to the proposed project are analyzed in this chapter and discussed in terms of their merits relative to the proposed project.

- Alternative 1 – No Project/No Build Alternative
- Alternative 2 – 2008 Maritime Business Plan Buildout Alternative
- Alternative 3 – Reduced Project Alternative
- Alternative 4 – Full Refrigerated and Dry Container Buildout Alternative<sup>12</sup>
- Alternative 5 – Sustainable Terminal Capacity Alternative

Based on the analysis below, Alternative 3, the Reduced Project Alternative, would be the environmentally superior alternative.

#### Pages 7-3 through 7-5

**Table 7-1. Summary of Significant Effects of the Proposed Project**

Resource Impact	Significant and Unavoidable	Less than Significant with Mitigation
Section 4.1, Aesthetics and Visual Resources		
Visual impacts from installation of gantry cranes identified in TAMT plan buildout	X	

<sup>12</sup> This alternative was considered in the TAMT plan and would be similar to the Full Dry Container Buildout except with slightly less throughput and fewer modifications to the existing condition (e.g., refrigerated containers are already a major portion of the terminal and the infrastructure would not have to be removed under the Full Refrigerated and Dry Container Buildout Alternative). Neither of these alternatives are consistent with the District maritime operations, however, because they would break away from a longstanding commitment of handling neo bulk, break bulk, and roll-on/roll-off cargos and the benefits of cargo diversification. They are considered in this chapter because they were mentioned in the TAMT plan.



<b>Resource Impact</b>	<b>Significant and Unavoidable</b>	<b>Less than Significant with Mitigation</b>
<b>Section 4.2, Air Quality and Health Risk</b>		
Exceed VOC, NO <sub>x</sub> , CO, SO <sub>x</sub> , PM10, and PM2.5 emissions thresholds from TAMT plan buildout construction and operations	X	
Toxic air contaminants above thresholds from TAMT plan buildout construction and operations	X	X
<b>Section 4.3, Biological Resources</b>		
Potential destruction of Migratory Bird Treaty Act protected nests		X
Disturbance of active bat roosts		X
<b>Section 4.4, Cultural Resources</b>		
Potential disturbance of archaeological resources during ground-disturbing activities		X
Potential disturbance of human remains during ground-disturbing activities		X
<b>Section 4.5, Geology and Soils</b>		
N/A	N/A	N/A
<b>Section 4.6, Greenhouse Gas Emissions and Climate Change</b>		
Exceed GHG emissions thresholds from Demolition and Initial Rail Component construction and operations through 2020		X
Exceed GHG emissions thresholds from TAMT plan construction and operations and operations beyond 2020	X	
<b>Section 4.7, Hazards and Hazardous Materials</b>		
Possible soil contamination		X
<b>Section 4.8, Hydrology and Water Quality</b>		
N/A	N/A	N/A
<b>Section 4.9, Noise and Vibration</b>		
Exceedance of adopted noise standards during TAMT plan buildout operational activities	X	
Substantial permanent increase in ambient noise levels in the project vicinity from buildout of the TAMT plan	X	
Substantial temporary increase in ambient noise levels during construction of the Demolition and Initial Rail Component	X	
Substantial temporary increase in ambient noise levels during construction of the full TAMT plan buildout	X	
<b>Section 4.10, Transportation, Circulation, and Parking</b>		
Construction-Related Impact on an Intersection: Norman Scott Road/32 <sup>nd</sup> Street/Wabash Boulevard from Demolition and Initial Rail Component Construction	X	
<del>Operation-Related Impact on an Intersection: Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard from Demolition and Initial Rail Component Operations</del>	<del>X</del>	
Construction Traffic from Future TAMT Plan Construction Projects	X	
Operation-Related Impact on a Roadway Segment: 28 <sup>th</sup> Street between Boston Avenue and National Avenue from TAMT Plan	X	

Resource Impact	Significant and Unavoidable	Less than Significant with Mitigation
Operations		
Operation-Related Impact on an Intersection: Norman Scott Road/32 <sup>nd</sup> Street/Wabash Boulevard from TAMT Plan Operations	X	
Insufficient Parking at Full TAMT Plan Buildout		X
Section 4.11, Utilities and Energy		
N/A	N/A	N/A

## 7.4 Alternatives Considered

A total of ~~eight-nine~~ alternatives were initially considered for evaluation. Based on the criteria described in Section 7.3, in addition to evaluating the No Project Alternative scenario, ~~three-four~~ other alternatives were carried forward. The other alternatives that were considered, but rejected, included an alternate location alternative, a full dry container buildout scenario, relocation of the cruise ship terminal, and use of cleanest feasible technologies. Table 7-2 summarizes the buildout scenarios for the ~~four-five~~ alternatives that were carried forward.

**Table 7-2. Comparison of Proposed Project and Alternative Buildout Scenarios**

	Dry Bulk	Liquid Bulk	Refrigerated Containers	Multi-Purpose General Cargo <sup>2</sup>	Total Cargo Throughput
Proposed Project	2,650,000	239,017	2,288,000	977,400	<b>6,154,417</b>
Alternative 1 – No Project/No Build	400,000	239,017	700,000	100,000	<b>1,439,017</b>
Alternative 2 – 2008 Maritime Business Plan Buildout	2,250,000	239,017	730,000	1,670,000	<b>4,889,017</b>
Alternative 3 – Reduced Project Alternative (<29% Buildout)	400,000	60,000	800,000	220,000	<b>1,480,000</b>
Alternative 4 – Full Refrigerated and Dry Container Buildout Alternative	2,650,000	239,017	2,960,840 <sup>1</sup>	0	<b>5,849,857</b>
<u>Alternative 5 – Sustainable Terminal Capacity Alternative</u>	<u>1,987,500</u>	<u>239,017</u>	<u>1,716,000</u>	<u>733,050</u>	<u><b>4,675,567</b></u>

<sup>1</sup> For this alternative, the number includes both refrigerated and dry containers.

<sup>2</sup> This category is specific to neo bulk, break bulk, and other miscellaneous non-containerized cargo.

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#### 7.4.2.5 Alternative 5 – Sustainable Terminal Capacity Alternative

The Sustainable Terminal Capacity (STC) Alternative was added to the Final EIR in response to comments received by the California Air Resources Board (ARB), the San Diego Air Pollution Control District, and the Environmental Health Coalition about the MPC scenario's significant and

unavoidable impacts associated with criteria pollutants and health risk. Extensive coordination between the District's Maritime business and operations staff, Real Estate staff, and Planning and Green Port staff occurred in an effort to develop an alternative that would reduce criteria pollutants and toxic air contaminants further while still achieving the basic project objectives and remaining feasible.

The STC Alternative represents what the TAMT could handle on a regular basis without having to maximize all facilities concurrently as under the MPC scenario. Under this alternative, the throughput that could be reached under the MPC scenario of the proposed project would be reduced by 25 percent for each of the three cargo nodes that are proposed for changes under the TAMT plan (i.e., Dry Bulk, Refrigerated Containers, and Multipurpose General Cargo). Total annual throughput would be limited to 4,675,567 MT. These throughput limits would be enforced throughout the life of the plan.

An estimated throughput breakdown by node includes:

- Dry Bulk: 1,987,500 MT
- Refrigerated Containers: 1,716,000 MT
- Multi-Purpose/General Cargo 733,050 MT
- Liquid Bulk (No Change): 239,017

If adopted, this alternative would not allow throughput to exceed a total of 4,675,567 MT without analyzing the environmental effects of additional throughput, consistent with State law.

## 7.5 Analysis of Alternatives

This section discusses each of the project alternatives and determines whether each alternative would avoid or substantially reduce any of the significant impacts of the proposed project. This section also identifies any additional impacts resulting from the alternatives that would not result from the proposed project and considers the alternatives' respective relationships to the proposed project's basic objectives. A summary comparison of the impacts of the proposed project and the alternatives under consideration is included as Table 7-324 at the end of this chapter.

### Pages 7-14 and 7-15

#### 7.5.2.2 Air Quality and Health Risk

Alternative 2 would result in both construction and operational emissions similar to the proposed project and the emissions would be well above baseline conditions. The impacts of this alternative on the existing condition would be significant. However, unlike the project, the 2008 Maritime Business Plan Buildout Alternative would not incorporate air quality mitigation such as implementation of CAP measures, vessel speed reduction, reduction of truck idling, and cleaner zero-emissions cargo-handling equipment (CHE), and at-berth emissions capture for vessels that do not cold iron. Therefore, while the throughput under Alternative 2 would be slightly lower than the project, it is likely that air emissions would be significantly greater: and result in greater air quality and health risk levels when compared to the proposed project.

**Page 7-18****7.5.3.2 Air Quality and Health Risk**

Alternative 3 would result in both construction and operational emissions at about one-third the level of the proposed project, although the same level of mitigation would result in emissions ~~would still be well above~~ below baseline conditions. Thus, the air quality and health risk impacts of this alternative on the existing condition would likely be less than significant. While this alternative would not include the improvements to the dry bulk facility, which would help reduce the PM10 and PM2.5 particulate matter 10 microns or less in diameter (PM10) and particulate matter 2.5 microns or less in diameter (PM2.5) emissions of TAMT operations, this alternative would result in substantially fewer truck traffic trips, and would reduce nitrogen oxide (NO<sub>x</sub>) and PM2.5 emissions compared to the same sources under project conditions. In addition, unlike the project, the Reduced Project Alternative would not need to reduce its air emissions as significantly as the proposed project and could result in less-than-significant NO<sub>x</sub> volatile organic compound (VOC) emissions after mitigation was incorporated. Therefore, while the throughput would be significantly lower than the project, it is likely that air emissions, after mitigation, would also be significantly lower than the proposed project.

**Pages 7-21 and 7-22****7.5.4.2 Air Quality and Health Risk**

Alternative 4 would result in both construction and operational emissions at a similar level to the proposed project and, similarly, emissions would be well above baseline conditions. Thus, the air quality and health risk impacts of this alternative on the existing condition would be significant. The Full Refrigerated and Dry Container Buildout Alternative would need to reduce its air emissions as significantly as the proposed project and would still likely result in significant NO<sub>x</sub> emissions after mitigation was incorporated. VOC emissions and health risk after mitigation was incorporated. The benefit of Alternative 4 would be that container and refrigerated container vessels are subject to ARB's at-berth regulation, so vessel-related hoteling emissions would likely be reduced compared to the proposed project. However, dry container and refrigerated container vessels are larger and have much larger engines, which tend to generate more emissions than other vessels during transit, maneuvering, and berthing. Alternative 4 would require the District to immediately install enough shore power infrastructure to handle multiple vessels simultaneously. Therefore, with a similar throughput to the project, it is likely that air emissions under Alternative 4, after mitigation, would also be similar to the proposed project, which would be significant and unavoidable.

**Pages 7-24 through 7-66****7.5.5 Analysis of Alternative 5 – Sustainable Terminal Capacity Alternative****7.5.5.1 Aesthetics and Visual Resources**

The project components of the STC Alternative would be similar to the proposed project, but throughput would be limited to approximately 75% of the throughput proposed under the MPC scenario discussed under the proposed project. Changes to the project site would include all

elements of the Demolition and Initial Rail Component, which may be visually noticeable from key viewpoints. However, these changes would be consistent with the industrial character of the working bayfront and would not substantially alter the overall views of the project site. In addition, like the proposed project, this alternative would include the potential installation of up to five gantry cranes. Therefore, significant impacts related to visual quality would occur. However, for the same reasons discussed under the MPC scenario analysis, the STC Alternative would not result in any significant impacts associated with designated vista areas, scenic resources, or glare affecting nighttime views. As such, impacts on aesthetics and visual quality under the STC Alternative, which would propose the same components as the MPC but would limit throughput to 75 percent of the MPC, would be significant and unavoidable due to the gantry cranes being highly visible. This impact would be similar to the MPC scenario analyzed under the proposed project.

### **7.5.5.2 Air Quality and Health Risk**

The STC Alternative would result in construction emissions similar to the MPC scenario and operational emissions at a level below the MPC scenario analyzed for the proposed project. Under the STC Alternative, the throughput anticipated under the proposed project, which uses the MPC scenario, would be reduced by 25 percent for each of the three cargo nodes that are proposed for changes under the TAMT plan (i.e., Dry Bulk, Refrigerated Containers, and Multipurpose General Cargo), thereby reducing activity on a daily and annual basis. A quantitative analysis was performed to estimate the degree to which air quality and health risk impacts would change relative to the proposed project.

#### **Methodology**

The methodology used to estimate air quality and health risk impacts under the STC Alternative is similar to the proposed project but the associated operational activity would change based on the lower throughput. Key assumptions in determining the level of activity on a daily and annual basis are provided below.

- The Draft EIR estimated that the proposed project would result in up to four vessel calls on the peak day. Similarly, it was assumed that the STC Alternative would result in up to four vessel calls on the peak day because four vessel calls is the berth capacity and berth capacity would not change under the STC Alternative. Based on this, assist tug and ocean-going tug activity would be similar to the proposed project because tug activity is tied to vessel calls. However, on an annual basis, vessels that call on TAMT are based on throughput capacity; as such, the number of annual vessel calls would decrease along with throughput. Under the STC Alternative, annual vessel calls would decrease from an estimated 579 calls under the proposed project to 433 calls under the STC Alternative, while assist tug and ocean-going tug activity would decrease linearly along with vessel calls under the STC Alternative.
- The Draft EIR assumed the proposed project would increase annual rail activity from 72 trains per year under existing conditions to up to 684 trains per year due to the increase in dry bulk and multi-purpose general cargo, and that maximum daily visitation would increase from one trip on the peak day to two trips. Under the STC Alternative, annual train activity would decrease to 513 trains per year based on the change in throughput, while daily activity (two trains on a peak day) would be the same as the proposed project.

- The Draft EIR assumed the proposed project would add 423 new one-way truck trips per day. Because truck activity is averaged out over the year, and annual truck activity would change with throughput, daily truck activity would also change with throughput. It was assumed the STC Alternative would add 296 new one-way truck trips per day.
- The Draft EIR assumed the proposed project would result in 524 new workers (the sum of dock workers and managers) per day over existing conditions. Because daily worker activity is dictated (and limited) by berthing capacity, and because the maximum number of vessels that could call on or berth at TAMT on a given day would not change under the STC Alternative, the number of workers on a given day would not change relative to the proposed project.
- The Draft EIR assumed that baseline CHE activity would increase along with throughput. CHE emissions from the District's Air Emissions Inventory (District 2014) were scaled up linearly with throughput and daily activity was assumed to be equal to annual activity averaged over the year. Because CHE activity is averaged out over the year, and annual CHE activity would change with throughput, daily CHE activity associated with the STC Alternative would also change with throughput.
- The Draft EIR assumed that bulk material handling for dry bulk cargo would increase along with throughput. Because bulk material handling is averaged out over the year, and annual bulk material handling associated with the STC Alternative would change with throughput, daily bulk material handling would also change with dry bulk throughput.

### **Consistency with Air Quality Plan**

Similar to the proposed project, the STC Alternative would replace the existing 2008 Maritime Business Plan (2008 Plan) to provide greater flexibility and meet current and future market conditions at the project site. While the STC Alternative would include the same infrastructure investments (e.g., gantry cranes, additional and consolidated dry bulk storage capacity), the STC Alternative would cap throughput by 25 percent for each of the three cargo nodes. Similar to the proposed project, full buildout of the STC Alternative would result in no changes in land use, nor would it result in incompatible land uses. The STC Alternative would include the same features, infrastructure, and mitigation measures as the proposed project, but throughput and associated activity would be lower and result in fewer emissions. Similar to the proposed project, the STC Alternative would be consistent with statewide and local strategies to reduce emissions, including proposed new State Implementation Plan control measures (e.g., related to shore power), the District's Green Port and Clean Air Programs, and San Diego Air Pollution Control District rules and regulations. Thus, similar to the proposed project, the STC Alternative buildout would not hinder, conflict with, or obstruct the implementation of the applicable air quality plan. This impact is considered less than significant.

### **Violation of Air Quality Standard**

#### **Construction**

Construction associated with the STC Alternative would result in the temporary generation of emissions of ozone precursors (reactive organic gases, NO<sub>x</sub>), CO, and particulate matter exhaust emissions that could result in short-term impacts on ambient air quality. The various components of the TAMT plan that are described in detail in Section 3.4.1 of the Draft EIR would also be constructed as part of the STC Alternative. Emissions and related impacts would be similar to the

proposed project; however, as with the proposed project, the specifics regarding timing and exact activities are unknown, and therefore it is unknown if individual project components would result in emissions that would violate any air quality standard or contribute substantially to an existing or projected air quality violation. Therefore, similar to the proposed project, construction activities associated with the STC Alternative are assumed to be significant (**Impact-AQ-1**) and mitigation is required. **Impact-AQ-1** would remain significant after implementation of **MM-AQ-1** and **MM-AQ-2** because it is unknown if construction of individual project components would result in emissions that would violate any air quality standard or contribute substantially to an existing or projected air quality violation and to what extent mitigation would reduce the effects. Consequently, construction impacts associated with buildout of the STC Alternative on air quality standards (**Impact-AQ-1**) would be considered significant and unavoidable. Because the STC Alternative would construct the same features as the proposed project, construction-related effects and impacts would be similar to those of the proposed project.

### **Operations**

Table 7-3 shows the anticipated criteria pollutant emissions associated with operation of STC Alternative buildout relative to existing conditions. Existing conditions are shown in Table 4.2-6 of the Draft EIR. As shown in Table 7-3, emissions during STC Alternative buildout are anticipated to exceed San Diego County's screening-level thresholds (SLTs) for multiple cargo types for VOC, NO<sub>x</sub>, PM10, and PM2.5 (**Impact-AQ-2**). The VOC and NO<sub>x</sub> exceedances would primarily be due to fossil fuel combustion from ocean-going vessels, trucks, fuel tugs, and rail activities, while the PM10 and PM2.5 exceedances would primarily be due to bulk loading and material handling, and in particular to the uncontrolled nature of current soda ash and bauxite handling at the project site. These impacts are similar to but slightly lower than those of the proposed project. Therefore, **Impact-AQ-2** would be significant and mitigation is required.

Full buildout of the STC Alternative would require similar mitigation as required for the proposed project. Implementation of **MM-AQ-2** through **MM-AQ-9** described in Section 4.2, *Air Quality and Health Risk*, would be required to mitigate VOC, NO<sub>x</sub>, PM10, and PM2.5 emissions. As shown in Table 7-4, **Impact-AQ-2** would be less than significant after implementation of **MM-AQ-2** through **MM-AQ-9**. Implementation of **MM-AQ-2** through **MM-AQ-9** would succeed in reducing emissions of VOC, NO<sub>x</sub>, CO, sulfur oxides (SO<sub>x</sub>), PM10, and PM2.5 below San Diego County SLTs. In fact, mitigation would reduce emissions of NO<sub>x</sub>, PM10, and PM2.5 to levels below existing conditions. As such, operation of the STC Alternative would not violate an air quality standard or contribute substantially to an existing or projected air quality standard during operation. Operation of the STC Alternative would not violate an air quality standard or contribute substantially to an existing or projected air quality standard during operation for all criteria pollutants (VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM10, and PM2.5) after mitigation.

It is worth noting that while annual criteria pollutant emissions are not generally analyzed within CEQA documents, the STC Alternative would result in greater reductions in emissions compared to the proposed project over the course of the year rather than on just the peak day, given that the peak day is based on berth capacity but annual activity is based on the average activity, which would decrease by about 25 percent for every emission source.

**Table 7-3. Estimate of Operational Emissions under Existing plus Sustainable Terminal Capacity Alternative Unmitigated Conditions (pounds per day)**

<b>Operational Element</b>	<b>VOC</b>	<b>NO<sub>x</sub></b>	<b>CO</b>	<b>SO<sub>x</sub></b>	<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub></b>
<b><u>Dry Bulk (1,987,500 MT)</u></b>						
<b><u>Project Daily</u></b>						
<u>Ocean-Going Vessels</u>	<u>39</u>	<u>706</u>	<u>58</u>	<u>21</u>	<u>13</u>	<u>12</u>
<u>Assist Tugs</u>	<u>2</u>	<u>13</u>	<u>13</u>	<u>&lt;1</u>	<u>&lt;1</u>	<u>&lt;1</u>
<u>Tugs and Fuel Barges</u>	<u>22</u>	<u>221</u>	<u>166</u>	<u>&lt;1</u>	<u>8</u>	<u>7</u>
<u>Trucks</u>	<u>6</u>	<u>160</u>	<u>30</u>	<u>1</u>	<u>13</u>	<u>4</u>
<u>Worker Trips</u>	<u>1</u>	<u>2</u>	<u>18</u>	<u>&lt;1</u>	<u>6</u>	<u>2</u>
<u>Rail - Regional Line Haul</u>	<u>5</u>	<u>142</u>	<u>13</u>	<u>3</u>	<u>3</u>	<u>1</u>
<u>Rail - Switching between Terminal and Yard</u>	<u>1</u>	<u>33</u>	<u>3</u>	<u>1</u>	<u>1</u>	<u>&lt;1</u>
<u>Cargo Handling Equipment</u>	<u>8</u>	<u>85</u>	<u>45</u>	<u>&lt;1</u>	<u>2</u>	<u>2</u>
<u>Bulk Loading</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>4,450</u>	<u>1,249</u>
<b><u>Dry Bulk Existing plus Project Daily</u></b>	<b><u>82</u></b>	<b><u>1,360</u></b>	<b><u>345</u></b>	<b><u>26</u></b>	<b><u>4,496</u></b>	<b><u>1,279</u></b>
<u>Dry Bulk Existing Daily<sup>1</sup></u>	<u>53</u>	<u>1,007</u>	<u>181</u>	<u>17</u>	<u>608</u>	<u>192</u>
<u>Net New Over Existing</u>	<u>29</u>	<u>354</u>	<u>164</u>	<u>9</u>	<u>3,888</u>	<u>1,086</u>
<u>Exceed Significant Threshold?</u>	<u>No</u>	<u>Yes</u>	<u>No</u>	<u>No</u>	<u>Yes</u>	<u>Yes</u>
<b><u>Refrigerated Containers (1,716,000 MT)</u></b>						
<b><u>Project Daily</u></b>						
<u>Ocean-Going Vessels</u>	<u>188</u>	<u>2,785</u>	<u>318</u>	<u>124</u>	<u>72</u>	<u>66</u>
<u>Assist Tugs</u>	<u>5</u>	<u>42</u>	<u>40</u>	<u>&lt;1</u>	<u>1</u>	<u>1</u>
<u>Tugs and Fuel Barges</u>	<u>18</u>	<u>181</u>	<u>136</u>	<u>&lt;1</u>	<u>6</u>	<u>6</u>
<u>Trucks</u>	<u>6</u>	<u>236</u>	<u>27</u>	<u>1</u>	<u>12</u>	<u>4</u>
<u>Worker Trips</u>	<u>1</u>	<u>3</u>	<u>27</u>	<u>&lt;1</u>	<u>5</u>	<u>2</u>
<u>Cargo Handling Equipment</u>	<u>7</u>	<u>73</u>	<u>38</u>	<u>&lt;1</u>	<u>2</u>	<u>2</u>
<b><u>Refrigerated Containers Existing plus Project Daily</u></b>	<b><u>225</u></b>	<b><u>3,320</u></b>	<b><u>588</u></b>	<b><u>125</u></b>	<b><u>98</u></b>	<b><u>81</u></b>
<u>Refrigerated Containers Existing Daily<sup>1</sup></u>	<u>207</u>	<u>4,064</u>	<u>651</u>	<u>110</u>	<u>87</u>	<u>77</u>
<u>Net New Over Existing</u>	<u>18</u>	<u>-744</u>	<u>-64</u>	<u>15</u>	<u>11</u>	<u>4</u>
<u>Exceed Significant Threshold?</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>
<b><u>Multi-Purpose General Cargo (733,050 MT)</u></b>						
<b><u>Project Daily</u></b>						
<u>Ocean-Going Vessels</u>	<u>95</u>	<u>1,742</u>	<u>148</u>	<u>57</u>	<u>34</u>	<u>31</u>
<u>Assist Tugs</u>	<u>4</u>	<u>32</u>	<u>30</u>	<u>&lt;1</u>	<u>1</u>	<u>1</u>
<u>Tugs and Fuel Barges</u>	<u>47</u>	<u>473</u>	<u>356</u>	<u>&lt;1</u>	<u>17</u>	<u>16</u>
<u>Trucks</u>	<u>1</u>	<u>20</u>	<u>4</u>	<u>&lt;1</u>	<u>2</u>	<u>1</u>
<u>Worker Trips</u>	<u>&lt;1</u>	<u>1</u>	<u>6</u>	<u>&lt;1</u>	<u>2</u>	<u>1</u>
<u>Rail - Regional Line Haul</u>	<u>8</u>	<u>249</u>	<u>23</u>	<u>5</u>	<u>5</u>	<u>2</u>
<u>Rail - Switching between Terminal and Yard</u>	<u>3</u>	<u>63</u>	<u>3</u>	<u>1</u>	<u>1</u>	<u>&lt;1</u>
<u>Cargo Handling Equipment</u>	<u>3</u>	<u>31</u>	<u>16</u>	<u>&lt;1</u>	<u>1</u>	<u>1</u>
<b><u>Multi-Purpose General Cargo Existing plus</u></b>	<b><u>161</u></b>	<b><u>2,610</u></b>	<b><u>587</u></b>	<b><u>64</u></b>	<b><u>62</u></b>	<b><u>52</u></b>



<b>Operational Element</b>	<b>VOC</b>	<b>NO<sub>x</sub></b>	<b>CO</b>	<b>SO<sub>x</sub></b>	<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub></b>
<b><u>Project Daily</u></b>						
<u>Multi-Purpose General Cargo Existing Daily<sup>1</sup></u>	<u>85</u>	<u>1,463</u>	<u>281</u>	<u>34</u>	<u>33</u>	<u>31</u>
<u>Net New Over Existing</u>	<u>75</u>	<u>1,146</u>	<u>306</u>	<u>31</u>	<u>29</u>	<u>21</u>
<u>Exceed Significant Threshold?</u>	<u>Yes</u>	<u>Yes</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>
<b><u>All Cargo Types (4,675,567 MT)</u></b>						
<b><u>All Cargo Types Existing plus Project Daily Total</u></b>	<b><u>468</u></b>	<b><u>7,290</u></b>	<b><u>1,520</u></b>	<b><u>215</u></b>	<b><u>4,656</u></b>	<b><u>1,411</u></b>
<u>All Cargo Types Existing Daily Total<sup>1</sup></u>	<u>346</u>	<u>6,534</u>	<u>1,113</u>	<u>161</u>	<u>728</u>	<u>300</u>
<u>Net New Over Existing</u>	<u>122</u>	<u>756</u>	<u>407</u>	<u>54</u>	<u>3,928</u>	<u>1,111</u>
<u>Exceed Significant Threshold?</u>	<u>Yes</u>	<u>Yes</u>	<u>No</u>	<u>No</u>	<u>Yes</u>	<u>Yes</u>
<u>Significance Thresholds</u>	<u>75</u>	<u>75</u>	<u>250</u>	<u>550</u>	<u>150</u>	<u>100</u>

<sup>1</sup> Existing daily emissions shown in Table 4.2-6.

Notes: Totals may not add exactly due to rounding.

Source: Appendix F.

**Table 7-4. Estimate of Operational Emissions under Existing plus Sustainable Terminal Capacity Alternative Mitigated Conditions (pounds per day)**

<b>Operational Element</b>	<b>VOC</b>	<b>NO<sub>x</sub></b>	<b>CO</b>	<b>SO<sub>x</sub></b>	<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub></b>
<b><u>Dry Bulk (1,987,500 MT)</u></b>						
<b><u>Unmitigated Emissions</u></b>						
<u>Ocean-Going Vessels</u>	<u>39</u>	<u>706</u>	<u>58</u>	<u>21</u>	<u>13</u>	<u>12</u>
<u>Assist Tugs</u>	<u>2</u>	<u>13</u>	<u>13</u>	<u>&lt;1</u>	<u>&lt;1</u>	<u>&lt;1</u>
<u>Tugs and Fuel Barges</u>	<u>22</u>	<u>221</u>	<u>166</u>	<u>&lt;1</u>	<u>8</u>	<u>7</u>
<u>Trucks</u>	<u>6</u>	<u>160</u>	<u>30</u>	<u>1</u>	<u>13</u>	<u>4</u>
<u>Worker Trips</u>	<u>1</u>	<u>2</u>	<u>18</u>	<u>&lt;1</u>	<u>6</u>	<u>2</u>
<u>Rail - Regional Line Haul</u>	<u>5</u>	<u>142</u>	<u>13</u>	<u>3</u>	<u>3</u>	<u>1</u>
<u>Rail - Switching between Terminal and Yard</u>	<u>1</u>	<u>33</u>	<u>3</u>	<u>1</u>	<u>1</u>	<u>&lt;1</u>
<u>Cargo Handling Equipment</u>	<u>8</u>	<u>85</u>	<u>45</u>	<u>&lt;1</u>	<u>2</u>	<u>2</u>
<u>Bulk Loading</u>	<u>=</u>	<u>=</u>	<u>=</u>	<u>=</u>	<u>4,450</u>	<u>1,249</u>
<b><u>Mitigated Reductions</u></b>						
<u>MM-AQ-2 Idling<sup>1</sup></u>	<u>&lt;-1</u>	<u>&lt;-1</u>	<u>&lt;-1</u>	<u>&lt;-1</u>	<u>&lt;-1</u>	<u>&lt;-1</u>
<u>MM-AQ-3 CAP Measures<sup>2</sup></u>	<u>-1</u>	<u>-11</u>	<u>-1</u>	<u>&lt;-1</u>	<u>&lt;-1</u>	<u>&lt;-1</u>
<u>MM-AQ-4 Dry Bulk BACT<sup>3</sup></u>	<u>=</u>	<u>=</u>	<u>=</u>	<u>=</u>	<u>-4,236</u>	<u>-1,178</u>
<u>MM-AQ-5 VSR Beyond CAP<sup>4</sup></u>	<u>-5</u>	<u>-97</u>	<u>-7</u>	<u>-2</u>	<u>-2</u>	<u>-2</u>
<u>MM-AQ-6 Electric CHE</u>	<u>-5</u>	<u>-84</u>	<u>-53</u>	<u>&lt;-1</u>	<u>-3</u>	<u>-3</u>
<u>MM-AQ-9 At-Berth Capture</u>	<u>-1</u>	<u>-25</u>	<u>&lt;-1</u>	<u>-1</u>	<u>-1</u>	<u>&lt;-1</u>
<b><u>Dry Bulk Existing Plus Project Daily</u></b>	<b><u>71</u></b>	<b><u>1,143</u></b>	<b><u>285</u></b>	<b><u>23</u></b>	<b><u>255</u></b>	<b><u>95</u></b>
<u>Dry Bulk Existing Daily</u>	<u>53</u>	<u>1,007</u>	<u>181</u>	<u>17</u>	<u>608</u>	<u>192</u>
<u>Net New Over Existing</u>	<u>18</u>	<u>137</u>	<u>104</u>	<u>6</u>	<u>-353</u>	<u>-97</u>
<u>Exceed Significant Threshold?</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>

<b><u>Operational Element</u></b>	<b><u>VOC</u></b>	<b><u>NO<sub>x</sub></u></b>	<b><u>CO</u></b>	<b><u>SO<sub>x</sub></u></b>	<b><u>PM<sub>10</sub></u></b>	<b><u>PM<sub>2.5</sub></u></b>
<b><u>Refrigerated Containers (1,716,000 MT)</u></b>						
<b><u>Unmitigated Emissions</u></b>						
<u>Ocean-Going Vessels</u>	<u>188</u>	<u>2,785</u>	<u>318</u>	<u>124</u>	<u>72</u>	<u>66</u>
<u>Assist Tugs</u>	<u>5</u>	<u>42</u>	<u>40</u>	<u>&lt;1</u>	<u>1</u>	<u>1</u>
<u>Tugs and Fuel Barges</u>	<u>18</u>	<u>181</u>	<u>136</u>	<u>&lt;1</u>	<u>6</u>	<u>6</u>
<u>Trucks</u>	<u>6</u>	<u>236</u>	<u>27</u>	<u>1</u>	<u>12</u>	<u>4</u>
<u>Worker Trips</u>	<u>1</u>	<u>3</u>	<u>27</u>	<u>&lt;1</u>	<u>5</u>	<u>2</u>
<u>Cargo Handling Equipment</u>	<u>7</u>	<u>73</u>	<u>38</u>	<u>&lt;1</u>	<u>2</u>	<u>2</u>
<b><u>Mitigated Reductions</u></b>						
<u>MM-AQ-2 Idling<sup>1</sup></u>	<u>&lt;-1</u>	<u>&lt;-1</u>	<u>&lt;-1</u>	<u>&lt;-1</u>	<u>&lt;-1</u>	<u>&lt;-1</u>
<u>MM-AQ-3 CAP Measures<sup>2</sup></u>	<u>-1</u>	<u>-11</u>	<u>-1</u>	<u>&lt;1</u>	<u>&lt;1</u>	<u>&lt;1</u>
<u>MM-AQ-5 VSR Beyond CAP<sup>4</sup></u>	<u>-1</u>	<u>-16</u>	<u>-1</u>	<u>&lt;-1</u>	<u>&lt;-1</u>	<u>&lt;-1</u>
<u>MM-AQ-6 Electric CHE</u>	<u>-5</u>	<u>-84</u>	<u>-53</u>	<u>&lt;-1</u>	<u>-3</u>	<u>-3</u>
<b><u>Refrigerated Containers Existing Plus Project Daily</u></b>	<b><u>219</u></b>	<b><u>3,209</u></b>	<b><u>533</u></b>	<b><u>124</u></b>	<b><u>95</u></b>	<b><u>78</u></b>
<u>Refrigerated Containers Existing Daily<sup>5</sup></u>	<u>207</u>	<u>4,064</u>	<u>651</u>	<u>110</u>	<u>87</u>	<u>77</u>
<u>Net New Over Existing</u>	<u>12</u>	<u>-855</u>	<u>-118</u>	<u>14</u>	<u>8</u>	<u>1</u>
<u>Exceed Significant Threshold?</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>
<b><u>Multi-Purpose General Cargo (733,050 MT)</u></b>						
<b><u>Unmitigated Emissions</u></b>						
<u>Ocean-Going Vessels</u>	<u>95</u>	<u>1,742</u>	<u>148</u>	<u>57</u>	<u>34</u>	<u>31</u>
<u>Assist Tugs</u>	<u>4</u>	<u>32</u>	<u>30</u>	<u>&lt;1</u>	<u>1</u>	<u>1</u>
<u>Tugs and Fuel Barges</u>	<u>47</u>	<u>473</u>	<u>356</u>	<u>&lt;1</u>	<u>17</u>	<u>16</u>
<u>Trucks</u>	<u>1</u>	<u>20</u>	<u>4</u>	<u>&lt;1</u>	<u>2</u>	<u>1</u>
<u>Worker Trips</u>	<u>&lt;1</u>	<u>1</u>	<u>6</u>	<u>&lt;1</u>	<u>2</u>	<u>1</u>
<u>Rail - Regional Line Haul</u>	<u>8</u>	<u>249</u>	<u>23</u>	<u>5</u>	<u>5</u>	<u>2</u>
<u>Rail - Switching between Terminal and Yard</u>	<u>3</u>	<u>63</u>	<u>3</u>	<u>1</u>	<u>1</u>	<u>&lt;1</u>
<u>Cargo Handling Equipment</u>	<u>3</u>	<u>31</u>	<u>16</u>	<u>&lt;1</u>	<u>1</u>	<u>1</u>
<b><u>Mitigated Reductions</u></b>						
<u>MM-AQ-2 Idling<sup>1</sup></u>	<u>&lt;-1</u>	<u>&lt;-1</u>	<u>&lt;-1</u>	<u>&lt;-1</u>	<u>&lt;-1</u>	<u>&lt;-1</u>
<u>MM-AQ-3 CAP Measures<sup>2</sup></u>	<u>-4</u>	<u>-74</u>	<u>-5</u>	<u>-1</u>	<u>-1</u>	<u>-1</u>
<u>MM-AQ-5 VSR Beyond CAP<sup>4</sup></u>	<u>-14</u>	<u>-266</u>	<u>-19</u>	<u>-6</u>	<u>-4</u>	<u>-4</u>
<u>MM-AQ-6 Electric CHE</u>	<u>-5</u>	<u>-84</u>	<u>-53</u>	<u>&lt;-1</u>	<u>-3</u>	<u>-3</u>
<u>MM-AQ-9 At-Berth Capture</u>	<u>-4</u>	<u>-97</u>	<u>0</u>	<u>-3</u>	<u>-2</u>	<u>-2</u>
<b><u>Multi-Purpose General Cargo Existing Plus Project Daily</u></b>	<b><u>135</u></b>	<b><u>2,088</u></b>	<b><u>510</u></b>	<b><u>54</u></b>	<b><u>52</u></b>	<b><u>42</u></b>
<u>Multi-Purpose General Cargo Existing Daily<sup>5</sup></u>	<u>85</u>	<u>1,463</u>	<u>281</u>	<u>34</u>	<u>33</u>	<u>31</u>
<u>Net New Over Existing</u>	<u>50</u>	<u>625</u>	<u>229</u>	<u>20</u>	<u>19</u>	<u>11</u>
<u>Exceed Significant Threshold?</u>	<u>No</u>	<u>Yes</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>

<b>Operational Element</b>	<b>VOC</b>	<b>NO<sub>x</sub></b>	<b>CO</b>	<b>SO<sub>x</sub></b>	<b>PM10</b>	<b>PM2.5</b>
<b>All Cargo Types (4,675,567 MT)</b>						
<b>All Cargo Types Daily Existing Plus Project Total</b>	<b>425</b>	<b>6,441</b>	<b>1,328</b>	<b>200</b>	<b>402</b>	<b>216</b>
All Cargo Types Existing Daily Total <sup>5</sup>	346	6,534	1,113	161	728	300
Net New Over Existing	75 <sup>6</sup>	-93	215	40	-326	-84
<i>Exceed Significant Threshold?</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>
Significance Thresholds	75	250	550	150	100	55

Source: Appendix F. Totals may not add exactly due to rounding.

<sup>1</sup> Reductions from idling are not quantified because reductions would be speculative, as it is not fully known whether long trucks currently idle at any given location.

<sup>2</sup> Includes VSR compliance with the CAP target of 80% (12 knot speed within 20 nautical miles of Point Loma) and 80% compliance with at-berth regulations.

<sup>3</sup> Dry Bulk BACT reductions assume 95% reduction with controls. Any concrete handling will require an APCD permit, which may require up to 99% reduction.

<sup>4</sup> Includes VSR compliance of 90% (12 knot speed within 40 nautical miles of Point Loma).

<sup>5</sup> Existing daily emissions shown in Table 4.2-6.

<sup>6</sup> Net new daily emissions will not exceed 75 pounds on a peak day at TAMT plan buildout under the STC because MM-AQ-7 requires the use of advanced technologies to limit VOC emissions to no more than 75 pounds on a peak day once throughput exceeds 4,000,000 MT annually, **OR** to limit the number of vessels to no more than three vessels on a peak-day once throughput exceeds 4,000,000 metric tons annually, if advanced technologies are not available.

### **Cumulatively Considerable Increase in Nonattainment Pollutants**

As shown in Table 7-3, operation of the STC Alternative at buildout would exceed thresholds for nonattainment pollutants (ozone precursors [VOC and NO<sub>x</sub>], PM10, and PM2.5). Therefore, when combined with cumulative projects (see Chapter 5, *Cumulative Impacts*), operation of the STC Alternative at buildout would exceed the thresholds for non-attainment pollutants including VOC, NO<sub>x</sub>, PM10, and PM2.5 (**Impact-AQ-3**). As such, full buildout of the STC Alternative is expected to result in a cumulatively considerable net increase in a nonattainment pollutant. As shown in Table 7-4 with mitigation measures **MM-AQ-2** through **MM-AQ-9** incorporated, VOC, NO<sub>x</sub>, PM10, and PM2.5 emissions would be reduced below County SLTs. Therefore, after mitigation, similar to the proposed project, STC Alternative operational air quality impacts would be less than significant. The STC Alternative, which would reduce throughput for each of the three cargo nodes that are proposed for changes under the TAMT plan by 25 percent, would be less than significant with mitigation incorporated and would be only marginally reduced compared to the proposed project on a peak day (**Impact-AQ-3**).

### **Pollutant Concentrations**

#### **Health Risk**

Section 4.2, *Air Quality and Health Risk*, of the Draft EIR provides a discussion of the health risk associated with full buildout of the proposed project, which uses the MPC scenario to estimate impacts. Similarly, operation of the STC Alternative would increase activity that results in diesel particulate matter and other toxic air contaminant emissions generated from vessel transit through the Bay, vessel hoteling at the terminal, truck traffic on neighboring roads, locomotive switching activity between the yard and project site, and CHE activity at the project site. Similar to the criteria

pollutant analysis above, the STC Alternative would result in emissions that could result in health risk in neighboring communities but at a lower magnitude due to the lower throughput.

As shown in Table 7-5, maximum risk at nearby receptors associated with the STC Alternative would increase to approximately 170 cases per million at maximally exposed residences, 18 per million at maximally exposed parks, and 30 per million at maximally exposed schools. Relative to existing conditions, this represents an increase of 132 cases per million at maximally exposed residences, 14 cases per million at maximally exposed parks, and 24 cases per million at maximally exposed schools, levels that are well above the cancer risk threshold of 10 cases per million, and mitigation is required (Impact-AQ-4).

Table 7-5 presents the contributions from each emission source to the maximum unmitigated health effects impacts for the STC Alternative. The greatest contributors to unmitigated cancer risk at the maximally exposed residential, park, and school receptors are terminal equipment, vessel hoteling, and (to a lesser extent) rail activity. The maximally exposed residential areas, parks (namely Cesar Chavez Park), and school receptor locations (namely Perkins Elementary School and Monarch School) are all close to the terminal and the railyard. Receptor locations farther away from the terminal show dramatically lower health risk values.

Full buildout of the STC Alternative would require similar mitigation as required for the proposed project. Implementation of MM-AQ-2 through MM-AQ-9 described in Section 4.2, *Air Quality and Health Risk*, would be required to mitigate health risk impacts at nearby receptor locations. As shown in Table 7-5, relative to existing conditions, maximum risk at nearby receptors associated with the mitigated STC Alternative would increase by approximately 8 cases per million at maximally exposed residences, 1 per million at maximally exposed parks, and 2 per million at maximally exposed schools. These levels are below the project-level cancer risk threshold of 10 cases per million after full mitigation. It is worth noting that while the STC Alternative would allow for lower throughput than the proposed project, the requirements prescribed in each mitigation measure, in particular the number of electric CHE pieces required in MM-AQ-6, would be the same for the STC Alternative and the proposed project. As shown, after full mitigation, cancer risk at the maximally exposed residential, park, and school locations would be reduced to below the cancer risk threshold relative to existing conditions. Therefore, this impact is considered less than significant and lower than the fully mitigated health risk associated with the proposed project using the MPC scenario.

**Table 7-5. Estimate of Health Risk at Nearby Receptors during Existing Plus Sustainable Terminal Capacity Alternative Operations**

Receptor Type	Sustainable Terminal Capacity Alternative (unmitigated)			Net Over Existing <sup>1</sup>			Sustainable Terminal Capacity Alternative (mitigated)			Net Over Existing <sup>1</sup>		
	Cancer Risk Per Million	Chronic Hazard Index	Acute Hazard Index	Cancer Risk Per Million	Chronic Hazard Index	Acute Hazard Index	Cancer Risk Per Million	Chronic Hazard Index	Acute Hazard Index	Cancer Risk Per Million	Chronic Hazard Index	Acute Hazard Index
<b><u>Dry Bulk</u></b>												
Residential	50	0.02	<0.01	43	0.02	<0.01	20	0.02	<0.01	13	0.02	<0.01
Park	6	0.03	<0.01	5	0.03	<0.01	3	0.03	<0.01	2	0.03	<0.01
School	9	0.03	<0.01	8	0.02	<0.01	4	0.03	<0.01	2	0.02	<0.01
<b><u>Refrigerated Containers</u></b>												
Residential	102	0.03	<0.01	75	0.02	<0.01	17	0.01	<0.01	-11	0.01	<0.01
Park	9	0.05	<0.01	6	0.03	<0.01	2	0.03	<0.01	-1	0.01	<0.01
School	16	0.04	<0.01	11	0.02	<0.01	3	0.02	<0.01	-2	0.01	<0.01
<b><u>Multi-Purpose General Cargo</u></b>												
Residential	27	0.01	<0.01	24	0.01	<0.01	11	0.01	<0.01	8	0.01	<0.01
Park	3	0.02	<0.01	3	0.02	<0.01	1	0.02	<0.01	1	0.02	<0.01
School	5	0.02	<0.01	4	0.02	<0.01	2	0.02	<0.01	1	0.02	<0.01
<b><u>Total for all cargo</u></b>												
Residential	170	0.01	<0.01	132	0.05	<0.01	46	0.05	<0.01	8	0.03	<0.01
Park	18	0.02	<0.01	14	0.07	<0.01	6	0.08	<0.01	1	0.06	<0.01
School	30	0.02	<0.01	24	0.06	<0.01	8	0.06	<0.01	2	0.05	<0.01
<u>Threshold</u>	--	--	--	10	1.0	1.0	--	--	--	10	1.0	1.0
<u>Exceed Threshold?</u>	--	--	--	Yes	No	No	--	--	--	No	No	No

Source: Appendix F.

Note that risk for the various receptor types is not additive and the risk is not the sum of all the risks shown here; rather, the risk at each receptor type is already the sum of emissions.

**Bold** = exceedance.

<sup>1</sup> Existing health risk is shown in Table 4.2-8.

### **Carbon Monoxide Hot-spots**

The STC Alternative would decrease the throughput identified by the proposed project by approximately 25 percent. As described in the STC Alternative traffic memorandum provided by the traffic engineer (Appendix G-1), worker vehicle trips would be similar to those under the proposed project on a daily and peak-hour basis but truck trips would be 25 percent lower than those under the proposed project. In the Draft EIR, CO concentrations were modeled at the intersection with the most congestion and highest volumes, Harbor Drive and 32<sup>nd</sup> Street. As noted in Table 4.2-24 of the Draft EIR, CO concentrations were estimated to be minor and far below thresholds. CO concentrations at the intersection with the most congestion and highest volumes under the STC Alternative would be lower than that analyzed for the proposed project, which uses the MPC scenario. Therefore, impacts related to CO concentrations occurring from implementation of the STC Alternative would be less than significant, similar to those of the proposed project, and no mitigation is required.

### **Criteria Air Pollutants**

As shown in Table 7-4, Impact-AQ-2 would remain significant after implementation of **MM-AQ-2** through **MM-AQ-9** because VOC emissions would remain in excess of San Diego County SLTs during operation of the STC Alternative. The incremental contribution of the STC Alternative to specific health outcomes related to criteria pollutant emissions would be limited and any effects thereof would be below any health-based significance threshold (e.g., National and California Ambient Air Quality Standards). However, because the project would result in emissions above health-based thresholds (San Diego Air Pollution Control District Trigger Levels and County SLTs) for VOC emissions after mitigation, operation of the STC Alternative at buildout would result in adverse health effects associated with criteria pollutant emissions (**Impact AQ-3**). Because of the slightly lower emissions on the peak day, the STC Alternative would remain significant for VOC emissions after mitigation but would be marginally reduced compared to the proposed project.

### **Odors**

Similar to the proposed project, odor impacts would be limited to the circulation routes, parking areas, and areas immediately adjacent to terminal operations. Although such brief exhaust odors occurring from implementation of the STC Alternative may be considered adverse, they would not affect a substantial number of people and any odor-related impacts would be less than significant, similar to those of the proposed project, and no mitigation is required.

### **Cumulative Impacts**

In addition, as noted in Chapter 5, *Cumulative Impacts*, cumulatively significant air quality and health risk impacts resulting from past, present, and reasonably foreseeable future projects were identified. Because the STC Alternative would construct the same features as the proposed project, construction-related effects and impacts would be similar to those of the proposed project (**Impact-C-AQ-1**). Mitigation Measure **MM-AQ-1** would reduce the effects, but construction-related impacts would remain cumulatively considerable and of similar magnitude as those of the proposed project.

As shown in Table 7-3, operations-related emissions associated with the STC Alternative buildout would be above threshold levels for VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> before mitigation (**Impact-C-AQ-2**). As shown in Table 7-4, with mitigation measures **MM-AQ-2** through **MM-AQ-9**, operations-

related emissions would remain above threshold levels for VOC emission but below threshold levels for NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions. Consequently, the STC Alternative's incremental contribution to cumulative air quality impacts (i.e., for VOCs) during its operational stage would be cumulatively considerable after mitigation is incorporated but would be marginally reduced compared to the proposed project.

As shown in Table 7-5, the STC Alternative would result in long-term health risks at nearby sensitive receptor locations that exceed incremental risk thresholds primarily due to vessel hoteling, diesel-powered activity at the project site, and truck travel through the region (**Impact-C-AQ-3**). However, mitigation measures **MM-AQ-2** through **MM-AQ-9** would reduce the maximum incremental cancer risk at all residential, park, and school receptors below thresholds. Therefore, while the effects from past, present, and reasonably foreseeable future projects are considered cumulatively significant, the proposed project's incremental contribution from operation of the STC Alternative would not result in a net increase in toxic air contaminants that contribute to existing air quality conditions in the area after mitigation. Consequently, the STC Alternative's incremental contribution to cumulative health impacts during its operational stage would be less than cumulatively considerable after mitigation is incorporated. This is a reduction of a cumulatively considerable impact (**Impact-C-AQ-3**) identified under the MPC scenario analyzed for the proposed project.

### **7.5.5.3 Biological Resources**

The STC Alternative would not avoid or substantially reduce the significant impacts associated with the proposed project because, like the proposed project, this alternative would result in the demolition of the transit sheds, which could affect nesting birds (**Impact-BIO-1**) or disturb active bat roosts (**Impact-BIO-2**). Incorporation of **MM-BIO-1** and **MM-BIO-2**, both of which are described in Section 4.3, *Biological Resources*, would reduce these two impacts to less-than-significant levels. Therefore, impacts on biological resources under the STC Alternative would be less than significant after mitigation and would be similar to those of the proposed project.

### **7.5.5.4 Cultural Resources**

The project site does not contain any historic resources and, therefore, the STC Alternative would not result in impacts on historic resources, similar to the proposed project. The STC Alternative could involve ground-disturbing activities in the eastern portion of the project site where potential prehistoric archaeological resources and human remains may be located (**Impact-CUL-1** and **Impact-CUL-2**, respectively). As such, the STC Alternative could adversely affect archaeological resources and human remains; however, these two impacts would be reduced to less-than-significant levels with the incorporation of **MM-CUL-1** as described in Section 4.4, *Cultural Resources*. Therefore, impacts on cultural resources under the STC Alternative would be less than significant after mitigation and would be similar to those of the proposed project.

### **7.5.5.5 Geology and Soils**

Under the STC Alternative, Transit Sheds #1 and #2 and Warehouse C, which are located above the Silver Strand Fault, would be demolished and replaced with an open storage area, which would reduce risks associated with rupture of the Silver Strand Fault that runs under these structures. In addition, other improvements that would occur under the STC Alternative would be susceptible to risks associated with liquefaction. As with the proposed project, structures constructed under this alternative would involve shallow grading and foundation depths that would not exacerbate the

rupture of existing faults in the area and would be offset by 50 feet from the fault line. In addition, the STC Alternative would not include features that would exacerbate liquefaction conditions at the project site. Preparation of geotechnical reports would be required under this alternative to ensure that new structures address geologic hazards by incorporating recommendations for earthwork condition and preparation, building/structure foundations, and all other geotechnical engineering best management practices, similar to the proposed project. As such, the STC Alternative would have less than significant geology and soils impacts and would result in geology and soil impacts similar to those of the proposed project's MPC scenario.

### **7.5.5.6 Greenhouse Gas Emissions**

The STC Alternative would result in construction-related GHG emissions similar to the MPC scenario and operational GHG emissions at a level below the MPC scenario analyzed for the proposed project. Under the STC Alternative, the throughput anticipated under the proposed project, which uses the MPC scenario, would be reduced by 25 percent for each of the three cargo nodes that are proposed for changes under the TAMT plan (i.e., Dry Bulk, Refrigerated Containers, and Multipurpose General Cargo), thereby reducing activity on a daily and annual basis. A quantitative analysis was performed to estimate the degree to which GHG impacts would change relative to the proposed project.

#### **Methodology**

The methodology used to estimate GHG impacts under the STC Alternative is similar to that used for the proposed project but the associated operational activity would change based on the lower throughput. Key assumptions in determining the level of activity on an annual basis is provided within the *Air Quality and Health Risk* analysis above in Section 7.5.5.2. In addition to those items, emission sources that are specific to GHG emissions include the following.

- The Draft EIR assumed that electricity consumption (mainly to power equipment, bulk loading, and lighting) and water consumption (mainly for employee consumption and vessel restocking) would increase along with the increase in throughput associated with the MPC scenario. Similarly, electricity consumption would increase along with the increase in throughput associated with the STC Alternative. Emissions were estimated using the same energy intensity factors and San Diego Gas & Electric emission rates used in the Draft EIR.

#### **GHG Impacts in 2020**

The Demolition and Initial Rail Component is an initial project-level component of the TAMT plan. The Demolition and Initial Rail Component is expected to be constructed between 2017 and 2020 and become operational in year 2020, after which the remaining components of the TAMT plan would be implemented as market conditions require. The Demolition and Initial Rail Component would remain unchanged under the STC Alternative. Consequently, similar to the proposed project, the STC Alternative buildout would conflict with the CAP and GHG reduction plans, policies, and regulations (**Impact GHG-1**). After implementation of **MM-GHG-1** through **MM-GHG-3**, this impact would be reduced to less-than-significant levels. Because the STC Alternative would not change the Demolition and Initial Rail Component, impacts would be similar to those of the proposed project.

#### **GHG Impacts beyond 2020**

As discussed in Section 4.6, *Greenhouse Gas Emissions and Climate Change*, there are currently no



adopted plans or measures that specifically prescribe how the ambitious post-2020 targets will be met, and the District's CAP, ARB's Scoping Plan First Update, and other State programs (e.g., ARB's Sustainable Freight Strategy) include proposed, recommended, or adopted actions that will reduce emissions over the long term.

The first test is consistency with CAP Strategies beyond 2020. The analysis regarding consistency with CAP Strategies beyond 2020 is the same as shown in Table 4.6-10 of the Draft EIR. Similar to the analysis of the proposed project, implementation of the STC Alternative would not be entirely consistent with the post-2020 CAP measures (**Impact-GHG-2**).

The second test is consistency with the State's overall reduction targets set forth in EO S-03-05 and EO B-30-15, and recently adopted in SB 32. As shown in Table 7-6, prior to mitigation, the STC Alternative buildout would not be entirely consistent with the post-2020 CAP measures (**Impact-GHG-2**). Similarly, Mitigation Measures **MM-GHG-1** through **MM-GHG-9** are required to support progress toward the 2030 and 2050 GHG reduction goals of EO S-03-05 and EO B-30-15, but project emissions would remain significant due to the lack of a known project-specific reduction target.

The third test is consistency with other regulations and regulatory programs adopted by ARB or other State agencies, including post-2020 measures in the Scoping Plan and the Sustainable Freight Strategy. Similar to the analysis for the proposed project, before mitigation, STC Alternative buildout would not be completely consistent with the Sustainable Freight Strategy and Action Plan (**Impact-GHG-2**). Similar to the analysis shown in Table 4.6-13 of the Draft EIR, after incorporating mitigation measures **MM-GHG-1** through **MM-GHG-9**, the STC Alternative would implement technologies that help achieve the relevant strategies of the Sustainable Freight Strategy while supporting the guiding principles of the Freight Action Plan. These mitigation measures would also be incorporated into the Coastal Development Permit and any real estate agreements between the District and the project proponent to ensure implementation.

Therefore, even after implementation of **MM-GHG-1** through **MM-GHG-9**, **Impact-GHG-2** would remain significant due to the lack of a known project type and location-specific reduction target; as such, it cannot be stated with certainty that the project would result in emissions that would represent a fair share of the requisite reductions to achieve post-2020 targets.

The STC Alternative, which would reduce throughput for each of the three cargo nodes that are proposed for changes under the TAMT plan by 25 percent, would remain significant for GHG emissions but would be reduced compared to the proposed project given the lower throughput and associated emissions.

**Table 7-6. Estimate of Existing Plus STC Alternative Buildout GHG Emissions in 2035 (Metric Tons of CO<sub>2</sub>e per Year)**

<b>Operational Element</b>	<b>Plan MTCO<sub>2</sub>e Without Mitigation</b>	<b>Plan MTCO<sub>2</sub>e With Mitigation</b>
<b><u>Dry Bulk (1,987,500 MT)</u></b>		
<b><u>Unmitigated Emissions</u></b>		
<u>Ocean-Going Vessels<sup>1</sup></u>	<u>3,750</u>	<u>3,750</u>
<u>Assist Tugs</u>	<u>122</u>	<u>122</u>
<u>Fuel Tug and Barge</u>	<u>260</u>	<u>260</u>
<u>Trucks<sup>2</sup></u>	<u>15,672</u>	<u>11,612</u>

<b><u>Operational Element</u></b>	<b><u>Plan MTCO<sub>2</sub>e Without Mitigation</u></b>	<b><u>Plan MTCO<sub>2</sub>e With Mitigation</u></b>
<u>Worker Trips</u>	<u>1,219</u>	<u>946</u>
<u>Rail - Regional Line Haul</u>	<u>1,579</u>	<u>1,579</u>
<u>Rail - Switching between Terminal and Yard</u>	<u>175</u>	<u>175</u>
<u>Cargo Handling Equipment</u>	<u>2,140</u>	<u>2,140</u>
<u>Electricity</u>	<u>1,333</u>	<u>877</u>
<u>Water</u>	<u>177</u>	<u>124</u>
<b><u>Mitigated Reductions</u></b>		
<u>MM GHG-1 Idling<sup>3</sup></u>	<u>--</u>	<u>&lt;-1</u>
<u>MM-GHG-2 CAP Measures<sup>4</sup></u>	<u>--</u>	<u>-33</u>
<u>MM-GHG-4 Electric CHE<sup>5</sup></u>	<u>--</u>	<u>-564</u>
<u>MM-GHG-5 VSR Beyond CAP<sup>6</sup></u>	<u>--</u>	<u>-563</u>
<u>MM-GHG-6 PV<sup>7</sup></u>	<u>--</u>	<u>-6,937</u>
<u>MM-GHG-9 At-Berth Emissions Capture</u>	<u>--</u>	<u>+209</u>
<b><u>Dry Bulk Existing Plus Project Annual</u></b>	<b><u>26,425</u></b>	<b><u>13,694</u></b>
<u>Dry Bulk Existing Annual<sup>5</sup></u>	<u>4,110</u>	<u>4,110</u>
<u>Net New over Existing</u>	<u>22,315</u>	<u>9,584</u>
<u>Reduction from Unmitigated</u>	<u>--</u>	<u>-12,731</u>
<u>Percentage Reduction with Mitigation Measures</u>	<u>--</u>	<u>57%</u>
<b><u>Refrigerated Containers (1,716,000 MT)</u></b>		
<b><u>Unmitigated Emissions</u></b>		
<u>Ocean-Going Vessels<sup>1</sup></u>	<u>23,207</u>	<u>23,207</u>
<u>Shore Power</u>	<u>2,687</u>	<u>1,873</u>
<u>Assist Tugs</u>	<u>101</u>	<u>101</u>
<u>Fuel Tug and Barge</u>	<u>214</u>	<u>214</u>
<u>Trucks<sup>2</sup></u>	<u>14,163</u>	<u>10,912</u>
<u>Worker Trips</u>	<u>1,153</u>	<u>1,034</u>
<u>Cargo Handling Equipment</u>	<u>1,847</u>	<u>1,847</u>
<u>Electricity</u>	<u>765</u>	<u>571</u>
<u>Water</u>	<u>158</u>	<u>110</u>
<u>Refrigerants</u>	<u>40</u>	<u>40</u>
<u>New Gantry Cranes</u>	<u>73</u>	<u>48</u>
<b><u>Mitigated Reductions</u></b>		
<u>MM GHG-1 Idling<sup>3</sup></u>	<u>--</u>	<u>&lt;-1</u>
<u>MM-GHG-2 CAP Measures<sup>4</sup></u>	<u>--</u>	<u>-5,800</u>
<u>MM-GHG-4 Electric CHE<sup>5</sup></u>	<u>--</u>	<u>-564</u>
<u>MM-GHG-5 VSR Beyond CAP<sup>6</sup></u>	<u>--</u>	<u>-12</u>
<u>MM-GHG-6 PV<sup>7</sup></u>	<u>--</u>	<u>-5,957</u>
<b><u>Refrigerated Containers Existing Plus Project Annual</u></b>	<b><u>44,408</u></b>	<b><u>27,624</u></b>
<u>Refrigerated Containers Existing Annual<sup>8</sup></u>	<u>14,990</u>	<u>14,990</u>
<u>Net New over Existing</u>	<u>29,418</u>	<u>12,634</u>

<b><u>Operational Element</u></b>	<b><u>Plan MTCO<sub>2e</sub> Without Mitigation</u></b>	<b><u>Plan MTCO<sub>2e</sub> With Mitigation</u></b>
<u>Reduction from Unmitigated</u>	--	<u>-16,784</u>
<u>Percentage Reduction with Mitigation Measures</u>	--	<u>57%</u>
<b><u>Multi-Purpose General Cargo (733.050 MT)</u></b>		
<b><u>Unmitigated Emissions</u></b>		
<u>Ocean-Going Vessels<sup>1</sup></u>	<u>8,936</u>	<u>8,936</u>
<u>Assist Tugs</u>	<u>263</u>	<u>263</u>
<u>Fuel Tug and Barge</u>	<u>558</u>	<u>558</u>
<u>Trucks<sup>2</sup></u>	<u>2,300</u>	<u>1,713</u>
<u>Worker Trips</u>	<u>444</u>	<u>337</u>
<u>Rail - Regional Line Haul</u>	<u>949</u>	<u>949</u>
<u>Rail - Switching between Terminal and Yard</u>	<u>226</u>	<u>226</u>
<u>Cargo Handling Equipment</u>	<u>789</u>	<u>789</u>
<u>Water</u>	<u>90</u>	<u>63</u>
<u>New Gantry and Rubber Tired Cranes</u>	<u>364</u>	<u>353</u>
<b><u>Mitigated Reductions</u></b>		
<u>MM GHG-1 Idling<sup>3</sup></u>	--	<u>&lt;-1</u>
<u>MM-GHG-2 CAP Measures<sup>4</sup></u>	--	<u>-150</u>
<u>MM-GHG-4 Electric CHE<sup>5</sup></u>	--	<u>-564</u>
<u>MM-GHG-5 VSR Beyond CAP<sup>6</sup></u>	--	<u>-1,209</u>
<u>MM-GHG-6 PV<sup>7</sup></u>	--	<u>-5,170</u>
<u>MM-GHG-9 At-Berth Emissions Capture</u>	--	<u>+432</u>
<b><u>Multi-Purpose General Cargo Existing Plus Project Annual</u></b>	<b><u>14,896</u></b>	<b><u>7,510</u></b>
<u>Multi-Purpose General Cargo Existing Annual<sup>8</sup></u>	<u>1,950</u>	<u>1,950</u>
<u>Net New over Existing</u>	<u>12,947</u>	<u>5,561</u>
<u>Reduction from Unmitigated</u>	--	<u>-7,386</u>
<u>Percentage Reduction with Mitigation Measures</u>	--	<u>57%</u>
<b><u>All Cargo Types</u></b>		
<b><u>All Cargo Types Daily Existing Plus Project Annual</u></b>	<b><u>85,729</u></b>	<b><u>48,829</u></b>
<u>All Cargo Types Daily Existing Annual<sup>8</sup></u>	<u>21,050</u>	<u>21,050</u>
<u>Net New over Existing</u>	<u>64,679</u>	<u>27,779</u>
<u>Reduction from Unmitigated</u>	--	<u>-36,900</u>
<u>Percentage Reduction with Mitigation Measures</u>	--	<u>57%</u>
<u>Reduction Target</u>	--	<u>57%<sup>7</sup></u>

Source: Appendix F. Totals may not add up exactly due to rounding.

<sup>1</sup> Includes compliance with VSR similar to existing condition.

<sup>2</sup> Truck travel include the recently-adopted Phase 2 truck standards, which would reduce improve truck fuel economy and reduce emissions up 25% once full implemented. For purposes of reductions in 2035, it was estimated that GHG emission factors would be reduced approximately 16% related to the rates in EMFAC, which e reductions associated with Phase 1 truck standards.

<sup>3</sup> Reductions from idling are not quantified because reductions would be speculative, as it is not fully known whether long trucks currently idle at any given location.

<sup>4</sup> Includes VSR compliance with the CAP target of 80% (12 knot speed within 20 nautical miles of Point Loma) compliance with at-berth regulations for eligible vessels. Each Dole vessel will use shore power.

<b><u>Operational Element</u></b>	<b><u>Plan MTCO<sub>2</sub>e Without Mitigation</u></b>	<b><u>Plan MTCO<sub>2</sub>e With Mitigation</u></b>
<sup>5</sup> Reductions from electric CHE assumes the replacement of 36 pieces of diesel equipment with 36 pieces of electric equipment by 2030, including twenty new electric yard trucks by 2025 as well as three electric reach stackers and ten electric forklifts by 2030. The reductions are split evenly between the three cargo nodes affected by the proposed project.		
<sup>7</sup> Includes VSR compliance of 90% (12 knot speed within 40 nautical miles of Point Loma). Reductions are shown relative to CAP compliance (MM-GHG-2).		
<sup>8</sup> The reduction targets identified in the post-2020 period (i.e., 2035) is based on statewide reduction targets identified in EO S-3-2005 and EO B-30-2015. Because there are no project-specific targets based on location and project type as is the case in the 2020 period, these targets are used as a general guide for the level of reductions needed, but it is understood that the State will need to play a major role to meet these aggressive targets.		
<sup>8</sup> Existing annual emissions shown in Table 4.6-4.		

### **Climate Change Effects on the Project**

Similar to under the proposed project, the project site would remain sufficiently above sea level (approximately 2.24–4.11 feet above projections by 2050 without storm surge) and no significant impacts would occur from sea-level rise through the reasonably foreseeable life of the STC Alternative (2050). The STC Alternative would result in the same development as the proposed project. Impacts would be less than significant and the same as analyzed for the proposed project.

### **Cumulative Impacts**

In addition, as noted in Chapter 5, *Cumulative Impacts*, cumulatively significant GHG impacts resulting from past, present, and reasonably foreseeable future projects were identified. First, the Demolition and Initial Rail Component in 2020 (**Impact-C-GHG-1**) would remain unchanged under the STC Alternative; impacts would therefore remain unchanged.

Beyond 2020, the STC Alternative's incremental contribution to this cumulatively significant impact would be cumulatively considerable (**Impact-C-GHG-2**), and mitigation measures **MM-GHG-1** through **MM-GHG-9** would be incorporated to reduce emissions, similar to the proposed project. However, while project emissions are generally in line with statewide targets and would help facilitate, rather than impede, local and statewide efforts to achieve the post-2020 targets in EO S-3-05 and EO B-30-15, the uncertainty of statewide target implementation at the local level, and the level of effort that will be required at the Port level to achieve these targets, is unknown at this time. Impacts would remain significant and unavoidable but at a lower magnitude due to the lower throughput and associated emissions.

### **7.5.5.7 Hazards and Hazardous Materials**

The STC Alternative would involve demolition of existing structures, regrading and paving of surface areas, and construction activities, which would require ground disturbance and could result in the exposure of potential soil contamination (**Impact-HAZ-1**). Mitigation in the form of the implementation of a soil management plan (**MM-HAZ-1**, as described in Section 4.7, *Hazards and Hazardous Materials*) and the required implementation of engineering controls and best management practices during construction (**MM-HAZ-2**, as described in Section 4.7, *Hazards and Hazardous Materials*) would be required. After mitigation is incorporated, **Impact-HAZ-1** would be reduced to less-than-significant levels. As such, the STC Alternative would result in similar impacts related to hazards and hazardous materials as those of the proposed project.

### **7.5.5.8 Hydrology and Water Quality**

The STC Alternative would involve similar construction and operational activities as those that would occur under the proposed project, although cargo throughput and the associated terrestrial and marine vehicle traffic would be lower. Like with the proposed project, construction and operation of this alternative would be subject to a General Construction Permit, with required implementation of a SWPPP and BMPs, and the BMPs contained within the District's JTMP. In addition, like the proposed project, this alternative would include installation of a stormwater retention system, which would clean runoff before discharge into the bay or the sanitary sewer system. Furthermore, any permanent structures constructed under this alternative would comply with FEMA structural design requirements for permanent structures within Flood Hazard Zone A, subject to District Engineering Department Approval. Therefore, impacts related to hydrology and water quality occurring from implementation of the STC Alternative would be less than significant, similar to those of the proposed project, and no mitigation is required.

### **7.5.5.9 Noise and Vibration**

The STC Alternative would decrease the MPC throughput identified by the proposed project by approximately 25 percent. However, this alternative would still involve operation of additional gantry cranes, mobile cranes, and a bulk discharge unloading system that would be added from buildout of the STC Alternative. As such, operations under this alternative would result in noise impacts similar to those of the proposed project. Specifically, the STC Alternative would have the potential to result in an exceedance of the applicable noise ordinance and guidelines during operational activities (**Impact-NOI-1**) and, more generally, would potentially result in a substantial permanent increase in noise from these operational activities (**Impact-NOI-2**). Mitigation measures would be required to reduce these impacts and would include acoustical treatments (**MM-NOI-1**, as described in Section 4.9, *Noise and Vibration*) and a complaint and response tracking program (**MM-NOI-2**, as described in Section 4.9, *Noise and Vibration*). Yet, even with these measures, because the specifics of these future operations are not known at this time, it cannot be concluded with certainty that these impacts would be reduced to levels below significance. Therefore, **Impact-NOI-1** and **Impact-NOI-2** would remain significant and unavoidable after mitigation is incorporated.

In addition, as noted in Chapter 5, *Cumulative Impacts*, a cumulatively significant operational noise impact resulting from past, present, and reasonably foreseeable future projects was identified. The STC Alternative's incremental contribution to this cumulatively significant impact would be cumulatively considerable (**Impact-C-NOI-1**), and while mitigation measures **MM-NOI-1** and **MM-NOI-2** would be incorporated, this cumulative noise impact would remain significant and unavoidable.

Construction activities would be roughly the same as what is anticipated under the proposed project. Construction activities would involve the elements associated with the Demolition and Initial Rail Component, such as the demolition of existing transit sheds, on-terminal rail upgrades that include a rail lubricator for more efficient rail movement and three compressed air systems for air brake testing on the terminal rather than its current off-terminal testing, subsurface conduit and electrical improvements to allow for future electrification and/or shore power capabilities prior to resurfacing, and stormwater drainage improvements. Construction activities associated with the plan-level components of the STC Alternative could include installation of up to five gantry cranes, additional and consolidated dry bulk storage capacity (which may include a new 100,000-square-foot dry bulk structure or an equivalent vertical storage facility), enhancements to the existing

conveyor system, demolition of the molasses tanks and Warehouse C, additional open storage space, establishment of an on-dock rail facility, and a centralized gate facility. These construction activities associated with both the near-term project and the future program level components would result in a substantial increase in ambient noise levels over a short-term period (**Impact-NOI-3** and **Impact-NOI-4**, respectively). Mitigation in the form of a construction noise reduction plan would be required (**MM-NOI-3**, as described in Section 4.9, *Noise and Vibration*). However, because it is not certain if the noise reduction plan would reduce construction noise levels to less-than-significant levels, **Impact NOI-3** and **Impact-NOI-4** would remain significant and unavoidable. Temporary construction noise impacts under this alternative would be similar to those occurring under the proposed project, as described in Section 4.9 of this EIR.

Trip generation under the STC Alternative would see a reduction of approximately 25 percent of the trip generation under the MPC scenario analyzed for the proposed project. As such, the noise analysis for this alternative assumes that traffic volumes on adjacent roadways would be 75 percent of MPC buildout volumes. As a result, traffic noise levels would increase under this alternative relative to existing conditions, but traffic noise levels would be somewhat lower than under the proposed project. As with the proposed project, impacts related to traffic noise would be less than significant and no mitigation would be needed. Traffic noise levels on truck routes under this alternative are shown in Table 7-7.

Cumulative traffic noise levels under future year (2035) conditions, including with the addition of the STC Alternative, are summarized in Table 7-8. The results indicate that traffic would increase noise levels by up to 2 decibels (dB) due to the STC Alternative. An increase of less than 3 dB to the existing Community Equivalent Noise Level (CNEL) would not be perceptible. In addition, cumulative overall noise levels would remain under the 75 A-weighted decibels (dBA) CNEL threshold. Therefore, traffic noise from past, present, and reasonably foreseeable future projects in combination with this alternative is not considered to be cumulatively significant.

**Table 7-7. Traffic Noise Levels on TAMT Truck Routes: Existing Plus STC Alternative**

<b>Roadway Segment</b>	<b>Average Daily Traffic</b>		<b>CNEL (dBA)</b>				<b>Increase (dB)</b>	<b>Significant?</b>
	<b>Existing</b>	<b>Sustainable Terminal Capacity Buildout <sup>1</sup></b>	<b>Existing</b>	<b>STC Plan Buildout</b>	<b>Existing plus STC Plan Buildout</b>			
<u>Harbor Drive, west of Cesar E. Chavez Parkway</u>	<u>20,194</u>	<u>354 Autos, 322 Heavy Trucks</u>	<u>72</u>	<u>63</u>	<u>73</u>		<u>0</u>	<u>No</u>
<u>Harbor Drive, east of Cesar E. Chavez Parkway</u>	<u>12,050</u>	<u>786 Autos, 846 Heavy Trucks</u>	<u>69</u>	<u>67</u>	<u>71</u>		<u>+2</u>	<u>No</u>
<u>28<sup>th</sup> Street, north of Harbor Drive</u>	<u>19,563</u>	<u>79 Autos, 448 Heavy Trucks</u>	<u>67</u>	<u>63</u>	<u>68</u>		<u>+1</u>	<u>No</u>

<sup>1</sup> Based on project vehicle distributions in the project traffic study.  
Source: Appendix G-1

**Table 7-8. Traffic Noise Levels on TAMT Truck Routes: Future Year 2035 Base Plus STC Alternative**

Roadway Segment	Average Daily Traffic			CNEL (dBA)			Future Year Increase over Baseline (dB)	Incremental STC Plan Increase over Future Year (dB)	Applicable Threshold (dBA CNEL)	Perceptible Change?	S?
	Future Year Base	Sustainable Terminal Capacity Buildout <sup>1</sup>	Existing	Future Year (Includes Cumulative Projects)	STC Plan	Future Year with STC Plan					
Harbor Drive, west of Cesar E. Chavez Parkway	25,050	354 Autos, 322 Heavy Trucks	72	73	63	73	+1	0	75	No	No
Harbor Drive, east of Cesar E. Chavez Parkway	18,800	786 Autos, 846 Heavy Trucks	69	71	67	73	+2	+2	75	No	No
28 <sup>th</sup> Street, north of Harbor Drive	20,220	79 Autos, 448 Heavy Trucks	67	67	63	69	+0	+2	75	No	No
<sup>1</sup> Based on project vehicle distributions in the project traffic study. Source: Appendix G-1											

### 7.5.5.10 Transportation, Circulation, and Parking

Under the STC Alternative, the MPC of the proposed project would be reduced by 25 percent for each of the three cargo nodes that are proposed for changes under the TAMT plan (i.e., Dry Bulk, Refrigerated Containers, and Multipurpose General Cargo) and would result in a total annual throughput of 4,675,567 MT. Construction activities, which would involve demolition of existing transit sheds and warehouses and development of new open laydown areas, among other activities, would occur and would result in significant construction-related traffic impacts (**Impact-TRA-1** and **Impact-C-TRA-1**; **Impact-TRA-2** and **Impact-C-TRA-2**). Similar to those of the proposed project, construction-related traffic impacts would be reduced with the implementation of a Transportation Demand Management Plan during construction, as required by **MM-TRA-1** and **MM-TRA-2**, respectively, as described in Section 4.10, *Transportation, Circulation, and Parking*, and Chapter 5, *Cumulative Impacts*. However, given the uncertainty of the timing of future construction activities and the fact that it is unknown if projects may overlap, construction-related traffic impacts may remain significant even after mitigation has been implemented. Therefore, similar to the proposed project, the STC Alternative would result in significant and unavoidable construction-related traffic impacts.

Operational trip generation associated with the STC Alternative would reach approximately 75 percent of the total trips that would be generated by the MPC scenario associated with the full TAMT plan buildout. As a result of the increased throughput capacity of the terminal, the STC Alternative is anticipated to generate 296 additional truckloads of cargo each day and require an additional 524 total employees each day at the project site. The total projected trip generation from both trucks and employees that would access the TAMT under the STC Alternative is provided in Table 7-9 below.

**Table 7-9. Project Trip Generation**

<b>Type</b>	<b>Units</b>	<b>Rate</b>	<b>PCE</b>	<b>ADT</b>	<b>AM</b>			<b>PM</b>		
					<b>Total</b>	<b>In</b>	<b>Out</b>	<b>Total</b>	<b>In</b>	<b>Out</b>
Trucks	296	2/Truck	3	1,776	74	37	37	74	37	37
Dock Workers	461	3/Employee	1	1,383	308	154	154	308	154	154
Administrative	63	3/Employee	1	189	63	63	0	63	0	63
<b>Total</b>				3,348	445	254	191	445	191	254

Source: Appendix G-1.

Rate = number of daily trips per truck or employee

ADT = average daily trips; PCE = Passenger Car Equivalent, based on industry standards

As shown, the STC Alternative would generate 3,348 new Passenger Car Equivalent trips, including 445 trips (254 in/191 out) during the AM peak hour and 445 trips (191 in/254 out) during the PM peak hour. The same distribution for truck and employee trips assumed for the proposed project was assumed under this alternative. The analysis below assumes full buildout of the STC Alternative and details the impacts that additional throughput and employees would have on existing roadway segments, intersections, freeway ramp intersections, and freeway segments within the project study area.



## **Existing Plus Sustainable Terminal Capacity Alternative**

The transportation analyses for this alternative were conducted using the same methodologies described in Section 4.10, *Transportation, Circulation, and Parking*, of this EIR. Roadway segment analysis, intersection level of service (LOS) analysis, freeway ramp Intersection Lane Volume (ILV) analysis, and freeway analysis results are discussed below.

### **Roadway Segment Analysis**

Table 7-10 shows existing and existing plus STC Alternative LOS conditions for the roadway segments in the project study area. As shown, all roadway segments operate at LOS D or better under existing conditions, except 28<sup>th</sup> Street between Boston Avenue and National Avenue, which currently operates at LOS E. With the addition of traffic generated by the STC Alternative, this segment would worsen to LOS F and increase the volume to capacity (V/C) ratio by 0.029 (**Impact-TRA-3**), which would exceed the City of San Diego's threshold for allowable increase in V/C ratio of 0.01 for roadway segments operating at LOS F. Therefore, similar to the proposed project, the STC Alternative would result in a significant impact at this roadway segment and mitigation would be required.

Similar to under the proposed project, the STC Alternative's impact on 28<sup>th</sup> Street between Boston Avenue and National Avenue would be mitigated with implementation of mitigation measure **MM-TRA-3**, as described in Section 4.10, *Transportation, Circulation, and Parking*. This mitigation measure requires the District to pay a fair-share contribution of the cost to widen this roadway to a Four-Lane Major Arterial classification. Based on the traffic added to the roadway segment by the STC Alternative (647 daily trips) to the projected volume of 22,759 daily trips, the District would be responsible for a fair-share contribution of 2.8 percent. The significant impact on 28<sup>th</sup> Street between Boston Avenue and National Avenue would occur when the STC Alternative is generating a total of 161 new truck trips. This is the point at which operational vehicle trips generated under the STC Alternative would add more than 0.01 V/C to this failing roadway segment.

The added lane would improve LOS from F to C, which, if implemented, would reduce this impact to a less-than-significant level. However, because the timing and implementation of the necessary improvement are within the exclusive jurisdiction of the City of San Diego, and not the District, the District cannot ensure that the improvements would be made when needed. Therefore, while mitigation is required that could reduce the impact to a less-than-significant level, the uncertainty regarding the timing and implementation of the recommended improvement to 28<sup>th</sup> Street between Boston Avenue and National Avenue means the STC Alternative's impact on this roadway segment would remain significant and unavoidable, similar to that of the proposed project.

**Table 7-10. Peak Hour Roadway Segment LOS Results – Existing Plus Sustainable Terminal Capacity Alternative**

Roadway	Segment	Cross-Section	Threshold (LOS E)	Existing + TAMT Plan			Existing			Δ	S?
				Buildout							
				ADT	V/C	LOS	ADT	V/C	LOS		
Harbor Drive	<u>Between Beardsley Street and Cesar Chavez Parkway</u>	<u>4 lanes w/RM</u>	<u>40,000</u>	<u>21,223</u>	<u>0.531</u>	<u>C</u>	<u>20,194</u>	<u>0.505</u>	<u>B</u>	<u>0.026</u>	<u>N</u>
	<u>Between Cesar Chavez Parkway and Sampson Street</u>	<u>4 lanes w/RM</u>	<u>40,000</u>	<u>13,108</u>	<u>0.328</u>	<u>A</u>	<u>10,546</u>	<u>0.264</u>	<u>A</u>	<u>0.064</u>	<u>N</u>
	<u>Between Sampson Street and Schley Street</u>	<u>4 lanes w/RM</u>	<u>40,000</u>	<u>14,612</u>	<u>0.365</u>	<u>B</u>	<u>12,050</u>	<u>0.301</u>	<u>A</u>	<u>0.064</u>	<u>N</u>
	<u>Between Schley Street and 28<sup>th</sup> Street</u>	<u>4 lanes w/RM</u>	<u>40,000</u>	<u>14,188</u>	<u>0.355</u>	<u>A</u>	<u>11,626</u>	<u>0.291</u>	<u>A</u>	<u>0.064</u>	<u>N</u>
	<u>Between 28<sup>th</sup> Street and Belt Street</u>	<u>4 lanes w/RM</u>	<u>40,000</u>	<u>19,356</u>	<u>0.484</u>	<u>B</u>	<u>18,050</u>	<u>0.451</u>	<u>B</u>	<u>0.033</u>	<u>N</u>
	<u>Between Belt Street and 32<sup>nd</sup> Street</u>	<u>4 lanes w/RM</u>	<u>40,000</u>	<u>17,909</u>	<u>0.448</u>	<u>B</u>	<u>16,603</u>	<u>0.415</u>	<u>B</u>	<u>0.033</u>	<u>N</u>
28 <sup>th</sup> Street	<u>Between Harbor Drive and Main Street</u>	<u>4 lanes w/RM</u>	<u>40,000</u>	<u>17,390</u>	<u>0.435</u>	<u>B</u>	<u>16,134</u>	<u>0.403</u>	<u>B</u>	<u>0.032</u>	<u>N</u>
	<u>Between Main Street and Boston Avenue</u>	<u>4 lanes w/TWLT</u>	<u>30,000</u>	<u>20,583</u>	<u>0.686</u>	<u>D</u>	<u>19,563</u>	<u>0.652</u>	<u>C</u>	<u>0.034</u>	<u>N</u>
	<u>Between Boston Avenue and National Avenue</u>	<u>3 lanes w/TWLT</u>	<u>22,500<sup>1</sup></u>	<u>22,759</u>	<u>1.012</u>	<b><u>F</u></b>	<u>22,112</u>	<u>0.983</u>	<b><u>E</u></b>	<u>0.029</u>	<b><u>Y</u></b>
32 <sup>nd</sup> Street	<u>Between Harbor Drive and Norman Scott Road</u>	<u>6 lanes w/RM</u>	<u>50,000</u>	<u>21,226</u>	<u>0.425</u>	<u>B</u>	<u>19,920</u>	<u>0.398</u>	<u>A</u>	<u>0.027</u>	<u>N</u>

Source: Appendix G-1

Notes:

<sup>1</sup> Capacity is 75% of a 4-Lane Collector w/TWLT.**Bold** letter indicates a significant impact.

ADT = average daily trips; LOS = level of service; RM = raised median; S? = Indicates if change in V/C ratio is significant; TWLT = two-way left turn; V/C = volume to capacity ratio; Δ = change in V/C ratio

### **Intersection Analysis**

Table 7-11 shows existing and existing plus STC Alternative peak hour LOS conditions for the intersections in the project study area. As indicated, all intersections in the project study area operate at LOS D or better under existing conditions with the exception of Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard, which currently operates at LOS F in the AM peak hour and LOS E in the PM peak hour. At full buildout, operation of the STC Alternative would worsen the existing delay at this intersection by 17.7 seconds during the AM peak hour and by 7.2 seconds during the PM peak hour, where a threshold of 1.0 second of additional delay applies to LOS F and a threshold of 2.0 seconds of additional delay applies to LOS E (**Impact-TRA-4**). The initial impact is anticipated to occur when 195 new daily trips are being generated, at which point this alternative would contribute more than 1.0 second of delay in the AM peak hour period. Therefore, similar to the proposed project, the STC Alternative would result in a significant impact at this intersection and mitigation would be required.

Similar to under the proposed project, the STC Alternative's impact on the Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard intersection would be mitigated with implementation of mitigation measure **MM-TRA-4**, as described in Section 4.10, *Transportation, Circulation, and Parking*. This mitigation measure includes the addition of a westbound right-turn overlap phase at the Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard intersection. As shown in Table 7-12, this would reduce the unmitigated delay associated with this alternative by 19.4 seconds during the AM peak hour and by 19.3 seconds during the PM peak hour and would effectively reduce delay at this intersection to below current levels.

However, because the timing and implementation of the necessary improvement are within the exclusive jurisdiction of the California Department of Transportation (Caltrans), and not the District, the District cannot ensure that the improvements would be made when needed. Therefore, while mitigation is required that could reduce the impact to a less-than-significant level, the uncertainty regarding the timing and implementation of the recommended improvement to the intersection of Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard means the STC Alternative's impact on this intersection would remain significant and unavoidable, similar to that of the proposed project.

**Table 7-11. Peak Hour Intersection LOS Results – Existing Plus Sustainable Terminal Capacity Alternative**

#	Intersection	AM Peak Hour		PM Peak Hour		Delay w/o STC	LOS w/o STC	Change in Delay	S?
		Avg. Delay (sec.)	LOS	Avg. Delay (sec.)	LOS	Alternative (sec.) AM/PM	Alternative AM/PM	(sec.)	
1	Harbor Drive/Cesar Chavez Parkway	45.4	D	43.6	D	36.8/33.3	D/C	8.6/10.3	No
2	Harbor Drive/Sampson Street	41.0	D	42.2	D	40.4/40.9	D/D	0.6/1.3	No
3	Harbor Drive/Schley Street	16.7	B	15.1	B	16.7/15.0	B/B	0.0/0.1	No
4	Harbor Drive/28 <sup>th</sup> Street	30.1	C	22.8	C	23.1/20.3	C/C	7.0/2.5	No
5	Main Street/28 <sup>th</sup> Street	21.9	C	37.5	D	21.4/34.8	C/C	0.5/2.7	No
6	Boston Avenue/28 <sup>th</sup> Street	19.4	B	23.2	C	19.4/23.0	B/C	0.0/0.2	No
7	National Avenue/28 <sup>th</sup> Street	42.4	D	30.2	C	42.3/29.6	D/C	0.1/0.6	No
8	National Avenue/I-5 NB Off-Ramp	15.5	B	15.3	B	14.9/14.7	B/B	0.6/0.6	No
9	Harbor Drive/Belt Street	18.8	B	17.2	B	18.6/17.1	B/B	0.2/0.1	No
10	Harbor Drive/32 <sup>nd</sup> Street	31.1	C	47.3	D	28.6/39.9	C/D	2.5/7.4	No
11	Norman Scott Road/32 <sup>nd</sup> Street/Wabash Boulevard	113.0	<b>F</b>	73.4	<b>E</b>	95.3/66.2	<b>F/E</b>	17.7/7.2	<b>Yes</b>

Source: Appendix G-1

**Bold** letter indicates a significant impact.

LOS = level of service; NB = northbound; S? = Indicates a significant impact

**Table 7-12. Peak Hour Intersection LOS – Mitigated Intersection Existing Plus Sustainable Terminal Capacity Alternative Conditions**

#	Intersection	AM Peak Hour		PM Peak Hour		Delay w/o Project (sec.) AM/PM	LOS w/o Project AM/PM	Change in Delay (sec.)	S?
		Avg. Delay (sec.)	LOS	Avg. Delay (sec.)	LOS				
11	Norman Scott Road/32 <sup>nd</sup> Street/Wabash Boulevard	93.6	F	54.1	D	95.3/66.2	F/E	-1.7/-12.1	N

Source: Appendix G-1  
LOS = level of service; S? = Indicates a significant impact

**Ramp Intersection Capacity Analysis**

Consistent with Caltrans requirements, the signalized ramp intersections of National Avenue/I-5 northbound off-ramp and Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard were analyzed under ILV procedures. Both signalized ramp intersections would continue to operate “Under Capacity” during both the AM and PM peak hours under the STC Alternative, as shown in Table 7-13. Therefore, impacts on signalized ramp intersections at the National Avenue/I-5 northbound off-ramp and Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard would be less than significant, which is similar to the proposed project.

**Table 7-13. Peak Hour Ramp Intersection Capacity Analysis: Existing Plus Sustainable Terminal Capacity Alternative**

#	Intersection	Peak Hour	ILV/Hour		Description
			Existing	Existing + Sustainable Terminal Capacity	
8	National Avenue/I-5 NB Off-Ramp	AM	636	662	Under Capacity
		PM	794	817	Under Capacity
11	Norman Scott Road/32 <sup>nd</sup> Street/Wabash Boulevard	AM	956	1,071	Under Capacity
		PM	1,028	1,132	Under Capacity

Source: Appendix G-1  
Note: Less than 1,200 ILV/Hour indicates operation is “Under Capacity.”  
ILV = intersection lane volume; NB = southbound

**Freeway Mainline Segment Analysis**

Table 7-14 shows existing and existing plus STC Alternative peak hour LOS conditions for the freeway mainline segments in the project study area.

**Table 7-14. Freeway Mainline LOS Analysis – Existing Plus Sustainable Terminal Capacity Alternative**

Freeway	Segment	ADT	Direction	Peak Hour Volume	With Project		Base		$\Delta$ V/C	S?
					V/C	LOS	V/C	LOS		
I-5	SR-94 & Imperial Avenue	180,500	NB	9,600	0.890	D	0.890	D	0.000	N
			SB	8,400	0.780	C	0.780	C	0.000	N
	Imperial Avenue & SR-75	170,500	NB	9,100	0.840	D	0.840	D	0.000	N
			SB	8,500	0.790	C	0.780	C	0.010	N
	SR-75 & 28 <sup>th</sup> Street	167,400	NB	10,400	0.850	D	0.850	D	0.000	N
			SB	8,300	0.770	C	0.770	C	0.000	N
	28 <sup>th</sup> Street & SR-15	165,900	NB	10,300	1.100	F	1.100	F	0.000	N
			SB	8,200	0.870	D	0.870	D	0.000	N
	SR-15 & Main Street	195,900	NB	12,200	1.000	E	0.990	E	0.010	N
			SB	11,700	1.000	E	0.990	E	0.010	N
SR-15	SR-94 & Market Street	127,400	NB	6,500	0.770	C	0.760	C	0.010	N
			SB	7,200	0.850	D	0.840	D	0.010	N
	Market Street & Ocean View Boulevard	115,400	NB	6,000	0.850	D	0.840	D	0.010	N
			SB	6,500	0.920	D	0.910	D	0.010	N
	Ocean View Boulevard & I-5	104,400	NB	4,700	0.560	B	0.540	B	0.020	N
			SB	4,700	0.430	B	0.430	B	0.000	N
	I-5 & Norman Scott Road	8,700	NB	400	0.090	A	0.060	A	0.030	N
			SB	400	0.090	A	0.060	A	0.030	N

**Notes:**

The capacity, directional split, peak hour %, and heavy vehicle % are assumed to be the same as existing conditions.

Bold letter indicates substandard LOS E or F.

ADT = average daily trips; LOS = level of service; NB = northbound; SB = southbound; V/C = volume to capacity ratio;  $\Delta$  = change in V/C ratio; S? = Indicates if change in V/C ratio is significant

As indicated, all freeway segments within the project study area operate at LOS D or better under existing conditions, except for the following.

- I-5 northbound between 28<sup>th</sup> Street and SR-15 (LOS F)
- I-5 northbound between SR-15 and Main Street (LOS E)
- I-5 southbound between SR-15 and Main Street (LOS E)

The addition of traffic generated by this alternative would not result in a change in V/C ratio greater than 0.01 for freeway segments operating at LOS E or 0.005 for those operating at LOS F at any key study area freeway mainline segment. Therefore, impacts would be less than significant, which is similar to the proposed project.

### **Existing Plus Sustainable Terminal Capacity Alternative – Alternative Gate Scenario**

The proposed TAMT plan identifies an alternative gate concept that would serve as the primary entry and exit location for the Refrigerated Container node and the Multi-Purpose General Cargo node. The alternative gate would be located in the northeast corner of the project site and would provide access directly onto Harbor Drive. According to the proposed TAMT plan, the Dry and Liquid Bulk nodes would continue to utilize the existing gate off Caesar Chavez Parkway, particularly for domestic bulk shipments. It is also assumed that employee traffic would continue to use the existing Crosby Street gate. The same distribution for truck and employee trips assumed for the TAMT Plan Buildout – Alternative Gate Scenario and analyzed in Section 4.10, *Transportation, Circulation, and Parking*, was assumed for the STC Alternative – Alternative Gate Scenario.

#### **Roadway Segment Analysis**

Based on the assumed redistribution of truck trips, Harbor Drive between Beardsley Street and Cesar Chavez Parkway is the only study area roadway segment that is anticipated to experience a change in average daily traffic due to the alternative gate location. As shown in Table 7-15, the roadway segment of Harbor Drive between Beardsley Street and Cesar Chavez Parkway is anticipated to operate at LOS C with the addition of the STC Alternative traffic utilizing the alternative gate location.

**Table 7-15. Peak Hour Roadway Segment LOS Results: Existing Plus Sustainable Terminal Capacity Alternative – Alternative Gate Scenario**

<u>Roadway</u>	<u>Segment</u>	<u>Cross-Section</u>	<u>Threshold (LOS E)</u>	<u>Existing + Sustainable Terminal Capacity Alternative</u>			<u>Existing</u>			<u>Δ</u>	<u>S?</u>
				<u>ADT</u>	<u>V/C</u>	<u>LOS</u>	<u>ADT</u>	<u>V/C</u>	<u>LOS</u>		
Harbor Drive	Between Beardsley Street and Cesar Chavez Parkway	4 lanes w/ RM	40,000	21,743	0.544	C	20,194	0.505	B	0.039	N

Source: Appendix G-1

Notes:

ADT = average daily trips; LOS = level of service; RM = raised median; S? = Indicates if change in V/C ratio is significant; V/C = volume to capacity ratio; Δ = change in V/C ratio

Based on the City of San Diego's Significance Criteria, the traffic associated with the proposed alternative gate would not cause any additional roadway segments to operate at LOS E or F. Therefore, similar to the proposed project, implementation of the proposed alternative gate location under the STC Alternative would not result in any roadway segment impacts and no mitigation would be required.

### **Intersection Analysis**

Based on the assumed redistribution of truck trips, the Harbor Drive/Cesar Chavez Parkway intersection (Main Gate) is the only existing study intersection that is anticipated to experience a change in peak hour volumes due to the alternative gate. All other key study intersections are anticipated to operate at the same conditions as under the existing plus STC Alternative conditions. Table 7-16 shows intersection LOS and average vehicle delay resulting from implementation of the STC Alternative with the alternative gate location.

**Table 7-16. Peak Hour Intersection LOS Results: Existing Plus Sustainable Terminal Capacity Alternative – Alternative Gate Scenario**

#	<u>Intersection</u>	<u>AM Peak Hour</u>		<u>PM Peak Hour</u>		<u>Delay w/o STC Alt (sec.) AM/PM</u>	<u>LOS w/o STC Alt AM/PM</u>	<u>Change in Delay (sec.)</u>	<u>S?</u>
		<u>Avg. Delay (sec.)</u>	<u>LOS</u>	<u>Avg. Delay (sec.)</u>	<u>LOS</u>				
1	<u>Harbor Drive/Cesar Chavez Parkway</u>	<u>37.5</u>	<u>D</u>	<u>38.1</u>	<u>D</u>	<u>36.8/33.3</u>	<u>D/C</u>	<u>0.7/4.8</u>	<u>N</u>
12	<u>Harbor Drive/Alternative Gate</u>	<u>19.4</u>	<u>B</u>	<u>25.5</u>	<u>C</u>	<u>N/A</u>	<u>N/A</u>	<u>19.4/25.5</u>	<u>N</u>

Source: Appendix G-1

LOS = level of service; N/A = not applicable; S? = Indicates significant impact

Based on the City of San Diego's Significance Criteria, the traffic associated with the proposed alternative gate would not cause any additional intersections to operate at LOS E or F. Therefore, similar to the proposed project, implementation of the proposed alternative gate location under the STC Alternative would not result in any intersection impacts and no mitigation would be required.

### **Future Year 2035 Base Plus Sustainable Terminal Capacity Alternative**

The cumulative transportation analyses for this alternative were conducted using the same methodologies described in Section 5.3.11, *Cumulative Impacts*. Roadway segment analysis, intersection LOS analysis, freeway ramp ILV analysis, and freeway analysis results are discussed below.

#### **Roadway Segment Analysis**

Roadway segment geometrics under Future Year 2035 plus STC Alternative conditions were assumed to be identical to existing conditions. Table 7-17 shows Future Year 2035 Base and Future Year 2035 plus STC Alternative LOS conditions for the roadway segments in the project study area. As shown, all key study roadway segments are projected to operate at acceptable LOS D or better under Future Year 2035 plus full STC Alternative conditions, except 28<sup>th</sup> Street between Boston Avenue and National Avenue, which would operate at LOS F. Based on the City of San Diego's criteria, the addition of STC Alternative traffic to this roadway segment would increase the V/C ratio by 0.029, which would exceed the City's threshold for allowable increase in V/C ratio of 0.01 for roadway segments operating at LOS F (**Impact-C-TRA-3**). Therefore, similar to the proposed



project, the STC Alternative would result in a cumulatively significant impact at this roadway segment and mitigation would be required.

Similar to the proposed project, the STC Alternative's cumulatively significant impact on 28<sup>th</sup> Street between Boston Avenue and National Avenue would be mitigated with implementation of mitigation measure **MM-TRA-3** as described in Section 4.10, *Transportation, Circulation, and Parking*. This mitigation measure requires the District to pay a fair-share contribution (2.8 percent) of the cost to widen this roadway to a Four-Lane Major Arterial classification. Implementation of mitigation measure **MM-TRA-3** would reduce this alternative's incremental contribution to significant cumulative traffic impacts to a level less than cumulatively considerable. However, because the timing and implementation of the necessary improvements to the roadway segment of 28<sup>th</sup> Street between Boston Avenue and National Avenue are within the exclusive jurisdiction of the City of San Diego, the District cannot ensure that the improvement would be made when needed. Therefore, while mitigation has been identified that could reduce the STC Alternative's cumulatively considerable traffic impacts to a less-than-significant level, the uncertainty regarding the timing and implementation of the recommended improvements to this roadway segment is considered cumulatively significant and unavoidable.

**Table 7-17. Roadway Segment LOS Results: Future Year 2035 Base Plus Sustainable Terminal Capacity Alternative**

<u>Roadway</u>	<u>Segment</u>	<u>Classification</u>	<u>Threshold (LOS E)</u>	<u>Future Year 2035 + Sustainable Terminal Capacity Alternative</u>			<u>Future Year 2035 Base</u>	<u>Δ</u>	<u>S?</u>
				<u>ADT</u>	<u>V/C</u>	<u>LOS</u>	<u>ADT/V/C/LOS</u>		
Harbor Drive	<u>Between Beardsley Street and Cesar Chavez Parkway</u>	<u>4-Lane Major</u>	<u>40,000</u>	<u>26,079</u>	<u>0.652</u>	<u>C</u>	<u>25,050/0.626/C</u>	<u>0.026</u>	<u>No</u>
	<u>Between Cesar Chavez Parkway and Sampson Street</u>	<u>4-Lane Major</u>	<u>40,000</u>	<u>21,362</u>	<u>0.534</u>	<u>C</u>	<u>18,800/0.470/B</u>	<u>0.064</u>	<u>No</u>
	<u>Between Sampson Street and Schley Street</u>	<u>4-Lane Major</u>	<u>40,000</u>	<u>19,612</u>	<u>0.490</u>	<u>B</u>	<u>17,050/0.426/B</u>	<u>0.064</u>	<u>No</u>
	<u>Between Schley Street and 28<sup>th</sup> Street</u>	<u>4-Lane Major</u>	<u>40,000</u>	<u>19,612</u>	<u>0.490</u>	<u>B</u>	<u>17,050/0.426/B</u>	<u>0.064</u>	<u>No</u>
	<u>Between 28<sup>th</sup> Street and Belt Street</u>	<u>4-Lane Major</u>	<u>40,000</u>	<u>25,306</u>	<u>0.633</u>	<u>C</u>	<u>24,000/0.600/C</u>	<u>0.033</u>	<u>No</u>
	<u>Between Belt Street and 32<sup>nd</sup> Street</u>	<u>4-Lane Major</u>	<u>40,000</u>	<u>25,306</u>	<u>0.633</u>	<u>C</u>	<u>24,000/0.600/C</u>	<u>0.033</u>	<u>No</u>
28 <sup>th</sup> Street	<u>Between Harbor Drive and Main Street</u>	<u>4-Lane Major</u>	<u>40,000</u>	<u>18,206</u>	<u>0.455</u>	<u>B</u>	<u>16,950/0.424/B</u>	<u>0.031</u>	<u>No</u>
	<u>Between Main Street and Boston Avenue</u>	<u>4-Lane Collector w/TWLT</u>	<u>30,000</u>	<u>21,240</u>	<u>0.708</u>	<u>D</u>	<u>20,220/0.674/D</u>	<u>0.034</u>	<u>No</u>
	<u>Between Boston Avenue and National Avenue</u>	<u>3-Lanes Collector w/TWLT</u>	<u>22,500</u>	<u>28,367</u>	<u>1.261</u>	<u>F</u>	<u>27,720/1.232/F</u>	<u>0.029</u>	<u>Yes</u>
32 <sup>nd</sup> Street	<u>Between Harbor Drive and Norman Scott Road</u>	<u>6-Lane Major</u>	<u>50,000</u>	<u>27,106</u>	<u>0.542</u>	<u>B</u>	<u>25,800/0.516/B</u>	<u>0.026</u>	<u>No</u>

Source: Appendix G-1

ADT = average daily trips; LOS = level of service; S? = Indicates if change in V/C ratio is significant; TWLT = two-way left turn; V/C = volume to capacity ratio; Δ = change in V/C ratio.

### **Intersection Analysis**

Intersection geometrics under Future Year 2035 plus STC Alternative conditions were assumed to be identical to existing conditions. Table 7-18 shows Future Year 2035 and Future Year 2035 plus STC Alternative peak hour LOS conditions for the intersections in the project study area. As shown, all key study intersections are projected to operate at LOS D or better under Future Year 2035 plus STC Alternative conditions, except the following two intersections.

- National Avenue and 28<sup>th</sup> Street – LOS F during AM peak hour and LOS E during PM peak hour
- Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard – LOS F during AM peak hour and LOS E during PM peak hour

Based on the City of San Diego's criteria, the traffic associated with the proposed project would not worsen the delay by more than 1 second or result in further deterioration in peak hour intersection LOS at the intersection of National Avenue and 28<sup>th</sup> Street. However, the traffic associated with this alternative would worsen the delay at the Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard intersection by 16.1 seconds during the AM peak hour and 7.4 seconds during the PM peak hour, where a threshold of 1.0 second of additional delay applies to LOS F and a threshold of 2.0 seconds of additional delay applies to LOS E (**Impact-C-TRA-4**). The addition of STC Alternative traffic would also cause intersection operations to degrade from LOS E to LOS F during the AM and PM peak hours. Therefore, similar to the proposed project, the STC Alternative would have a significant cumulative impact at the Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard intersection and mitigation would be required.

Similar to that of the proposed project, the STC Alternative's cumulatively significant impact on the Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard intersection would be mitigated with implementation of mitigation measure **MM-TRA-4** as described in Section 4.10, *Transportation, Circulation, and Parking*. This mitigation measure includes the addition of a westbound right-turn overlap phase at the Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard intersection. As shown in Table 7-19, this would reduce the unmitigated delay associated with this alternative by 18.1 seconds during the AM peak hour and by 17.4 seconds during the PM peak hour and would effectively reduce delay at this intersection to below future cumulative baseline levels. Implementation of mitigation measure **MM-TRA-4** would reduce the STC Alternative's incremental contribution to significant cumulative traffic impacts to a level less than cumulatively considerable. However, because the timing and implementation of the necessary improvements to the intersection of Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard are within the exclusive jurisdiction of Caltrans, the District cannot ensure that the improvement would be made when needed. Therefore, while mitigation has been identified that could reduce the STC Alternative's cumulatively considerable traffic impacts to a less-than-significant level, the uncertainty regarding the timing and implementation of the recommended improvements to this intersection is considered cumulatively significant and unavoidable.

**Table 7-18. Peak Hour Intersection LOS Results: Future Year 2035 Base Plus Sustainable Terminal Capacity Alternative**

#	Intersection	AM Peak Hour		PM Peak Hour		Delay w/o STC Alternative	LOS w/o STC Alternative	Change in Delay	Significant Impact?
		Avg. Delay (sec.)	LOS	Avg. Delay (sec.)	LOS	(sec) AM/PM	AM/PM	(sec)	
1	Harbor Drive/Cesar Chavez Parkway	53.2	D	51.7	D	50.6/39.6	D/D	2.6/12.1	No
2	Harbor Drive/Sampson Street	53.2	D	53.0	D	50.9/53.0	D/D	2.3/0.0	No
3	Harbor Drive/Schley Street	26.7	C	20.3	C	23.2/19.4	B/B	3.5/0.9	No
4	Harbor Drive/28 <sup>th</sup> Street	32.0	C	32.0	C	28.8/28.2	C/C	3.2/3.8	No
5	Main Street/28 <sup>th</sup> Street	22.6	C	42.0	D	22.2/39.2	C/D	0.4/2.8	No
6	Boston Avenue/28 <sup>th</sup> Street	28.0	C	38.8	D	27.7/37.4	C/D	0.3/1.4	No
7	National Avenue/28 <sup>th</sup> Street	122.5	F	72.1	E	122.5/71.4	F/E	0.0/0.7	No
8	National Avenue/I-5 NB Off-Ramp	19.8	B	18.3	B	18.9/17.5	B/B	0.9/0.8	No
9	Harbor Drive/Belt Street	22.8	C	19.8	C	22.3/19.1	C/B	0.5/0.7	No
10	Harbor Drive/32 <sup>nd</sup> Street	35.8	C	51.6	D	32.3/44.2	C/D	3.5/7.4	No
11	Norman Scott Road/32 <sup>nd</sup> Street/Wabash Boulevard	97.6	F	74.6	F	81.5/67.2	E/E	16.1/7.4	Yes

Source: Appendix G-1

LOS = level of service; NB = northbound

**Table 7-19. Peak Hour Intersection LOS – Mitigated Intersection Future Year 2035 Base Plus Sustainable Terminal Capacity Alternative**

#	Intersection	AM Peak Hour		PM Peak Hour		Delay w/o Project (sec.) AM/PM	LOS w/o Project AM/PM	Change in Delay (sec.)	S?
		Avg. Delay (sec.)	LOS	Avg. Delay (sec.)	LOS				
11	Norman Scott Road/32 <sup>nd</sup> Street/Wabash Boulevard	79.5	F	57.2	E	81.5/67.2	F/E	-2.0/-10.0	N

Source: Appendix G-1  
LOS = level of service; S? = Indicates a significant impact

**Ramp Intersection Capacity Analysis**

Consistent with Caltrans requirements, the signalized ramp intersections of National Avenue/I-5 northbound off-ramp and Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard were analyzed using ILV procedures. As shown in Table 7-20, these signalized ramp intersections are projected to operate at “Under Capacity” or “At Capacity” during both the AM and PM peak hours under Future Year 2035 plus STC Alternative conditions. Therefore, impacts from past, present, and reasonably foreseeable future projects would not be cumulatively significant.

**Table 7-20. Ramp Intersection Capacity Analysis: Future Year 2035 Base Plus Sustainable Terminal Capacity Alternative Conditions**

#	Intersection	Peak Hour	ILV/Hour		Description
			Future Year 2035 Base	Future Year 2035 Base + STC Alternative	
8	National Avenue/I-5 NB Off-Ramp	AM	950	976	Under Capacity
		PM	930	953	Under Capacity
11	Norman Scott Road/32 <sup>nd</sup> Street/Wabash Boulevard	AM	1,095	1,210	At Capacity
		PM	1,083	1,187	Under Capacity

Source: Appendix G-1  
ILV = Intersection Lane Volume; NB = northbound

**Freeway Mainline Segment Analysis**

Table 7-21 shows Future Year 2035 Base and Future Year 2035 plus STC Alternative peak hour LOS conditions for the freeway mainline segments in the project study area. As indicated, all freeway segments within the project study area are projected to operate at LOS D or better, except for the following.

- I-5 northbound between SR-94 & Imperial Avenue (LOS F)

- I-5 southbound between SR-94 & Imperial Avenue (LOS E)
- I-5 northbound between Imperial Avenue & SR-75 (LOS E)
- I-5 northbound between SR-75 & 28<sup>th</sup> Street (LOS E)
- I-5 northbound between 28<sup>th</sup> Street & SR-15 (LOS F)
- I-5 southbound between 28<sup>th</sup> Street & SR-15 (LOS E)
- I-5 northbound between SR-15 & Main Street (LOS F)
- I-5 southbound between SR-15 & Main Street (LOS F)
- SR-15 northbound between Market Street & Ocean View Boulevard (LOS E)
- SR-15 southbound between Market Street & Ocean View Boulevard (LOS F)

**Table 7-21. Freeway Mainline Segments: Future Year 2035 Base Plus Sustainable Terminal Capacity Alternative Conditions**

Freeway	Segment	ADT	Direction	Peak Hour Volume	With Project		Base		Δ	S?
					V/C	LOS	V/C	LOS		
I-5	SR-94 & Imperial Avenue	218,900	NB	11,700	1.080	F	1.070	F	0.010	Y
			SB	10,200	0.940	E	0.940	E	0.000	N
	Imperial Avenue & SR-75	196,200	NB	10,500	0.970	E	0.960	E	0.010	N
			SB	9,700	0.900	D	0.900	D	0.000	N
	SR-75 & 28 <sup>th</sup> Street	191,400	NB	11,900	0.970	E	0.970	E	0.000	N
			SB	9,500	0.880	D	0.880	D	0.000	N
	28 <sup>th</sup> Street & SR-15	177,700	NB	11,000	1.170	F	1.170	F	0.000	N
			SB	8,800	0.940	E	0.940	E	0.000	N
	SR-15 & Main Street	221,200	NB	13,800	1.130	F	1.120	F	0.010	Y
			SB	13,200	1.120	F	1.120	F	0.000	N
SR-15	SR-94 & Market Street	122,200	NB	6,200	0.730	C	0.720	C	0.010	N
			SB	6,900	0.820	D	0.800	D	0.020	N
	Market Street & Ocean View Boulevard	130,600	NB	6,800	0.960	E	0.950	E	0.010	N
			SB	7,300	1.040	F	1.020	F	0.020	Y
	Ocean View Boulevard & I-5	123,400	NB	5,500	0.650	C	0.650	C	0.000	N
			SB	5,600	0.520	B	0.510	B	0.010	N
	I-5 & Norman Scott Road	31,900	NB	1,400	0.300	A	0.300	A	0.000	N
			SB	1,400	0.300	A	0.280	A	0.020	N

ADT = average daily trips; LOS = level of service; NB = northbound; SB = southbound; S? = Indicates a significant impact; V/C = volume to capacity ratio; Δ = change in V/C ratio

The addition of STC Alternative traffic onto Future Year 2035 Base conditions would result in a change in V/C ratio greater than 0.005 for freeway segments operating at LOS F at the following key study area freeway segments (**Impact-C-TRA-5**).

- I-5 northbound between SR-94 & Imperial Avenue (LOS F)
- I-5 northbound between SR-15 & Main Street (LOS F)
- SR-15 southbound between Market Street & Ocean View Boulevard (LOS F)

Based on the City of San Diego's Significance Criteria, the traffic associated with the STC Alternative would exceed the allowable threshold of a 0.005 V/C ratio increase for freeway segments operating at LOS F. Therefore, although the STC Alternative would result in slightly reduced freeway segment impacts compared to the proposed project, which would result in a cumulatively significant impact at four freeway segments, this alternative would result in a cumulatively significant impact at three freeway segments and mitigation would be required.

Implementation of mitigation measure **MM-C-TRA-1** as described in Chapter 5, *Cumulative Impacts*, would reduce the STC Alternative's incremental contribution to significant cumulative traffic impacts on the freeway segments of I-5 northbound between SR-94 and Imperial Avenue, I-5 northbound between I-15 and Main Street, and I-15 southbound between Market Street and Ocean View Boulevard to a level less than cumulatively considerable. It should be noted that the STC Alternative would only be responsible for implementing the portion of **MM-C-TRA-1** that is directly related to the alternative's cumulative impacts on the three aforementioned freeway segments. However, there is no program in place into which the District would pay its fair-share contribution toward the cost of the improvements to these freeway facilities. Consequently, because these freeway segments are within the exclusive jurisdiction of Caltrans, and the San Diego Association of Governments is responsible for planning the improvements, the District cannot ensure that the improvements would be made when needed. Therefore, while mitigation has been identified that could reduce the STC Alternative's cumulatively considerable traffic impacts to a less-than-significant level, the uncertainty regarding the timing and implementation of the recommended improvements to these freeway segments means that **Impact-C-TRA-1** would be considered cumulatively significant and unavoidable even with payment of the project's fair-share contribution.

### **Future Year 2035 Base Plus Sustainable Terminal Capacity Alternative – Alternative Gate Scenario**

As mentioned, the proposed TAMT plan identifies an alternative gate concept that would serve as the primary entry and exit location for the Refrigerated Container node and the Multi-Purpose General Cargo node. The alternative gate would be located in the northeast corner of the project site and would provide access directly onto Harbor Drive. According to the proposed TAMT plan, the Dry and Liquid Bulk nodes would continue to utilize the existing gate off Caesar Chavez Parkway. It is also assumed that employee traffic would continue to use the existing Crosby Street gate. The same distribution for truck and employee trips assumed for the TAMT Plan Buildout – Alternative Gate Scenario and analyzed in Section 4.10, *Transportation, Circulation, and Parking*, was assumed for the STC Alternative – Alternative Gate Scenario.

### **Roadway Segment Analysis**

Based on the assumed redistribution of truck trips, Harbor Drive between Beardsley Street and Cesar Chavez Parkway is the only study roadway segment that is anticipated to experience a change in average daily traffic due to the alternative gate location. As shown in Table 7-22, the roadway segment of Harbor Drive between Beardsley Street and Cesar Chavez Parkway is anticipated to operate at LOS C with the addition of the STC Alternative traffic utilizing the alternative gate location.

**Table 7-22. Peak Hour Roadway Segment LOS Results: Future Year 2035 Base Plus Sustainable Terminal Capacity Alternative – Alternative Gate Scenario**

<u>Roadway</u>	<u>Segment</u>	<u>Cross- Section</u>	<u>Threshold (LOS E)</u>	<u>Future Year 2035 + Sustainable Terminal Capacity Alternative</u>			<u>Future Year 2035</u>			<u>Δ</u>	<u>S?</u>
				<u>ADT</u>	<u>V/C</u>	<u>LOS</u>	<u>ADT</u>	<u>V/C</u>	<u>LOS</u>		
Harbor Drive	Between Beardsley Street and Cesar Chavez Parkway	4 lanes w/ RM	40,000	26,599	0.665	C	25,050	0.626	C	0.039	N

Source: Appendix G-1

ADT = average daily trips; LOS = level of service; RM = raised median; S? = Indicates if change in V/C ratio is significant; V/C = volume to capacity ratio; Δ = change in V/C ratio

Based on the City of San Diego's Significance Criteria, the traffic associated with this scenario would not cause any roadways segments to operate at LOS E or F. Therefore, similar to the proposed project, implementation of the proposed alternative gate location under the STC Alternative would not result in any additional impacts on roadway segment operations not previously identified under Future Year 2035 Base plus STC Alternative conditions.

### **Intersection Analysis**

Based on the assumed redistribution of truck trips, the Harbor Drive/Cesar Chavez Parkway intersection (Main Gate) is the only existing study intersection that is anticipated to experience a change in peak hour volumes due to the alternative gate. All other key study intersections are anticipated to operate at the same conditions as under Future Year 2035 Base plus STC Alternative conditions identified in Table 7-22 above. Table 7-23 displays intersection LOS and average vehicle delay resulting from implementation of the STC Alternative with the alternative gate location. As shown, both affected intersections are anticipated to operate at LOS D or better under the Future Year 2035 Base plus STC Alternative – Alternative Gate Scenario.



**Table 7-23. Peak Hour Intersection LOS Results: Future Year 2035 Plus Sustainable Terminal Capacity Alternative – Alternative Gate Scenario**

#	<u>Intersection</u>	<u>AM Peak Hour</u>		<u>PM Peak Hour</u>		<u>Delay w/o Project (sec.) AM/PM</u>	<u>LOS w/o Project AM/PM</u>	<u>Change in Delay (sec.)</u>	<u>S?</u>
		<u>Avg. Delay (sec.)</u>	<u>LOS</u>	<u>Avg. Delay (sec.)</u>	<u>LOS</u>				
1	<u>Harbor Drive/Cesar Chavez Parkway</u>	52.7	D	49.4	D	50.6/39.6	D/D	2.1/9.8	No
12	<u>Harbor Drive/Alternative Gate</u>	33.2	C	37.0	D	N/A	N/A	33.2/37.0	No

Source: Appendix G-1

**Bold** letter indicates a significant impact.

LOS = level of service; S? = indicates a significant impact

Based on the City of San Diego's Significance Criteria, the traffic associated with this scenario would not cause any intersections to operate at LOS E or F. Therefore, similar to the proposed project, implementation of the proposed alternative gate location under the STC Alternative would not result in any additional impacts on intersection operations not previously identified under Future Year 2035 Base plus STC Alternative conditions.

### **Parking**

Parking impacts under the STC Alternative would be similar to those under the MPC scenario analyzed under the proposed project. Specifically, because of the fluid nature of cargo terminal operations and the flexibility generally needed for onsite parking, the lack of absolute certainty that sufficient parking would be provided in the buildout year would be considered a significant impact (Impact-TRA-5). Mitigation measures MM-TRA-5, MM-TRA-6, and MM-TRA-7 would be required, as with the proposed project, to ensure parking does not occur off-terminal in undesignated locations, that a District-maintained parking inventory is implemented, and that parking management plans are prepared for future components and real estate leases. As with the proposed project, after mitigation is incorporated, parking impacts from the buildout of the STC Alternative would be less than significant.

### **7.5.5.11 Utilities and Energy**

Under the STC Alternative, demand for water and the generation of wastewater would increase over existing conditions, but would be slightly less than the level of the proposed project. Aside from the subsurface stormwater retention tank, which would have no significant impacts on the environment, no other new facilities would be needed, the construction of which could have an impact on the environment. In addition, similar to the proposed project, the STC Alternative would not require additional water entitlements or result in a determination that the City of San Diego is unable to accommodate the additional wastewater generated by the alternative. Energy use would also be higher over time compared to baseline conditions, but would not represent a wasteful, inefficient, or unnecessary use of energy because all energy would be used for highly coordinated goods movement on and off the terminal. Compared to the project, the STC Alternative would have a slightly lower energy demand because it would not reach the MPC throughput projections. Overall,

the STC Alternative's impact on utilities and energy would be less than significant and would be similar to that of the proposed project because it would have lower throughput (approximately 25 percent less) and a similar reduction of overall energy use, particularly related to fuel use from trucks and vessels. No mitigation related to utilities and energy would be required under this alternative; however, mitigation required to reduce GHG emissions (as discussed under 7.5.5.6) would significantly reduce energy use compared to projections without the mitigation.

Under cumulative conditions, the STC Alternative, like the proposed project, would exceed the City of San Diego's threshold for solid waste by generating more than 60 tons annually (**Impact-C-UTIL-1** and **Impact-C-UTIL-2**) and as such would be required to prepare a waste management plan under **MM-C-UTIL-1**, as described in Chapter 5, *Cumulative Impacts*.

### **7.5.5.12 Relationship to Project Objectives**

The STC Alternative would meet all the central project objectives. Specifically, it would (1) enhance the District's competitive position by increasing throughput capabilities, (2) maintain and promote the District's longstanding commitment to dry bulk, liquid bulk, refrigerated containers, and multi-purpose general cargo, (3) ensure benefits to existing project site tenants by implementing a series of short-term infrastructure improvements, (4) maintain and expand the District's ability to support military deployment activities during a military contingency or national emergency, (5) enhance the efficiency, productivity, and long-term success of the TAMT by identifying potential infrastructure needs, decreasing intra-terminal transfer time, simplifying terminal layout patterns, and making internal traffic flows more predictable, (6) optimize the use of land and waterways and provide deep-water and water-dependent facilities in a manner that is consistent with the Port Master Plan and the California Coastal Act, and (7) balance the critical need of staying economically competitive with maintaining environmental sustainability and stewardship by supporting the cleanest feasible technology and infrastructure for terminal upgrades and by maintaining consistency with California's Sustainable Freight Strategy and the District's Climate Action Plan, Clean Air Program, and Jurisdictional Runoff Management Program.

### **7.5.56 Environmentally Superior Alternative**

Pursuant to CEQA, the EIR is required to identify the environmentally superior alternative. Although the No Project/No Build Alternative reduces the greatest number of significant impacts, CEQA requires that when the environmentally superior alternative is the No Project Alternative, another alternative should be identified. Therefore, as indicated in Table 7-324, the Reduced Project Alternative would be the environmentally superior alternative. The Reduced Project Alternative would reduce significant impacts on air quality and health risk, GHGs, noise, and transportation by eliminating components such as the gantry cranes and other efficient technologies and strategies that would otherwise help the terminal increase its throughput. The reduced throughput would mean less activity on the project site and fewer vessel and truck trips; however, to achieve these reduced impacts, an artificial limit may need to be placed on throughput. More importantly, though, is the fact that the Reduced Project Alternative would not meet several of the central project objectives, including Objectives #1, #2, #5, or #6 as described in Section 7.5.3.12.

However, based on feedback received during public review of the Draft EIR, notably from ARB, the San Diego Air Pollution Control District, and the Environmental Health Coalition, about the MPC scenario's significant and unavoidable impacts associated with criteria pollutants and health risk, the District organized multiple working sessions with the District's Maritime business and

operations staff, Real Estate staff, and Planning and Green Port staff in an effort to develop an alternative that would reduce criteria pollutants and toxic air contaminants further while still achieving the basic project objectives and remaining feasible. In addition, the District met with ARB, the San Diego Air Pollution Control District, and the Environmental Health Coalition to discuss feasible solutions to reduce air quality impacts. The result was the STC Alternative (Alternative 5). The STC Alternative would reduce throughput by 25 percent from the MPC scenario proposed under the project, but would still allow the District to accommodate realistic market forecasts without severely harming the port's and TAMT's economic competitiveness. As such, the STC Alternative is considered feasible, and would reduce significant health risk impacts and several impacts associated with the emission of criteria pollutants while still achieving the basic project objectives. As a result, District staff supports approval of the STC Alternative in place of the proposed project that is based on the MPC scenario.

**Table 7-324. Summary Impact Comparison of Proposed Project Alternatives**


Environmental Resource	Proposed Project Determination	No Project/ No Build (Alternative Alt 1)	2008 Maritime Business Plan Buildout (Alternative Alt 2)	Reduced Project (Alternative Alt 3)	Full Refrigerated and Dry Container Buildout (Alternative Alt 4)	Sustainable Terminal Capacity (Alt 5)
Aesthetics and Visual Resources	Significant and Unavoidable	-2	-2	-2	0	<u>0</u>
Air Quality and Health Risk	Significant and Unavoidable	-1	+2	<del>-12</del>	0	<del>-2</del>
Biological Resources	Less Than Significant w/Mitigation	-1	+1	0	0	<u>0</u>
Cultural Resources	Less Than Significant w/Mitigation	-1	+1	0	0	<u>0</u>
Geology and Soils	Less Than Significant	0	0	0	0	<u>0</u>
Greenhouse Gas Emissions and Climate Change	Significant and Unavoidable	-1	+2	-1	0	<u>-1</u>
Hazards and Hazardous Materials	Less Than Significant w/Mitigation	-1	0	0	0	<u>0</u>
Hydrology and Water Quality	Less Than Significant	+1	+1	0	0	<u>0</u>
Noise and Vibration	Significant and Unavoidable	-2	0	-2	0	<u>-1</u>
Transportation, Circulation, and Parking	Significant and Unavoidable	-2	0	-2	+1	<u>-1</u>
Utilities and Energy	Less Than Significant	-2	+1	-1	+1	<u>-1</u>
<b>Total<sup>1</sup></b>	<b>--</b>	<b>-12</b>	<b>+4</b>	<b>-910</b>	<b>+2</b>	<b><u>-6</u></b>

<b>Environmental Resource</b>	<b>Proposed Project Determination</b>	<b>No Project/ No Build (Alternative Alt 1)</b>	<b>2008 Maritime Business Plan Buildout (Alternative Alt 2)</b>	<b>Reduced Project (Alternative Alt 3)</b>	<b>Full Refrigerated and Dry Container Buildout (Alternative Alt 4)</b>	<b>Sustainable Terminal Capacity (Alt 5)</b>
Legend: -2= Substantially Reduced -1= Slightly Reduced 0 = Similar +1 = Slightly Greater +2 = Substantially Greater <sup>1</sup> Lowest score is environmentally superior						

### 3.2.14 Changes to Chapter 8, *List of Preparers*

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I hereby certify that the statements furnished above present the data and information required for this report to the best of my ability, and that the facts, statements, and information presented are true and correct to the best of my knowledge and belief.

Signature:  Date: ~~June 29~~ December 2, 2016

### 3.2.15 Changes to Chapter 9, *References*

#### Pages 9-4 and 9-5

- United States Environmental Protection Agency (EPA). 1998. *Locomotive Emission Standards - Regulatory Support Document*. Available: <https://www3.epa.gov/otaq/documents/420r98101.pdf>.
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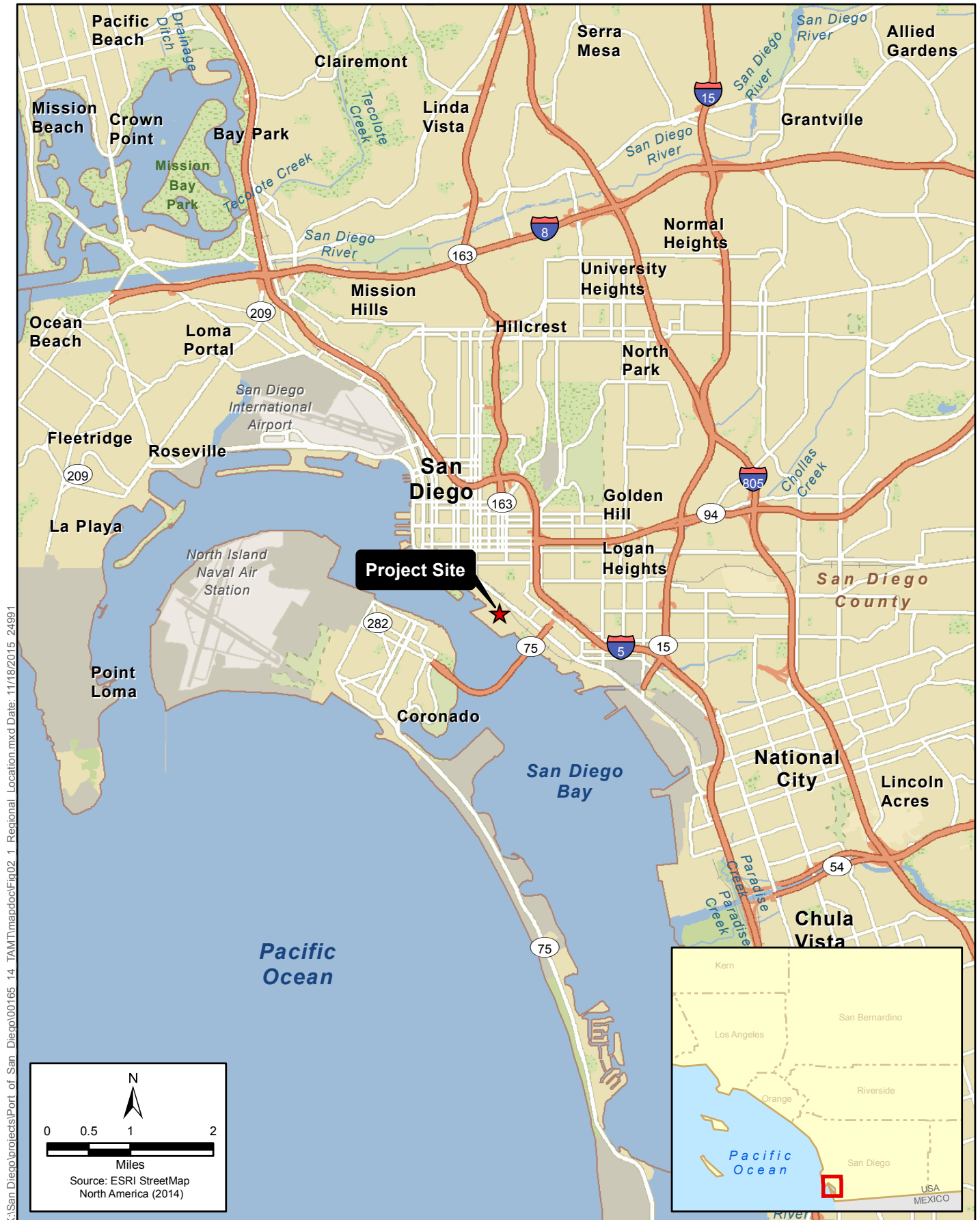
# 9.13 Chapter 7, Alternatives to the Proposed Project

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## 3.2.16 Figure Revisions

The figures on the following pages have been added or revised.





**Figure ES-1**  
**Regional Location**  
**Tenth Avenue Marine Terminal Redevelopment Plan and Demolition and Initial Rail Component EIR**







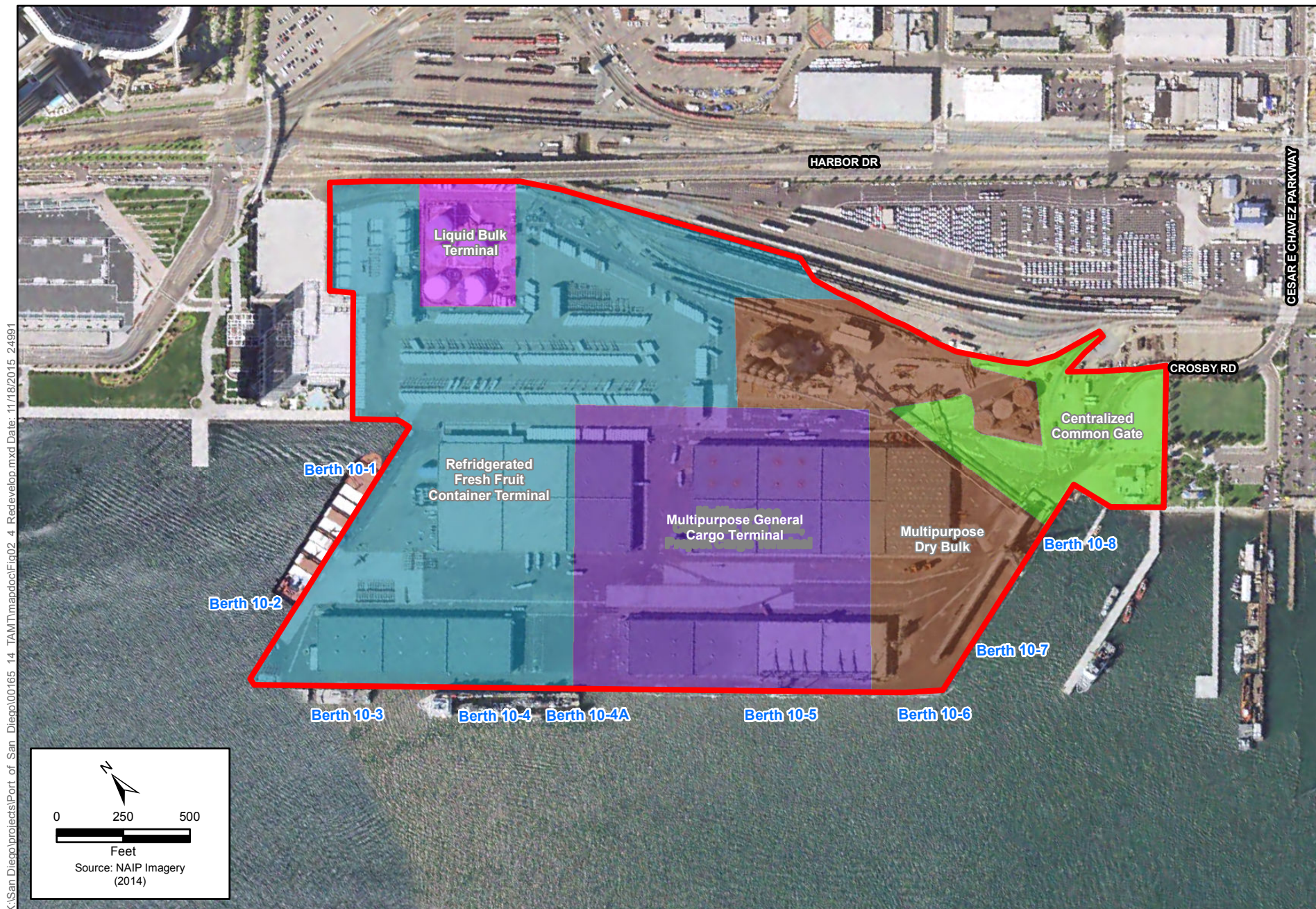
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**Figure ES-2**  
**Project Location Map**  
 Tenth Avenue Marine Terminal Redevelopment Plan and Demolition and Initial Rail Component EIR



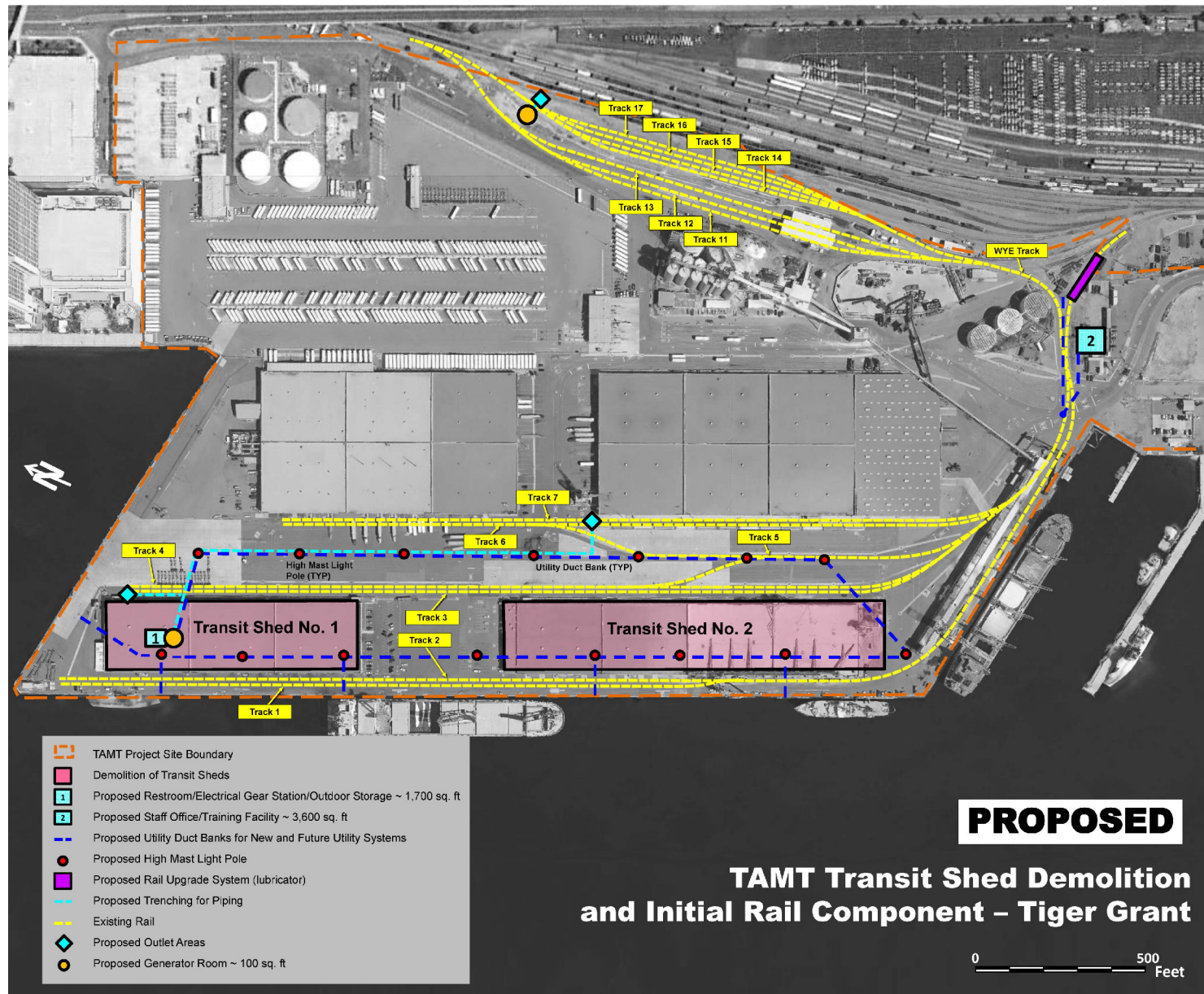




**Figure ES-3**  
**Tenth Avenue Redevelopment Plan Layout**  
**Tenth Avenue Marine Terminal Redevelopment Plan and Demolition and Initial Rail Component EIR**





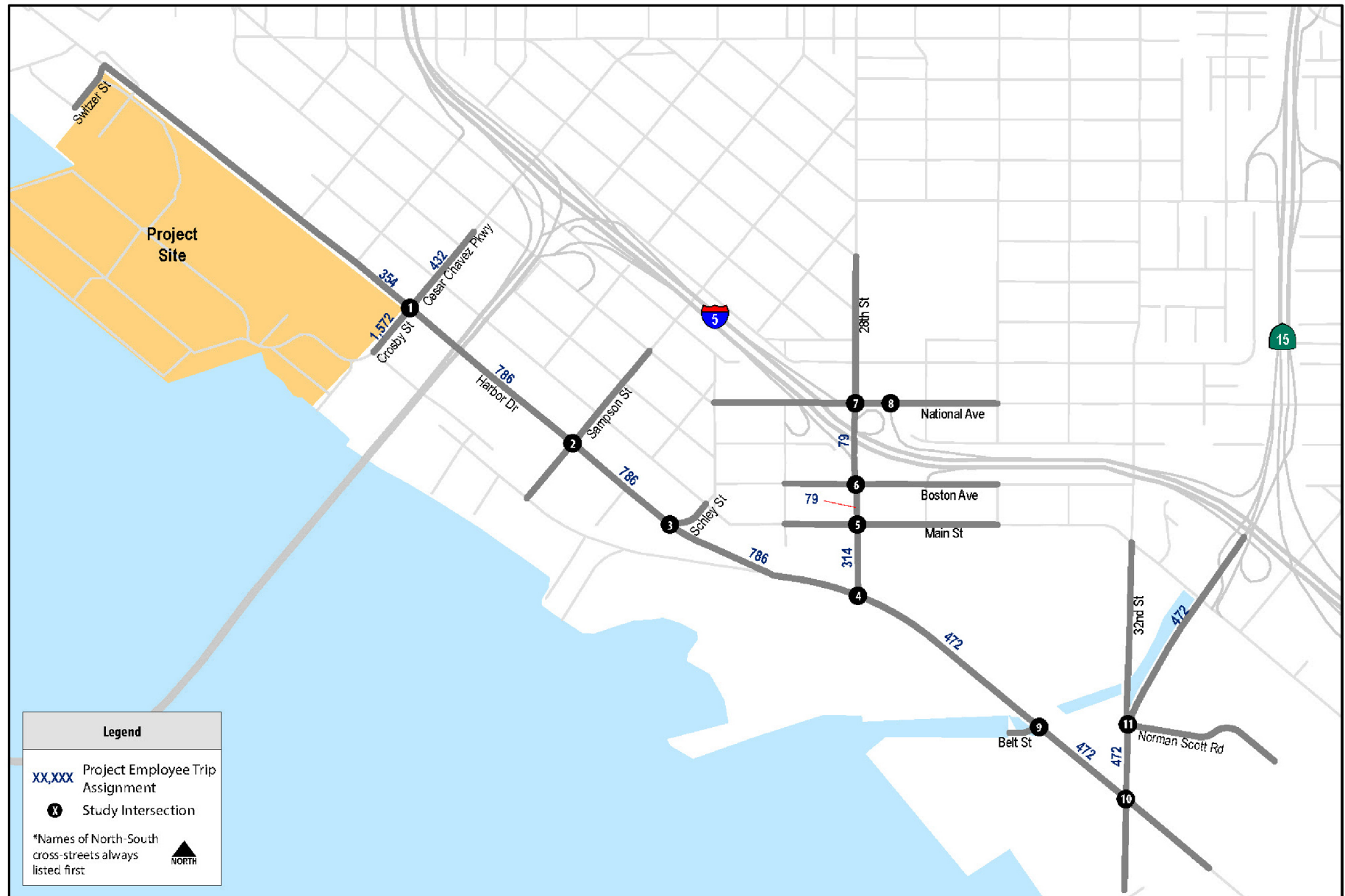












Source: Chen Ryan Associates, 2015



**Figure 4.10-7**  
**Project Trip Assignment – Employees**  
**Tenth Avenue Marine Terminal Redevelopment Plan and Demolition and Initial Rail Component EIR**





Source: Chen Ryan Associates, 2015



**Figure 4.10-12**  
**Demolition and Initial Rail Component Trip Assignment - Employees**  
**Tenth Avenue Marine Terminal Redevelopment Plan and Demolition and Initial Rail Component EIR**



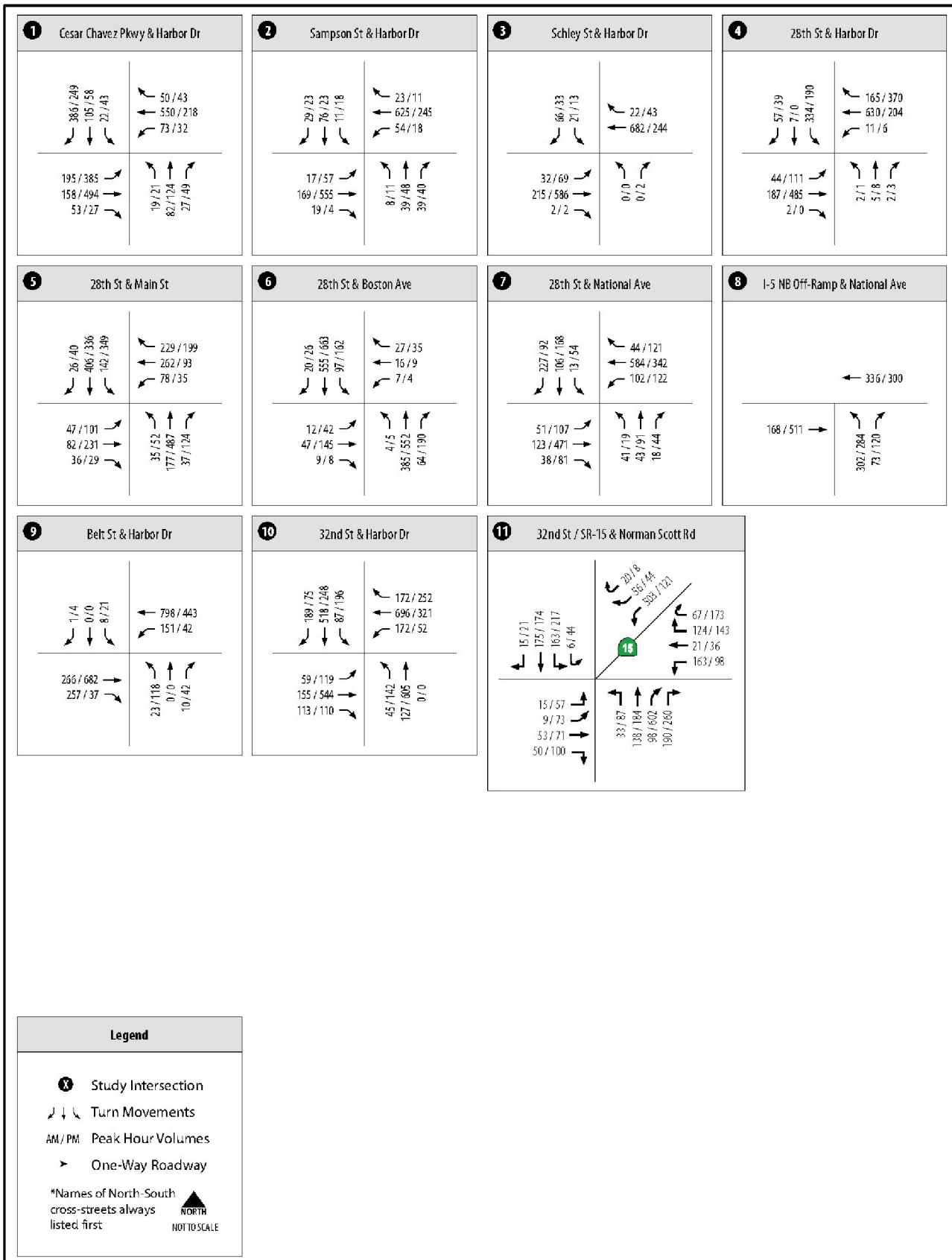


Source: Chen Ryan Associates, 2016



**Figure 4.10-14**  
**Study Area Roadways Existing + Demolition and Initial Rail Component Volumes**  
**Tenth Avenue Marine Terminal Redevelopment Plan and Demolition and Initial Rail Component EIR**





Source: Chen Ryan Associates, 2015





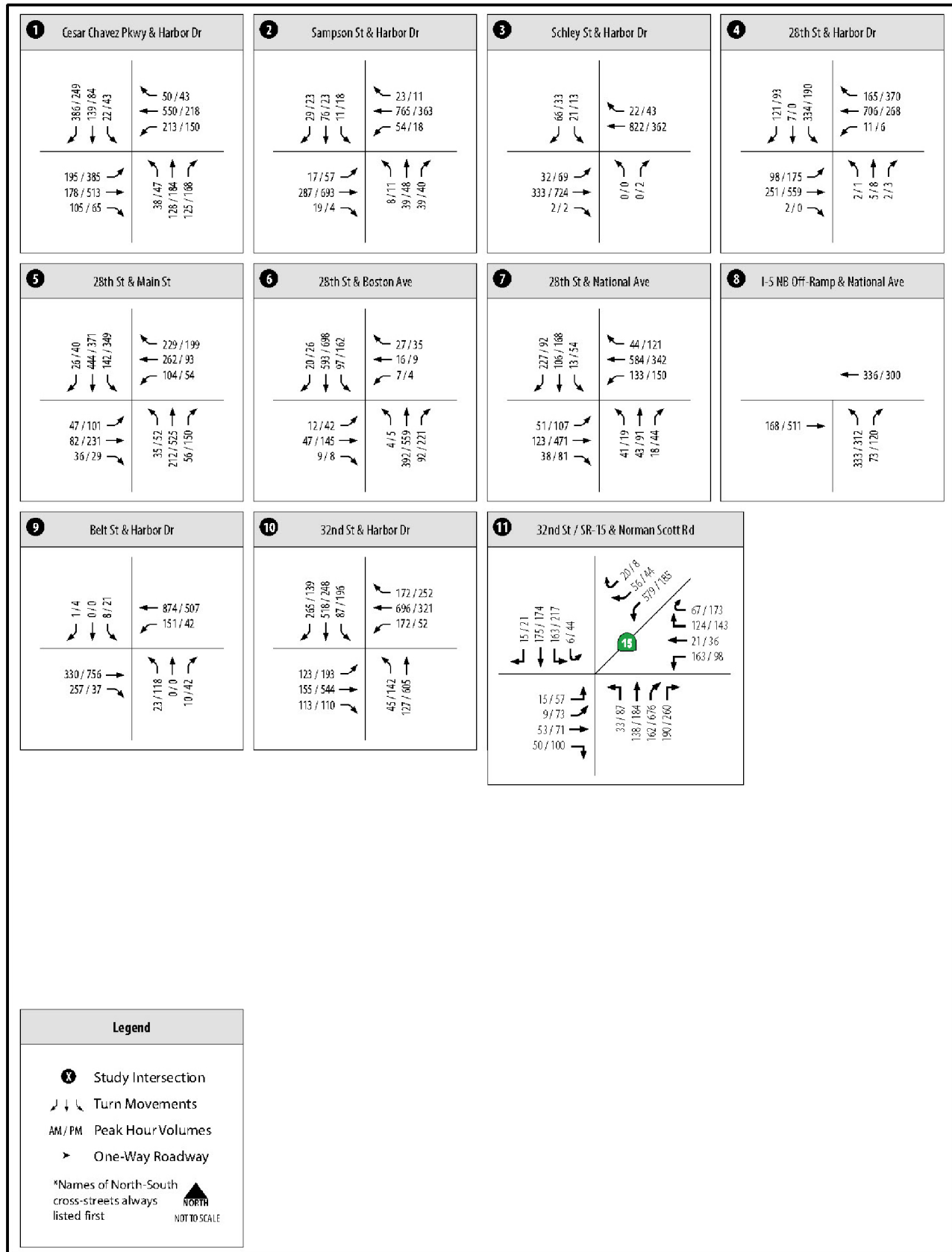


Source: Chen Ryan Associates, 2016



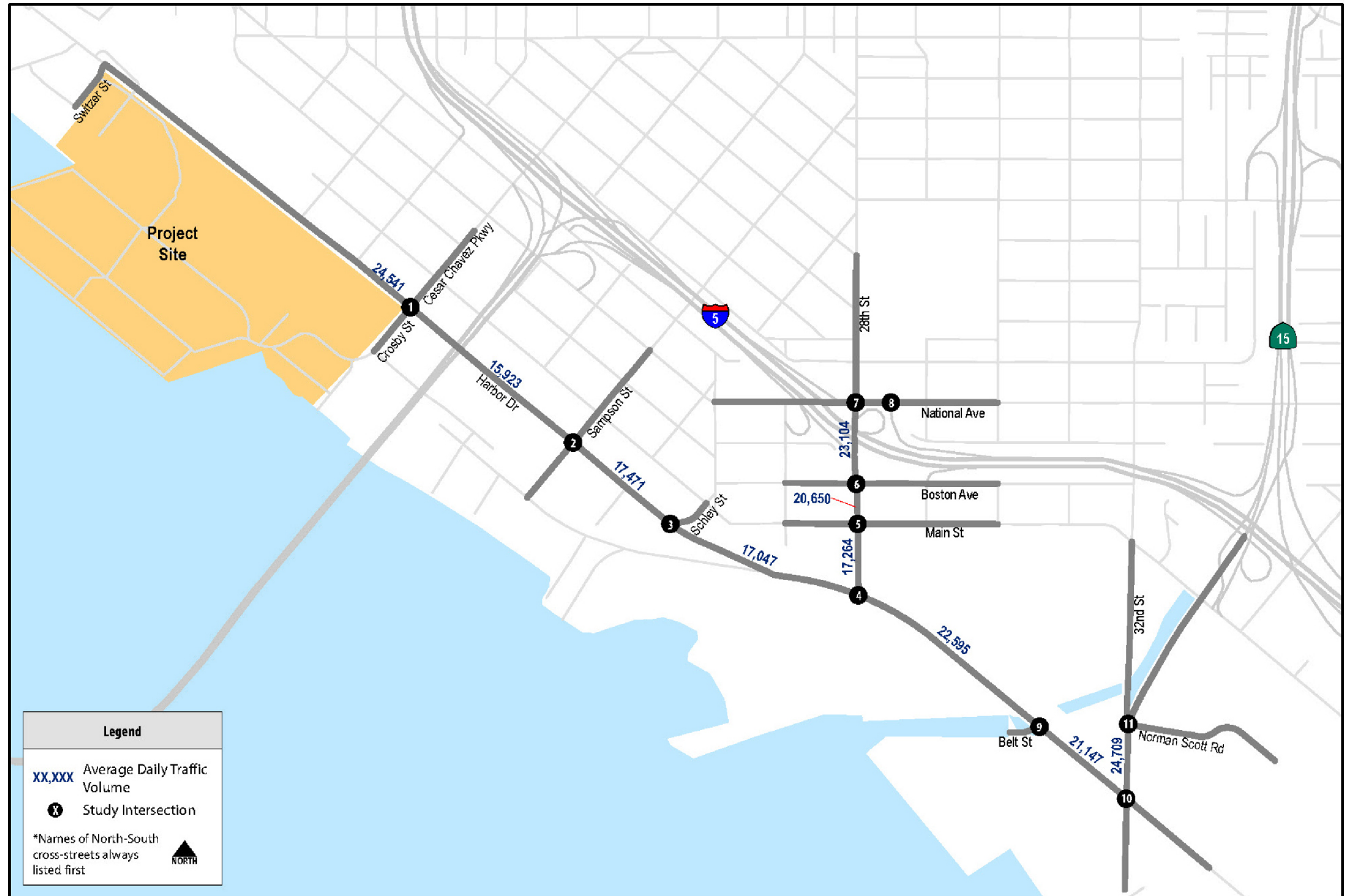
**Figure 4.10-18**  
**Study Area Roadways Existing and Project Volumes**  
**Tenth Avenue Marine Terminal Redevelopment Plan and Demolition and Initial Rail Component EIR**





Source: Chen Ryan Associates, 2016



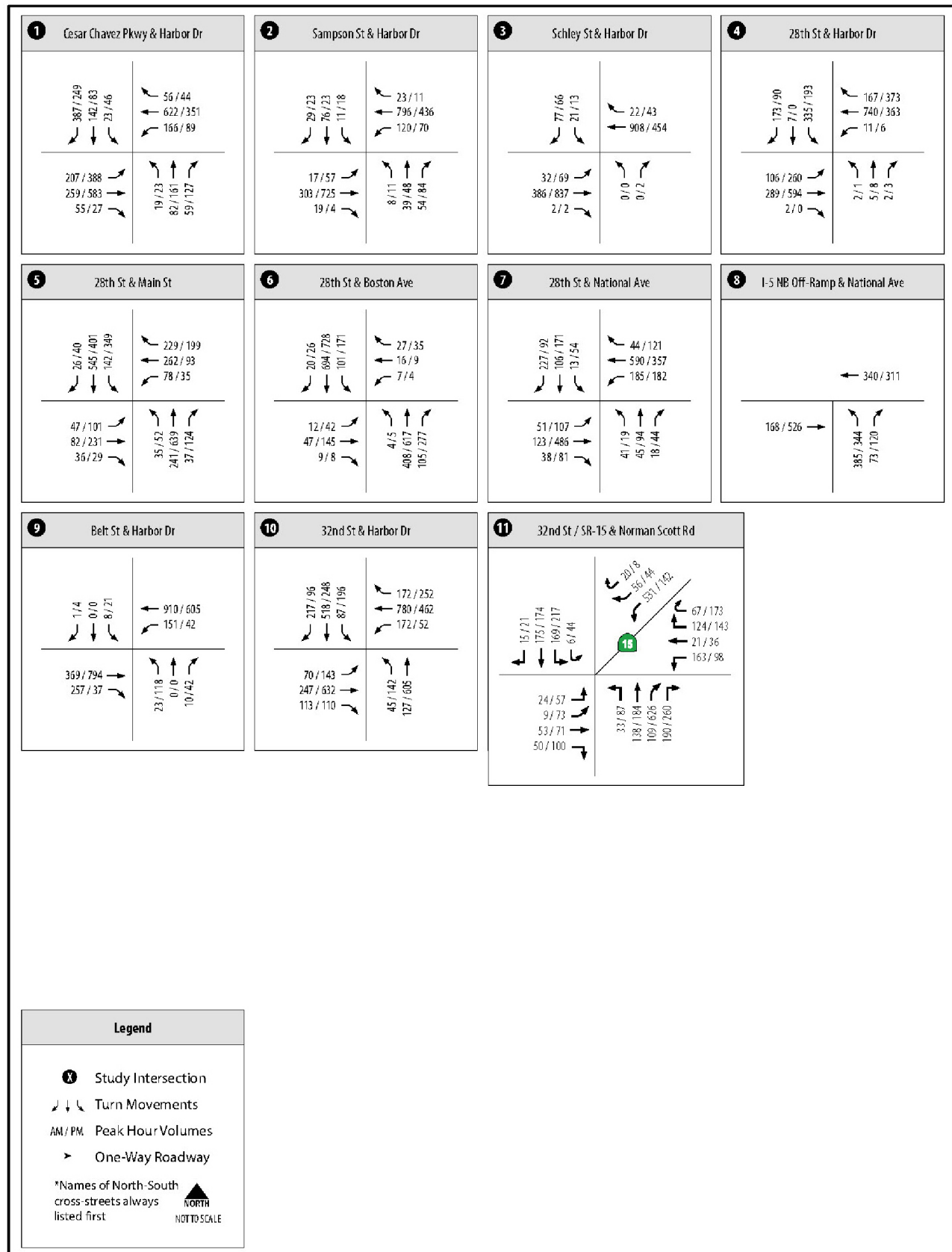


Source: Chen Ryan Associates, 2016



**Figure 5-8**  
**Study Area Roadways: Near-Term Year 2020 and Demolition and Initial Rail Component Volumes**  
**Tenth Avenue Marine Terminal Redevelopment Plan and Demolition and Initial Rail Component EIR**





Source: Chen Ryan Associates, 2016





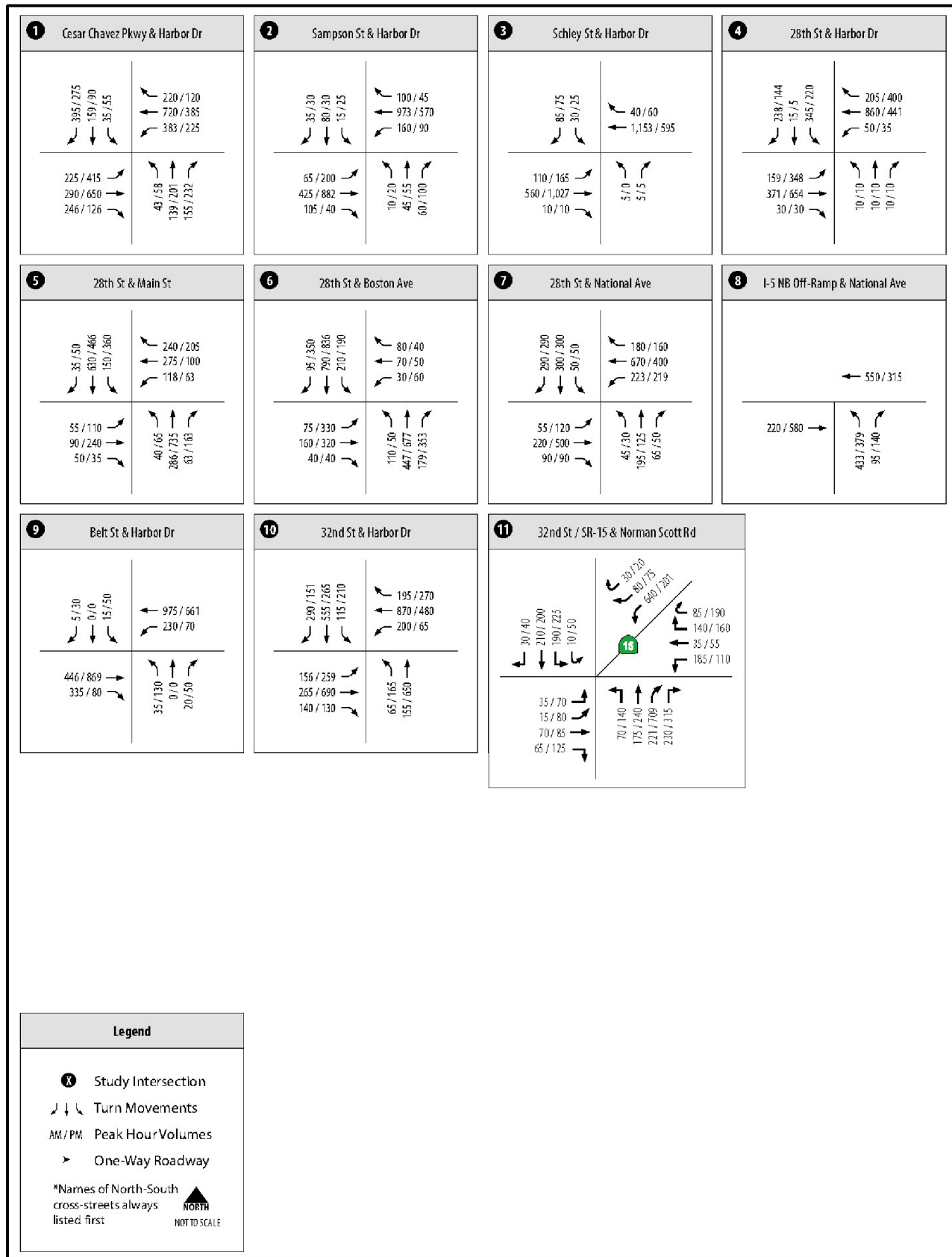


Source: Chen Ryan Associates, 2016



**Figure 5-12**  
**Study Area Roadways: Future Year 2035 and Full TAMT Plan Buildout Volumes**  
**Tenth Avenue Marine Terminal Redevelopment Plan and Demolition and Initial Rail Component EIR**





Source: Chen Ryan Associates, 2016



## Chapter 4

# Comments Received and District Responses

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The Draft EIR was available for public review for 50 days beginning on June 30, 2016 and ending on August 18, 2016. The District posted an electronic version on the District website, hard copies were sent to the City of San Diego Central Library and the City of San Diego Logan Heights Branch Library, and a copy was available for review at the District's Administration Building at 3165 Pacific Hwy, San Diego, CA 92101. A Notice of Availability was posted with the County Clerk on June 29, 2016. All requisite documents, including the Notice of Completion form, were sent to the State Clearinghouse on June 29, 2016. Below is a listing of those agencies and organizations that received a copy of the Draft EIR or a postcard noticing the availability of the Draft EIR.

## 4.1 Public Draft EIR Distribution List

### 4.1.1 Federal Agencies

Federal Aviation Administration: San Diego Flight Standards District Office; Southwest Region; Western-Pacific Region

Federal Emergency Management Agency: Floodplain Management and Insurance Branch

U.S. Army Corps of Engineers: Los Angeles District; San Diego Field Office

U.S. Coast Guard: San Diego Marine Safety Office

U.S. Department of Commerce, National Marine Fisheries Service: West Coast Regional Office

U.S. Department of the Navy: Naval Facilities Engineering Command Southwest Office, Public Affairs Department, Naval Air Station North Island, Naval Base Coronado, Naval Station San Diego

U.S. Environmental Protection Agency: Pacific Southwest, Region 9

U.S. Fish and Wildlife Service: Carlsbad Office

U.S. Department of Homeland Security: Social Security Office; U.S. Customs and Border Protection

### 4.1.2 State Agencies

California Air Resources Board

California Air Resources Board: Freight Transport Branch

California Coastal Commission: San Diego Coast District Office

California Department of Boating and Waterways

California Department of Fish and Wildlife, South Coast Region

California Department of Public Health

California Department of Toxic Substances Control

California Department of Transportation, District 11 - San Diego

California Department of Transportation: Division of Aeronautics; District 11 Office

California Environmental Protection Agency

California Highway Patrol

California Integrated Waste Management Board  
California Native American Heritage Commission  
California Office of Historic Preservation  
California Office of Planning and Research (State Clearinghouse)  
California Public Utilities Commission  
California Regional Water Quality Control Board: Region 9, San Diego  
California Resources Agency  
California State Lands Commission  
California State Water Resources Control Board

### **4.1.3 Regional and Local Agencies**

City of Chula Vista: Planning Department  
City of Coronado: Community Development Department  
City of Imperial Beach: Community Development Department  
City of National City: Community Development Department  
City of San Diego: Central Library; Logan Heights Branch Library; Districts 1 through 10; Development Services; Transportation Division; City Clerk; City Planning and Community Involvement; Mayor's Office; City Council; Water Department; Stormwater Pollution Prevention District; Metro Wastewater Department  
County of San Diego: County Clerk; Board of Supervisors; Department of Planning and Land Use; Department of Environmental Health; Air Pollution Control District; Land Use and Environmental Group  
San Diego Association of Governments  
San Diego County Regional Airport Authority  
San Diego County Water Authority  
San Diego Gas & Electric  
San Diego Metropolitan Transit System  
Sempra Energy

### **4.1.4 Organizations**

Accessible San Diego  
Adams Broadwell Joseph & Cardozo  
Atlantic Richfield Co.  
BAE Systems San Diego Ship Repair Inc.  
Barrio Station  
Bayfront Complex Coalition  
Briggs Law Corporation  
Cemex Construction Materials Pacific, LLC.  
Chevron USA Inc.  
Citizens Coordinate for Century 3

Civic San Diego  
Continental Maritime of San Diego  
CP Kelco  
Crowley Marine Services, Inc.  
de maximis, Inc.  
Dole Fresh Fruit Company  
Downtown San Diego Partnership  
Environmental Health Coalition  
Foss Maritime Company  
General Dynamics NASSCO: Western Pacific Region  
Helf Investments  
Hilton San Diego Bayfront  
Hogan Guiney Dick  
I Love a Clean San Diego  
Ibew Local 569  
International Materials, Inc.  
Katheryn Rhodes and Dr. Conrad Hartsell  
Marine Inspection and Logistic  
Marine Spill Response Corporation  
Metropolitan Stevedore Company  
NASSCO  
National Steel and Shipbuilding Company  
Norton Lilly International, Inc.  
One Park Boulevard, LLC  
P.G. Barrio Logan  
Pacific Maritime Freight, Inc.  
Quality Vending Services Inc. DBA Café Refreshment Services  
R.E. Staite Engineering, Inc.  
Roman Catholic Bishop of San Diego  
San Diego and Arizona Eastern Railway Co  
San Diego Audubon Society  
San Diego Business Journal  
San Diego Coastkeeper  
San Diego Convention and Visitors Bureau  
San Diego County Archaeological Society  
San Diego Daily Transcript  
San Diego Port Tenants Association  
San Diego Refrigerated Service  
San Diego Regional Chamber of Commerce

San Diego Union Tribune  
Save Everyone's Access  
Save Our Bay Inc  
Save Our Heritage Org  
Searles Valley Minerals Operation  
Sierra Club: San Diego Chapter  
Southwest Marine Inc.  
SSA Pacific Inc.  
Surfrider Foundation: San Diego Chapter  
SWM Holdings Inc. C/O Southwest Marine Inc.  
TEJ Enterprises LLC.  
The Jankovich Company  
Universal Protection Service  
Urban Corps of San Diego County  
Young's Market Co.

Other interested individuals and groups also received a postcard noticing the availability of the Draft EIR.

## 4.2 Comments Received on the Draft EIR

The District received 10 comment letters, including one attachment, on the Draft EIR during the public review period. Topics included air quality and health risk, aesthetics, transportation, circulation, and parking, cumulative projects, greenhouse gas (GHG) emissions, hazardous materials, hydrology and water quality, and noise. Table 4-1 lists the agencies and interested parties that provided comment letters.



**Table 4-1. Agencies and Organizations that Submitted Comment Letters on the Draft EIR**

<b>Letter</b>	<b>Agency/Organization</b>	<b>Dated</b>	<b>Page</b>
<b>Federal Agencies</b>			
A	United States Department of the Navy	08/16/16	4-6
<b>State Agencies</b>			
B	Governor's Office of Planning and Research, State Clearinghouse and Planning Unit	8/18/16	4-15
C	California Department of Transportation	08/11/16	4-18
D	California Air Resources Board	08/18/16	4-19
E	California State Lands Commission	07/08/16	4-35
<b>Regional and Local Agencies</b>			
F	County of San Diego, Air Pollution Control District	08/16/16	4-36
G	City of San Diego, Planning Department	08/18/16	4-43
H	City of San Diego, Solid Waste Local Enforcement Agency	07/27/16	4-57
<b>Organizations</b>			
I	Environmental Health Coalition	08/18/16	4-68
J	San Diego County Archaeological Society	08/01/16	4-135
<b>Individuals</b>			
No comment letters were received from individuals.			

## 4.2.1 Letter A – United States Department of the Navy



DEPARTMENT OF THE NAVY  
COMMANDING OFFICER  
NAVAL BASE SAN DIEGO  
3465 SENN ROAD  
SAN DIEGO, CALIFORNIA 92136-5084

5090  
Ser N00/2294  
August 16, 2016

San Diego Unified Port District  
Planning & Green Port Department  
3165 Pacific Highway  
San Diego CA 92101-1128

Dear Ms. Buzaitis:

SUBJECT: TENTH AVENUE MARINE TERMINAL DEIR

This letter is in response to the San Diego Unified Port District's Notice of Availability of a Draft Environmental Impact Report (EIR) for the TAMT Redevelopment Plan and Demolition and Initial Rail Component Project (UPD #EIR-2015-039; SCH #2015031046). The Tenth Avenue Marine Terminal is a Department of Defense Strategic Port, is close to Naval facilities, and uses 28th Street, Harbor Drive, and 32nd Street. As such, the proposed project is of interest to Naval Base San Diego and I thank the Port for the opportunity to provide comments on the Draft EIR.

Naval Base San Diego is potentially affected by the project's impacts to air quality; greenhouse gas emissions and climate change; and transportation, circulation and parking. As discussed in the Draft EIR, the U.S. Navy's Pacific Rebalance requires an approximate 40 percent increase in both active-duty military and dependents (26,548) from Fiscal Years 2015-2024 in the San Diego region. At Naval Base San Diego, which is within the proposed project's study area, current projections for the rebalance show a 46 percent increase in afloat units (24 ships) and a 46 percent estimated increase in both active-duty military and dependents (15,880) from Fiscal Years 2015-2020. As we grow, we will continue to coordinate with our neighbors and partners and hope you consider our future growth in your planning efforts. Our specific comments on the Draft EIR are attached.

We understand the Draft EIR describes many of the impacts as unmitigated because the Port does not control infrastructure improvements beyond its land use jurisdiction. We strongly recommend the Port formally coordinate with the City of San Diego, the San Diego Association of Governments, the Metropolitan Transit System, the City of National City, and the Navy to further address the transportation issues identified in the Draft EIR, particularly at 28th Street, Harbor Drive, 32nd Street, and the local freeways. These transportation facilities provide access to Naval Base San Diego, which processes approximately 40,000 people per day through its gates. As both Naval Base San Diego and the Port grow, we both will need to identify solutions to our shared challenges.

### Comment A-1:

This comment is an introductory comment that explains that the Navy is providing comments on the Draft EIR for the TAMT Redevelopment Plan and Demolition and Initial Rail Component Project (#EIR-2015-039; SCH #2015031046). The comment notes that the TAMT is a Department of Defense Strategic Port close to Naval facilities, making it a point of interest to Naval Base San Diego (NBSD). The comment states that the comments contained in the letter relate to the project impacts on air quality, GHG emissions, and climate change; and transportation, circulation, and parking. The comment also acknowledges that the Draft EIR indicates that there is an increase in active-duty military and dependents from Fiscal Years 2015-2020 and notes that both the Navy and the District will continue to plan for future growth. The comment concludes by urging the District to coordinate with the City of San Diego, San Diego Association of Governments, San Diego Metropolitan Transit System (MTS), City of National City, and the Navy to address the transportation issues identified in the Draft EIR, particularly at 28th Street, Harbor Drive, 32nd Street, and the local freeways.

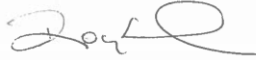
The U.S. Navy is the District's federal strategic partner and the District appreciates the Navy's interest in the proposed project. The District has had a longstanding partnership with the Navy that will help ensure the orderly planning of future growth within and adjacent to both the District's and the Navy's jurisdictions, including at the TAMT, as well as with other adjacent jurisdictions affected by growth in the area. The District is committed to working on solutions associated with increased growth in the region with neighboring agencies, including the Navy. No other specific issues are raised in this particular comment that require a response, but the specific comments that follow in the letter are addressed in the following responses.

SUBJECT: TENTH AVENUE MARINE TERMINAL DEIR

A-1  
cont.

Again, thank you for the opportunity to comment on the Draft EIR for this project. My point of contact for this matter is Ms. Anna Shepherd, Community Plans Liaison Officer, AICP at (619) 556-2314 or at [anna.shepherd@navy.mil](mailto:anna.shepherd@navy.mil). She can provide you additional information that may be helpful.

Sincerely,



R. LOVE  
Captain, U.S. Navy  
Commanding Officer,  
Naval Base San Diego

Enclosure: 1. Tenth Avenue Marine Terminal DEIR Comments

Tenth Avenue Marine Terminal Draft EIR Comments - NBSD		
Page	Paragraph	Comment
A-2	4.2-12	5
A-3	4.2-58	8
A-4	4.2-72	Table 4.2-21
A-5	4.2-74	1
A-6	4.6-48	4
A-7	4.10-4	3
A-8	4.10-4	5
A-9	4.10-15	3
A-10	4.10-15	5
A-11	4.10-15	6
A-12	4.10-48	2
A-13	5.0-7	Figure 5-1

### Comment A-2:

The comment requests a description or map that explains the study area for sensitive receptors. The commenter indicates that NBSD contains sensitive receptors (residential, parks, and child care centers) and is located along the rail and truck haul routes and requests that the District indicate if health risks at NBSD were analyzed as part of this project.

The study area used to determine health risks is described in Section 4.2, *Air Quality and Health Risk*. Page 4.2-9 states:

#### “Sensitive Receptors

The impact of air pollutant emissions on sensitive members of the population is a special concern. *Sensitive receptors are defined as locations where pollutant-sensitive members of the population may reside or where the presence of air pollutant emissions could adversely affect use of the land. ARB has identified the following people as the most likely to be affected by air pollution: children younger than 14, the elderly older than 65, athletes, and people with cardiovascular and chronic respiratory diseases. These groups are classified as sensitive receptors (ARB 2005a). Locations that may contain a high concentration of these sensitive population groups include residential areas, hospitals, daycare facilities, elder-care facilities, elementary schools, and parks (see Figure 4.2-1 for sensitive receptor locations in the project area).*” [Italics added]

“Land uses within vicinity of the project site include a mix of recreation (including Embarcadero Park and the San Diego Convention Center) to the north and northwest, Burlington Northern Santa Fe (BNSF) railyard to the north, and Port industrial uses to the south. *The closest residential land uses to the project site are the residences approximately 1,300 feet north, 1,400 feet west, and 1,500 feet to the east-northeast (in the Sigsbee Row neighborhood) of the project boundary. There are also many nearby recreational land uses, including Cesar Chavez Park, Petco Park, other outdoor parks, and promenades. The closest sensitive receptors to truck travel along Harbor Drive and 28<sup>th</sup> Street are the*

*multi- and single-family residential areas directly adjacent to truck travel along both 28<sup>th</sup> Street and Boston Avenue and the residential areas along Harbor Drive, Tidelands Avenue, and Bay Marine Drive near the National Distribution Center. Additionally, there are schools (Perkins Elementary, Logan Elementary, and Monarch School) and residences approximately 380 feet north of Harbor Drive as well as recreational receptors adjacent to truck travel at Cesar Chavez Park. The closest sensitive receptors to ocean-going vessels (OGV) and tug travel within the harbor include the various multi- and single-family residential areas in Point Loma, Shelter Island, and Coronado, multifamily residential areas in Downtown, and the various recreational areas along Point Loma, Shelter Island, Harbor Island, along the Embarcadero, and in Coronado.”*  
[Italics added]

Therefore, the study area can be summarized as the closest sensitive receptor locations, as indicated in Figure 4.2-1. The closest receptors would have the highest levels of emissions at their locations and, therefore, risk of health issues, while sensitive receptors that are progressively farther away from the project site and the truck corridor would have progressively lower emissions and risk.

The health risk assessment (HRA) does include receptors within the NBSD property. While there is a mixture of uses within the NBSD property, each of the receptors was treated as a residential use, which is the most conservative and realistic approach given it is reasonable to assume that people likely work, play, and live within the property boundary. Health risk there is lower than at locations closer to the terminal, but maximum risk within NBSD would amount to eight new cases in a million after mitigation within the NBSD property. Risk within the NBSD property is primarily attributable to vessel hoteling, vessel transit in the harbor, and terminal equipment, and mitigation measures to reduce emissions from vessel hoteling and terminal equipment would keep health risk below the 10 cases in a million threshold. As noted in the Draft EIR, impacts related to health risk at the closest residential sensitive receptors would potentially result in 43 new cases in 1 million after mitigation, which is considered to be significant and unavoidable.

**Comment A-3:**

The comment recommends inclusion of additional measures for air quality compliance and specifically requests inclusion of a measure to actively pursue interagency coordination on measures, such as transit, land use, urban heat island reduction, and offsite mitigation, particularly as it relates to impacts along Harbor Drive and 32<sup>nd</sup> Street, which are primary access roads to NBSD.

Section 4.2 has been updated to include augmentation to the existing mitigation measures and new mitigation measures to address significant impacts identified in the Draft EIR, including an emission control system such as a Bonnet system for vessels at berth, additional electric cargo-handling equipment (CHE), and development of an emissions reduction program.

In addition, the Draft EIR provides mitigation to reduce project-related significant impacts at the road segment of 28<sup>th</sup> Street between Boston Avenue and National Avenue and at the intersection of Norman Scott Rd/32<sup>nd</sup> Street/Wabash Blvd. The District is committed to working with the agencies with jurisdiction over these segments (City of San Diego and California Department of Transportation [Caltrans], respectively) and, as stated in mitigation measures MM-TRA-3 and MM-TRA-4, the District will provide fair share contributions to improvements, which would reduce potentially significant impacts to less-than-significant levels. The only reason the Draft EIR concludes these two impacts would remain significant and unavoidable is because the actual implementation of the improvements is not within the District's control, which would mean the District would not be able to ensure the implementation of the improvements would precede the impact and, indeed, if the agencies with jurisdiction would choose to implement the improvements at all. However, the mitigation measures would ensure the District pays its fair share prior to the impact occurring.

Changes to mitigation are included in Chapter 3, *Errata and Revisions*, of the Final EIR.

**Comment A-4:**

The comment requests an indication of whether sensitive receptors at NBSD were included in the HRA in Table 4.2-21.

Please see the response to comment A-2. Sensitive receptors at NBSD were included in the analysis. No changes to the Final EIR are required.

**Comment A-5:**

The comment requests clarification on whether the intersection of Norman Scott Rd/32<sup>nd</sup> Street/Wabash Blvd was included in the carbon monoxide (CO) hot-spot analysis.

As indicated on page 4.2-82, one of the busiest intersections and the intersection to which the proposed project would contribute the greatest number of vehicle trips is Harbor Drive and 28<sup>th</sup> Street. As indicated in Table 4.2-23, even at this intersection, localized CO emissions would be significantly below (i.e., four times below) the threshold established by ARB. As indicated in the project's traffic study, traffic volumes at the Norman Scott Rd/32<sup>nd</sup> Street/Wabash Blvd intersection are expected to be relatively similar to the Harbor Drive and 28<sup>th</sup> Street; therefore, localized CO emissions would be similar. Consequently, no intersections within the project study area would exceed the threshold. No changes to the Final EIR are required.

**Comment A-6:**

The comment notes the Draft EIR mitigation measure MM-GHG-2 requires compliance with six of the District's Climate Action Plan (CAP) measures. The comment requests additional measures for compliance, including a measure to actively pursue measures that require interagency coordination, similar to comment A-3, particularly as it relates to Harbor Drive and 32<sup>nd</sup> Street, which are primary access roads to NBSD.

Please see the response to comment A-3. Based on recommendations received during the public comment period, Section 4.6 has been updated to include augmented mitigation measures along with new

measures to reduce significant impacts identified in the Draft EIR. Changes to mitigation are included in Chapter 3, *Errata and Revisions*, of the Final EIR and are reflected in the project's Mitigation Monitoring and Reporting Program (MMRP).

**Comment A-7:**

The comment notes that the Blue Line Pacific Fleet Trolley stop also serves Harbor Drive at 32<sup>nd</sup> Street, which is within the project study area.

The Blue Line Pacific Fleet Trolley stop does not serve the project site. While it is within the overall transportation study area, trolley passengers would arrive and depart from the Barrio Logan Trolley Station if on the Blue Line or the 12<sup>th</sup> and Imperial Station if on the Orange or Green lines. Both stops are less than 0.5 mile from the project site. The Blue Line Pacific Fleet Trolley stop is nearly 2 miles' walking distance from the project site. No changes to the Final EIR are required.

**Comment A-8:**

The comment notes that MTS Route 929 also serves the project area, on Main Street.

The Final EIR has been updated to indicate that MTS Route 929 also serves the study area, including stops near the project site at Main Street and Cesar Chavez Parkway. Please see the changes in Chapter 3, *Errata and Revisions*, of this Final EIR.

**Comment A-9:**

This comment repeats comment A-8, but indicates a different page.

The Final EIR has been updated to indicate that MTS Route 929 also serves the study area, including stops near the project site at Main Street and Cesar Chavez Parkway. Please see the changes in Chapter 3, *Errata and Revisions*, of this Final EIR.



**Comment A-10:**

The comment requests analysis of a proposed bikeway along Chollas Creek until 32<sup>nd</sup> Street, which proposes changes to the intersection of 32<sup>nd</sup> Street and Norman Scott Street in the Draft EIR, particularly as it relates to safety and traffic.

The Chollas Creek-to-Bayshore Bikeway Multi-Use Path Final Design proposes to include a bicycle refuge island at the 32<sup>nd</sup> Street/Norman Scott Street/Interstate 15 intersection. However, this improvement will not change the intersection's vehicular lane configuration from current conditions (i.e., it will maintain the same number of travel lanes at the intersection); therefore, no additional analysis is required with the implementation of this project. No clarifications are needed in the Final EIR.

Please note that the traffic analysis for the Demolition and Initial Rail Component was further refined since being distributed for public review because it estimated that over 50% of employee commute traffic was being sent to the Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard intersection located over 1.5 miles from the project. After reviewing these results with District Maritime staff working at the terminal and discussing the routes current TAMT workers use, it was concluded that the actual number of employee commuter traffic at this intersection is significantly lower than originally estimated. The updated analysis estimated approximately 39% of employees would travel the more than 1.5 miles to access the freeway, whereas the majority would access the freeway along Cesar Chavez Parkway, Beardsley Street, 28<sup>th</sup> Street, and Boston Avenue, all of which are much closer to the project site. With the updated analysis, the previous Impact-TRA-2 was eliminated along with the previous MM-TRA-2.

In addition, please note that MM-TRA-4 (changed from MM-TRA-5 in the Draft EIR) recommends the implementation of a westbound right-turn overlap phase. Because an exclusive westbound right-turn lane is already in place at the intersection, this recommendation would only require modifications to the signal at the intersection (i.e., include a westbound right-turn green arrow) and would not require

improvements to any of the intersection approaches or lanes. Therefore, the recommended improvement would not conflict with the Chollas Creek-to-Bayshore Bikeway Multi-Use Path Final Design. No clarifications are needed in the Final EIR.

**Comment A-11:**

The comment notes that Harbor Drive and 32<sup>nd</sup> Street have pedestrian bridges that provide access across the intersection.

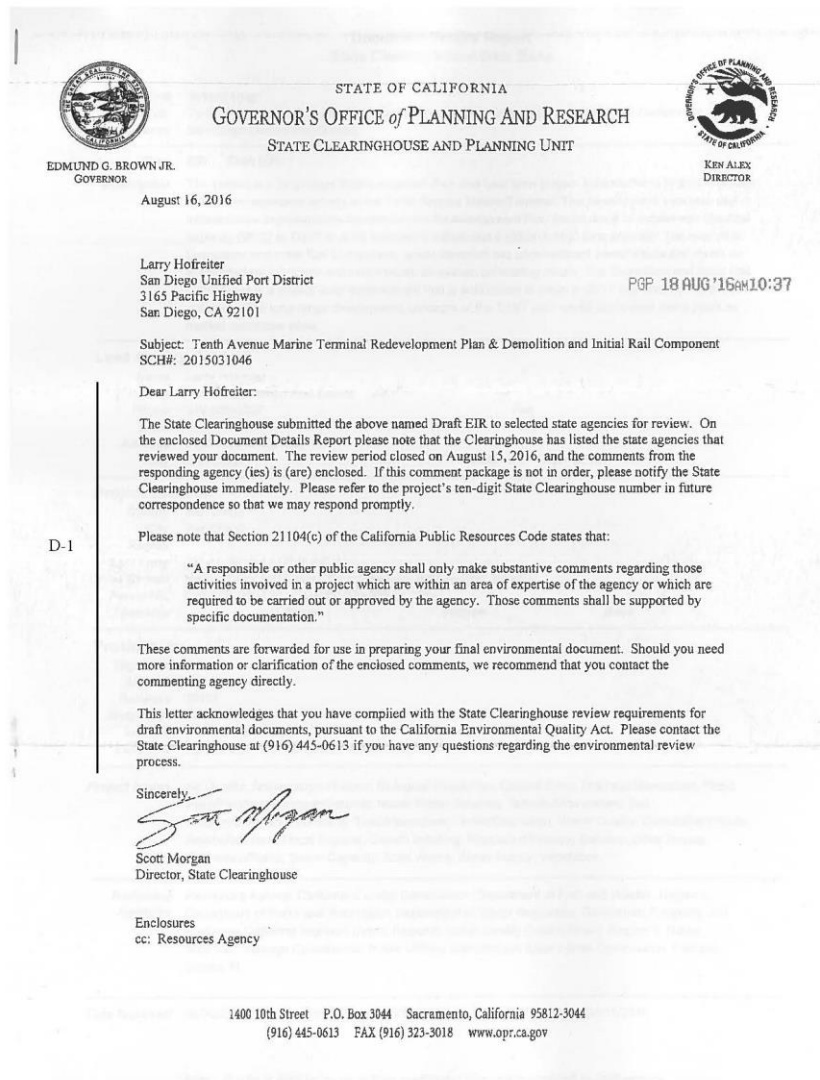
These bridges do not provide access to the project site and the project would have no effect on their use. As such, they were not included in the project pedestrian analysis. No clarifications are needed in the Final EIR.

**Comment A-12:**

The comment requests inclusion of a graphic and additional written description of the new westbound right-turn lanes. NBSD is unable to determine impacts on Naval facilities and operations based on the information provided.

Please see the response to comment A-10. As stated in that response, MM-TRA-4 recommends the implementation of a westbound right-turn overlap phase. Because an exclusive westbound right-turn lane is already in place at the intersection, this recommendation would only require modifications to the signal at the intersection (i.e., include a westbound right-turn green arrow) and would not require improvements to any of the intersection approaches or lanes. Because the recommended improvement only requires a signal modification and not physical modifications to the roadway, it would not impede the Navy's operations.

## 4.2.2 Letter B – Governor's Office of Planning and Research, State Clearinghouse and Planning Unit



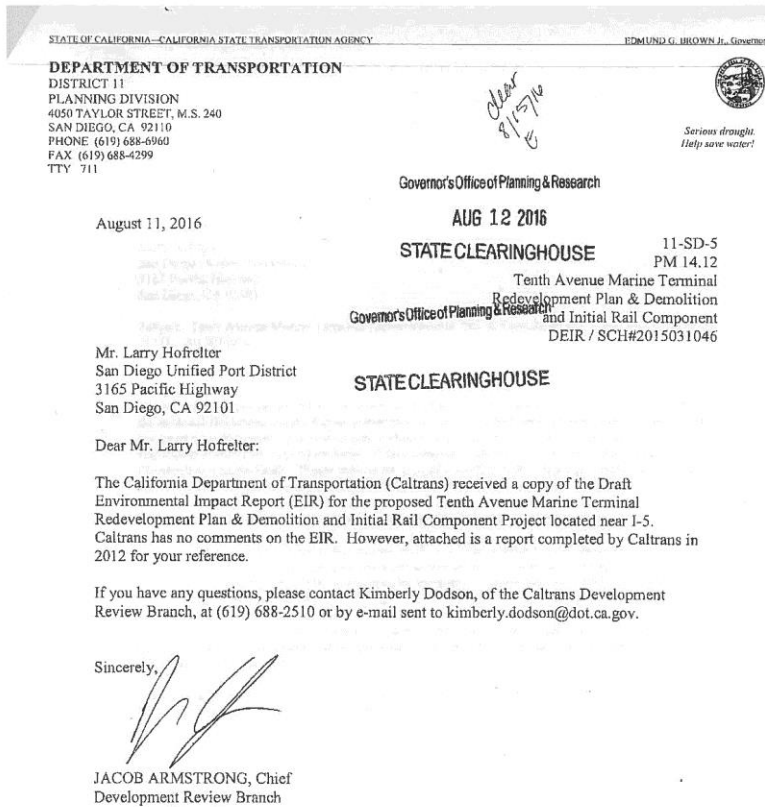
### Comment B-1:

The comment notes the State agencies that received the Draft EIR for comment and the date the comment period closed, and includes an attached letter from Caltrans (see comment C-1). In addition, the comment notes that the project has complied with the State Clearinghouse review requirements for the Draft EIR pursuant to CEQA.

The District appreciates the Office of Planning and Research's coordination of the Draft EIR. As indicated, one comment letter was provided, which was from Caltrans (Comment Letter C). As indicated in Comment Letter C, Caltrans has no comments on Draft EIR. No other comments were received and no further response is necessary.

Document Details Report State Clearinghouse Data Base			
<b>SCH#</b>	2015031046		
<b>Project Title</b>	Tenth Avenue Marine Terminal Redevelopment Plan & Demolition and Initial Rail Component		
<b>Lead Agency</b>	San Diego Unified Port District		
<b>Type</b>	EIR Draft EIR		
<b>Description</b>	The project is a long-range Redevelopment Plan and near-term project improvements to accommodate anticipated economic activity at the Tenth Avenue Marine Terminal. The development concepts and infrastructure improvements identified in the Redevelopment Plan would result in a maximum practical capacity (MPC) at TAMT in 2035 between 5 million and 6 million metric tons annually. The near-term Demolition and Initial Rail Component, would demolish two under-utilized transit sheds and install an automated rail lubricator and compressed air system on existing tracks. The Demolition and Initial Rail Component is a project level improvement that is anticipated to begin in 2017 and take 33 months to complete. The long-range development concepts of the TAMT plan would occur over many years as market conditions allow.		
<b>Lead Agency Contact</b>			
<b>Name</b>	Larry Hofreiter		
<b>Agency</b>	San Diego Unified Port District		
<b>Phone</b>	619-686-6257	<b>Fax</b>	
<b>email</b>			
<b>Address</b>	3165 Pacific Highway		
<b>City</b>	San Diego	<b>State</b>	CA <b>Zip</b> 92101
<b>Project Location</b>			
<b>County</b>	San Diego		
<b>City</b>	San Diego		
<b>Region</b>			
<b>Lat / Long</b>	32° 41' 57" N / 117° 9' 22" W		
<b>Cross Streets</b>	Harbor Drive and Cesar Chavez Parkway (687 Switzer Street)		
<b>Parcel No.</b>	020-183; 020-091; 020-025; 020-039		
<b>Township</b>	<b>Range</b>	<b>Section</b>	<b>Base</b>
<b>Proximity to:</b>			
<b>Highways</b>	I-5		
<b>Airports</b>			
<b>Railways</b>	BNSF		
<b>Waterways</b>	San Diego Bay		
<b>Schools</b>	Perkins Elementary		
<b>Land Use</b>	Port Master Plan designates the 96-acre area as either Marine Terminal or Marine Related.		
<b>Project Issues</b>	Air Quality; Archaeologic-Historic; Biological Resources; Coastal Zone; Drainage/Absorption; Flood Plain/Flooding; Geologic/Seismic; Noise; Public Services; Schools/Universities; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Traffic/Circulation; Water Quality; Cumulative Effects; Aesthetic/Visual; Fiscal Impacts; Growth Inducing; Population/Housing Balance; Other Issues; Recreation/Parks; Sewer Capacity; Solid Waste; Water Supply; Vegetation		
<b>Reviewing Agencies</b>	Resources Agency; California Coastal Commission; Department of Fish and Wildlife, Region 5; Department of Parks and Recreation; Department of Water Resources; Resources, Recycling and Recovery; California Highway Patrol; Regional Water Quality Control Board, Region 9; Native American Heritage Commission; Public Utilities Commission; State Lands Commission; Caltrans, District 11		
<b>Date Received</b>	06/30/2016	<b>Start of Review</b>	06/30/2016 <b>End of Review</b> 08/15/2016

Note: Blanks in data fields result from insufficient information provided by lead agency.



## 4.2.3 Letter C – California Department of Transportation

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

EDMUND G. BROWN Jr., Governor

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 11

PLANNING DIVISION

4050 TAYLOR STREET, M.S. 240

SAN DIEGO, CA 92110

PHONE (619) 688-6960

FAX (619) 688-4299

TTY 711



Serious drought.  
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August 11, 2016

11-SD-5

PM 14.12

Tenth Avenue Marine Terminal  
Redevelopment Plan & Demolition  
and Initial Rail Component  
DEIR / SCH#2015031046

Mr. Larry Hofreiter  
San Diego Unified Port District  
3165 Pacific Highway  
San Diego, CA 92101

Dear Mr. Larry Hofreiter:

The California Department of Transportation (Caltrans) received a copy of the Draft Environmental Impact Report (EIR) for the proposed Tenth Avenue Marine Terminal Redevelopment Plan & Demolition and Initial Rail Component Project located near I-5. Caltrans has no comments on the EIR. However, attached is a report completed by Caltrans in 2012 for your reference.

If you have any questions, please contact Kimberly Dodson, of the Caltrans Development Review Branch, at (619) 688-2510 or by e-mail sent to [kimberly.dodson@dot.ca.gov](mailto:kimberly.dodson@dot.ca.gov).

Sincerely,

JACOB ARMSTRONG, Chief  
Development Review Branch

"Provide a safe, sustainable, integrated and efficient transportation system  
to enhance California's economy and livability"

**Comment C-1:**

The comment notes that Caltrans received a copy of the Draft EIR for the proposed project and indicates that it has no comments on the EIR. Caltrans attached a report (*TCIF Port Access Improvement Projects – 32<sup>nd</sup> St Supplemental Engineering Report*) completed by Caltrans in 2012 as reference.

The District appreciates Caltrans' interest in the project and notes that Caltrans has no comments on the Draft EIR. District staff will review the *TCIF Port Access Improvement Projects – 32<sup>nd</sup> St Supplemental Engineering Report* (included as Attachment 4 to this Final EIR) and consider it for future analyses. No comments are raised and therefore no further response is needed.

C-1

## 4.2.4 Letter D – California Air Resources Board



August 18, 2016

Mr. Larry Hofreiter  
San Diego Unified Port District  
3165 Pacific Highway  
San Diego, California 92101

Dear Mr. Hofreiter:

Thank you for providing the California Air Resources Board (ARB) the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Tenth Avenue Marine Terminal (TAMT) Redevelopment Plan (proposed Plan). This proposed Plan provides an opportunity to create a terminal that promotes the use of the cleanest technologies and practices available during both the construction phase and full project build-out.

ARB reviewed the TAMT Notice of Preparation (NOP) and provided comments to the San Diego Unified Port District (Port) in a letter dated, October 22, 2015. ARB expressed concerns regarding the localized cancer risk likely to occur due to the increase in diesel particulate matter (PM) from the construction and long-term operation of the facility. To address these concerns, ARB recommended actions to support the development, demonstration, and deployment of zero and near-zero emission technology at the TAMT.

We commend the Port for including a number of features that begin to mitigate the air quality and health impacts from the proposed project. These features include 100-foot rail-mounted electrical cranes, electrical utility improvements, additional ocean going vessel shorepower capabilities, adding electrical cargo handling equipment (CHE) at each node, increasing the target requirement for the Vessel Speed Reduction Program, and implementation of an annual Technology Review Program and a Sustainable Leasing Program.

However, the increase in cargo throughput from baseline conditions to 2035 is substantial. The long-term operation of diesel vehicles and equipment will have significant impacts in the region, especially given the proximity to residences and sensitive receptors. Therefore, to ensure that all feasible mitigation is implemented to

*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website: <http://www.arb.ca.gov>.*

California Environmental Protection Agency

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### Comment D-1:

This comment is an introductory comment that briefly summarizes the California Air Resources Board's (ARB's) Notice of Preparation comments that expressed concern regarding the localized cancer risk and recommended actions to support the use of zero and near-zero emission technology at the TAMT. The commenter commends the Port for including features that would mitigate air quality and health impacts from the proposed project. However, the comment notes that the increase in cargo throughput from baseline conditions to 2035 is substantial and provides additional mitigation measures and recommendation in the paragraphs below.

The District appreciates ARB's interest in the proposed project. The Draft EIR includes an assessment of localized cancer risk and includes some of ARB's recommended zero and near-zero emission technology actions in the Draft EIR. As noted in detail below, the District has incorporated many of the recommended measures into the Final EIR. See responses to comments D-2 through D-15 below.

Mr. Larry Hofreiter  
August 18, 2016  
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reduce these significant impacts, ARB recommends the Port adopt the additional mitigation measures and recommendations set forth below.

#### Background

The proposed Plan replaces the existing 2008 Maritime Business Plan using an updated review of existing cargo throughput and a market forecast to 2035. The proposed Plan occupies 96 acres along the San Diego Bay near downtown San Diego and the Barrio Logan Community. Surrounding land uses near the TAMT include many sensitive receptors: Cesar Chavez Park, Perkins Elementary School, and Mercado Head Start Preschool, as well as the residences, schools, childcare facilities, and healthcare facilities along the truck routes that would be used by the additional trucks entering and leaving the TAMT. The Barrio Logan Community is among the worst five percent in the State for cumulative pollution burden, according to the California Environmental Protection Agency.<sup>1</sup>

The proposed Plan identifies five operating nodes that include dry bulk, liquid bulk, refrigerated container, multi-purpose general cargo and the Central Gate Facility. The DEIR results in an increase throughput of 5,109,971 metric tons over baseline, based on the "worst case" scenario. The DEIR also assesses the maximum individual cancer risk to residents in the neighboring residential community from the TAMT emissions. Results of this risk assessment are a net increase of 132 chances in a million with the proposed mitigation measures.

#### Recommendations

The majority of the localized cancer risk for the TAMT is attributable to the increase in diesel PM from the long-term operation of the facility, specifically the increase in vessel hoteling, transit, and CHE. Additionally, the DEIR estimates a net increase in fugitive PM at the dry bulk node from 106 tons per year to 1,000 tons per year at full build out. Consequently, ARB staff recommends the following to reduce these emissions:

- 1) The DEIR estimates that annual throughput at the dry bulk terminal will increase from 289,864 metric tons, at baseline conditions, to 2,650,000 metric tons, by full buildout. Table 4.2.18 indicates that bulk loading/unloading operations of bauxite, concrete, and soda ash, results in 5,343 pounds per day of fugitive PM emissions over baseline conditions. Given this increase in fugitive PM emissions from the bulk operations, incorporate new mitigation measures that will significantly reduce the fugitive PM emissions. The Port should consult with the San Diego

<sup>1</sup> Office of Environmental Health Hazard Assessment. "CalEnviro Screen Version 2.0," November, 10, 2014, <<http://oehha.ca.gov/ei/ces2.html>>, accessed April 30, 2015.

#### Comment D-2:

This comment recommends that the Port consult with San Diego Air Pollution Control District (SDAPCD) to identify the best available control technologies and strategies in developing mitigation measures that would further reduce fugitive particulate matter emissions.

After the Draft EIR public review period closed, District staff determined that MM-AQ-4: Implement Best Available Control Technologies (BACT) for Conveyor System and Bulk Discharge Unloader for Future Dry Bulk Operations was not quantified. This was an inadvertent oversight that has been corrected in Table 4.2-18, Estimate of Operational Emissions under the Mitigated Existing Plus Full TAMT Build-out Condition (pounds per day), of the Draft EIR, which shows this mitigation measure, as well as others, results in a net decrease of -246 pounds per day for particulate matter 10 microns or less in diameter (PM10) and -51 pounds per day for particulate matter 2.5 microns or less in diameter (PM2.5) emissions.

In addition, District staff followed up with SDAPCD regarding fugitive dust emissions associated with dry bulk operations at plan buildout. SDAPCD staff confirmed their agency would require BACT for new dry bulk operations, but that the control efficiency that would be required by them would depend on the type of commodity that is being conveyed (e.g., cement, bauxite, soda ash) and other factors. SDAPCD did not object to the Draft EIR establishing a minimum 95% BACT control efficiency, acknowledging that more stringent BACT control efficiencies may be required as a result of the SDAPCD permitting process. Furthermore, SDAPCD staff provided guidance to District staff about referencing the Prop 1B Goods Movement Emission Reduction Program and the Carl Moyer Program in the revisions to MM-AQ-7: Annual Inventory Submittal and Periodic Technology Review.



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- D-2 | Air Pollution Control District to identify the best available control technologies and strategies in developing related mitigation measures.
- D-3 | 2) Although the DEIR includes some features that begin to mitigate the air quality and health impacts from the proposed project, as recommend in our NOP comment letter and given the health and air quality impacts, ARB suggests further incorporating more zero and near-zero emission technologies that are commercially available now and by full build-out in 2035. While the project includes some zero emission equipment, such as electric yard trucks and rail-mounted electric gantry cranes, other technologies that are available today should be incorporated in the project. These technologies include battery or fuel cell electric forklifts, and battery electric, fuel cell, or hybrid medium and heavy-duty on-road vehicles. ARB's Technology and Fuels Assessments provide information on the current and projected development of mobile source technologies and fuels, including current and anticipated costs at widespread deployment. The assessments can be found at <http://www.arb.ca.gov/msprog/tech/tech.htm>.
- D-4 | 3) Mitigation Measure (MM)-AQ-3 requires 80 percent compliance of ARB's At-Berth Regulation by 2020. This is already required under the regulation. Therefore, given the projected increase in operations and associated emissions by the proposed project, this mitigation measure should instead require 100 percent shorepower for all vessels or incorporate other technologies, such as emissions capture and control systems, to maximize emission reductions from all vessels. Additionally, hybrid technologies have shown success at achieving emission reductions in certain tugs based on duty, engine size, and location. Consider incorporating hybrid tugs at TAMT, if feasible for the application. ARB is available to provide assistance in implementing this recommendation.
- D-5 | 4) MM-AQ-6 includes implementing one electric yard truck at each node by 2020. To further address the health risk and associated emissions from the proposed project, this mitigation measure should be expanded to require purchase of zero and near-zero technologies, when available and where feasible, for all new purchases, as well as replacements due to attrition, as operations begin at each node but no later than January 1, 2020. In addition, consider incorporating hybrid straddle carriers and electric rubber tired gantry cranes (RTGs) or hybrid RTGs, if feasible for the application. ARB is available to provide assistance in implementing this recommendation.
- D-6 | 5) The San Diego Air Pollution Control District implements the Proposition 1B: Goods Movement Emission Reduction Program to reduce air pollution emissions

### Comment D-3:

This comment suggests further incorporation of more zero and near-zero emission technologies that are commercially available now and by full buildout in 2035. These technologies include battery or fuel cell electric forklifts, and battery electric, fuel cell, or hybrid medium and heavy-duty on-road vehicles. The comment provides a link to ARB's Technology and Fuels Assessments website.

The District has revised MM-AQ-6, MM-GHG-3, and MM-GHG-4 to include more zero and near-zero emission technologies over the life of the plan. In addition to the 3 electric pieces by 2020 included in the Draft EIR, the District has increased the number of zero emission pieces of equipment to include 20 additional zero emission electric yard trucks by 2025 and 3 cargo stackers and 10 forklifts by 2030. In total, the District plans to add 36 pieces of zero emission equipment to the terminal by 2030. At the time of the District's most recent air emissions inventory, there were 15 yard trucks (or yard tractors) and a total of 118 cargo handling pieces operating at the Port, mostly at TAMT. This mitigation measure will replace approximately 30% (36 of 118 pieces) of the active pieces of CHE, and most of the existing yard trucks at TAMT, to help the District achieve its GHG-reduction targets with the co-benefit of reducing diesel particulate matter (DPM) emissions from terminal operations.

According to the *Technology and Fuels Assessment* report the comment cites, the most common type of CHE at ports and intermodal railyards is a yard truck. According to that report, zero and near-zero emission hybrid and fuel cell electric yard truck technologies are still under development and are not yet commercially available. Therefore, immediate deployment of such technologies at the terminal is not feasible, which is why the mitigation is staggered over time. Furthermore, the District has already begun the transition to zero and near-zero emission cargo-handling technologies, as various tenants at the terminal, including Dole and CEMEX, have recently been awarded demonstration grants to purchase electric equipment and trucks for use at the terminal. The mitigation measures prescribed and revised in the Final EIR would be

a significant step in the transition to zero and near-zero emission technologies at the terminal.

The District has revised MM-AQ-6, MM-GHG-3, and MM-GHG-4 and updated the emissions and health risk tables in both Section 4.2 and Section 4.6, which is presented in Chapter 3, *Errata and Revisions*, of the Final EIR.

**Comment D-4:**

This comment recommends revising MM-AQ-3 to require 100% shore power for all vessels or incorporate other technologies, such as emissions capture and control systems, to maximize emission reductions from all vessels. The commenter notes that hybrid technologies have shown success at achieving emission reductions and suggests incorporating hybrid tugs at TAMT, if feasible.

As mentioned in Table 4.6-8 of the Draft EIR, refrigerated container vessels that currently call on TAMT are all related to Dole's operations, which primarily operate using Dole's new Tier 2 vessels that utilize shore power while at berth. Therefore, as of today, 100% of refrigerated container vessels utilize shore power. No other vessels that currently call on TAMT are required by law to use shore power or implement alternative technologies while at berth. Vessels that call on TAMT in the future will be required to abide by existing or future at-berth regulations, but the extent to which 100% of a given fleet's vessels will include shore power-equipped vessels is unknown and speculative.

However, in an effort to reduce emissions from vessel idling at the terminal, the District has added MM-AQ-9, which requires the District to enter into a contract and/or install an alternative technology to reduce emissions from vessels that cannot cold iron while at the terminal. ARB currently has two approved technologies, and the list is expected to grow in the coming years. Reductions associated with MM-AQ-9 were based on ARB's most recently approved technology.

As for tugs, the assist tugs that help vessels navigate the San Diego Bay were remanufactured to be compliant with U.S. Environmental

Protection Agency (EPA) Tier 3 emissions standards in 2015 and the ocean-going tugs that pull barges to and from the terminal have engines that were remanufactured to be compliant with EPA Tier 3 emissions standards in 2010. The recent *National Port Strategy Assessment* published by EPA mentions that hybrid and alternative fuel tugs are just now starting to become commercially available and the emission benefits are not yet fully known. Furthermore, because tugs used in TAMT operations were recently remanufactured and these engines tend to have a long useful life (more than 20 years), the additional cost of a liquefied natural gas or hybrid technology may not be warranted given the little emission reduction benefit over the short term. The District, through its CAP and through mitigation measures implemented as part of the TAMT plan, will monitor and incorporate alternative technologies over the life of the plan, as required by MM-AQ-7.

Lastly, in an effort to attract the cleanest vessel technologies to the terminal, the District has revised MM-AQ-8 and MM-GHG-8 to now require the District to implement an exhaust emissions reduction program at TAMT by January 1, 2020. The exhaust emissions reduction program would aim to achieve the District's goals to attract the cleanest ships and ships that utilize shore power, implement zero and near-zero technologies, and otherwise incorporate technological and operational practices that reduce criteria pollutants, toxic air contaminants, and GHGs.

The District has revised MM-AQ-8, MM-GHG-8, added MM-AQ-9, and updated the emissions and health risk tables in both Sections 4.2 and 4.6. These changes are reflected in Chapter 3, *Errata and Revisions*, of the Final EIR.

**Comment D-5:**

This comment suggests expanding MM-AQ-6 to require purchase of zero and near-zero technologies, when available and where feasible, for all new purchases, as well as replacements due to attrition, as operations associated with the plan begin at each node but no later than January 1, 2020. The commenter suggests incorporation of hybrid straddle carriers and electric rubber-tired gantry cranes or

hybrid rubber-tired gantry cranes, if feasible.

A point of clarification needs to be made that operation of the components described in the TAMT plan would not be operational until after the Demolition and Initial Rail Component is complete, which is planned for 2020. As discussed in the response to comment D-3, MM-AQ-6 has been expanded to require up to 36 pieces of zero emission equipment at the terminal, beginning with the first purchase of a single piece of zero emission equipment for each node (3 pieces in total) by 2020. Also, as described in Section 3.4.1 of the Draft EIR, the TAMT plan includes installing up to five electric gantry cranes as throughput increases over the life of the plan, which would replace diesel-powered crane activity. It is also worth noting that while the District is implementing measures to increase zero and near-zero technologies at the terminal, much of the zero and near-zero equipment being recommended is not yet commercially available. For example, according to ARB's November 2015 *Draft Technology Assessment: Mobile Cargo Handling Equipment* (Table III-1 on page III-5, incorporated herein by reference), electric and hybrid yard trucks are not yet commercially available and while diesel-electric reach stackers recently completed a year-long demonstration at a Swedish port, they have not yet been deployed in California and, similarly, are not yet commercially available. As such, instituting flexible and measureable mitigation strategies will be more effective than requiring technologies right away that are not yet available or tested. Therefore, MM-AQ-7 and MM-GHG-7 require tenants to work with the District to review technologies for each tenant that seeks discretionary action approval and/or Coastal Development Permit(s) to submit an inventory of all equipment to be used, identify which technologies are available to reduce emissions, and implement feasible technologies within 1 year.

The District has revised mitigation measures and updated the emissions and health risk tables in both Section 4.2 and Section 4.6, which is reflected in Chapter 3, *Errata and Revisions*, of the Final EIR. No further changes are required.

**Comment D-6:**

The comment states that SDAPCD implements the Prop 1B: Good Movement Emission Reduction Program to reduce air pollution emissions and health risk from diesel exhaust and suggests incorporation of a collaborative process for tenants and the Port to apply for funding to support zero-emission technologies of freight-related diesel equipment technologies, including commercial harbor craft and CHE.

MM-AQ-7 and MM-GHG-7 will ensure the District monitors and incorporates alternative technologies over the life of the plan. These measures have been revised to state that the District will coordinate with ARB and SDAPCD to identify feasible technologies and funding opportunities.

Mr. Larry Hofreiter  
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|--------------|--|
| D-6<br>cont. | and health risk from diesel exhaust. Consider incorporating a collaborative process for tenants and the Port to apply for funding to support zero-emission technologies of freight related diesel equipment technologies, including commercial harbor craft and CHE. ARB is available to provide assistance in implementing this recommendation.   |
| D-7          | 6) MM-AQ-7 and MM-AQ-8 require a Periodic Technology Review and Sustainable Leasing Program, respectively. These mitigation measures should be modified to implement and plan accordingly for the necessary infrastructure to successfully implement these mitigation measures that will support the zero emission and near-zero emission technology vehicles and equipment that will be operating at full build-out. This includes physical, energy, and fueling infrastructure for construction equipment, on-site vehicles and equipment, and medium-heavy and heavy-heavy duty trucks.   |
| D-8          | 7) ARB recognizes the Dole Refrigeration Facility Rack project was analyzed under a separate EIR and that this project includes sufficient plug-in capabilities for the projected transport refrigerated unit throughput related to Dole operations. However, the Port should ensure existing and future tenants are compliant now and in the future with ARB's Transport Refrigeration Regulation. If not already implemented, incorporate operating practices that eliminate the amount of time that a transport refrigeration system powered by a fossil-fueled internal combustion engine can operate utilizing the combustion system while at the TAMT. Use of zero emission all-electric plug-in transport refrigeration systems, hydrogen fuel cell transport refrigeration, and cryogenic transport refrigeration is encouraged. |
| D-9          | 8) As part of the proposed project design, an electronic gate access system should be installed at the existing centralized common gate. An electronic gate access system should also be installed at the proposed alternative gate scenario, if the Port pursues this concept. This will allow for more efficient movement through the gate and will improve compliance with current regulations and programs for on-road trucks.   |
| D-10         | 9) MM-AQ-1 identifies use of diesel oxidative catalysts (DOCs) or diesel particulate filters on construction related equipment. Reference to DOCs should be removed, as cleaner equipment, which would obviate the need for DOCs, is available. ARB suggests expanding this mitigation measure by requiring all off-road vehicles and equipment brought onsite meet Tier 4 engine standards. If Tier 4 is not available, the off-road equipment should meet Tier 3 engine standards. For heavy-duty on-road trucks, require that all medium-heavy and  |

#### Comment D-7:

The comment suggests modifying MM-AQ-7 and MM-AQ-8 to implement and plan accordingly for the necessary infrastructure at the terminal to support the zero and near-zero emission technology vehicles and equipment that would be operating at full buildout (includes physical, energy, and fueling infrastructure for construction equipment, onsite vehicles and equipment, and medium-heavy and heavy-heavy trucks).

As part of the Demolition and Initial Rail component, the District would be laying electrical lines for future shore power and electric CHE charging. In addition, MM-AQ-7 has been modified to require each tenant seeking a discretionary action approval and/or Coastal Development Permit(s) to submit an inventory of all equipment to be used, identify which technologies are available to reduce emissions, and implement feasible technologies within 1 year. As part of the review, the tenant and/or District shall ensure that adequate infrastructure is in place to allow the zero and near-zero emission technology, such as fueling (if alternatively powered) and electrical outlets.

MM-AQ-8 has been revised to require the District to adopt an exhaust emissions reduction program by January 1, 2020). The exhaust emissions reduction program would support ARB's Sustainable Freight Transport Initiative, which aims to "improve freight efficiency, transition to zero-emission technologies, and increase competitiveness of California's freight system." MM-AQ-8, along with other measures identified above that have been included in the Final EIR, will help the District support ARB's effort by attracting the cleanest vessels, attracting vessels that can utilize shore power, implementing zero and near-zero technologies in the cargo-handling fleet, and otherwise incorporating technological and operational practices to improve freight efficiency while keeping and even improving the terminal's competitiveness.

The District has revised mitigation measures MM-AQ-7 and MM-AQ-8 and updated the emissions and health risk tables in both Section 4.2

and Section 4.6, as reflected in Chapter 3, *Errata and Revisions*, of the Final EIR. No further changes are required.

**Comment D-8:**

This comment recognizes that the Dole Fresh Fruits Refrigerated Facility Rack Improvements Project was analyzed in a separate EIR and that project includes sufficient plug-in capabilities for transport refrigerated unit throughput related to Dole's operations. However, the comment states that the Port should ensure existing and future compliance with ARB's Transport Refrigeration Regulation by incorporating operating practices that reduce operating time for fossil-fueled engines at the TAMT. The comment encourages the use of zero emission all-electric plug-in transport refrigeration systems, hydrogen fuel cell transport refrigeration, and cryogenic transport refrigeration.

The commenter notes that the Dole Refrigerated Racks, which will be installed in 2017, will support ARB's sustainable freight vision of improving air quality and helping to meet State GHG reduction targets by including more electrified refrigerated racks for container storage and power and connecting to shore power for hoteling.

The District's CAP and Green Port program constantly monitor regulations and ensure compliance with tenant and lease agreements. For example, Board of Port Commissions Policy 750 requires the District to track progress of CAP measures and availability of new measures annually, with a comprehensive update required every 3 years. The District already monitors compliance with ARB's Transport Refrigeration Unit Airborne Toxic Control Measure. All operators of transport refrigeration units (or reefers) are required by law to comply with this rule.

A key objective of the TAMT plan is to improve operational efficiency, remain competitive, and promote environmental sustainability. In terms of efficiency, the plan will enhance efficiency of terminal operations by decreasing intra-terminal transfer time, simplifying terminal layout patterns, and making internal traffic flows more predictable. The initial project-level component of the TAMT plan

would remove obsolete transit sheds and improve rail infrastructure, which would eliminate the need for line-haul locomotives to stop at the railyard before entering the terminal, thereby reducing emissions. Moreover, subsurface conduit and other electrical improvements would be added to allow future electrification of the project site and eventual shore power capabilities at Berths 10-5/10-6. Each of these features would help reduce operating time for fossil-fueled engines both on site and nearby at the railyard. The plan itself would allow the District to accommodate increased medium- to long-range cargo opportunities while implementing numerous zero and near-zero technologies to support ARB's sustainable freight vision.

No changes are required in the Final EIR.

**Comment D-9:**

This comment suggests that an electronic gate access system should also be installed at the proposed alternative gate scenario, if the Port pursues this concept, to allow for more efficient movement through the gate and to improve compliance with current regulations and programs for on-road trucks.

A requirement to install an electronic gate access at the proposed alternative gate scenario is not necessary to mitigate an environmental impact, because no impacts related to site access or lack of compliance with existing regulations or programs for on-road trucks were identified. No changes to the Final EIR are required.

**Comment D-10:**

This comment recommends removing reference to diesel oxidative catalysts as cleaner equipment is available. The commenter suggests expanding MM-AQ-1 by requiring all off-road vehicles and equipment brought on site to meet EPA Tier 4 engine standards. If Tier 4 is not available, off-road equipment should meet Tier 3 engine standards. The commenter recommends adding a requirement for medium-heavy and heavy-heavy-duty trucks, including alternative fuel vehicles, to meet or exceed 2010 emission standards.

MM-AQ-1 has been revised as suggested in this comment. However,



because implementation of the TAMT plan would be phased over numerous years, the mitigation measure has been revised with requirements that vary over time: Tier 3 or better for construction between 2020 and 2025 and Tier 4 for construction beyond 2025. Moreover, all medium-heavy and heavy-heavy-duty trucks that enter the Port during construction must meet the requirements of the Truck and Bus Rule (unless exempted). If exempt trucks (e.g., solid waste trucks, smaller pick-up trucks, certain workover rigs and cranes) enter the terminal during construction, their respective activity is expected to be minimal and limited to specific tasks related to construction and debris removal. Because activity from exempt vehicles is expected to be minimal, so too are emissions from their use. MM-AQ-1 has been updated based on this comment. No other changes to the Final EIR are required in response to this comment.

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D-10 cont.	heavy-heavy duty trucks, including any alternative fuel vehicles, meet or exceed 2010 emission standards.
D-11	10) To ensure fleets are compliant with ARB's heavy-duty diesel regulations during construction activities, consider requiring that fleet owners submit certificates of compliance, issued by ARB, for both on-road and off-road equipment, as well as proof of compliance with ARB's Periodic Smoke Inspection Program prior to entering any TAMT construction site. ARB is available to provide assistance in implementing this recommendation.
D-12	11) To ensure current and future tenants are in compliance and maintain compliance with all current air quality regulations for on-road trucks including ARB's Heavy-Duty Greenhouse Gas Regulation and Truck and Bus Regulation, consider incorporating related contractual language into tenant leasing agreements. ARB is available to provide assistance in implementing this recommendation.
D-13	12) The project includes an "Alternative Gate Concept" that will reduce traffic impacts near the existing Central Gate Facility. While this may reduce congestion near the existing gate, this would move truck traffic out of the terminal and on to Harbor Drive, and closer to the Perkins Elementary School. The DEIR indicates that there have been no preliminary studies or other technical work that evaluates the operational feasibility of implementing the Alternative Gate Concept. Therefore, if the Port proceeds with this Alternative Gate Concept, given the potential significant impacts to the sensitive receptors near Harbor Drive, including the occupants of the Perkins Elementary School, the Port should analyze potential for increased health risk impacts at the elementary school. If necessary, mitigation measures should be developed that implement best practices for reducing near-road pollution exposure at schools. Further information on best practices is available at <a href="https://www.epa.gov/sites/production/files/2015-10/documents/ochp_2015_near_road_pollution_booklet_v16_508.pdf">https://www.epa.gov/sites/production/files/2015-10/documents/ochp_2015_near_road_pollution_booklet_v16_508.pdf</a> .
D-14	13) MM TRA-3 identifies a traffic study will be conducted and if necessary, preparation of a Traffic Demand Management Plan (TDMP), prior to construction activities. Should a TDMP be needed, this should be developed in consultation with the local community. The TDMP should ensure traffic circulation associated with construction and operational activities are diverted away from surrounding communities.

#### Comment D-11:

The commenter recommends requiring that fleet owners submit certificates of compliance with ARB's heavy-duty diesel regulations for both on-road and off-road equipment, as well as proof of compliance with ARB's Periodic Smoke Inspection Program prior to entering any TAMT construction site.

The California Highway Patrol and ARB are the agencies charged with inspection and audit authority and enforcement of these regulations (see Sections 2025 (v), (k)(7),(t), (z) Title 13, Division 3, Chapter 1 of the California Code of Regulations for the Truck and Bus Regulation, and Sections 1900, 1956.8, 2036, 2037, 2112, 2139, 2140, 2147, and 2485, Title 13, Division 3, Chapter 1 of the California Code of Regulations for the Heavy Duty GHG Regulation). Unlike the Drayage Truck Rule, ports do not have automated connectivity to the State's registry for the Heavy Duty Truck and Bus Regulation and do not have authority to enforce the regulation. All owners regardless of where their vehicles are registered must comply with the regulation when they operate their affected vehicles on California highways. Consequently, the comment's proposal would provide no additional benefit. No changes to the Final EIR are required.

#### Comment D-12:

The commenter asks that contractual language related to ARB's Heavy Duty GHG Regulation and Truck and Bus Regulation be considered and incorporated into tenant leasing agreements.

See response to comment D-11. Similarly, adding this language to the agreement would provide no measureable benefit. No changes to the Final EIR are required.

#### Comment D-13:

This comment states that should the Port proceed with the Alternative Gate Concept, the Port should analyze potential for increased health risk impacts at Perkins Elementary School, because the alternative would move truck traffic out of the terminal and onto

Harbor Drive, which is closer to Perkins Elementary School. The commenter suggests that if mitigation measures are necessary, they should be developed to implement best practices for reducing near-road pollution exposure at schools.

The Draft EIR analyzed health risk based on current site access, which assumes all trucks enter the main gate and only refrigerated trucks exit the terminal via Switzer Street. Results of the HRA indicate truck activity to and from the terminal contributes only a tiny portion (0.2 case per million under existing conditions; 0.07 net new under full buildout) of the total risk at Perkins Elementary School. The Alternative Gate Concept would increase truck trips near Perkins Elementary School by requiring all inbound Refrigerated Container and the Multi-Purpose General Cargo node trucks to enter near Perkins Elementary School rather than using the existing gate off Cesar Chavez Parkway. The increase in health risk associated with full buildout is small (0.07 new case per million). For illustrative purposes only, even in the event the Alternative Gate Concept doubled truck trips near Perkins Elementary School, risk from trucks would remain small ( $0.07 \times 2 = 0.14$  case per million). Moreover, any increase in risk at Perkins Elementary School would be somewhat offset by an equal decrease at receptors near the existing gate off Cesar Chavez Parkway, namely Cesar Chavez Park. As such, no changes are needed to the HRA or the Final EIR.

Moreover, best practices are already in place at the Port, as trucks that carry refrigerated containers are subject to the Drayage Truck Rule and trucks that carry general cargo would be subject to either the Drayage Truck Rule (if carrying containers) or the Truck and Bus Regulation. Lastly, MM-AQ-2 limits idling to 3 minutes when trucks and equipment are not in use. Health risk associated with the Alternative Gate Concept would be similar to that analyzed in the Draft EIR and would result in no changes to impacts and mitigation measures. No changes to the Final EIR are required.

**Comment D-14:**

The comment states that should a Traffic Demand Management (TDM) Plan be needed, as identified in MM-TRA-3 (now MM-TRA-2),

it should be developed in consultation with the local community. The commenter suggests that the TDM Plan should ensure traffic circulation associated with construction and operational activities is diverted away from surrounding communities.

The goal of the TDM Plan would be to minimize temporary construction-related traffic impacts in the area, which would include the local community of Barrio Logan. To ensure appropriate coordination occurs, however, mitigation measure MM-TRA-2 has been modified to include required coordination with any affected jurisdictions. Such coordination could also include coordination with the local planning group, such as the Barrio Logan Community Planning Group. Please see the revisions to MM-TRA-2 in Chapter 3, *Errata and Revisions*, of the Final EIR.

Mr. Larry Hofreiter  
August 18, 2016  
Page 6

**Closing**

ARB recognizes the critical role the proposed Plan will play in keeping the Port competitive well into the future. The scale of the proposed Plan provides the City of San Diego and the Port an opportunity to set a benchmark for environmental leadership for freight transport in California while expanding economic opportunities.

D-15 ARB staff appreciates the opportunity to comment on the DEIR for the proposed Plan. We are pleased to provide assistance for successful implementation and deployment of a state-of-the-art facility that serves the region's distribution and air quality needs, while protecting public health.

If you would like to learn more about ARB's freight related work, please see our Sustainable Freight: Pathways to Zero and Near-Zero Emissions Discussion Document at <http://www.arb.ca.gov/gmp/sfti/sfti.htm>.

If you have questions, please contact Robbie Morris, Air Pollution Specialist, Freight Transport Branch, at (916) 327-0006 or [Robbie.Morris@arb.ca.gov](mailto:Robbie.Morris@arb.ca.gov).

Sincerely,



Heather Arias, Chief  
Freight Transport Branch  
Transportation & Toxics Division

cc: State Clearinghouse  
P.O. Box 3044  
Sacramento, California 95812-3044

Ms. Connell Dunning  
Transportation Team Supervisor  
U.S. Environmental Protection Agency, Region IX  
75 Hawthorne St., ENF-4-2  
San Francisco, California 94105

Continued next page.

**Comment D-15:**

The comment letter concludes by recognizing the role the proposed TAMT plan will play in keeping the Port competitive well into the future while also setting the benchmark for environmental leadership. The commenter provides ARB contact name and information as well as a link to ARB's Sustainable Freight document.

The District appreciates ARB's interest in the proposed project and ARB's acknowledgement of the TAMT plan's goal to expand economic opportunities while improving environmental quality. This comment is noted, but does not raise any issues needing a response pursuant to CEQA.

Mr. Larry Hofreiter  
August 18, 2016  
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cc: (continued)

Mr. Bill Figge  
Deputy District Director of Planning, District 11  
California Department of Transportation  
4050 Taylor Street  
San Diego, California 92110

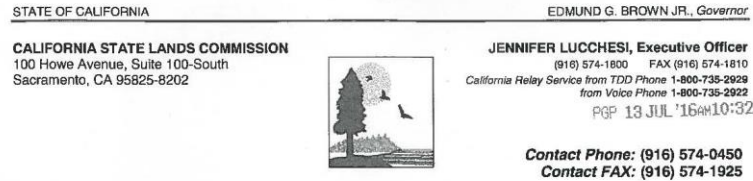
Ms. Kathy Keehan  
Air Quality Specialist  
San Diego County Air Pollution Control District  
10124 Old Grove Road  
San Diego, California 92131-1649

Mr. Robert Reider  
Deputy Director  
San Diego Air Pollution Control District  
10124 Old Grove Road  
San Diego, California 92131-1649

Mr. Rahul Srivastava, Chief  
Office of Freight Planning  
California Department of Transportation  
Division of Transportation Planning, MS #32  
P.O. Box 942874  
Sacramento, California 94274-0001

Ms. Michelle White  
Environmental Policy Manager  
San Diego Unified Port District  
3165 Pacific Highway  
San Diego, California 92101-1128

## 4.2.5 Letter E – California State Lands Commission



July 8, 2016

File Ref: SCH 2015031046

Larry Hofreiter  
San Diego Unified Port District  
3165 Pacific Highway  
San Diego, CA 92101

SUBJECT: **Draft Environmental Impact Report (DEIR) for the Tenth Avenue Marine Terminal Redevelopment Plan, San Diego County**

Dear Mr. Hofreiter:

California State Lands Commission staff has reviewed the subject DEIR for the Tenth Avenue Marine Terminal Redevelopment Plan and Demolition and Initial Rail Component, which is being prepared for the San Diego Unified Port District.

The Tenth Avenue Marine Terminal consists of approximately 100 acres located on San Diego Bay tidelands which were granted in trust to the San Diego Unified Port District pursuant to Chapter 67, Statutes of 1962, First Extraordinary Session, as amended (Port Act). The Port District manages the day-to-day administration of these lands. Therefore, no authorization for this project is required from the Commission. Staff, however, understands the importance of the Tenth Avenue Marine Terminal as it is one of the two marine cargo terminals in San Diego Bay. In accordance with Public Trust principles, the terminal must promote maritime commerce and other Port functions and must be operated as an asset for statewide public purposes.

This jurisdictional determination is without prejudice to any future assertion of State ownership or public rights, should circumstances change, or should additional information come to our attention. In addition, this letter is not intended, nor should it be construed as, a waiver or limitation of any right, title, or interest of the State of California in any lands under its jurisdiction.

If you have any questions, please contact me at (916) 574-0450 or by email at reid.boggiano@slc.ca.gov.

Sincerely,

  
Reid Boggiano  
Granted Lands Specialist

### Comment E-1:

This comment confirms review of the subject Draft EIR and states that no authorization is required from the California State Lands Commission because the TAMT is within Port jurisdictional lands. The comment further emphasizes the importance of the TAMT as one of the two marine cargo terminals in San Diego Bay and asserts that the terminal must promote maritime commerce and other Port functions and must be operated as an asset for statewide public purposes, in accordance with Public Trust principles.

The District appreciates California State Lands Commission's interest in the proposed project and notes that it does not have any comments on the Draft EIR. As such, no responses are needed.

## 4.2.6 Letter F – San Diego County Air Pollution Control District



**Air Pollution Control Board**  
 Greg Cox District 1  
 Dianne Jacob District 2  
 Dave Roberts District 3  
 Ron Roberts District 4  
 Bill Horn District 5

August 16, 2016

Larry Hofreiter  
 Planning & Green Port  
 3165 Pacific Highway  
 San Diego, CA 92101-1128

Via email to: [lhofreiter@portsandiego.org](mailto:lhofreiter@portsandiego.org)

**COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE  
 TENTH AVENUE MARINE TERMINAL REDEVELOPMENT PLAN AND  
 DEMOLITION AND INITIAL RAIL COMPONENT**

Dear Mr. Hofreiter:

The San Diego County Air Pollution Control District (APCD) has received the San Diego Unified Port District's (Port) Notice of Availability of a Draft Environmental Impact Report for the Tenth Avenue Marine Terminal Redevelopment Plan and Demolition and Initial Rail Component (Draft EIR). The APCD appreciates the opportunity to comment on the Draft EIR. Please consider and address the following comments.

- |     |   |
|-----|---|
| F-1 | 1. The APCD is charged with improving the region's air quality to protect public health and the environment while being mindful of the need for a strong economic climate. The Tenth Avenue Marine Terminal (TAMT) Redevelopment Plan provides an opportunity to incorporate cleaner technology while enhancing the operations at the Port.   |
| F-2 | 2. The air quality mitigation measures included in the Draft EIR (discussed below) primarily reflect local and state regulatory requirements. In light of the proposed finding of significant air quality impacts and the community's longstanding concerns about local air pollution, the APCD suggests that the Port pursue technologically and economically feasible emission reductions that go above and beyond those achieved through existing requirements to improve air quality. As discussed below, grant funding may be available to help achieve early or extra emission reductions to further benefit public health and the environment. The APCD would be pleased to collaborate with the Port and offers its assistance with this aspect of the project. |

10124 Old Grove Rd. – San Diego – California 92131-1649 – (858) 586-2600  
 FAX (858) 586-2601 – Smoking Vehicle Hotline 1-800-28-SMOKE  
[www.sdapcd.org](http://www.sdapcd.org)

### Comment F-1:

This comment is an introductory comment that states SDAPCD's responsibility with improving the region's air quality to protect public health and the environment and notes that the TAMT plan provides an opportunity to incorporate cleaner technology and enhance operations.

The District appreciates SDAPCD's interest in the proposed project. This comment is noted, but does not raise any issues needing a response pursuant to CEQA. The specific comments raised in the pages that follow this introduction are listed separately along with the District's individual responses.

### Comment F-2:

This comment suggests that the Port pursue technologically and economically feasible emission reductions that go above and beyond those achieved through existing requirements to improve air quality. The comment provides further information on potential grant funding opportunities to help achieve early or extra emission reductions.

The District disagrees with SDAPCD's notion that the mitigation measures reflect primarily local and state regulatory requirements. For example, vessel speed reduction is a District-specific action that goes above and beyond local and state regulatory requirements, particularly because ARB has not instituted any regulations related to vessel speed reduction. However, additional mitigation has been added to the Final EIR to further reduce the proposed project's air emissions, including increasing the number of electric CHE pieces in MM-AQ-6 and implementing alternative technologies to reduce emissions from those vessels that are currently exempt from the at-berth regulation and cannot cold iron while at the terminal (MM-AQ-9). Moreover, please see responses to comments D-4 through D-7, which discuss long-term technological reviews (MM-AQ-7), the exhaust reduction program (MM-AQ-8), and at-berth emissions



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August 16, 2016

3. Technology Feasibility Criteria
- a. The Draft EIR commits the Port to undertake an annual technology assessment (Mitigation Measure MM-AQ-7) to determine the feasibility of implementing new zero and near-zero emission technology for Port operations. The Final Environmental Impact Report (Final EIR) could provide clarity to this commitment by discussing the criteria for judging feasibility.
- F-3 i. For example, diesel emission reduction projects that are funded under California's Carl Moyer program must meet a maximum cost-effectiveness limit of \$18,260 per ton of emissions reduced.
- ii. Another consideration could be the monetized public health benefits to be expected from emissions reductions. For example, the California Air Resources Board has found that "for every \$1 invested to implement these strategies, \$3 to \$8 in economic benefits are realized by avoided health effects, including premature death, hospitalization due to respiratory and cardiovascular causes, asthma and other lower respiratory symptoms, and acute bronchitis."<sup>1</sup>
- b. Because of the significant impact the air pollutants will likely have on the community, the Port could establish an even higher cost effectiveness threshold than noted above for evaluating emission reduction technologies as mitigation for the anticipated air quality impacts, both for purposes of the Final EIR and for the long-term commitment established in Mitigation Measure MM-AQ-7.
4. Mitigation Measures
- a. With respect to other mitigation measures discussed in the Draft EIR, the APCD offers the following comments:
- F-4 i. MM-AQ-1 (Best Management Practices) – Requiring Best Management Practices (BMPs) during construction is a useful mitigation strategy. The Port could also require contractors working on the project to use equipment meeting the current tier (Tier 4 final) off-road equipment emission standards.
- F-5 ii. MM-AQ-2 (Idling restrictions and engine maintenance) – The Port could regularly monitor idling and maintenance practices (through tenant record keeping or other proof) to ensure compliance. To the extent the Port can offer

<sup>1</sup> 2006 Emission Reduction Plan for Ports and Goods Movement in California.  
[http://www.arb.ca.gov/planning/gmcrp/plan/final\\_plan.pdf](http://www.arb.ca.gov/planning/gmcrp/plan/final_plan.pdf)

capture (MM-AQ-9). Each of these measures would go well beyond existing requirements to improve air quality, reduce health risk, and reach long-term GHG reduction goals. Revisions to these mitigation measures from the Draft EIR are reflected in Chapter 3, *Errata and Revisions*, of the Final EIR.

### Comment F-3:

This comment relates to MM-AQ-7 and has two parts.

The first part of the comment suggests adding clarification of criteria used for judging feasibility as committed to under MM-AQ-7. Examples provided include:

- i. Diesel emission reduction projects that are funded under California's Carl Moyer program must meet a maximum cost-effectiveness limit of \$18,260 per ton of emissions reduced.
- ii. Monetized public health benefits to be expected from emissions reductions. For example, ARB has found that for every \$1 invested to implement these strategies, \$3 to 8 in economic benefits are realized by health effects, including premature death, hospitalization due to respiratory and cardiovascular causes, asthma, and other lower respiratory symptoms, and acute bronchitis.

The second part of the comment suggests that the Port establish an even higher cost-effectiveness threshold than noted in comment F-3-i above, both for the purposes of the Final EIR and for the long-term commitment established in MM-AQ-7.

Please see the response to comment D-7. MM-AQ-7 has been modified to clarify the requirements and criteria for judging technological feasibility. MM-AQ-7 requires each tenant seeking a discretionary action approval and/or Coastal Development Permit(s) to submit an inventory of all equipment to be used, identify which technologies are available to reduce emissions from that equipment, and implement feasible technologies within 1 year. As part of the review, the technological review will utilize the Carl Moyer Program Guidance, or similar cost-effectiveness criteria established by the District or elsewhere, to determine cost-effectiveness. Revisions to the Draft EIR

Larry Hofreiter

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August 16, 2016

F-5 cont.		incentive programs to encourage electrically-powered equipment (MM-AQ-6), idling will be reduced accordingly.
F-6	iii.	MM-AQ-3 (Shore power) – The project could provide shore power (cold ironing) for all vessels, not just those subject to the state at-berth requirements.
F-7	iv.	MM-AQ-4 (Conveyor and bulk handling) – The Final EIR should specify that the proposed 95% control is for PM <sub>10</sub> . Please also note that any new or modified equipment with the potential to emit air pollutants may require APCD permits or registration.
F-8	v.	MM-AQ-5 (Vessel speed reduction) – The Port could investigate incentives and other means (enforcement) to achieve 90% or greater participation of vessels complying with the vessel speed reduction initiative.
F-9	vi.	MM-AQ-6 (Electric cargo handling equipment) – The Draft EIR commits to providing one piece of electrified equipment at each operating node. This commitment could be expanded to include more pieces of equipment.
F-10	5. APCD Grant Programs	
	a.	The APCD's incentive programs currently provide substantial financial incentives that may be applicable to Port operations and the technology-based mitigation measures mentioned above. These competitive grant programs include heavy duty trucks, cold ironing, and cargo handling equipment such as forklifts, cranes, and yard trucks. Prior to project construction, and during each annual technology assessment, the APCD is available to assist the Port in identifying advanced technology grant opportunities including those the APCD may be aware of from other agencies.
F-11	6. Demolition Activities	
	a.	The Draft EIR may have demolition or renovation activities subject to Subpart M of the National Emission Standards for Hazardous Air Pollutants (NESHAP), applicable to asbestos. For information regarding these federal requirements, please visit the APCD's website at <a href="http://www.sdapcd.org/content/sdc/apcd/en/compliance-programs/asbestos_program.html">http://www.sdapcd.org/content/sdc/apcd/en/compliance-programs/asbestos_program.html</a> or contact William Jacques at (858) 586-2671.

are reflected in Chapter 3, *Errata and Revisions*, of the Final EIR.

#### Comment F-4:

This comment relates to MM-AQ-1 and suggests that the Port require contractors working on the project to use equipment meeting the current tier (EPA Tier 4 final) off road equipment emission standards.

Please see the response to comment D-10, which states that MM-AQ-1 has been revised to require Tier 3 and Tier 4 construction equipment.

#### Comment F-5:

This comment relates to MM-AQ-2 (Idling restrictions and engine maintenance) and suggests that the Port regularly monitor idling and maintenance practices (through tenant record keeping or other proof) to ensure compliance, as well as offer incentive programs to encourage electrically powered equipment (MM-AQ-6) in order to reduce idling.

MM-AQ-2 requires tenants to submit reports on idling and equipment maintenance annually from the date of project completion, and the number of electric pieces of equipment to be purchased as part of MM-AQ-6 has been increased from 3 to 36 pieces over the life of the plan. Please see the revisions to MM-AQ-6 in Chapter 3, *Errata and Revisions*, of the Final EIR.

#### Comment F-6:

This comment relates to MM-AQ-3 (shore power) and suggests that the project extend shore power to all vessels, not just to those subject to the State at-berth requirements.

Please see response to comment D-4. The project would add conduits to allow for the future installation of shore power at Berths 10/5-10-6 as the need arises or as ARB extends the regulation to other vessels. However, shore power is not feasible for all vessels because the vessels themselves must be equipped with infrastructure to allow the vessels to plug in while at berth. Alternatively, ARB has approved other technologies for reducing vessel emissions when shore power is not a feasible option. MM-AQ-9 has been added to the Final EIR,

Larry Hofreiter

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August 16, 2016

## 7. Other Comments

F-12

- a. The Final EIR should discuss how possible changes to local streets and the circulation of auto and truck traffic may impact the planned Bayshore Bikeway facility, particularly at the intersections examined in the traffic study. If significant impacts are identified, the Final EIR should specify mitigation measures to minimize impacts to the bike path. Consideration could also be given to encouraging bicycle commuting utilizing the bikeway, which will be separated from vehicle traffic and extend several miles north and south of the project site.

F-13

The APCD looks forward to receiving future documents and/or notices related to this project and providing additional assistance at your request. If you have any questions regarding these comments, please contact Kathleen Keehan, Air Quality Specialist, at (858) 586-2726, or via email at [Kathleen.Keehan@sdcounty.ca.gov](mailto:Kathleen.Keehan@sdcounty.ca.gov).

Sincerely,



ROBERT J. KARD  
Air Pollution Control Officer

RJK:AH/KK:ew

cc: Michael De La Rosa, Policy Advisor, Board of Supervisors, District I  
Vincent Kattoula, CAO Staff Officer, LUEG  
Kathleen Keehan, Air Quality Specialist, Air Pollution Control District

which requires the District to enter into a contract and/or install an alternative technology to reduce emissions from vessels that cannot cold iron while at the terminal. At-berth technology approved by ARB includes emissions controls installed at the wharf, including a bonnet emission capture and treatment system. The most recently approved system is the Advanced Marine Emissions Control System, which is a barge-based capture system that is powered by two Tier 4 generators, effectively reducing particulate matter emissions from bulk and general cargo carriers by 80% and nitrogen oxide (NO<sub>x</sub>) emissions by 77% while the system is attached (e.g., not accounting for barge start-up and replacement/removal of the bonnet).

Furthermore, MM-AQ-8 has been revised to require the District to adopt an emissions reduction program that will aim to attract the cleanest ships and those that utilize shore power. Therefore, the District is instituting programs and measures to reduce emissions beyond State requirements. Please see changes to the Draft EIR in Chapter 3, *Errata and Revisions*, of this Final EIR.

**Comment F-7:**

This comment relates to MM-AQ-4 (conveyor and bulk handling) and states that the Final EIR should specify that the proposed 95% control is for PM<sub>10</sub>. The comment states that any new or modified equipment with the potential to emit air pollutants may require SDAPCD permits or registration.

MM-AQ-4 has been clarified to state that the 95% is only for PM<sub>10</sub> and PM<sub>2.5</sub>. Also, the FEIR has been clarified to state that new or modified equipment with the potential to emit air pollutants may require SDAPCD permits or registration. These changes are reflected in Chapter 3, *Errata and Revisions*, of the Final EIR.

**Comment F-8:**

This comment relates to MM-AQ-5 (vessel speed reduction [VSR]) and suggests that the Port investigate incentives and other means such as enforcement to achieve 90% or greater participation of vessels complying with the VSR initiative.

MM-AQ-5 requires enhanced VSR compliance to attain 90% compliance at 40 nautical miles prior to a specified number of vessel calls to ensure reductions are in place prior to the impact occurring or beginning on January 1, 2030, whichever occurs first. This measure will be included as part of any lease agreement and compliance will be provided on an annual basis. The District believes this requirement provides the best and most flexible measures of implementing the VSR program. The 2030 enhanced VSR requirement has been added to MM-AQ-5 in the Final EIR.

**Comment F-9:**

This comment relates to MM-AQ-6 (electric CHE) and suggests expanding the commitment of electrified equipment at each operating node to include more than one piece of equipment.

Please see response to comment D-3. The District has revised MM-AQ-6, MM-GHG-3, and MM-GHG-4 to include more zero and near-zero emission technologies over the life of the plan. In addition to the 3 electric pieces by 2020 included in the Draft EIR, the District has increased the number of zero emission pieces of equipment to include 20 additional electric yard trucks in 2025 and 3 cargo stackers and 10 forklifts in 2030. In total, the District plans to add 36 pieces of zero emission equipment to the terminal by 2030. According to the District's most recent inventory, there are 15 yard trucks (or tractors) and a total of 118 cargo handling pieces that operate at the Port, mostly at TAMT. This mitigation measure will replace approximately 30% (36 of 118 pieces) of the active pieces of CHE, and most of the existing yard trucks at TAMT to help the District achieve its GHG-reduction targets with the co-benefit of reducing DPM emissions from terminal operations.

The District has revised MM-AQ-6, MM-GHG-3, and MM-GHG-4 and updated the emissions and health risk tables in both Sections 4.2 and 4.6, which is presented in Chapter 3, *Errata and Revisions*, of the Final EIR.

**Comment F-10:**

This comment suggests that SDAPCD's incentive programs may be applicable to Port operations and technology-based mitigation measures. The comments states that SDAPCD is available to assist with identifying advanced technology grant opportunities, including those SDAPCD may be aware of from other agencies, prior to project construction and during each annual technology assessment.

Please see the response to comment F-3. MM-AQ-7 has been modified to clarify that the District will work with SDAPCD to identify equipment and grant opportunities through the technology assessment. These changes are reflected in Chapter 3, *Errata and Revisions*, of the Final EIR. No further changes are required in the Final EIR.

**Comment F-11:**

The comment states that the Draft EIR may have demolition or renovation activities subject to Subpart M of the National Emission Standards for Hazardous Air Pollutants, applicable to asbestos. The commenter provides a web link to the asbestos program, as well as a contact name and information.

The presence and control of asbestos-containing materials and lead-based paints is discussed in Section 4.7, *Hazards and Hazardous Materials*, of the Draft EIR. As discussed therein, compliance with Title 8, Industrial Relations, of the California Code of Regulations would ensure that removal of any asbestos-containing materials and lead-based paints would be conducted in a safe manner, including proper disposal in an approved facility, and includes mitigation (MM-HAZ-1 and MM-HAZ-2) related to removal of any contaminated materials. Reference to SDAPCD rules and MM-HAZ-1 and MM-HAZ-2 has been added to Section 4.2, *Air Quality and Health Risk*, of the Final EIR.

**Comment F-12:**

This comment suggests that the Final EIR discuss how possible changes to local streets and the circulation of auto and truck traffic

may affect the planned Bayshore Bikeway facility, in particular the intersections analyzed in the traffic study. The comment suggests that mitigation measures be identified to minimize impacts on the bike path if significant impacts are identified. The comment states that encouragement of bicycle commutes via the bikeway should be considered.

There are only two changes to roadways that would occur as an indirect result of the proposed project. The first is the widening of a segment of 28<sup>th</sup> Street between Boston Avenue and National Avenue from a three-lane to a four-lane major arterial. This modification is consistent with the Barrio Logan Community Plan and would include bike lanes. However, it would not affect the Bayshore Bikeway. The second improvement would be installation of a westbound right-turn green arrow at the intersection of Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard. No physical changes would occur to this intersection because there is already an exclusive westbound right-turn lane in place at the intersection. As such, the project would not have any adverse impacts on the Bayshore Bikeway. No changes to the Final EIR are required.

**Comment F-13:**

The comment letter concludes by providing a contact name and information.

The District appreciates SDAPCD's interest in the proposed project. This comment is noted, but does not raise any issues needing a response pursuant to CEQA.

## 4.2.7 Letter G – City of San Diego

Comment Letter G



August 18, 2016

San Diego Unified Port District, Planning & Green Port  
 Attn: Larry Hofreiter  
 3165 Pacific Highway  
 San Diego, CA 92101-1128

Subject: CITY OF SAN DIEGO COMMENTS ON THE TENTH AVENUE MARINE TERMINAL REDEVELOPMENT  
 PLAN AND DEMOLITION AND INITIAL RAIL COMPONENT DRAFT EIR (SCH# 2015031046)

G-1 The City of San Diego ("City") Planning Department has received the Draft EIR prepared by the San Diego Unified Port District and distributed it to applicable City departments for review. The City, as a Responsible Agency under CEQA, has reviewed the Draft EIR and appreciates this opportunity to provide comments to the Port District.

In response to this request for public comments, the City has identified potential environmental issues that may result in a significant impact to the environment. Continued coordination between the City, the Port District, and other local, regional, state, and federal agencies will be essential. Following are comments on the Draft EIR for your consideration.

Transportation & Storm Water Dept – Mark Stephens, Associate Planner –  
 MGStephens@sandiego.gov, 858-541-4361

Section 4.8 Hydrology and Water Quality:

G-2 4.8.2.1 Surface Water Hydrology, page 4.8-1. Is "runoff" the term intended, rather than "run-on" in the last sentence on the page? If "run-on" is the term intended, clarify what it is describing.

G-3 4.8.3.3 Local, page 4.8-11. In the last sentence under the San Diego Integrated Regional Water Management Plan heading, update text to reflect that the 2013 San Diego Integrated Regional Water Management Plan was adopted (i.e., it is no longer a draft and has been in effect since the latter part of 2013).

G-4 4.8.4.3 Project Impacts and Mitigation Measures, beginning on page 4.8-21. Different components of the project are described in varying detail throughout this section, including: "underground stormwater treatment systems that allow for infiltration or retention", "additional stormwater treatment related structures" (p. 4.8-21); options to be explored for structural controls including a below-ground stormwater treatment system with pollutant removal, retention and infiltration of the design capture volume, and infrastructure and permits to discharge to the sanitary sewer system (p. 4.8-25); "The proposed project [Multipurpose General Cargo Node], as part of the Demolition and Rail Component, would provide an onsite below-ground storm water treatment system..." and furnishes details on how this would be accomplished (p. 4.8-27); and "... as part of the Demolition and Initial Rail Component, an onsite underground detention tank would be

Planning Department  
 1010 2nd Avenue, MS 413 – San Diego, CA 92101-4155  
 Tel (619) 235-5200

### Comment G-1:

This comment is an introduction that states that the City of San Diego received the Draft EIR and distributed it to applicable City departments. The commenter indicates that continued coordination is essential and that specific comments are provided after the introductory comment.

The District appreciates the City's interest in the proposed project and its associated environmental effects. The District is committed to working with affected and permitting agencies, including the City of San Diego. As no specific comment is raised in this introduction, no specific response is needed.

### Comment G-2:

This comment asks if the term "runoff" was intended, rather than the term "run-on," found on the last sentence on page 4.8-1. If not, clarification for the term "run-on" is requested.

The term "run-on" is correct as it describes flows onto the terminal from adjacent areas.

### Comment G-3:

This comment requests to update the text on page 4.8-11 to reflect that the 2013 San Diego Integrated Regional Water Management Plan was adopted, and is no longer a draft.

Text on page 4.8-11 has been updated to reflect that the 2013 San Diego Integrated Regional Water Management Plan has been adopted by the City of San Diego's City Council, County of San Diego's Board of Supervisors, and San Diego County Water Authority's Board of Directors. Please see the revisions in Chapter 3, *Errata and Revisions*, of this Final EIR. No further clarifications are needed and these revisions do not change the impact analysis or significance determinations.

Page 2 of 4  
San Diego Unified Port District  
August 18, 2016

G-4 cont. installed to capture runoff within the area of Transit Sheds #1 and #2 and Warehouses B and C and prevent drainage into the bay." (p. 4.8-31). We would like to request additional clarification regarding which parts of the project would still be subject to additional analysis as part of future project-level environmental review.

Section 4.11 Utilities and Energy:

G-5 4.11.2 Existing Conditions, page 4.11-1. Storm drains and conveyance owned by the City of San Diego are located in the overall project area. These should be described in Existing Conditions and Project Impact Analysis sections. Will any impacts to existing City-owned drains or pipes result from removal of the transit sheds, construction of additional drainage infrastructure and/or construction of an underground storage basin?

G-7 4.11.4.3 Project Impacts and Mitigation Measures, page 4.11-21. The Initial Study Checklist prepared for this project includes the following text under Utilities, Service Systems, and Energy (page 66): "... As part of the near-term optimization improvements, the transit sheds would be removed and their footprints regraded and paved to match the surrounding contour, with some slope for drainage. The existing storm drain system and water quality treatment devices will be evaluated and modified to ensure sufficient flow capacity and effective treatment of any contaminants from activities on the new paved areas. Further discussion will be provided in the EIR." This is an appropriate location in the Draft EIR for discussing these points. The last sentence on page 4.11-21 and extending to 4.11-22 states, "However, at this time and as mentioned, no major stormwater upgrades are known with the exception of the installation of the stormwater tank at the Multi-Purpose General Cargo node." What about additional storm drains likely required by removal of transit sheds as indicated under 6.4.7 Hydrology and Water Quality on page 6-10 of this Draft EIR?

Section 6.4 Effects Not Found to Be Significant

G-8 6.4.7.2 Erosion or Siltation On Site or Off Site, page 6-10. Relating to the sentence cited in the previous comment, would conveyance need to be constructed or just drains? As previously noted, only the Port is mentioned with respect to storm water facilities, even though the City also owns storm drain facilities in the project area. Will the Port own and maintain any new drainage structures, and is the City expected to have any role?

G-9 6.4.7.3 Surface Runoff in a Manner that Would Result in Flooding On Site or Off Site, page 6-10. Existing drainage patterns are characterized as being "left intact." Questions arise regarding this characterization when text in Utilities and Energy under 4.11.4.3, page 4.11-21, states, "The Demolition and Initial Rail Component would include a comprehensive update (emphasis added) to the existing storm drainage under the proposed Multi-Purpose General Cargo node, where Transit Sheds #1 and #2 are currently located." Alterations described throughout the EIR include the storm water detention basin, transit shed removal, additional storm drains and possibly additional conveyance, and possible construction of the best management practices (BMPs) mentioned under 4.8.4.3. Would these changes still be regarded as having less than significant impacts?

Development Services Department, Transportation Development Section – Kamran Khaligh,  
Associate Traffic Engineer – KhalighK@sandiego.gov, 619-446-5357

#### Comment G-4:

This comment identifies that different sections within Section 4.8.4.3, *Project Impacts and Mitigation Measures*, of Section 4.8, *Hydrology and Water Quality*, are described at varying degrees of detail. The comment provides examples from page 4.8-21, 4.8-25, 4.8-27, and 4.8-31. The comment requests additional clarification regarding which parts of the project would still be subject to additional analysis as part of future project-level environmental review.

The commenter is correct that the Draft EIR provides detail on elements associated with the Demolition and Initial Rail Component, but can only provide general information on the elements that could occur in other future components as part of the overall TAMT plan. As discussed throughout the Draft EIR, the Demolition and Initial Rail Component is analyzed at a project level in anticipation of full CEQA clearance if the project and Final EIR are approved. The other future components associated with the TAMT plan, however, are analyzed at a program level, which means specific information about their design is unknown and future components of the plan will be subject to further review under State CEQA Guidelines section 15068. As such, elements proposed as part of the Demolition and Initial Rail Component, as noted by the commenter, are described in detail sufficient to know all of their potential impacts, whereas details related to the "additional stormwater treatment related structures" associated with the overall program-level analysis are not known at this time and it can only be stated that these features would be proposed consistent with the stormwater regulations and plans in place at the time they are designed and proposed for construction and implementation. No clarifications to the Final EIR are required.

#### Comment G-5:

This comment requests that the City-owned storm drains and conveyance located in the overall project area should be described in the *Existing Conditions* and *Project Impact Analysis* sections on page 4.11-1.



The Switzer Creek conveyance is near the eastern boundary of the project site. Furthermore, the Water Street storm drain is near the southern boundary of the project site. Pages 4.11-1 and 4.11-4 of the Draft EIR have been updated with this information (see Section 3.2.11 of Chapter 3, *Errata and Revisions*, of the Final EIR).

**Comment G-6:**

The comment asks if impacts on City-owned drains or pipes would result from the removal of the transit sheds or the construction of additional infrastructure.

As described in Section 4.8, *Hydrology and Water Quality*, of the Draft EIR, the project would implement BMPs as required by SWRCB Construction General Permit (Order 2009-0009-DWQ) and SWRCB Industrial General Permit (Order No. 2014-0057 DWQ) in order to reduce or prevent pollutants in stormwater discharges. Moreover, no impacts would occur on the Switzer Creek or Water Street conveyance as currently planned. However, should any modifications be required, the District would work with the City of San Diego to ensure the City concurred. As such, no changes to the City's drainage system are anticipated and, should any be needed, consultation with, and concurrence from, the City would be required.

**Comment G-7:**

This comment identifies a portion of text from the Initial Study Checklist that indicates the transit sheds would be removed and their footprints would be regraded and paved, and the existing storm drain system and water quality treatment devices would be evaluated and modified for the new paved areas and that this would be discussed further in the Draft EIR. The comment suggests Section 4.11.4.3 would be an appropriate section to discuss this information. The comment identifies the last sentence on page 4.11-21, which states there are no known major stormwater upgrades with the exception of the stormwater tank at the Multi-Purpose General Cargo node. The comment points out the additional storm drains would likely be required by the removal of the transit sheds as indicated in Section

6.4.7 on page 6-10, and asks for further clarification.

As the commenter notes, the proposed project includes installation of a stormwater capture tank underneath the location of the Multipurpose General Cargo node. This is also the location of the transit sheds that would be demolished. Consequently, after the transit sheds are removed, excavation would occur to install the stormwater capture tank. As part of this activity, drains would be installed that would be channeled to the tank. As noted in the Draft EIR and as indicated in the response to comment G-4, stormwater measures for other future components that are proposed at the program level in the Draft EIR do not have sufficient details at this time to know what improvements may be needed in the future. However, as noted in the Draft EIR on page 4.11-21, “As components become ready for construction, the proposed project would be required to comply with the current District JRMP, Municipal Permit, and Industrial General Permit, which may have specific improvements required that are not known at this time. Should any such improvements have the potential to result in a significant impact on the environment, CEQA compliance would be required and the subsequent document could be tiered from this programmatic Draft EIR. However, at this time and as mentioned, no major stormwater upgrades are known with the exception of the installation of the stormwater tank at the Multi-Purpose General Cargo node.” No clarifications to the Final EIR are required.

**Comment G-8:**

This comment is related comment G-5 and G-6, and asks if conveyance would be needed or if only drains are needed. The comment also states that only the District is mentioned as an owner of stormwater facilities, although the commenter indicates that the City owns storm drain facilities in the project area. The comment asks if the Port will own and maintain new drainage structures and if the City expected to have a role.

The necessary Municipal Separate Storm Sewer System Permits for the City- or District-owned storm drain facilities in the project area would be maintained based on jurisdiction, as is current practice. As

indicated in the response to G-7, the only stormwater improvements detailed at this time are associated with the Demolition and Initial Rail Component, which is the component of the TAMT plan that is analyzed at a project level. All other future components are analyzed at the program level and detailed stormwater improvements for the program-level components are not known at this time. No new offsite conveyance is proposed. New drains would lead to the proposed onsite stormwater capture tank. No clarifications to the Final EIR are needed.

**Comment G-9:**

This comment indicates that Section 6.4.7.3, page 6-10, states that existing drainage patterns are left intact. The comment questions this characterization when in Section 4.11.4.3 text reads, “The Demolition and Initial Rail Component would include a comprehensive update to the existing storm drainage under the proposed Multi-Purpose General Cargo node...” The comment identifies alterations to the stormwater system throughout the EIR, and questions whether these changes would still be regarded as having a less-than-significant impact.

Drainage patterns on site are not anticipated to change in any substantial way, but would be captured rather than transported through the existing drainage systems. The description of the update being “comprehensive” is referring to the installation of a stormwater capture tank. However, the onsite grade would not change substantially as a result of the proposed project. As stated in Sections 4.8, *Hydrology and Water Quality*, and 4.11, *Utilities and Energy Use*, impacts associated with the onsite drainage and stormwater system would be less than significant. No clarifications to the Final EIR are needed.

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**General:**

- G-10 1. Mitigation measures MM-TRA-2 and MM-TRA-4 for transportation impacts should be modified so that the project will mitigate to the extent feasible, rather than do nothing and rely on the statement that implementation of impacts is "uncertain because they are outside the jurisdiction of the district". (Please see the following specific comments).
- G-11 2. Section 4.10 should also include Near-Term and Near-Term plus project discussions and analysis. If a phase of the project is intended to be this Near-Term scenario, then it should be analyzed as such and identified in this section.
- G-12 3. Any Near-Term significant transportation impact should be fully mitigated by the project, and fair share contributions provided for any horizon year impacts. Fair share calculations should be per current standards, and included (with the formula and calculations) or referenced to where provided in the appendices.
- G-13 4. Please summarize the parking data discussed on Page 4.10-16 within a parking table identifying parking locations and numbers. Also, the required number and rate of parking spaces based on project demand should be discussed and included.
- G-14 5. Transportation Development staff does not recommend the "Alternative Gate Scenario" with an additional gate in the vicinity suggested, considering the proposal would include a signalized access on Harbor Drive for the projected low project turning volumes. The proposed location may have limited sight visibility, and be in close proximity to the elevated Harbor Drive. Signal warrant analysis should be included with any signal proposal. An additional gate could be considered rather than the proposed location at the existing Sigsbee Street/Harbor Drive intersection. Regardless, an additional signal on Harbor Drive within the project area may have a vehicular and bicycle capacity impact/effect on the road segment and intersections which should also be analyzed and discussed.
- G-15 6. The project trip distribution and assignment and the applied trip rates should be further explained.
- G-16 7. The project should strive to improve and increase pedestrian, bicycle, and transit use within the area.

**Specific:**

1. Page 4.10-2, Table 4.10-1- Summary of Significant Transportation Impacts and Mitigation Measures:
- G-17 A. Please add "Install" before "Westbound Right-Turn...." under the Summary of Mitigation Measure(s) for Impact-TRA-2:
- G-18 B. The project's mitigation would be to make a fair share contribution towards the stated widening under the Summary of Mitigation Measure(s) for Impact-TRA-4. Also the impact would occur at 29% of project buildout per Page 4.10-40. This should be reflected in the Mitigation Measures if the fair share payment would not be made at beginning of project development.
- G-19 C. Under the Summary of Mitigation Measure(s) for Impact-TRA-5, the impact would occur at 7% of project buildout prior to even the demo of first phase per Page 4.10-40. This should be reflected

**Comment G-10:**

This comment implies that mitigation measures MM-TRA-2 and MM-TRA-4 are not mandatory and should be modified so that they will mitigate to the extent feasible, rather than state that implementation of mitigation is uncertain because they are outside the jurisdiction of the district.

Please note that the traffic analysis for the Demolition and Initial Rail Component was further refined since being distributed for public review because it estimated that over 50% of employee commute traffic was being sent to the Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard intersection over 1.5 miles from the project. After reviewing these results with District Maritime staff working at the terminal and discussing the routes current TAMT workers use, it was concluded that the actual number of employee commuter traffic at this intersection is significantly lower than originally estimated. The updated analysis estimated approximately 39% of employees would travel the more than 1.5 miles to access the freeway, whereas the majority would access the freeway along Cesar Chavez Parkway, Beardsley Street, 28<sup>th</sup> Street, and Boston Avenue, all of which are much closer to the project site. With the updated analysis, the previous Impact-TRA-2 was eliminated along with the previous MM-TRA-2.

As such, Impact-TRA-4 has become Impact-TRA-3 and the associated mitigation measure MM-TRA-4 has become MM-TRA-3. As the Draft EIR indicates, the mitigation measure is a fair share payment for widening the segment of 28<sup>th</sup> Street between Boston Avenue and National Avenue to a four-lane major arterial. Payment of the fair share amount is not optional and would be satisfied if the project is approved. However, as indicated in the Draft EIR, the timing and implementation of the necessary improvement is within the exclusive jurisdiction of the City of San Diego, not the District. Therefore, the District can recommend the City install the necessary improvements, but cannot guarantee the City will make the improvements when the impact would occur. As such, the Draft EIR has conservatively concluded that the impact on the City of San Diego facility would be

significant and unavoidable because the project-related impact could occur before the mitigation is put into place, though not before payment of the fair share. As indicated in the Draft EIR, if the City implements the physical improvement identified in the Draft EIR prior to the significant impact occurring, the significant impact would be reduced to a level below significance. No additional changes to the Final EIR are required.

**Comment G-11:**

This comment suggests Section 4.10 should also include Near-Term and Near-Term Plus Project discussions and analysis. The comment states that if a phase of the project is intended to be in this Near-Term scenario, then it should be analyzed as such and identified in this section.

The transportation impact analysis contained within Section 4.10 is specific to project impacts only, not cumulative impacts. Consistent with the Neighbors for Smart Rail and Sunnyvale cases, the District identifies project-specific impacts as the project's change on the existing environment. The Near-Term and Near-Term Plus Project scenarios are provided in Chapter 5, *Cumulative Impacts*. Under these two scenarios, cumulative projects are added to the existing condition to provide a reasonably foreseeable future condition in 2021. The project's contribution to this near-term cumulative condition is then added to determine whether the project's incremental contribution would be cumulatively considerable. Please see Chapter 5, *Cumulative Impacts*, in the Draft EIR for a complete analysis of the near-term cumulative impacts, and the significance of the proposed project's contribution to those impacts. No changes to the Final EIR are required.

**Comment G-12:**

This comment states that any near-term significant transportation impacts should be fully mitigated by the project and fair-share contributions provided for any horizon year impacts. Fair-share calculations should be per current standards, and included (with the formula and calculations) or referenced to where provided in the

appendices.

Please see the response to G-11. As stated in that response, the District does not agree that the proposed project's incremental contribution to near-term cumulative impacts should be mitigated at the project level rather than through fair-share mitigation. Furthermore, the transportation-related impacts that would occur with implementation of the proposed project are related to the long-term TAMT plan. The TAMT plan is a market-based plan that identifies several improvements that could occur in the future if the market supports them. Because it is a plan and does not authorize implementation of specific components other than the Demolition and Initial Rail Component, the exact components that would be implemented (if any) are unknown, as is their timing. Moreover, both the roadway segment and intersection that would be significantly affected by the project are already failing. As such, the project does not cause either to go from acceptable to failing levels of service. As such, the Draft EIR appropriately applies fair-share mitigation to the roadway segment and intersection affected by the proposed project. No changes to the Final EIR are required.

**Comment G-13:**

The comment requests a summary of the parking data discussed on page 4.10-16 within a parking table identifying parking locations and numbers. Also, the comment indicates the required number and rate of parking spaces based on project demand should be discussed and included.

The parking discussion provided in Section 4.10.16 examines the area on the District's terminal that is used and would continue to be used as parking for District employees and visitors. The parking rate is assumed to be one space for one employee, which is roughly the current approximation. As noted in the analysis on page 4.10-60, a total of 526 workers is anticipated at the TAMT plan buildout year of 2035. As further noted on the same page, the terminal would support up to 514 parking spaces in areas specifically designated as parking and by supplementing with areas that are frequently used as parking. Figure 4.10-11 of the Draft EIR depicts the locations of these spaces.

Furthermore, the proposed project does not propose to park any vehicles within the City's jurisdiction unless entering into an agreement with a parking provider such as ACE or LAZ parking. As such, the proposed project would not have a significant effect on parking on City streets or areas not intended for parking. Please see mitigation measures MM-TRA-5, MM-TRA-6, and MM-TRA-7, as updated in the Final EIR, which would preclude any parking impacts on City facilities. No changes to the Final EIR are required.

**Comment G-14:**

The comment states that Transportation Development staff does not recommend the Alternative Gate Scenario with an additional gate in the vicinity suggested. The proposed location for the signalized access on Harbor Drive may have limited visibility and be close to the elevated Harbor Drive. The comment suggests signal warrant analysis should be included with any signal proposal. The comment suggests that a gate could be considered at the existing Sigsbee Street/Harbor Drive intersection rather than the currently proposed Alternative Gate location. The comment states an additional signal may have a vehicular and bicycle capacity impact on the road segment and intersections, which should be analyzed and discussed.

The District notes that the City does not recommend the currently proposed location of the possible Alternative Gate Scenario and has indicated that a better location for the Alternative Gate would be the Harbor Drive/Sigsbee Street intersection. This suggestion is included herein for consideration by the Board of Port Commissioners. The Draft EIR includes the Alternative Gate Scenario as part of the TAMT plan and evaluated it at a program level. The District agrees that further design details and study, as well as environmental review pursuant to State CEQA Guidelines section 15068, would ensure any future gate, if it were proposed for implementation, would not create any design hazards or further affect traffic operations that may not have been identified at the program level. No changes to the Final EIR are required.

**Comment G-15:**

The comment requests that the project trip distribution and assignment and the applied trip rates be further explained.

The project trip distribution, assignment, and applied trip rates are described in detail within Appendix G (Traffic Impact Analysis) of the Draft EIR, which was included with the circulated draft. Specifically, Chapter 3 of Appendix G (pages 9 to 27) explains the methods used to derive distribution, assignment, and trip rates. Figures 3-2A, 3-2B, 3-3A, 3-3B, 3-4A, 3-4B, 3-5A, 3-5B, 3-6A, and 3-6B provide illustrations of trip distribution and trip assignment by employees and trucks. Moreover, Appendix B of Appendix G includes the Trip Distribution Worksheets. A summary of the resulting numbers is provided in Section 4.10 of the Draft EIR. No changes to the Final EIR are required.

**Comment G-16:**

The comment suggests the project should strive to improve and increase pedestrian, bicycle, and transit use within the area.

The project would not adversely affect pedestrian, bicycle, and transit facilities within the area. Moreover, improvements are limited to the terminal boundaries. The project would require all parking to be within the terminal or in designated parking areas such as garages or surface lots intended for parking. As such, no on-street parking would occur within the City boundaries. In addition, mitigation measure MM-TRA-7 would require parking management plans for each tenant when new TAMT plan components, new leases, or lease renewals are approved. Specially, MM-TRA-7 requires the parking management plans to include alternative transportation options to reduce parking demand, such as subsidized transit passes, bicycle racks, employee vanpools, and other incentives. Furthermore, MM-TRA-7 requires employer coordination with the San Diego Association of Governments' iCommute Program to further reduce vehicle use and increase transit, bicycle, and pedestrian commuting. No changes to the Final EIR are required.



**Comment G-17:**

The comment requests the word “install” be added before “Westbound Right-Turn...” in Table 4.10-1, under the Summary of Mitigation Measure(s) for Impact-TRA-2.

Please see the response to G-10. As indicated in that response, the previous Impact-TRA-2 was eliminated along with previous MM-TRA-2, as described in the Draft EIR. No additional changes to the Final EIR are required.

**Comment G-18:**

This comment suggest the project’s mitigation would be to make a fair-share contribution toward the stated widening under the Summary of Mitigation Measure(s) for Impact-TRA-4 in Table 4.10-1, and the impact would occur at 29% of project buildout per page 4.10-40. The comment suggests this should be reflected in the mitigation measures if the fair-share payment would not be made at the beginning of project development.

Please note that with the elimination of Impact-TRA-2 and MM-TRA-2 as identified in the Draft EIR, Impact-TRA-4 now becomes Impact-TRA-3 and mitigation measure MM-TRA-4 becomes MM-TRA-3. Mitigation measure MM-TRA-3 indicates within its language when the fair-share payment would need to be made. Specifically, the measure indicates that the impact would occur once the proposed project generates 1,135 new daily trips. As such, the mitigation measure requires payment “prior to reaching 1,135 new daily trips. In order to ensure the significant impact does not occur before the District has paid its fair share to the City, the District shall initiate payment once approximately 1,000 new daily trips are reached under the proposed project.” No additional changes to the Final EIR are required.

**Comment G-19:**

The comment suggests that Impact-TRA-5 would occur at 7% of project buildout, which is prior to the demolition of the first phase per page 4.10-40. The comment suggests this should be reflected in

the mitigation measures if the fair-share payment would not be made at the beginning of project development.

Please note that with the elimination of Impact-TRA-2 and MM-TRA-2 as identified in the Draft EIR, Impact-TRA-5 now becomes Impact-TRA-4 and mitigation measure MM-TRA-5 becomes MM-TRA-4. No transportation-related impacts would occur through implementation of the Demolition and Initial Rail component of the TAMT plan, which is the project-level analysis provided within the Draft EIR. Mitigation measure MM-TRA-4 indicates within its language when the fair-share payment would need to be made. Specifically, the measure indicates that the impact would occur once the proposed project generates 331 new daily trips. To ensure the impact would not occur prior to payment of the project's fair share contribution, the mitigation measure requires "payment once approximately 200 new daily trips are reached under the proposed project." No additional changes to the Final EIR are required.

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- G-19 cont. | in the Mitigation Measures if the fair share payment would not be made at beginning of project development.
- G-20 | **2. Page 4.10-48, For Impact-TRA-2:**  
A. Please revise the mitigation language so that the mitigation would more fully mitigate the impact.
- G-21 | B. Please replace "coordinate with Caltrans...the addition of" with "Install" in second sentence.
- G-22 | C. Remove the last two sentences starting with "in order to..." and ending with "...their contribution."
- G-23 | **3. Page 4.10-49, For Impact-TRA-3:**  
A. Please replace "construction activity" with "project" in second sentence.
- G-24 | B. Please replace the start of the first sentence within the second paragraph with the "A TDM plan will address potential..."
- G-25 | Thank you for the opportunity to provide comments on the Draft EIR. Please contact me directly if there are any questions regarding the contents of this letter or if the Port District would like to meet with City staff to discuss our comments. Please feel free to contact Myra Herrmann, Senior Planner, directly via email at [MHerrmann@sandiego.gov](mailto:MHerrmann@sandiego.gov) or by phone at 619-446-5372.

Sincerely,



Jeff Murphy, Director  
Planning Department

cc: Reviewing Departments (via email)  
Review and Comment online file

#### Comment G-20:

This comment is specific to Impact-TRA-2 on page 4.10-48. The comment requests a revision to the mitigation language so that the mitigation would more fully mitigate the impact.

Please see the response to G-10. As indicated in that response, Impact-TRA-2 was eliminated along with MM-TRA-2. No additional changes to the Final EIR are required.

#### Comment G-21:

This comment is specific to Impact-TRA-2 on page 4.10-48. The comment requests to replace "coordinate with Caltrans...the addition of" with "Install" in the second sentence.

Please see the response to G-10. As indicated in that response, Impact-TRA-2 was eliminated along with MM-TRA-2. No additional changes to the Final EIR are required.

#### Comment G-22:

This comment is specific to Impact-TRA-2. The comment requests the removal of the last two sentences starting with "in order to..."

Please see the response to G-10. As indicated in that response, Impact-TRA-2 was eliminated along with MM-TRA-2. No additional changes to the Final EIR are required.

#### Comment G-23:

This comment is specific to Impact-TRA-3 on page 4.10-49. The comment requests "construction activity" to be replaced with "project" in the second sentence.

Please note that with the elimination of Impact-TRA-2 and MM-TRA-2 as identified in the Draft EIR, Impact-TRA-3 now becomes Impact-TRA-2 and mitigation measure MM-TRA-3 becomes MM-TRA-2. The District believes that retaining the phrase "construction activity" is appropriate because it is specific to the type of activities that could result in a temporary construction-related impact identified under

Impact-TRA-2, rather than the more broadly defined “project.” No additional changes to the Final EIR are required.

**Comment G-24:**

This comment is specific to Impact-TRA-3 on page 4.10-49. The comment requests the replacement of the start of the first sentence within the second paragraph with “A TDM plan will address potential...”

Please note that with the elimination of Impact-TRA-2 and MM-TRA-2 as identified in the Draft EIR, Impact-TRA-3 now becomes Impact-TRA-2 and mitigation measure MM-TRA-3 becomes MM-TRA-2. The District believes that retaining the opening paragraph phrase “The traffic study shall specifically consider if a TDM plan is required to address potential temporary traffic impacts...” is appropriate because it is specific to the programmatic nature of the analysis and considers that some activities may be very small and not warrant a TDM plan, while others may. It also provides flexibility for multiple future construction projects that may each require specific TDM plans over the plan’s lifetime through 2035. No additional changes to the Final EIR are required.

**Comment G-25:**

This comment provides contact information.

The District appreciates the City’s interest and comments on the proposed project. The District looks forward to working with the City related to mitigation measure MM-TRA-3 and through the ministerial permitting process.

## 4.2.8 Letter H – City of San Diego Solid Waste Local Enforcement Agency



Comment Letter H

July 27, 2016

EMAIL

Mr. Larry Hofreiter, Planning and Green Port  
San Diego Unified Port District  
3165 Pacific Highway  
San Diego, CA 92101

Subject: Comments on Draft Environmental Impact Report: Tenth Avenue Marine Terminal Redevelopment Plan and Demolition and Initial Rail Component (SWIS # 37-AA-0430)

Dear Mr. Hofreiter:

H-1

Thank you for the opportunity to review and provide comment on the subject line Draft Environmental Impact Report. Below are comments from the City of San Diego Solid Waste Local Enforcement Agency (LEA). Based on the complicated and overlapping nature of regulations at this site, the LEA recommends a joint meeting with the Port District, the San Diego Regional Water Quality Control Board, the San Diego County Department of Environmental Health Voluntary Assistance Program, and the LEA to discuss soil management for the project.

### Comments on Executive Summary

H-2

The project summary describes demolition of Transit Sheds #1 and #2 followed by soil excavation and grading. Additional subsurface improvements requiring soil disturbance are also described.

LEA comment 1 (Page S-8 ): The Tenth Avenue Marine Terminal includes portions of the 8th Avenue Tidelands Dump, which is assigned Solid Waste Information System # 37-AA-0430. The LEA has regulatory oversight over the 8th Ave Tidelands dump (8th Ave dump) or any areas of the project

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### Comment H-1:

This comment is an introductory statement indicating comments for the City of San Diego Solid Waste Local Enforcement Agency (LEA) follow. This comment also suggests that, due to the complicated nature of the regulations at the project site, the LEA, the District, the San Diego Regional Water Quality Control Board (RWQCB), and the San Diego County Department of Environmental Health (DEH) Voluntary Assistance Program should have a joint meeting to discuss the soil management for the project.

Per the commenter's recommendation, the District hosted an inter-agency meeting on September 7, 2016 to discuss the project's soil management plan and other regulatory oversight issues. Attending were the RWQCB: Sarah Mearon, Water Resource Engineer; DEH: Kevin Heaton, senior Hydrologist, and James Clay, senior environmental specialist; and LEA: Bill Prinz, Program Manager, and Renee Robertson, Senior Environmental Health Specialist.

At the meeting, District staff summarized the regulatory history of the site, and explained that the Draft EIR includes a near-term, project-level analysis and a long-term program-level analysis. The project-level analysis involves demolishing two obsolete transit sheds, installing an onsite air brake testing system and an automatic rail lubricator, along with other relatively modest site improvements. If the EIR is certified by the end of the year, the Demolition and Initial Rail Component could begin construction in 2017, and would be scheduled for completion in March 2020. The long-term program-level analysis looked at a wide range of infrastructure improvements that would help the terminal realize throughput numbers projected in the TAMT plan. The Draft EIR analyzed these improvements programmatically. District staff also clarified that the two transit sheds planned for demolition (including the approximately 47,000 cubic yards of soil to be exported off site) are in the western portion of the project site, which was constructed on fill material and reclaimed tidelands between 1953 and 1958. The burn ash and

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Larry Hofreiter  
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H-2  
cont. where burn ash, burn ash contaminated soils, or solid wastes were disposed, but often highly contaminated soils require additional oversight by the County of San Diego Department of Environmental Health (DEH). Grading or any soil disturbance at a burn ash site can expose workers, the public, or the environment to toxins. The 8th Ave dump was created mainly by the use of a refuse incinerator from 1913–1956. Based on available historical information, aerial photographs, and reports, portions of the site may include burned refuse and/or burn ash. Previous environmental site assessment work also indicated that elevated concentrations of total petroleum hydrocarbons (TPH), polycyclic aromatic hydrocarbons (PAHs), and metals are present in soil beneath portions of the site. As such, soils disturbed or excavated during demolition and grading at the site may require special handling. The draft EIR should reference that a soil management and sampling plan will be developed, reviewed, and approved by 1) the DEH and 2) the LEA and 3) consultation with the San Diego Regional Water Quality Control Board in accordance with the protocol for burn dump site investigation and characterization (AB709). The soil management plan will provide clear distinctions for regulatory oversight and approvals. (See comment 3 below regarding the 2010 Soil Management Plan).

H-3 LEA comment 2 (Page S-8): should include reference to known soil contamination at the site.

H-4 LEA comment 3 (Pages S-44– S-47): The draft EIR references a Soil Management Plan (SMP) prepared by Tetra Tech EM in 2010, which designates the LEA as the lead oversight agency for these activities (appendix J-1). The LEA does not have sole regulatory authority over burn ash soils classified as California or Federal Hazardous wastes, or soils containing any level of TPH. As such, the sampling plan presented in the 2010 SMP may not be adequate for the scope of work considered in the EIR. Additionally, on page 3 the SMP states that soil will be managed based on analytical results and either 1) reused onsite or 2) taken for appropriate offsite disposal. Offsite reuse is not discussed or addressed in the SMP. The draft EIR indicates that 36,000 tons of soil has been approved by the San Diego Regional Water Quality Control Board for offsite reuse at parcels within the Chula Vista Bayfront development. It is inconsistent to reference a Soil Management Plan provided to one regulatory agency while a second regulatory agency was consulted for an approval of the same material.

H-5 LEA comment 4 (Page S-45): describes a Community Health and Safety Program and provides CCR Title 23, Division 3, Chapter 16 as the regulatory

former 8<sup>th</sup> Avenue Tidelands dump is believed to have been in the northeastern portion of the project site.

Per the meeting on September 7, 2016 with the District, RWQCB, DEH, and LEA, the LEA clarified that it is only responsible for burn ash on the project site. The LEA noted that it does not regulate hydrocarbons or other industrial wastes that may be located on site. RWQCB staff explained that it has regulatory oversight of the soils planned for export in accordance with the RWQCB's Waste Discharge Requirement Waiver 10 (Order No. R9-2014-0041).

In compliance with Waiver 10 requirements, soils may be exported to the Chula Vista Bayfront Harbor District area for use as fill material or to raise surface elevations. In the event that Chula Vista Bayfront Harbor District parcels are not able to receive excavated soils based on the project's construction schedule, all material would be disposed of in a nearby landfill or another fill site approved by the RWQCB. No changes to the Final EIR are required.

#### Comment H-2:

This comment is in regard to page S-8 and indicates the LEA has regulatory oversight over the 8<sup>th</sup> Ave Tidelands dump or any other area of the project site where burn ash or contaminated soils were disposed, but often highly contaminated soils require additional oversight by DEH. The EIR should reference that a soil management plan and a sampling plan will be developed, reviewed, and approved by (1) the DEH, (2) the LEA, and (3) consultation with the San Diego RWQCB in accordance with AB 709. The soil management plan will provide clear distinctions for regulatory oversights and approvals. The comment references comment H-4 regarding the 2010 Soil Management Plan.

Page S-8 is within the Executive Summary of the Draft EIR. This page identifies improvements associated with the Demolition and Initial Rail Component of the project, and provides pertinent background information including the size of the transit sheds and that potentially hazardous materials may be present at the project site. The full discussion and analysis of hazardous materials are within Section 4.7,



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H-5 cont.	reference (which are underground tank regulations). Please check that this is the correct regulatory reference for this mitigation measure.
H-6	LEA comment 5 (Page S-45): describes complete soil disposal and references California Administrative Code, Title 22, Division 4.5 requirements. Please check that this is the correct regulatory reference for this mitigation measure. Additionally, please provide the Chapter(s) and Section(s) of Division 4.5 intended to apply to this mitigation measure.
H-7	LEA comment 6 (Page S-45): The draft EIR states, "if soils are determined to be appropriate for reuse they may be exported to Chula Vista Bayfront Harbor District area" please clarify which regulatory agency will provide this approval and under which Soil Disposal Plan off site reuse and sampling for offsite reuse has been approved. Appendix J-3 is not regulatory approval for offsite soil reuse. Offsite reuse was not discussed or approved in any LEA reviewed soil management plan.
H-8	LEA comment 7 (Page S-46): the mitigation measure describes transportation of hazardous soil to a Class I landfill. The 2010 SMP is referenced, but this plan does not address how drag-out of hazardous soil and dust on to City rights-of-way will be prevented, nor does the SMP apply to soil that has been classified as hazardous. Please address truck, tire, and equipment decontamination procedures which will ensure hazardous waste is not tracked out during hauling.
H-9	LEA comment 8 (Page S-47): the mitigation measure describes hazardous soil stockpile management, but does not provide a specific timeline for removal of soil that has been confirmed to be hazardous. LEA recommends removal of hazardous soil stockpile within 90 days of confirmed analytical results.
H-10	LEA comment 9 (Page S-47): the draft EIR states that the contractor shall thoroughly decontaminate all equipment prior to it leaving the site. LEA recommends requiring records of decontamination procedures and dates of decontamination.
H-11	LEA comment 10 (Page S-47): To protect the public from the health hazards of airborne contaminants, dust monitoring is required anytime contaminated soil is being handled.

*Hazards and Hazardous Materials.* Page 4.7-2 of the Draft EIR acknowledges that the northeastern portion of the site was likely to have been the 8<sup>th</sup> Avenue Tidelands dump that involved open burning of refuse from the 1900s to the 1940s. Pages 4.7-3 and 4.7-4 cite recent testing conducted by Ninyo & Moore in 2013, 2014, and 2015 for Transit Shed #1, Transit Shed #2, and Warehouse C, indicating that most of the tested soils would be suitable for reuse.

However, page 4.7-21 acknowledged possible onsite soil contamination and determined that construction and grading activities within the project site would potentially result in the release of materials hazardous for workers, the public, and the environment. In response, the EIR identifies mitigation measure MM-HAZ-1: Compliance with a Soil Management Plan, which requires compliance with the following specific requirements of the 2010 Soil Management Plan including, but not limited to, the following:

- Conduct Soil Testing, which shall follow the soil sampling protocol and soil sampling objectives, and shall comply with the soil characterizations methodology identified in the plan;
- Prepare and implement a Community Health and Safety Program, which requires utilizing a Certified Industrial Hygienist to approve the program and actively monitor compliance with the Program during construction activities;
- Complete Soil Disposal, which shall profile any soils disturbed by construction activities and ensure they are disposed of in accordance with California state law.

As noted, in the response to comment H-1, per the meeting on September 7, 2016 with the District, RWQCB, DEH, and LEA, the LEA clarified that it is only responsible for burn ash on the project site. The LEA clarified that it does not regulate hydrocarbons or other industrial wastes that may be located on site. RWQCB staff explained that it has regulatory oversight of the soils planned for export in accordance with the RWQCB's Waste Discharge Requirement Waiver 10. Finally, page 4.7-22 of the Draft EIR also identifies Mitigation Measure MM-HAZ-2: Implement Engineering Controls and Best Management Practices during Construction, which requires a site-

specific Health and Safety Plan be prepared by the contractor and be approved by a licensed California Certified Industrial Hygienist, to minimize human exposure to potential contaminants.

With implementation of mitigation measures MM-HAZ-1 and MM-HAZ-2, impacts related to the potential creation of a significant hazard to workers, the public, or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment would be less than significant because safeguards would be taken to ensure upset and accident conditions do not occur. No changes to the Final EIR are required.

**Comment H-3:**

This comment is in regard to the previous comment (page S-8) and suggests it should include reference to known soil contamination at the site.

See response to comment H-2 above. Page S-8 is the Executive Summary and acknowledges that “Demolition would involve the proper removal of any asbestos, lead polychlorinated biphenyls, or other potentially hazardous materials that may be present in the Transit Sheds.” Known soil contamination is discussed in Section 4.7, *Hazards and Hazardous Materials*, and in Appendix J, *Hazards Studies*, of the Draft EIR. No changes to the Final EIR are required.

**Comment H-4:**

This comment is in regard to pages S-44 to S-47. This comment states that the Soil Management Plan (SMP) referenced in the Draft EIR designates the LEA as the lead oversight agency; however, the LEA does not have sole regulatory authority over burn ash soils or soils containing any level of TPH. Therefore, the SMP may not be adequate for the scope of work considered in the EIR. Additionally, this comment notes the SMP never discusses offsite reuse. The Draft EIR indicates that 36,000 tons of soil have been approved by the RWQCB for reuse at the Chula Vista Bayfront. The comment states that it is inconsistent to reference an SMP provided to one regulatory agency while a second agency was consulted for an approval of the same



material.

See response to comment H-1 above. At the September 7, 2016 meeting with District staff and staff from LEA, RWQCB, and DEH, the District agreed to update Tetra Tech's SMP (2010) to clarify that the San Diego LEA is only responsible for regulating burn ash on the site, whereas the RWQCB is the regulatory agency that determines if soils are suitable for reuse and/or to ensure proper disposal of soils if they are not suitable for reuse. No changes to the Final EIR are required.

**Comment H-5:**

This comment addresses page S-45, which describes a Community Health and Safety Program that provides California Code of Regulations Title 23, Division 3, Chapter 16 as the regulatory reference. The comment indicates these are underground tank regulations and requests that the District check that these are, in fact, the correct regulatory reference for this mitigation measure.

The Community Health and Safety Program is written in accordance with the DEH's Site Assessment and Mitigation Manual (2009) and the EPA. Pages S-64 and 4.7-22 of the Draft EIR have been revised in the Final EIR to reflect this information.

**Comment H-6:**

This comment is in regard to page S-45, which references California Administrative Code, Title 22, Division 4.5 requirements. The comment requests that the District check that this is the correct regulatory reference for this mitigation measure, and provide the Chapter(s) and Section(s) of Division 4.5 intended to apply to this mitigation measure.

The District has confirmed this is the correct reference. The Chapter is Chapter 18 and the Sections are 66268.1–66268.124.

**Comment H-7:**

This comment is in regard to page S-45. The comment requests clarification on which regulatory agency will provide approval of soils from the project site to be exported to Chula Vista Bayfront Harbor District area, and under which Soil Disposal Plan offsite reuse and

sampling for offsite reuse has been approved. The comment states that Appendix J-3 is not regulatory approval for offsite soil reuse, and offsite reuse was not discussed or approved in any LEA-reviewed SMP.

See response to comment H-1 above. Based on the September 7, 2016 meeting, District staff and RWQCB staff clarified that RWQCB has regulatory authority over the reuse and/or disposal of soils from the project site. Page 4.7-3 of the Draft EIR references the Import Soil Evaluation performed by Ninyo and Moore in 2015, which evaluated the soil within the footprint of the planned removal area for constituents of potential concern that have been found during previous subsurface projects at the project site. The soil sampling revealed metals were the only constituents of potential concern detected in the soil samples, but were significantly lower than waste criteria and therefore suitable for reuse. This analysis was reviewed by the RWQCB, which approved the reuse of the soils at the Chula Vista Bayfront parcels. No changes to the Final EIR are required.

**Comment H-8:**

This comment is regarding page S-46. The comment states that the Draft EIR describes transport of hazardous soils to a Class I landfill, and it references the SMP. The comment states that the SMP referenced does not address how drag-out of hazardous soil and dust onto City rights-of-way will be prevented, nor does the SMP apply to soil that has been classified as hazardous. The comment requests information regarding truck, tire, and equipment decontamination procedures that will ensure hazardous waste is not tracked during hauling.

As discussed in Section 4.8, *Hydrology and Water Quality*, of the Draft EIR, in accordance with the State Water Resources Control Board (SWRCB) Construction General Permit (Order 2009-0009-DWQ) and the SWRCB Industrial General Permit (Order No. 2014-0057 DWQ), the project would include extensive best management practices including tire tracking controls and equipment decontamination. No changes to the Final EIR are required.

**Comment H-9:**

This comment is regarding page S-47, which contains a mitigation measure that describes hazardous soil stockpile management but does not provide a specific timeline for removal of soil that has been confirmed as hazardous. The commenter suggests removal of hazardous soil stockpiles within 90 days of confirmed analytical results.

In accordance with California Administrative Code 22, all soil stockpiles characterized as hazardous waste would be removed from the site to a licensed hazardous waste disposal facility within 90 days of final characterization. No changes to the Final EIR are required.

**Comment H-10:**

This comment is regarding page S-47. The commenter recommends requiring records of decontamination procedures and dates of decontamination.

The project's plan specifications would include requirements for detailed record-keeping of equipment decontamination procedures including implementation logs. Because this is a standard practice at the District, no changes to the Final EIR are required.

**Comment H-11:**

This comment states that dust monitoring is required for the project any time contaminated soil is being handled.

In accordance with mitigation measure MM-HAZ-1 in the Draft EIR, the guidelines of the Community Health and Safety Program (Program) shall be in accordance with the DEH's Site Assessment Mitigation Manual and the EPA. The Program shall include detailed plans on air monitoring and other appropriate construction means and methods to minimize the public's and site workers' exposure to the chemical constituents. The contractor shall utilize a Certified Industrial Hygienist with significant experience with chemicals of concern on the project site to approve the Program and actively monitor compliance with the Program during construction activities. No changes to the Final EIR are required.

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- H-12 LEA comment 11 (Page S-47): LEA recommends requiring the contractor to submit for approval (to the Port) and implement a soil stockpile labeling system and providing worker training regarding the system. This will reduce the potential for accidental exposure or mishandling of soils with elevated toxins.

#### Section 4.7 Hazards and Hazardous Materials

- H-13 LEA comment 12 (Page 4.7-1): Soil Management Plan prepared by Tetra Tech EM Inc 2010 may not be adequate for the scope of this project and needs additional review and by DEH or RWQCB.
- H-14 LEA comment 13 (Page 4.7-3): draft EIR states that the Regional Water Quality Control Board approved the reuse of soil at the Chula Vista Bayfront. Please include the approval correspondence from the RWQCB. See also LEA comment 3.
- H-15 LEA comment 14 (Page 4.7-3): draft EIR concludes that soil from under transit Shed #1 and Warehouse C are suitable for re-use. The 2010 SMP still required additional soil testing based on volume of material excavated, after pre-characterization sampling. The pre-characterization sampling was to determine if multiple waste streams needed to be considered and was not intended to substitute for characterization of excavated soils.
- H-16 LEA comment 15 (Page 4.7-14): Based on the scope of work presented in this draft EIR the LEA recommends additional review and approval of the 2010 SMP by DEH and RWQCB. Additionally, the 2010 SMP sampling protocol needs to be re-evaluated since this project does not conform to the "cap and leave in place" scenario which was the basis for the sampling protocol.
- H-17 LEA comment 16 (Page 4.7-20): The 2010 SMP considers onsite reuse of soils and provided testing protocols and reuse options based on those results. Offsite reuse and temporary offsite storage were not evaluated or discussed in either the 2002 or 2010 SMP. Additionally, offsite storage should not be utilized unless approved by the appropriate regulatory agency based on the analytical testing results.

#### Comment H-12:

This comment states that the contractor should be required to submit for approval (to the District) and implement a soil stockpile labeling system and providing worker training regarding the system. This will reduce the potential for accidental exposure or mishandling of soils with elevated toxins.

As standard practice, stockpiles would be labeled to ensure records of contaminant levels and characterization of the stockpiles are correctly identified. No changes to the Final EIR are required.

#### Comment H-13:

This comment addresses Section 4.7, page 4.7-1. The comment suggests the SMP prepared by Tetra Tech EM Inc 2010 may not be adequate for the scope of this project and needs additional review by DEH or RWQCB.

See response to comment H-1 above. Based on the September 7, 2016 meeting, the District is in the process of updating the 2010 SMP to clarify the regulatory oversight of the LEA, RWQCB, and DEH. The District agreed to update Tetra Tech's SMP (2010) to clarify that the San Diego LEA is only responsible for regulating burn ash on the site, whereas the RWQCB is the regulatory agency that determines if soils are suitable for reuse and/or to ensure proper disposal of soils if they are not suitable for reuse. Furthermore, as discussed at the September 7, 2016 meeting, no additional regulatory oversight of the project is necessary. No changes to the Final EIR are required.

#### Comment H-14:

This comment requests that the District include the approval correspondence from the RWQCB for the reuse of the soils at the Chula Vista Bayfront. (See also response to comment H-4.)

As the project continues to move forward, the District would continue to comply with RWQCB Waiver 10 requirements. Furthermore, the District received a letter from the RWQCB on April 17, 2015 with the conclusion that the soils at Transit Shed #1 are suitable for reuse

within the Chula Vista Bayfront Master Plan area without restriction. No changes to the Final EIR are required.

**Comment H-15:**

This comment stated that the Draft EIR concluded that the soil from under Transit Shed #1 and Warehouse C are suitable for reuse. The comment suggested that the SMP required additional testing of the soil based on the volume of material excavated. The pre-characterization sampling was to determine if multiple waste streams needed to be considered and was not intended to substitute for characterization of excavated soils.

In accordance with RWQCB Waiver 10, the District is completing characterization of all project export soil under the oversight of RWQCB staff. No changes to the Final EIR are required.

**Comment H-16:**

This comment recommends additional review and approval of the SMP by the DEH and RWQCB. Additionally, the comment states the SMP sampling protocol needs to be re-evaluated because this project does not conform to the “cap and leave in place” scenario, which was the basis for the sampling protocol.

Based on the September 7, 2016 meeting, the District is in the process of updating the 2010 SMP to clarify the regulatory oversight of the LEA, RWQCB, and DEH. For the current project, the District is processing Waiver 10 approvals with the RWQCB for all soils exported from the site. Additionally, any soils not able to be approved under Waiver 10 would be disposed of at a fill site approved by the RWQCB. No changes to the Final EIR are required.

**Comment H-17:**

This comment states that offsite reuse and temporary offsite storage were not evaluated or discussed in either the 2002 or 2010 SMP. Additionally, the comment states that offsite storage should not be utilized unless approved by the appropriate regulatory agency based on the analytical testing results.

Based on the September 7, 2016 meeting, the District is in the process of updating the 2010 SMP to clarify the regulatory oversight of the LEA, RWQCB, and DEH. For the current project, the District is processing Waiver 10 approvals with the RWQCB for all soils exported from the site. Additionally, any soils not able to be approved under Waiver 10 would be disposed of at a fill site approved by the RWQCB. No changes to the Final EIR are required.

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H-18 | Please feel free to contact me at (619) 533-3693 if you have any questions regarding these comments.

Sincerely,



Renee Robertson  
Solid Waste Inspector III  
City of San Diego Local Enforcement Agency

cc: John Anderson, Senior Engineering Geologist, California Regional Water Quality Control Board, San Diego Region  
Amy Grove, Engineering Geologist, California Regional Water Quality Control Board, San Diego Region  
James Clay, San Diego County Department of Environmental Health  
Paul Brown, Program Manager, San Diego Unified Port District  
Patrick Snyder, Environmental Scientist, CalRecycle  
Abel Martinez Centeno, Waste Management Engineer, CalRecycle  
Michael Richmond, Deputy Director, Development Services Department

### Comment H-18:

This is a comment concludes the letter and provides contact information.

The District appreciates the LEA's interest in the proposed project. This comment is noted, but does not raise any issues needing a response pursuant to CEQA.

## 4.2.9 Letter I – Environmental Health Coalition

Comment Letter I



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August 18, 2016

San Diego Unified Port District  
 Environmental & Land Use Management Department  
 Attn: Larry Hofreiter  
 3165 Pacific Highway  
 San Diego, CA 92101  
 Via email to: [lhofreiter@portofsandiego.org](mailto:lhofreiter@portofsandiego.org)

Re: EHC Comments on Draft Environmental Impact Report for the Tenth Avenue Marine Terminal Redevelopment Plan

Dear Mr. Hofreiter:

Environmental Health Coalition (EHC) is a 36-year-old environmental justice organization. EHC builds grassroots campaigns to confront the unjust consequences of toxic pollution, discriminatory land use, and unsustainable energy policies. Through leader development, organizing and advocacy, EHC improves the health of children, families, neighborhoods and the natural environment in the San Diego/Tijuana region.

I-1 EHC appreciates the opportunity to review the Draft Environmental Impact Report (DEIR) for the Tenth Avenue Marine Terminal (TAMT) Redevelopment Plan ("project"). The DEIR elucidates the potential for massive impacts from this project, impacts that will be heavily concentrated on the adjacent residential community of Barrio Logan. Barrio Logan residents have lived alongside the TAMT for decades and endured serious and sustained impacts with few benefits. EHC cannot support the project without substantial mitigation and job and quality of life benefits for the adjoining Environmental Justice community of Barrio Logan. At this time, the Reduced Plan Alternative, with appropriate mitigations, appears to be the least environmentally harmful option. Our comments on the DEIR follow.

I-2 I. POTENTIAL IMPACTS OF THE PROJECT

The project has many impacts across a wide range of categories, and will inflict harm on both nearby communities and the climate system of our planet.

A. AESTHETICS

- I-3
- There will be a significant, unmitigable impact to the viewshed (Impact AES-1). Residents' view of San Diego Bay will include up to 5 Gantry

**EMPOWERING PEOPLE. ORGANIZING COMMUNITIES. ACHIEVING JUSTICE.**  
**EMPODERANDO A LA GENTE. ORGANIZANDO A LAS COMUNIDADES. LOGRANDO LA JUSTICIA.**

### Comment I-1:

The first comment is an introduction to the Environmental Health Coalition (EHC), provides an opinion of the degree of impacts associated with the proposed project, and indicates that the commenter is unsupportive of the project without substantial mitigation and additional benefits to the adjacent Barrio Logan community. The introduction concludes by indicating that specific comments follow in the remainder of the letter.

The District appreciates the commenter's interest in the project, notes the commenter's lack of support for the project as it is currently proposed, and has responded to specific comments in the pages that follow.

### Comment I-2:

The comment expresses the opinion that implementation of the proposed project would inflict harm on both nearby communities and the climate system.

The environmental impacts of the project are fully disclosed and any significant adverse impacts in nearby communities and affecting global climate would be mitigated to the extent feasible within the Draft EIR, as revised in the Final EIR. As no specific comment requiring a response is raised, no further response is needed. Individual responses to comments are provided in the pages that follow.

### Comment I-3:

The comment summarizes the conclusions of the Draft EIR that there will be a significant impact on the viewshed due to the five gantry cranes that would reach heights of up to 270 feet with the boom arm raised (note that, while lowered and in operation, the height would be approximately 240 feet). The commenter also states that the Draft EIR indicates that the cranes would have floodlights attached to the crane structures, making the cranes visible at night. Lastly, the



I-3 cont.	cranes, with heights up to 270 feet. The cranes will have floodlights attached to the sides of the crane structures. Thus the cranes will be visible even at night. No mitigation measures are proposed for this impact.
I-4	<ul style="list-style-type: none"> <li>Nighttime light. While nighttime light pollution was not found to be a significant impact, this is largely because the existing ambient light at night is already high. Much of this ambient light emanates from sources on the tidelands – existing TAMT night operations, hotels, and the Convention Center (Section 4.1.2.4) Nighttime light pollution is an existing, unmitigated cumulative impact to the quality of life of Barrio Logan residents. “The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.” (CEQA Guidelines § 15355; (<i>Kings County Farm Bureau v. City of Hanford</i> [1990] 221 Cal.App.3d 692, 720).</li> </ul>
I-5	Nighttime light is also a health hazard, as EHC noted in our NOP comments for this project. In addition to sleep disruption and annoyance, light pollution has the potential to disrupt circadian rhythms and hormone levels, and increase cancer risk for hormone-related cancers such as breast and prostate. Circadian rhythms affect physiological processes including brain wave patterns, hormone production, cell regulation, and other biologic activities. Disruption of the circadian clock is linked to several medical disorders in humans, including depression, insomnia, cardiovascular disease, and cancer. <sup>1</sup> Excess light at night is also linked in epidemiologic studies to increases in breast cancer risk among night shift workers, and IARC in 2007 declared night shift work to be a Group 2A Probable Human Carcinogen. Researchers believe the increased cancer risk is linked to decreases in melatonin – a hormone secreted at night. Decreases in melatonin in turn produce a range of physiologic consequences including increased levels of estrogen. <sup>2</sup> The health risk appears not to be limited to night shift workers. A 2013 case-control study of patients with breast cancer in the state of Georgia found that high light exposure at night, as measured by satellite imaging, was associated with increased risk of breast cancer. <sup>3</sup>

<sup>1</sup> *Environmental Health Perspectives*, Vol. 117, Number 1, January 2009. Pp. A20-A27.

<sup>2</sup> *Ibid.*, p.A26.

<sup>3</sup> *International Journal of Health Geographics* 2013, 12:23 doi:10.1186/1476-072X-12-23.

commenter states, as indicated in the Draft EIR, that there are no mitigation measures proposed to reduce this significant impact.

The comment simply repeats information provided in the Draft EIR. As the commenter notes, the Draft EIR identified a significant and unavoidable aesthetics impact associated with the installation of up to five gantry cranes. This impact is identified and disclosed in the Draft EIR as Impact-AES-1. It is a fundamental characteristic of the project that the cranes remain sized at 270 feet in height to accommodate the size of the vessels that would likely be calling to the TAMT over the next 20 years. Similarly, while it is not known if market conditions would necessitate a total of five gantry cranes, the Draft EIR presented a conservative scenario to provide the District with flexibility in future years to meet market needs. Therefore, the EIR appropriately disclosed the “worst-case” scenario of five cranes and identified the impact as significant and unavoidable. No mitigation measures were provided by the commenter and therefore the case remains that there are no known feasible mitigation measures to reduce this impact to less-than-significant levels.

In addition, the commenter notes that the Draft EIR discloses the use of floodlights on the cranes during their nighttime operation. As stated on page 4.1-21 of the Draft EIR:

“...up to five new gantry cranes may be installed, along with other permanent operational equipment. The cranes would be equipped with night lighting to allow operational activities to continue through nighttime hours. Any lighting installed would be visible from offsite locations and would contribute to the overall ambient glow of the project site and surrounding areas; however, *lighting from onsite uses would be designed so as not to spill directly onto other areas, consistent with Section 142.0740 of the City of San Diego Municipal Code, and the proposed conditions would be similar to existing conditions because nighttime activities already occur at the project site and similar conditions are located farther south along the waterfront.*” [Emphasis added]

As stated, lighting would be directed downward and toward the terminal where dock activities would be occurring. Moreover, as

noted in the analysis on page 4.1-5, existing lighting is already used at the terminal during its nighttime operations:

“...during nighttime loading or offloading of ships, barges, and containers, floodlights attached to the bottoms of crane booms and sides of crane structures illuminate cranes and the areas around them. Headlights from vehicles transferring container goods to and from the berths are another source of transitory nighttime lighting. The overall onsite nighttime lighting environment is considered low to moderate because the site does not require substantial amounts of night lighting.”

Therefore, the proposed project’s potential to install and use gantry cranes instead of cranes on vessels would simply replace the existing floodlights from vessel cranes with floodlights from the gantry cranes. These floodlights, consistent with existing local regulations (i.e., 142.0740 of the City of San Diego Municipal Code), would be shielded and pointed downward toward the terminal where the work is occurring.

The threshold used to determine if a significant impact from lighting would occur as a result of the project’s implementation is whether the proposed project would introduce a substantial amount of new lighting. In this case, the lighting is already present and the amount of new lighting associated with the cranes would be sufficient to ensure compliance with Occupational Health and Safety Administration (OSHA) regulations (see 29 CFR 1915.82, 1926.56, 1917.123, 1915.82), but would not be excessive so as to contribute spill lighting on adjacent properties.

While lighting on the terminal is considered to be low to moderate, the ambient nighttime lighting in the surrounding area is considered to be high as stated on page 4.1-5 of the Draft EIR.

Therefore, the analysis in the Draft EIR (page 4.1-21) concluded that the project’s potential for new lighting would have a minimal impact and would not be readily apparent given the existing degree of nighttime lighting.

As previously stated, a significant impact on views would occur with the introduction of up to five gantry cranes (i.e., Impact-AES-1). No additional significant impacts related to aesthetics would occur, no additional disclosure is required, and no feasible mitigation was identified. Moreover, the commenter does not recommend consideration of any specific mitigation to reduce the identified significant impact (i.e., Impact-AES-1); therefore, no further response is required and no changes are required to the Final EIR.

**Comment I-4:**

The comment states that nighttime light associated with the proposed project was determined to be less than significant due to the presence of significant nighttime lighting already present in the existing condition. The commenter expresses the opinion that nighttime light is an existing, unmitigated cumulative impact on the quality of life for Barrio Logan residents and references State CEQA Guidelines section 15355 as evidence, which states:

“The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.”

Therefore, the State CEQA Guidelines acknowledge that an impact is a “change” in the environment. Existing nighttime lighting around the project site is discussed on page 4.1-21 of the Draft EIR, which states:

“Overall, existing nighttime views in the area surrounding the project site is already compromised due to the high level of nighttime lighting. A substantial change in lighting would not occur as a result of the project, and contributions to increased ambient glow would not represent a significant change in existing conditions that would be perceptible from surrounding sensitive viewing areas. Impacts would be less than significant.”

Similarly, the cumulative impact analysis on page 5-14 acknowledges

that a cumulatively considerable impact on aesthetics would result if the TAMT plan buildout, including the Demolition and Initial Rail Component, would contribute to a significant cumulative impact related to a substantial and adverse change in the overall character of the area or result in the addition of a cumulatively considerable amount of light and/or glare. The cumulative impact analysis determined that although cumulative projects continue to change the Bayfront and downtown area:

“...changes from past, present and reasonably foreseeable future projects have been and will continued to be designed in accordance with the existing viewshed regulations and design guidelines. Consequently, a cumulatively significant impact from past, present and reasonably foreseeable future projects is not present.”

No changes are required to the Final EIR.

**Comment I-5:**

The commenter provides references to studies that suggest that nighttime light is linked to a variety of health issues such as sleep disruption, hormone production, cell regulation, and even severe medical disorders, such as breast and prostate cancers. The comment expresses that this health risk is not limited to night shift workers. The EIR is not required to evaluate the effect of *existing* nighttime light on future workers or occupants of the project. As discussed on page 4.1-21 of the Draft EIR, the project will not result in a significant change to the existing levels of nighttime light in the area. In addition, OSHA regulates worker safety and health (see 29 CFR 1910, 1915, 1917, 1918, 1926) and the proposed project would be required to comply with all applicable OSHA regulations, as noted in Section 4.7, *Hazards and Hazardous Materials*, of the Draft EIR. Moreover, the terminal already operates during nighttime hours when needed and this practice would simply continue under the proposed project. As for impacts on non-workers off terminal, the project is separated from residential land uses by at least 1,500 feet with several intervening commercial

and institutional buildings, and the lighting will be shielded and pointed downward toward the terminal where the work is occurring, in compliance with the San Diego Municipal Code, which would lessen any potential for lighting impacts. Moreover, as noted in Section 4.1, *Aesthetics and Visual Resources*, the proposed lighting condition with full buildout of the TAMT plan would be very similar to the existing condition and the existing need to light the terminal sufficiently during nighttime work.

Additionally, the articles cited by the commenter also state that it is unclear how much light is too much light and that the health effects of light are not proven and are inconclusive (*Environmental Health Prospective*, Vol. 117, No. 1, January 2009, pp. A20–A27), and additional research using exposure metrics at the individual level is required to make any conclusions (*International Journal of Health Geographics* 2013, 12:23 doi:10.1186/1476-072X-12-23). Moreover, IARC acknowledged that its declaration was based on limited epidemiological studies that may have been influenced by bias and confounding factors that cause health effects (*Does light at night pose a health risk?*, 2015 available at <http://www.nhs.uk/news/2015/03March/Pages/Does-light-at-night-pose-a-health-risk.aspx>). Therefore, there is no substantial evidence that the project's light will cause health impacts.

No changes to the Final EIR are required.

	<b>B. AIR QUALITY/HEALTH RISK</b>
I-6	<p>The project proposes to increase cargo throughput at TAMT up to 589% of the current throughput, and the potential air quality impacts are correspondingly enormous. The scale of the projected increase in cargo volumes and air emissions from the project prompted the California Air Resources Board to write a letter to the Port in October of 2015 stating their conclusion that the project is likely to increase the health risk in the immediate area, and advising that the project incorporate maximum emission reduction strategies. In their words, "ARB staff concludes that it is extremely likely the proposed Plan will increase the health risk in the immediate area." The Human Health Risk Analysis completed for the DEIR does indeed find increased health hazards:</p> <ul style="list-style-type: none"> <li>• Cancer Risk (<b>Impact AQ-4</b>): Increased residential cancer risk attributable to the project is as high as 197 per million, versus an already high risk of 43 per million, for the full build out scenario (Table 4.2-22). Even the mitigated build out scenario produces a residential cancer risk of 132 per million, far above the current TAMT-associated risk, and far more than other San Diegans bear from adjacent land uses.</li> </ul>
I-7	<p>Human health risk is only one of the air quality impacts of the project. The other significant and unavoidable impacts include:</p> <ul style="list-style-type: none"> <li>• <b>Impact AQ-1</b>: Excess criteria pollutant emissions during construction.</li> <li>• <b>Impact AQ-2</b>: Excess criteria pollutant emissions during operations: VOC, NOx, CO, SOx, PM10, and PM2.5 are all above thresholds even after mitigation.</li> <li>• <b>Impact AQ-3</b>: Cumulative criteria pollutant emissions above thresholds during operations: VOC, NOx, CO, SOx, PM10, and PM2.5 are all above thresholds even after mitigation.</li> </ul> <p>Whereas the criteria pollutants are not included in the Human Health Risk Assessment, it is important to note that VOC and NOx are ozone precursors, and that the San Diego air basin is already in nonattainment of federal and state 8-hour ozone standards, and in nonattainment of the state 1-hour ozone standard. <sup>4</sup> Ozone is a highly reactive, oxidant gas that is irritating to respiratory tissues and is particularly harmful to those already suffering from respiratory illnesses such as asthma. <sup>5</sup></p>
I-8	<p>The health risk assessment also does not include any analysis of the impacts of the estimated 5,343 pounds per day of fugitive PM emissions from the project, a particular health hazard for those with existing cardiovascular or respiratory ailments.</p>

<sup>4</sup> <http://www.sdapcd.org/content/sdc/apcd/en/air-quality-planning/attainment-status.html>

<sup>5</sup> <http://www.arb.ca.gov/research/aags/caaqg/ozone/ozone-fs.pdf>

### Comment I-6:

The commenter expresses concern about increasing health risks in the immediate vicinity of the proposed project due to the projected increases of cargo throughput at TAMT. The comment also expresses concern over the increased residential cancer risk attributable to the proposed project, which would increase by 197 per 1 million persons above existing conditions at TAMT. The comment states that even with mitigation the residential cancer risk number would only decrease to 132 per 1 million persons, which the HRA for the Draft EIR indicates is far above existing conditions at TAMT and significantly greater than what other San Diego residents encounter from adjacent non-industrial land uses.

Emissions from CHE, vessel hoteling, and rail activity have the greatest contribution to the increase in health risk at the maximally exposed locations near the terminal. Based on comments provided by EHC, ARB, and SDAPCD, as well as further clarifications from terminal staff, District staff has further refined the emissions estimates and associated reductions of existing mitigation measures, including MM-AQ-4 and MM-AQ-6, as well as increased the existing mitigation measures and added a new mitigation measure MM-AQ-9, which will require capture of emissions from vessels at berth, and refinements to the assumptions regarding rail activity.

First, MM-AQ-6, *Electric Cargo Handling Equipment*, in the Draft EIR requires that one piece of CHE be upgraded for each of the three nodes. The Final EIR has increased the amount of mitigation required in MM-AQ-6 by adding the following requirements:

- By 2025, 20 Electric Yard Trucks will be in operation for terminal operations; and
- By 2030, three additional electric reach stackers and ten electric forklifts will be in operation for terminal operations.

Secondly, while fugitive PM10 and PM2.5 emissions from the conveyor system and bulk discharge unloader are not directly related to cancer risk, MM-AQ-4, *Implement BACT for Conveyor System and Bulk Discharge Unloader*, was included as a proposed mitigation

- I-8 Cont. The census tract that includes residential Barrio Logan already rates highly on the CalEnviroScreen<sup>6</sup> indicator for asthma hospitalization rate, with an asthma percentile score of 91.67, meaning that this census tract ranks higher on this measure than almost 92% of other census tracts in California. Residents of this community need cleaner air, not more pollution.
- I-9
- **TAMT Worker Impacts.** Although workers at TAMT are not identified in the analysis as sensitive receptors, they receive the most concentrated doses of the pollutants generated on the terminal. An IBEW spokesperson, commenting on development of the Port, has stated that worker asthma generates the highest expenses for the union's health plan.<sup>7</sup>
- I-10
- **Cumulative Truck impacts.** Port-related truck activity has been a top complaint of Barrio Logan residents since Dole trucks first appeared on Cesar Chavez Parkway in 2003. The TAMT redevelopment will generate up to 846 truck trips per day and generate a 619% increase in PM10 from trucks. This adds to the estimated 142 extra truck trips per day (71 one-way trips) that will be generated by the Dole Refrigerated Rack Project<sup>8</sup> and the 192 truck trips per day (Table 5-2) that a Mitsubishi project could add --or 384 trips if the 192 figure is assumed to be one-way. These three projects together would add up to 1,372 truck trips per day to a terminal and surface streets that are directly upwind of the Barrio Logan community. Existing trucks per year at TAMT, as given in Table 4.10-14, total 33,349; this comes to 182 truck trips per day, assuming each truck generates two truck trips. The TAMT, Dole, and Mitsubishi projects together, then, would result in a new total that amounts to 750% of the current total truck trips. Because of their closer proximity to homes, schools, parks, and walkways, trucks and truck emissions are of special concern to the community. While there are no direct measurements of roadway diesel PM in the community, there is evidence that ambient air in Barrio Logan continues to have a higher percentage of elemental carbon – found in higher proportion in diesel exhaust than in gasoline exhaust – in ambient particulate matter:

<sup>6</sup> <http://oehha.ca.gov/calenviroscreen/maps-data>

<sup>7</sup> Jen Badgley, spokesperson for IBEW, in oral testimony to the Rules Committee of San Diego City Council, March 6, 2013, regarding the mayor's draft Port Vision. Ms. Badgley stated that IBEW is self-insured for health and that asthma is their highest expense. She expressed concern regarding worker exposures to air pollutants on the waterfront.

<sup>8</sup> Dole Refrigerated Rack Project DEIR, p. 4.1-19.

measure in the Draft EIR but reductions from this measure were not quantified. However, to provide a comprehensive analysis of the reductions from this measure, this mitigation measure has been clarified and the reductions thereof have been quantified in the Final EIR. As demonstrated in Table 4.2-18 of Chapter 3, *Errata and Revisions*, of the Final EIR, MM-AQ-4 would result in a net decrease of PM10 and PM2.5 emissions on a peak day by -246 pounds for PM10 and -51 pounds for PM2.5. Consequently, the quantified reduction of PM10 and PM2.5 associated with MM-AQ-4 reduces the project's overall dust-related impact on sensitive receptors, as shown in Tables 4.2-22 and 7-4. Note that dust-related impacts are not related to the health risk discussion in the Draft EIR or as revised in the Final EIR.

Next, in an effort to further reduce emissions from the vessel hoteling activity at the terminal, the Draft EIR has been revised to require an additional mitigation measure MM-AQ-9, which would require an emissions capture and control system (e.g., a bonnet system or similar type of technology) for vessels that berth and hotel at berths 10-5/-6 and 10-7/-8, prior to when an impact would occur. (Note, emissions capture and control is not required for Berths 10-1/-2 and 10-3/-4 because they are shore power equipped and, just as importantly, the Dole vessels that call at these berths have shore power connection capabilities.) This emissions capture and control system would need to be installed and operational prior to dry bulk operations reaching an annual throughput of 691,418 metric tons absent any growth in multi-purpose/general cargo, multi-purpose/general cargo reaching an annual throughput of 356,666 metric tons absent any growth in dry bulk, or combined dry bulk and multi-purpose/general cargo node reaching an annual throughput of 691,418 metric tons, whichever occurs first. MM-AQ-9, in combination with the MM-AQ-6, reduces the net new residential cancer risk from 188 per million under the unmitigated scenario to 42 per million for the MPC scenario, and reduces net new cancer risk at the closest schools (Perkins and Monarch) from 30 per million under the unmitigated scenario to 8 per million for the MPC scenario and parks from 17 per million under the unmitigated scenario to 5 per million for the MPC scenario.



Table 1. Elemental Carbon (EC) as a Percentage of Total PM2.5 Carbon, 2012

Air Monitor	Average EC Percent	Maximum EC Percent
Barrio Logan (Beardsley)	21.9	44.3
El Cajon	14.6	24.5
Escondido	15.2	24.7

Source of data: US EPA, Air Data, from monitoring data submitted by SD APCD. Percentages compiled by EHC.

US EPA Air Data website: <https://ofmext.epa.gov/AQDMRS/aqdmrs.html>

I-11 We note also that EMFAC14, the CARB model of mobile source emissions utilized in the DEIR, includes the mobile source regulations that have been adopted to date, including the On-Road Heavy Duty Truck and Bus rule. Inclusion of the On-Road rule is appropriate; however, EMFAC modeling assumes virtually 100% compliance with the rule. In order to assure that all trucks visiting the terminals are in compliance, the Port must verify compliance, as it currently does with the Drayage truck rule.

I-12 As a cumulative impact that will be worsened by this and other upcoming projects, trucks are a key target for mitigations that reduce or eliminate diesel exhaust to the maximum possible degree. "In the end, the greater the existing environmental problems are, the lower the threshold should be for treating a project's contribution to cumulative impacts as significant." (*Communities for a Better Environment v. California Resources Agency* (2002) 103 Cal.App.4th 98, 120).

I-13 In our NOP comments on the scope of environmental analysis to be completed for this project, EHC recommended that No Net Increase be the threshold of significance for air quality/health risk. Using this threshold, all phases of the project are significant and should be mitigated. Full mitigation of air quality impacts would necessitate going beyond simple compliance with existing regulations and moving toward 100% electrification of the terminal and its operations.

#### C. GREENHOUSE GASES

I-14 At full buildout, the project proposes to increase GHG, measured in metric tons of CO<sub>2</sub> equivalents per year, to 540% of the current level.<sup>9</sup> This large increase is of great concern, given the urgency of reducing planetary emissions of greenhouse gases. The significant and unavoidable impact identified for the project is Impact GHG-2:

<sup>9</sup> Assuming that the existing annual total is 21,191 MT CO<sub>2</sub>e. Table 4.6-11 gives this figure as the "Daily Existing Annual," leaving some ambiguity as to whether this is a daily or an annual amount.

As shown below, health risk levels are substantially lower than what was originally estimated in the Draft EIR at nearby receptors. Impact-AQ-4 would remain significant and unavoidable after mitigation at the maximally exposed residence and park receptors, but would drop to below significance after full implementation of all mitigation measures under the Sustainable Terminal Capacity (STC) Alternative. Note that the Final EIR presents unmitigated risk levels that are below risk levels presented in the Draft EIR. This is because refinements were made regarding switching activity. The Draft EIR incorrectly assumed all the switching duties were done by the GP-60 switchers. Rather, a railcar mover performs approximately half of the switching activity, which results in lower emissions and health risk because the railcar mover is cleaner and smaller than the GP-60 switchers.

	Risk at Maximally Exposed Residence		Risk at Maximally Exposed Park		Risk at Maximally Exposed School	
Maximum Incremental Cancer Risk	Unmitigated	Mitigated	Unmitigated	Mitigated	Unmitigated	Mitigated
Draft EIR, June 2016	197	132	18	14	33	25
Final EIR, December 2016 (Proposed Project, MPC)	188	42	17	5	30	8
Final EIR, December 2016 (Proposed Project, STC)	132	8	14	1	24	2

Finally, the District will be recommending that the Board adopt an STC Alternative in place of the proposed project, which is a new reduced project alternative that cuts back throughput from the MPC by 25%. This reduction, unlike a steeper reduction, still achieves the basic project objectives by providing the port with flexibility to capture future business through 2035, but provides significant reductions in air emissions, health risk, and GHG emissions. The STC Alternative authorizes staff to pursue cargo volumes up to 4.6 million metric tons annually (as compared to 6.1 million metric tons annually under the MPC) and provides a programmatic assessment of the impacts for projects that are at or would be below these levels. Any future discretionary action that exceeds the STC Alternative would need to do a subsequent environmental analysis. The Final EIR includes an air quality analysis, HRA, and GHG analysis for the STC



I-14 cont.	<ul style="list-style-type: none"> <li>• <b>Impact GHG-2:</b> GHG Emissions in excess of post-2020 target during TMT plan buildout.</li> </ul>																														
I-15	Though the EIR acknowledges the <i>Newhall Ranch</i> case, the EIR fails to appropriately apply it. Just as a project may not rely on the AB 32 Scoping Plan to determine project-level GHG impacts, it is inappropriate to rely on business-as-usual projections derived from statewide reductions and ARB estimates to determine post-2020 project-level impacts. (p. 4.6-35). Notwithstanding the inappropriate derivation of the 57 percent reduction metric for 2035, the EIR's application of this standard is also flawed. The EIR compares only new/additional GHG emissions in the 2035 BAU scenario. However, the EIR concedes the 2035 emissions are additive. Therefore, the mitigated BAU scenario should be compared to total 2035 emissions. This analysis results in a 46.5 percent reduction from 2020 – not 57 percent. (p. 4.6-54-56). Further, in light of the admittedly significant GHG emissions beyond 2035, the project should include additional GHG emission mitigation measures, such as installation of solar beyond the Port's jurisdiction.																														
I-16																															
I-17	Further, whereas GHG themselves do not have direct toxic effects on the downwind communities, the co-pollutant emissions such as diesel PM do have harmful hot spot impacts on nearby receptors such as homes and schools in Barrio Logan. In this regard, it is important to note that the largest sources of GHG emissions, both now and after project implementation, are ships and trucks -- large sources of diesel exhaust emissions.																														
	<b>Table 2. GHG Increase by Source Type: Based on Tables 4.6-4 and 4.6-11 (metric tons per year CO2e)</b>																														
I-18	<table> <tr> <th>Emission Source</th> <th>Existing GHG</th> <th>Plan + Existing, unmitigated</th> <th>Plan Alone, unmitigated</th> <th>Pct Increase</th> </tr> <tr> <td>Trucks</td> <td>8474</td> <td>42,406</td> <td>33,932</td> <td>400%</td> </tr> <tr> <td>Ships, Ocean Going</td> <td>7783</td> <td>47,902</td> <td>40,119</td> <td>515%</td> </tr> <tr> <td>CHE</td> <td>1177</td> <td>6829</td> <td>5752</td> <td>488</td> </tr> <tr> <td>Harbor Craft</td> <td>352</td> <td>2038</td> <td>1686</td> <td>480</td> </tr> <tr> <td>Rail</td> <td>444</td> <td>4219</td> <td>3775</td> <td>850</td> </tr> </table> <p>Rail, also a major source of diesel PM, has the largest percent increase in GHG in this analysis. Clearly, all measures that can reduce the GHG and co-pollutants from these sources are critical to reducing the climate-harming impacts of this project.</p>	Emission Source	Existing GHG	Plan + Existing, unmitigated	Plan Alone, unmitigated	Pct Increase	Trucks	8474	42,406	33,932	400%	Ships, Ocean Going	7783	47,902	40,119	515%	CHE	1177	6829	5752	488	Harbor Craft	352	2038	1686	480	Rail	444	4219	3775	850
Emission Source	Existing GHG	Plan + Existing, unmitigated	Plan Alone, unmitigated	Pct Increase																											
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CHE	1177	6829	5752	488																											
Harbor Craft	352	2038	1686	480																											
Rail	444	4219	3775	850																											
I-19	Further, environmental justice communities such as Barrio Logan are affected sooner and more deeply by climate change. Barrio Logan ranks high in the Pacific Institute's 2012 "Social Vulnerability to Climate Change in California" study. It uses census tract level data and integrates 19 indicators into a score that underlines the disproportionate impact of climate change in low-income communities. Indicators include people over 65 living alone,																														

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Alternative. In conjunction with the additional mitigation measures identified above, the STC Alternative would result in a reduction of residential cancer risk from 132 per million under the unmitigated STC Alternative to 8 per million under the STC Alternative after implementation of all mitigation. Risk for both park and school receptors would be lower than the MPC as well.

Please see Chapter 3, *Errata and Revisions*, of the Final EIR for all the changes discussed above. As these changes are related to further reducing previously identified significant impacts, none of these changes would require recirculation of the Draft EIR.

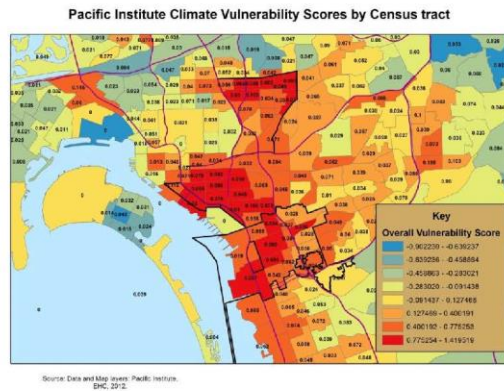
#### Comment I-7:

The commenter states that human health risk is only one of the air quality impacts that would result from the proposed project, as indicated in the Draft EIR. The commenter cites the summaries for Impact-AQ-1, Impact-AQ-2, and Impact-AQ-3 identified in the Draft EIR, which disclose a significant impact related to criteria pollutants. In particular, the commenter states that volatile organic compound (VOC) and NO<sub>x</sub> emissions contribute to ozone standards for which the air basin is already considered nonattainment.

The commenter repeats information disclosed in the Draft EIR that project-related VOC and NO<sub>x</sub> emissions would contribute to existing nonattainment conditions in the air basin. This comment does not question anything in the analysis, but simply states the Draft EIR findings. The fact that the increase in ozone precursor emissions could result in photochemical-related effects is acknowledged throughout the Draft EIR, with the most detail contained at the end of the discussion under Threshold 4 (starting on page 4.2-77 of the Draft EIR). As discussed, project-generated ozone precursors could increase photochemical reactions and the formation of tropospheric ozone, which, at certain concentrations, could lead to respiratory symptoms (e.g., coughing), decreased lung function, and inflammation of airways.

Please see the response to comment I-6 and the explanation of augmented and additional mitigation measures as well as the STC

I-19 cont. households in poverty, people of color, linguistic isolation, unemployment, tree canopy, and air conditioning. The highest vulnerability areas in the San Diego area, shown in red in the map below, include the entire Barrio Logan/Logan Heights area.



#### D. NOISE

The project will subject the community to significant and unmitigable increases in noise. Specifically, the analysis finds four Significant and Unavoidable noise impacts:

- **Impact NOI-1:** Exceedance of an adopted noise standard during plan operation. This is significant at Perkins Elementary and at Bayfront Park, as given in Table 4.9-11.
- **Impact NOI-2:** Substantial Permanent increase in ambient noise levels in the project site vicinity from buildout of the TAMT Plan. Table 4.9-13 finds significant increases at 4 locations. However, Perkins School and the Mercado Apartments are not on the list and it is unclear whether potential noise increases at these locations were estimated.
- **Impact NOI-3:** Substantial temporary increase in ambient noise levels during construction of the Demolition and Initial Rail Component. Table 4.9-14 likewise identifies significant impacts at 2 park locations but does not include Perkins

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Alternative. As explained further in that response, the District has updated the Final EIR to quantify reductions associated with MM-AQ-4, *Implement BACT for Conveyor System and Bulk Discharge Unloader*, modified MM-AQ-6 to require more electric CHE, and introduced MM-AQ-9, which would implement an emissions capture and control system (e.g., a bonnet system or similar type of technology).

Additionally, the air emissions associated with the TAMT plan were overestimated in the Draft EIR's peak daily emissions analysis because it compared the number of vessels associated with the plan's buildout in 2035 on a *peak day* (i.e., four vessels at berth for a 24-hour period) with the number of vessels that berthed at TAMT during the baseline year of 2013/2014 during an *average call day* (i.e., one vessel at berth per day). The Final EIR clarifies this on pages 4.2-12 and 4.2-33 and throughout the discussion under Threshold 2 starting on page 4.2-48. The discussion under Threshold 2 discloses that the air quality estimates are based on a maximum of four vessels at berth in 2035 on a *peak day*, and that the 2013/2014 *peak day* baseline condition was actually three vessels, not one vessel. Please note that during the baseline year the peak day condition occurred at TAMT on five separate occasions. This results in an adjustment to peak daily air quality emissions, but does not affect GHG and health risk calculations, which are based on annual emissions and multi-year exposure, respectively. This has been corrected in the Final EIR, as described in the response to comment I-6.

Finally, in terms of the actions the District is taking to further reduce emissions, District staff will be recommending that the Board adopt the STC Alternative, which is a new reduced project alternative that cuts back throughput from the MPC by 25%. As shown below, emission reductions associated with the STC Alternative are modest when compared to the project's MPC because the threshold is based on peak daily emissions (see Chapter 3, *Errata and Revisions*, of the Final EIR for revisions to Chapter 7). Under either scenario, there could still be a total of four vessels simultaneously at berth for a 24-hour period, which is one additional vessel on the peak day over existing conditions. As a result of additional mitigation and the proper adjustment to the project's air quality baseline, VOC, NO<sub>x</sub>, CO, sulfur

I-22 cont.	Elementary (or the site of the to-be-rebuilt Perkins, closer to TAMT) or the Mercado Apts. It is unclear whether potential noise increases at these locations were estimated.
I-23	<ul style="list-style-type: none"> <li><b>Impact NOI-4:</b> Substantial temporary increase in ambient noise levels during construction of the full TAMT plan buildout. Table 4-9-15 indicates this impact is significant at two parks but does not include Perkins or the Mercado Apartments, and it is unclear whether noise increases at these locations were estimated.</li> </ul>
I-24	These impacts will be imposed upon homes, parks, and schools where noise levels are already in excess of residential standards for the City of San Diego. The short-term noise measurements given in Table 4.9-5 indicate that average and maximum noise levels at all locations are above City 1-hour residential standards of 40, 45, or 50 dB (depending on whether homes are single-family or multiunit, and on time of day).
I-25	Noise impacts to workers at TAMT were not analyzed, as EHC recommended in our NOP comment letter. Workers on the terminal are on the front lines of exposure to both emissions and noise, and the environmental analysis for the project should include assessment of impacts to this population.
I-26	Further, the Threshold of Significance used in this analysis is inappropriate. The District does not have its own Threshold of Significance for ambient noise, and should adopt the City's residential noise standard for noise at homes and schools -- <b>without</b> using the procedure of averaging noise standards for two adjoining zoning types. This procedure is clearly discriminatory toward residents living adjacent to industrial land uses. There is no reason to believe these folks are less sensitive to noise, or that noises emanating from industrial sources are somehow less injurious to their health and wellbeing than the same noise levels from sources that are allowable in a residential zone. The Port should adopt the City noise standard of 40 to 50 dB for residences, not 57 as used in this analysis. Moreover, even if the Port's significance threshold was supported (it is not), the Port cannot simply ignore the significant impacts that will result notwithstanding the project's compliance with these standards. "[T]hresholds of significance can be used only as a measure of whether a certain environmental effect 'will normally be determined to be significant' or 'normally will be determined to be less than significant' by the agency. (Guidelines, § 15064.7, subd. (a), italics added.) In each instance, notwithstanding compliance with a pertinent threshold of significance, the agency must still consider any fair argument that a certain environmental effect may be significant." ( <i>Protect the Historic Amador Waterways v. Amador Water Agency</i> (2004) 116 Cal.App.4th 1099, 1109). This premise is equally applicable once an agency has decided to prepare an EIR. ( <i>Id.</i> ). Thus, the significant impact to nearby City of San Diego residents using the City's residential and educational institution thresholds must be appropriately analyzed and mitigated.
I-27	

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oxide (SO<sub>x</sub>), PM10, and PM2.5 all drop to levels that would be less than significant under both the MPC and the STC Alternative.

#### Peak Daily Criteria Pollutant Emissions over Existing after Mitigation

Scenario	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM10	PM2.5
Draft EIR June 2016	300	4,128	1,070	143	5,490	1,603
Final EIR December 2016 (Proposed Project)	75	26	265	33	-245	-50
Final EIR December 2016 (STC Alternative)	75*	-93	215	40	-326	-84
Significance Threshold	75	250	550	150	100	55
Does Project as described in Final EIR Exceed Significance Threshold?	No	No	No	No	No	No
* Net new daily emissions will not exceed 75 pounds on a peak day at buildout under the MPC or STC because MM-AQ-7 requires the use of advanced technologies to limit VOC emissions to no more than 75 pounds on a peak day once throughput exceeds 4,000,000 MT annually, <b>OR</b> to limit the number of vessels to no more than three vessels on a peak day once throughput exceeds 4,000,000 MT annually, if advanced technologies are not available.						

As a result, the Final EIR has updated mitigation measures MM-AQ-4, MM-AQ-6, and MM-AQ-7, and added MM-AQ-9, and District staff recommends approval of the STC Alternative.

#### Comment I-8:

The commenter states that the HRA does not include any analysis of the health effects from the estimated 5,343 pounds per day of fugitive particulate matter emissions from the project on nearby receptors and notes that fugitive particulate matter emissions have the potential to create a health hazard for those with existing cardiovascular and respiratory ailments. The commenter also states the community of Barrio Logan ranks highly on the CalEnviroScreen indicator for asthma hospitalization rates.

The HRA concentrated on the pollutant of most concern, which is DPM. The fugitive particulate matter emissions referred to in this comment relate to dry bulk operations and are not diesel related. The 5,343 pounds per day of PM10 is primarily due to the fugitive particulate matter emissions associated with dry bulk operations. As explained in the response to comment I-6, the Final EIR has quantified reductions associated with MM-AQ-4, *Implement BACT for Conveyor System and Bulk Discharge Unloader*, which results in a net reduction of -245 pounds per day of PM10 emissions, which is below

the 100 pounds per day significance threshold. Therefore, the project results in a less-than-significant impact for PM10 emissions.

Reductions of fugitive particulate matter emissions associated with mitigation measure MM-AQ-4 have been added to Chapter 3 of the Final EIR. Impacts from PM10 would be less than significant with mitigation.

**Comment I-9:**

The commenter states that workers at TAMT are not identified in the analysis as sensitive receptors, but they receive the most concentrated doses of the pollutants generated on the terminal.

Sensitive receptors are people who have an increased sensitivity to air pollution. Sensitive receptor locations include, but are not limited to, residential areas, schools (preschool–12<sup>th</sup> grade), hospitals, resident care facilities, day-care centers, or other facilities that may house individuals with health conditions who would be adversely affected by changes in air quality. Onsite workers are not considered air quality sensitive receptors. According to the Office of Environmental Health Hazard Assessment's (OEHHA's) February 2015 risk assessment guidance, only in certain circumstances should a risk assessment analyze onsite worker risk. These circumstances include Resource Conservation and Recovery Act sites, Comprehensive Environmental Response, Compensation, and Liability Act sites, facilities frequented by the public, and/or facilities where people may reside. TAMT does not qualify as any of these circumstances. Instead, workers on the TAMT, whether they are present during construction or operational activities, are subject to state and federal OSHA standards that protect workers from breathing contaminated air. OSHA standards for respiratory protection require effective engineering (e.g., ventilation) controls, and appropriate respirators to be supplied if controls are infeasible (29 CFR 1910.134(a)(1)). Furthermore, it is speculative to assume that workers receive the most concentrated doses of pollutants given that onsite worker exposure was not estimated. Given that onsite workers would be protected under OSHA requirements, including using the proper equipment to prevent inhalation of any toxic

substances whenever appropriate, no significant impacts on workers would occur.

**Comment I-10:**

The commenter states that due to the cumulative increase in port-related truck activity from TAMT, Dole, and Mitsubishi, there is the potential to affect ambient air quality in Barrio Logan, including on homes, schools, parks, and walkways, and both trucks and truck emissions are a special concern to the community. The comment also states that TAMT redevelopment will generate up to 846 truck trips per day and generate a 619% increase in PM10 from trucks. The comment states that Dole would add 142 trips per day and Mitsubishi would add 192 trips per day (or 384 trips if it is assumed to be one way), which would add up to 1,180 trips per day (or 1,372 trips if Mitsubishi is 384 trips). The comment concludes by providing a table from a 2012 EPA source that indicates that there is a higher concentration of elemental carbon in the ambient air in Barrio Logan when compared with El Cajon and Escondido.

The Dole and Mitsubishi projects are included as separate projects in the cumulative analysis for the 2020 Demolition and Initial Rail Component, and their throughput numbers are included in the MPC scenario identified as part of the TAMT plan because it considers the worst-case scenario (for throughput) at the TAMT. (Note, their throughput is also included in the STC Alternative now being proposed by the District, as detailed in Chapter 3 of the Final EIR.)

The 142 truck trips associated with the Dole Fresh Fruit Refrigerated Rack Improvements Project and the 150 truck trips estimated for the Mitsubishi Project are estimates that were included in the cumulative analysis for the Demolition and Initial Rail Component near-term project. The 192 truck trips identified by the commenter is based on the maximum number of trucks that could visit the site on a single day. However, it is anticipated that the Mitsubishi project would result in an additional 150 average daily trips per day, which reflects 2 trips per every 1 truck. Air quality and traffic impacts associated with these two projects, in addition to the several other cumulative projects, were analyzed in conjunction with the near-term Demolition

and Initial Rail Component, which identifies 2020 as its estimated completion date. Page 5-20 of the Draft EIR determined the Demolition and Initial Rail Component's incremental contribution to cumulative air quality impacts during its operational stage would be less than cumulatively considerable. Similarly, Page 5-68 of the Draft EIR determined that traffic associated with the Demolition and Initial Rail Component would not result in an increase in vehicle to capacity ratio or further deterioration in level of service (LOS) along the roadway segment of 28<sup>th</sup> Street between Boston Avenue and National Avenue, and consequently would not exceed the City of San Diego's Significance Criteria. Therefore, impacts on roadway segments from implementation of the Demolition and Initial Rail Component would be less than significant and no mitigation is required.

The 846 truck trips referenced by the commenter are based on Table 4.10-17 of the Draft EIR, which identifies an increase of 423 new trucks per day. According to this table, the number of new trucks is based on a 5,109,971-metric-ton throughput increase above existing baseline conditions. (The analysis uses the net change in throughput from Fiscal Year 2014 [i.e., July 2013–June 2014; 1,044,446 metric tons], which was the most recent data at start of the Draft EIR's analysis [July 2014], to buildout of the TAMT plan [6,154,417 metric tons].) Therefore, because neither cumulative project #13 (Dole) nor #2 (Mitsubishi) was operational and contributing to the baseline throughput numbers as of July 2014, they are included in the throughput numbers associated with buildout of the TAMT plan (i.e., their throughput is part of the 5,109,971 metric tons attributed to the net increase of the TAMT plan). Consequently, any potential impacts from these two projects are considered, not only as cumulative impacts associated with the near-term Demolition and Initial Rail Component, but as impacts associated with the TAMT plan directly. As such, any impacts identified with the buildout of the TAMT plan include the throughput growth associated with both the Dole and Mitsubishi projects. This includes any air emissions or truck trips, which are the two factors raised by the commenter. Likewise, any mitigation measures required for the TAMT plan (via future projects proposed under it) will help reduce these impacts.

Finally, the comment states that the TAMT plan's net increase of 846 truck trips per day would generate a 619% increase in PM10 from these trucks. The District is not sure how the commenter derived the 619% increase in PM10. Page 4.2-13 of the Draft EIR identifies existing baseline conditions of PM10 emissions associated with trucks for dry bulk, refrigerated containers, and multi-purpose general cargo in Table 4.2-6. Based on estimates provided in Table 4.2-18, truck emissions associated with buildout of the TAMT plan, prior to any mitigation or additional State regulations, is equal to 35 pounds of PM10 per day just from truck travel, and includes truck exhaust and brake, tire, and road dust. Based on these figures, the TAMT plan would result in approximately 4.2 times the amount of PM10 and PM2.5 emissions from truck travel when compared to the existing baseline condition (or a 420% increase). Therefore, PM10 levels would be about 4.2 times as high as the PM10 levels identified in the project's baseline, which would be associated with an almost six-fold increase in project throughput. However, as discussed in response to comment I-7, overall PM10 and PM2.5 from all sources of emissions drop to levels below significance under both the MPC and the STC Alternative.

As noted in response to comment I-6, the District will be recommending the Board adopt the STC Alternative, which is a new project alternative that reduces throughput by 25% of MPC. Under the STC Alternative, there would be 296 new trucks per day (as opposed to 423 new trucks per day associated with the project) resulting in 28 pounds per day of PM10 from truck activity, a 7-pound-per-day decrease from the proposed project.

**Comment I-11:**

The commenter states that EMFAC14 includes mobile source regulations that have been adopted to date, including the On-Road Heavy Duty Truck and Bus rule. The comment also states that while the inclusion of the On-Road rule is appropriate, the EMFAC modeling assumes 100% compliance with the rule. The comment recommends that the District verify this compliance for all trucks that visit the terminal as it currently does with drayage trucks under the Drayage

Truck rule. Truck and Bus rule compliance within EMFAC is based on data within ARB's Truck Regulation Upload, Compliance, and Reporting System. The Truck and Bus Rule is a statewide regulation that requires (1) newer, heavier trucks and buses to meet particulate matter filter requirements beginning January 1, 2012; (2) lighter and older, heavier trucks to be replaced starting January 1, 2015; and (3) nearly all trucks and buses to have 2010 model year engines or equivalent by January 1, 2023. Trucks compliant with this regulation register with ARB and then place "compliance" stickers on their doors. The California Highway Patrol and ARB are the agencies charged with inspection, audit authority, and enforcement of this regulation (Sections 2025 (v), (k)(7), (t), (z) Title 13, Division 3, Chapter 1 of the California Code of Regulations).

Unlike under the Drayage Truck Rule, ports do not have automated connectivity to the State's registry for the Heavy Duty Truck and Bus Regulation and do not have the legal authority to enforce the regulation without additional agreements with the State. According to District maritime staff, the major trucking companies that serve TAMT already use 2010 model year and newer engines. Furthermore, according to ARB's EMFAC model, the average drayage truck currently operating in San Diego is model year 2011. These large truck fleets routinely replace their trucks every few years and those that are not 2010 or newer have mostly installed diesel particulate filters, which also makes them compliant with the regulation. No changes to the Final EIR are required.

**Comment I-12:**

The comment indicates that trucks should be a key target for mitigation measures in order to reduce or eliminate diesel exhaust to the maximum degree possible.

See response to comment I-11. The District enforces the Drayage Truck Rule and the California Highway Patrol and ARB monitor and track compliance with the Truck and Bus Rule. Both of these rules require all trucks to include 2010 or newer model year engines by January 1, 2023, with few exceptions under the Truck and Bus Rule and no exceptions for Drayage trucks that enter the Port. Model Year



2007 and Model Year 2010 emissions standards are the same for particulate matter (0.02 gram per brake-horsepower-hour), and represent an approximately 90% decrease from the previous standard (0.10 gram per brake-horsepower-hour starting in model year 1994). Furthermore, implementation of both Truck and Bus and Drayage Truck Rules will further reduce diesel exhaust along truck routes. Moreover, a number of international, federal, and state regulations as well as actions implemented by the District have greatly reduced emissions from the Port. For example, according to the 2012 Air Emissions Inventory, on-road DPM emissions in 2012 were 71% lower than 2006 levels. As these rules implement more fully over time, emissions from trucks that visit the Port will decrease due to existing and future regulations, resulting in fewer emissions per truck trip over time. Furthermore, various demonstration projects are underway to test the viability of heavy-duty Class 8 hybrid, diesel-electric, and battery (fully electric) drayage trucks. In addition, as part of MM-AQ-7, the District will continue to monitor grant and demonstration opportunities to purchase zero and near-zero technologies. Note that EPA acknowledges in its *Port Strategy Assessment* that there may be limitations for applying these technologies for port drayage operations, and advances in battery technology may not enable all-electric port drayage trucks until at least 2030. Therefore, at this point most equipment is not yet commercially available and is infeasible to impose. Please see the changes to mitigation measures in Chapter 3, *Errata and Revisions*, of the Final EIR.

**Comment I-13:**

The comment recommends that a no net increase threshold of significance for air quality/health risk should be used in the EIR analysis. The comment states that by using this threshold all phases of the project would result in significant impacts and would require full mitigation of all air quality impacts, which would necessitate going beyond compliance with existing regulations and would move toward 100% electrification of the terminal and its operations.

Pages 4.2-38 to 4.2-45 of the Draft EIR provide a thorough discussion

to substantiate use of the thresholds selected, which are thresholds adopted and widely applied to ensure the region attains and maintains air quality standards and localized impacts are disclosed wherever present. Therefore, the District has exercised its discretion to use the thresholds of significance stated in the EIR rather than the “no net increase” threshold proposed by EHC.

Moreover, the District has revised the EIR to include additional mitigation measures that will help reduce air emissions and health risk from terminal operations, consistent with ARB’s goods movement plans and strategies. The District’s Planning and Green Port staff worked with Maritime staff to identify additional feasible mitigation measures based on comments received by EHC, ARB, and SDAPCD. The outcome was that the District was able to modify and update mitigation measures. MM-AQ-4 has been revised and reductions to fugitive particulate matter emissions have been quantified. MM-AQ-6 has been revised to require additional electric CHE to move quicker to a zero and near-zero terminal, including 20 zero emissions yard trucks by 2025, and 3 electric reach stackers and 10 electric forklifts by 2030. These additional pieces will help reduce all emissions associated with operations at the terminal, which is the main driver of health risk in neighboring communities. In addition, a new mitigation measure, MM-AQ-9, *Use of At-Berth Emissions Capture and/or Control System to Reduce Vessel Hoteling Emissions*, has been added to the Final EIR, as indicated in response to comment I-6. This measure would require an ARB-approved at-berth technology, such as a bonnet (or similar technology) emission capture and control system, that physically traps and controls emissions from vessel stacks calling at Berths 10-5/-6 and 10-7/-8.

In addition, the District will be recommending the STC Alternative, which is a 25% reduction from the MPC throughput of the proposed project that is identified in the Draft EIR. This will help reduce air quality and health risk impacts further than what would be possible with implementing the MPC proposed project scenario, while still achieving the basic project objectives. See the response to comments I-6 and I-7.

**Comment I-14:**

The comment repeats information provided in the Draft EIR regarding Impact-GHG-2 that implementation of the proposed project would increase carbon dioxide (CO<sub>2</sub>) equivalent emissions by 540% over the current level of emissions.

As the commenter indicates, the Draft EIR discloses an increase in GHG emissions associated with the potential increase in throughput at the terminal. Unmitigated existing plus TAMT plan GHG emissions provided in the Draft EIR (Table 4.6-11) were estimated to be 114,677 metric tons, or 540% over existing conditions. However, the commenter fails to note that mitigation in the Draft EIR reduces existing plus TAMT plan GHG emissions to 61,341 metric tons, or 289% over existing conditions, which reduces the project-related GHG emissions by 57% by year 2035. Furthermore, the District has revised the emission calculations to include additional mitigation measures, incorporate reductions from the recently adopted Phase 2 truck standards, and incorporate minor changes to rail activity as discussed in response to comment I-6.

Based on revisions to the Final EIR, unmitigated existing plus TAMT plan GHG emissions are now estimated to be 112,994 metric tons while mitigated existing plus TAMT plan GHG emissions are estimated to be 60,537 metric tons, which reduces the project-related GHG emissions by 57% by year 2035 (see Table 4.6-11). Furthermore, unmitigated existing plus STC Alternative GHG emissions are now estimated to be 85,979 metric tons while mitigated existing plus STC Alternative GHG emissions are estimated to be 48,936 metric tons, which also reduces the project-related GHG emissions by 57% by year 2035, similar to the Draft EIR..

It is important to understand that the 57% reduction parallels the statewide reduction targets set by Executive Orders S-03-05 and B-30-15 as well as the recently adopted Senate Bill (SB) 32. However, given there is no available State guidance on achieving the deep reductions needed that is specific to the type of project and based on its location, and because it is uncertain, in the absence of this guidance, to what degree the TAMT plan and the STC Alternative

would have to reduce its GHG emissions to be considered less than significant, the analysis conservatively concludes that Impact-GHG-2 would remain significant even after the substantial reductions of GHG emissions over the plan's lifetime. Because the comment merely expresses concern for an impact identified in the Draft EIR, but does not raise an environmental issue concerning the EIR, no additional response is required and no changes have been made to the Final EIR.

Also note that the "Daily Existing Annual" text referred to in the footnote to this comment is a typo. The correct labeling in the table should read "Existing Annual." This has been clarified in the Final EIR.

**Comment I-15:**

The comment suggests that the Draft EIR fails to appropriately apply the Newhall Ranch case to the project. The comment states that it is inappropriate to rely on business-as-usual projections derived from statewide reductions and ARB estimates to determine post-2020 project level impacts and to derive a 57% reduction metric for 2035.

Some points of clarification are required to address this comment:

- 1) The Newhall Ranch decision does not specifically address post-2020 analyses. The Newhall Ranch case was specific to a 2020 analysis that relied *solely* on consistency with Assembly Bill (AB) 32 targets. The case did not address post-2020 analyses, except to note that as the year 2020 approaches, EIRs using a goals consistency approach will need to consider the project's effects on meeting longer-term emissions reduction targets, while specifically referencing Executive Order S-3-05 and B-30-15. The analysis presented in the Draft EIR includes a much more comprehensive analysis of consistency with near- and long-term statewide targets, plans, and strategies, and provides a discussion of the limitations of using a "compliance with Executive Order only" approach.
- 2) At the time of analysis, there were no adopted post-2020 targets other than the Executive Order targets utilized in the Draft EIR, and there is currently no statewide plan to meet these Executive Order targets. The courts have ruled that Executive Order S-3-

05's 2050 reduction goal has set a trajectory for emissions reductions beyond AB 32's 2020 timeframe. The fact that there are no adopted thresholds for post-2020 does not absolve a lead agency from analyzing consistency with the intent of State and local action regarding climate change. Although the Governor signed SB 32 into law in September 2016, which establishes a 40% statewide GHG reduction target below 1990 levels by the year 2030, this requirement does not go into effect until January 1, 2017 and is not applicable to the analysis. Nonetheless, the 2030 target adopted in SB 32 is the same target used in the Draft EIR and incorporating the target adopted in SB 32 would not result in any changes to the analysis until the 2030 scoping plan is adopted.

As explained in detail starting on page 4.6-34 of the Draft EIR, analyses in the post-2020 period rely on the "substantial progress" approach, and the analysis for the post-2020 time period is both quantitative with respect to consistency with long-term reduction targets and qualitative with respect to compliance with the measures and regulatory programs outlined, adopted, or proposed by ARB or other California agencies. This approach is appropriate and consistent with both recent case law and recommendations by air quality experts, including the Association of Environmental Professionals in its *Beyond 2020 and Newhall* white paper.

Therefore, the Draft EIR appropriately applies not only the Newhall Ranch ruling but all emission reduction standards that apply to post-2020 analysis. No changes have been made to the Final EIR.

**Comment I-16:**

The commenter indicates that the Draft EIR compares only new/additional GHG emissions in the 2035 business-as-usual scenario but suggests that the Draft EIR concedes that the 2035 emissions are additive. According to the commenter, the mitigated business-as-usual scenario should be compared to total 2035 emissions, not the project's net increase in GHG emissions, and if this is done the reduction in GHG emissions is only 46.5% rather than the

57% reduction stated in the Draft EIR.

The commenter has misinterpreted the requirements of CEQA to determine a project's impact on the environment. To clarify, the Draft EIR calculated the GHG emissions associated with the Demolition and Initial Rail Component (which is estimated at 8,769 metric tons of carbon dioxide equivalent [MTCO<sub>2</sub>e] in year 2020 on page 4.6-43 in the Draft EIR) and the TAMT plan (which is estimated at 93,486 MTCO<sub>2</sub>e in year 2035 on page 4.6-59 in the Draft EIR) and compared them with the terminal's existing 2013/2014 baseline condition (which is estimated to be 21,191 MTCO<sub>2</sub>e annually). This approach is consistent with State CEQA Guidelines section 15125, which indicates that the baseline condition is normally set at the time of the Notice of Preparation for the EIR. As such, the Draft EIR assesses the net increase in GHG emissions for the Demolition and Initial Rail Component and the TAMT plan over the terminal's baseline condition (i.e., 2013/2014). If this increase is significant, the Draft EIR proposes mitigation that will reduce the project's impacts (i.e., the increase over baseline emissions) and properly quantifies the reduction in the project's impacts in percentage terms.

The concerns expressed in the second part of this comment are unclear. Specifically, it is unclear what approach the commenter is recommending by stating that "mitigated BAU scenario should be compared to total 2035 emissions, and that this analysis results in a 46.5 percent reduction from 2020– not 57 percent. (p. 4.6-54 to -56)." First, the 2035 mitigated emissions are compared to 2035 unmitigated emissions to determine impacts associated with the buildout of the TAMT plan relative to not implementing it. Comparing 2035 mitigated emissions to 2020 unmitigated emissions would be a fictional analysis that would not serve the purpose of determining the project's performance along a substantial progress trajectory. This approach is consistent with how other CEQA resource areas are analyzed, including traffic impacts and air quality impacts, and similar to the approach first presented in the AB 32 Scoping Plan and later in the District's CAP where emissions with mitigation or reduction measures are compared to that same year's emissions without mitigation or reduction measures. Second, the 46.5% reduction

referred to in the comment is based on the Existing plus TAMT plan emissions shown in Table 4.6-11, and, as such, is incorrectly implying that the project is required to mitigate existing conditions. CEQA only requires the EIR to analyze and mitigate the “project’s incremental contribution of greenhouse gas emissions” (State CEQA Guidelines section 15064.4). Therefore, the suggestion that the project should mitigate existing conditions is incorrect and the 57% reduction is based on the net new emissions from Full Plan conditions over existing conditions (i.e., the project’s incremental contribution).

Because the mitigated reductions are correctly accounted for, no changes have been made to the Final EIR.

**Comment I-17:**

The commenter suggests that additional mitigation is required to address significant and unavoidable impacts (i.e., Impact-GHG-2), such as installation of solar beyond the Port’s jurisdiction.

Additional mitigation is not required. First, while the project reduces emissions to meet the post-2020 targets, the Draft EIR concludes impacts remain significant because the lack of information about future components of the TAMT plan and location-specific reduction targets make defining a future component’s fair share of the requisite reductions speculative. Additional mitigation would not change the findings in the Draft EIR because the requisite reductions are unknown. In addition, because the buildout year for the TAMT plan is 2035, any assessment of environmental impacts beyond the life of the plan would be outside the project’s scope. If discretionary projects are pursued after the project’s 2035 plan buildout year, additional environmental review would need to be provided that demonstrates that the project-level conditions and mitigation measures identified in this EIR are appropriate to rely on given the future environmental conditions of the project site and of the surrounding area. If such documentation cannot be provided, a supplemental environmental analysis would need to be conducted that evaluates the project’s environmental changes based on year 2035 conditions and beyond. Therefore, this EIR does not evaluate environmental impacts associated with the TAMT plan beyond 2035. See response to

## comment I-16.

Climate change is a global impact and not a localized impact. Therefore, mitigation does not need to be locally focused to reduce global impacts that can be reduced by offsetting GHG emissions anywhere on the planet. Should a renewable energy project within TAMT be deemed infeasible by the District, then three additional options are available. “The San Diego Unified Port District shall either require the renewable energy project to be built off site within the San Diego Unified Port District’s jurisdiction, or within the adjacent community (City of San Diego), or shall require the proponent to purchase the equivalent amount of greenhouse gas offsets from sources listed on the American Carbon Registry and/or Climate Action Reserve” (page 4.6-67 of the Draft EIR).

**Comment I-18:**

The commenter states that GHG co-pollutants such as DPM have harmful hotspot impacts on nearby sensitive receptors. The comment notes that the largest sources of GHG emissions, both now and after project implementation, are diesel exhaust emissions from ships and trucks. The comment states that rail is also a major source of DPM and has the largest percentage increase in GHG. The comment further states that all measures that can reduce GHG and its co-pollutants are critical to reducing the climate-harming impacts of this project.

The commenter repeats information in the Draft EIR that the largest sources of GHG emissions associated with the project are also the largest sources of DPM. The Draft EIR addresses the potential DPM impacts from all sources on nearby sensitive receptors in the HRA, summarized in Section 4.2, *Air Quality and Health Risk*. The carbon monoxide “hot spot” analysis in Table 4.2-23 on page 4.2-82 of the Draft EIR indicates that implementation of the proposed project would not result in violations of the 1-hour or 8-hour CO levels. Moreover, mitigation measures to reduce criteria pollutant and DPM emissions are included in Section 4.2, which are similar to many mitigation measures included in Section 4.6 to reduce GHG emissions. For example, MM-AQ-2 is the same as MM-GHG-1, MM-AQ-3 is the same as MM-GHG-2, etc. This comment does not raise any issues that



require changes to the Final EIR.

**Comment I-19:**

The comment suggests that environmental justice communities, such as Barrio Logan, are affected sooner and more deeply by climate change. The comment also notes that Barrio Logan ranks high on the Pacific Institute’s 2012 “Social Vulnerability to Climate Change in California” study. The comment includes a map that shows the highest vulnerability areas in the San Diego area.

CEQA does not require an analysis of social or economic impacts (Section 15064 of the State CEQA Guidelines). This comment is an informational comment and does not call into question the analysis presented in the Draft EIR. As a response, the project is reducing GHG emissions (up 57% relative to unmitigated conditions in 2035), which would help the state reduce GHG emissions that contribute to climate change.

It is worth noting that the Pacific Institute study cited by the commenter is a guide to policymakers and affected communities on where to focus climate adaptation efforts and, as stated in the report, the information contained therein is not certain to occur. The study looks at a variety of factors—not solely air pollution or GHG emissions—that are not necessarily pertinent to a CEQA analysis and the tool is not intended to be used in risk assessments for a given community. Moreover, is not intended to be used to quantify CEQA impacts. Nowhere does the report state it should be used for CEQA or evidentiary purposes. As this is solely an informational comment, no changes are required in the Final EIR.

**Comment I-20:**

The comment notes that the project will subject the community to significant and unavoidable increases in noise and identifies Impact-NOI-1, which would affect Perkins Elementary School and Bayfront Park.

The Draft EIR noise analysis determined there would be significant and unavoidable impacts related to exceeding an adopted noise

threshold at the buildout of the TAMT plan. This was a conservative conclusion because the analysis was provided at the program level and acknowledges that design specifications for much of the possible future equipment are not known at this time. Therefore, mitigation measures are required to reduce this impact to the extent feasible and include:

- MM-NOI-1: Design and Implement Feasible Acoustical Treatments for Future Systems and Equipment to Reduce Operational Noise Levels at Nearby Noise-Sensitive Land Uses.
- MM-NOI-2: Initiate and Maintain a Complaint and Response Tracking Program.

However, because it is not yet known which project-level design measures may be employed in the future when individual components of the TAMT plan are proposed for approval, the analysis conservatively concludes that noise impacts on Cesar Chavez Park and Bayfront Park would remain significant after mitigation.

It should be noted that the City of San Diego, which has noise guidelines and an ordinance that the District elects to use for District projects within the City of San Diego, does not include parks in its stationary noise thresholds. Consequently, the Draft EIR applied the most stringent noise thresholds to parks, which is the 45 A-weighted decibels (dBA) equivalent noise level ( $L_{eq}$ ) threshold intended for single-family homes. Therefore, both Cesar Chavez Park and Bayfront Park use the most stringent thresholds, which are then averaged with the noise threshold for the project site, which is the industrial zone with a threshold of 75 dBA  $L_{eq}$ . However, the commenter indicates that there is a significant impact on Perkins Elementary School. This is not supported by the evidence in the record and, as stated in the Draft EIR in Table 4.9-11, noise impacts in the vicinity of Perkins Elementary School, including at the closer Monarch School, are below thresholds. Moreover, existing noise levels in this area are higher than what would be produced by the TAMT plan, indicating that impacts are from other sources closer to these schools and by aircraft flying overhead.

**Comment I-21:**

The commenter notes the substantial permanent increase in the ambient noise levels (i.e., Impact-NOI-2), states that both the Perkins Elementary School and the Mercado Apartments were not included as measurement locations, and requests further clarification as to whether or not potential increases in noise at these locations were estimated.

Tables 4.9-11, 4.9-13, 4.9-14, and 4.9-15 have been updated to include Perkins Elementary School and Mercado Apartments. In each case, noise levels at these two locations would be below thresholds. In addition, there would only be up to a 3 decibel (dB) increase at the Mercado Apartments for the full buildout of the TAMT plan, which would not be considered substantial. (Substantial is defined as 5 dB or more.) Please see the updated tables in Chapter 3, *Errata and Revisions*, of the Final EIR.

**Comment I-22:**

The commenter notes the substantial temporary increase in ambient noise levels during construction of the Demolition and Initial Rail Component (i.e., Impact-NOI-3), states that both Perkins Elementary School and the Mercado Apartments were not included as measurement locations, and requests further clarification as to whether or not potential increases in noise at these locations were estimated.

Please see the response to comment I-21. Table 4.9-14 has been updated to clarify that construction of the Demolition and Initial Rail Component would not result in significant temporary noise increases at the Perkins Elementary School (-14 dB) and the Mercado Apartments (-8 dB). A substantial increase is defined as at least 5 dB or greater. As such, no additional impacts would result.

**Comment I-23:**

The commenter notes the substantial temporary increase in ambient noise levels during construction of components associated with the TAMT plan buildout (i.e., Impact-NOI-4), states that both Perkins

Elementary School and the Mercado Apartments were not included as measurement locations, and requests further clarification as to whether or not potential increases in noise at these locations were estimated.

Please see the response to comment I-21. Table 4.9-15 has been updated to clarify that construction of the TAMT plan would not result in significant temporary noise increases at Perkins Elementary School (-10 dB) and the Mercado Apartments (+3 dB). A substantial increase is defined as at least 5 dB or greater. As such, no additional impacts would result.

**Comment I-24:**

The commenter suggests that noise impacts Impact-NOI-1, NOI-2, NOI-3, and NOI-4 would affect homes, parks, and schools where noise levels are already in excess of residential standards. The comment says that Table 4.9-5 indicates that these land uses already experience noise levels above the City of San Diego's 1-hour residential noise thresholds specific to each of their respective zones.

Table 4.9-5 of the Draft EIR identifies the short-term noise measurements that were taken at three sites to establish the existing ambient noise environment in nearby neighborhoods (ST1, ST2 and ST3). It also references noise levels taken in 2011 from three additional locations as background information (ST4, ST5, and ST6). The existing, short-term ambient noise levels range from 56.6 dBA  $L_{eq}$  to 64.9 dBA  $L_{eq}$  for the 15-minute interval, and noise levels range from 53.1 dBA  $L_{eq}$  to 60.2 dBA  $L_{eq}$  for the 1-hour interval. Pursuant to State CEQA Guideline Sections 15125 and 15126.2, the Draft EIR does not evaluate these existing ambient noise levels, but rather assesses the change in noise levels from these existing baseline levels that would result from the construction and ongoing operations of the (1) Demolition and Initial Rail Component, and (2) the TAMT plan.

In addition, the commenter is incorrect about the 1-hour residential noise standards when those residential land uses are within an industrial area or within a zone that is adjacent to an industrial zone. Section 59.5.0401 of the Municipal Code states the sound level limit

along the boundary line between two zoning districts is the arithmetic mean of the respective limits for the two districts. Therefore, because nearby residential land uses are sited adjacent to and in immediate proximity of industrial land uses—and are in fact within the M-2 Industrial/Commercial/Residential land use zone as indicated on page 118 of the Barrio Logan Community Plan (see Attachment 5 of the Final EIR)—the correct significance threshold is the arithmetic mean of the two, as shown in the City Noise Ordinance Standard column in Table 4.9-11 of the Draft EIR.

Permanent noise increases associated with the TAMT plan's proposed operations are provided in Table 4.9-13 of the Draft EIR, whereas temporary noise increases associated with the TAMT plan are listed in Table 4.9-15 of the Draft EIR. Both tables show that no residential or school land uses would experience a substantial noise increase due to the TAMT plan or the Demolition and Initial Rail Component. Residents at Sigsby Street and at Newtown Avenue, the two closest residential land uses, and the Monarch School, which is the closest school to the project site, would generally not even notice noise coming from the terminal given how much lower noise that would emanate from the terminal would be than the existing environment in these areas. Noise would be noticeable at Cesar Chavez Park, Bayfront Park, and Embarcadero Marina Park South. This is a conservative determination because, as noted in the response to comment I-20, the TAMT plan is analyzed at the program level and specific details for future components' facilities and equipment are not fully known at this time. However, MM-NOI-1 would require future components that include noise-generating features to provide a site-specific noise study that would require feasible attenuation measures specific to the feature proposed, including measures such as installing equipment inside of acoustical enclosures, installing intake and/or exhaust silencers, using low-noise motors, and placing sound barriers around noise-generating equipment. The noise analysis for the TAMT plan was not able to take into account any of these potential measures because of the programmatic nature of the analysis.

Finally, the mitigation of existing conditions is not within the purview of CEQA. All of the areas mentioned by the commenter are located in

industrial areas with a high degree of business activity. Therefore, the noise experienced by these land uses are not specific to the terminal, but rather the vehicle and aircraft traffic along with stationary sources from business operations nearby. Because CEQA cannot require a project to mitigate for the existing conditions, no additional mitigation is required and no changes to the Final EIR are needed.

**Comment I-25:**

This comment states that noise impacts on workers at TAMT were not analyzed and recommends that the proposed project include an assessment of impacts on this population.

Unlike residential, recreational, and many institutional uses, workers at the proposed project are not considered noise-sensitive receptors. Noise-sensitive receptors can be defined as locations where people reside or congregate where there is an expectation for relatively low, stable noise levels for purposes such as sleep (e.g., residential), concentration and meditation (e.g., schools, churches), or for health reasons (e.g., hospitals, nursing homes). Workers on the TAMT, whether they are present during construction or operational activities, are not engaged in any activities that would be highly sensitive to noise, nor do they expect to experience a noise-free environment. Furthermore, state and federal OSHA standards protect workers, addressing occupational noise exposure common in the construction and industrial industries. OSHA standards for noise exposure include an 8-hour time-weighted average of 85 dBA or a dose of 50%, referred to as OSHA action levels (29 CFR 1910.95(c)(2)). Occupational exposure to noise levels in excess of 85 dBA requires monitoring and standard measures to protect workers, as governed by law. Given that onsite workers would be protected under OSHA requirements, no significant impacts on workers would occur and no further clarifications to the Final EIR are needed.

**Comment I-26:**

The comment provides the opinion that the threshold of significance used for the noise analysis is inappropriate. The comment

recommends that the District adopt the City's residential noise standard for noise at homes and schools without using the procedure of using the mean noise for two adjoining zoning types. The comment expresses that the existing procedure is discriminatory toward residents living adjacent to industrial land uses.

The origin of the threshold, including using the mean between two adjoining zoning districts, is the City, not the District. The text of the City Code is as follows (*emphasis added*):

**59.5.0401 (a):** It shall be unlawful for any person to cause noise by any means to the extent that the one-hour average sound level exceeds the applicable limit given in the following table [Table 4.9-6 in the TAMT EIR], at any location in the City of San Diego on or beyond the boundaries of the property on which the noise is produced. The noise subject to these limits is that part of the total noise at the specified location *that is due solely to the action of said person.*

**59.5.0401 (b):** The sound level limit at a location on a *boundary between two zoning districts is the arithmetic mean of the respective limits for the two districts.*

For TAMT, the class of the noise source is industrial (limit of 75 dBA), and the class of noise receiver is residential (nighttime limit of 40 to 45 dBA) within an industrial area and surrounded by industrial uses. Therefore, as specified by Section 59.5.0401(b), the applicable standard is the mean between these two values (57.5 to 60 dBA).

Moreover, the land use zone in the area mentioned by the commenter, as shown in the Barrio Logan Community Plan on page 118, is M-2 Industrial/Commercial/Residential (see Attachment 5 of the Final EIR). Therefore, the zone permits both industrial and residential land uses. Given the immediate proximity of the residential uses to industrial business uses, it is not reasonable to assume noise levels emanating from industrial uses would be required to achieve very low noise levels such as 40 to 50 dBA when so close to residential uses, nor would that be a consistent interpretation of Section 59.5.0401 of the Municipal Code. No changes

to the Final EIR are required.

**Comment I-27:**

The comment suggests that the noise threshold is not supported and states that the District cannot ignore the significant impacts that would result notwithstanding the project's compliance with the standards. An excerpt from case law related to the fair argument standard in CEQA is provided. The comment states that an agency must consider any fair arguments that a certain environmental effect may be significant. The comment concludes by stating that the significant impact on nearby City of San Diego residents using the City's residential and educational institution thresholds must be appropriately analyzed and mitigated.

The comment's references to the fair argument standard are incorrect. The fair argument standard applies to negative declarations, where there is a low threshold for requiring preparation of an EIR. Where a lead agency prepares an EIR, as in this case, the agency has the discretion to determine the threshold of significance and an agency's determination of whether an impact is significant or less than significant must be supported by substantial evidence. See response to comment I-26 for an explanation of how the threshold is supported and how it is taken directly from the City of San Diego's municipal code noise ordinance. In addition, as noted in response to comment I-24, the noise analysis in the Draft EIR determined that there would be no substantial noise increases at residential land uses or schools. Specifically, Table 4.9-13 (Substantial Permanent Noise Increases) and 4.9-15 (Substantial Temporary Noise Increases) indicate that noise levels from the TAMT plan buildout would generally not be perceptible by the closest residential and school receptors, resulting in noise levels that were between -12 dB compared to existing noise levels at the closest school (i.e., Monarch School) and -1 dB compared to existing noise levels at the closest residences in Barrio Logan. Therefore, the EIR's determination that noise impacts on residential and school uses would be less than significant is supported by substantial evidence in the record.

No changes to the Final EIR are required.



	<b>E. TRANSPORTATION/TRAFFIC</b>
I-28	The project will generate four significant, unavoidable impacts. The most significant impact for residents is Impact 4:
	1. <b>Impact TRA-4:</b> Operation-Related Impact on a Roadway Segment: 28 <sup>th</sup> Street Between Boston and National from TAMT Plan Operations. Congestion on this link of 28 <sup>th</sup> Street will produce additional truck idling and emissions in the community.
I-29	2. <b>Impact TRA-6:</b> Insufficient parking at full plan buildout. This impact is of great concern to the community, given that Barrio Logan is already overflowing with the vehicles of waterfront workers on a daily basis. The analysis relies on a University of Tennessee study that 150 parking spaces per acre can be available in unmarked spots. This estimate has not been empirically tested at TAMT and may be an overestimate -- leading to an underestimate of the additional spaces that will be needed, particularly before Warehouse C is torn down. Parking deficiencies lead to increased driving and idling, as drivers search for parking spots, and even greater air quality impacts.
	This unacknowledged subsidy of the community to the Port's tenants has been a sore spot for years, and it is unacceptable to ask the community to host additional Port parking. Solutions must be found to identify additional parking that is not in the community; reduce demand such as by providing transit passes or shuttles; and maximizing local hire of the 524 new workers expected at full buildout.
	<b>F. CUMULATIVE IMPACTS</b>
I-30	The DEIR identifies cumulative impacts in the areas of Air Quality and Health Risk, GHG, Noise, and Transportation, Circulation, and Traffic. However, the analysis does not quantify the combined project operational impacts in important areas such as truck trips and air quality. In particular, the Dole and Mitsubishi projects are also occurring on TAMT and share with the TAMT Redevelopment Plan a common purpose of increasing cargo throughput; if the combined impacts are never summed, these projects are essentially piecemealed parts of one huge, overall project. "The requirements of CEQA cannot be avoided by chopping up a proposed project into bite-size pieces which, individually considered, might be found to have no significant effect on the environment." (Kings County Farm Bureau v. City of Hanford (1990) 221 Cal.App.3d 692, 716). "No one project may appear to cause a significant amount of adverse effects. However, without a mechanism for addressing the cumulative effects of individual projects, there could never be any awareness of or control over the speed and manner of downtown development. Without such control, piecemeal development would inevitably cause havoc in virtually every aspect of the urban environment." ( <i>San Franciscans for Reasonable Growth v. City &amp; County of San Francisco</i> (1984) 151 Cal.App.3d 61, 76-77).

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**Comment I-28:**

The comment summarizes the conclusions of the Draft EIR by noting that the project will generate significant and unavoidable traffic impacts and indicates Impact TRA-4 would affect 28<sup>th</sup> Street and would produce additional truck idling and emissions in the community.

Please note that the traffic analysis for the Demolition and Initial Rail Component was further refined since being distributed for public review. The Draft EIR estimated that over 50% of employee commute traffic was being sent to the Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard intersection over 1.5 miles from the project. After reviewing these results with District Maritime staff working at the terminal and discussing the routes current TAMT workers use, it was concluded that the actual number of employees using this intersection as a percentage is significantly lower than originally estimated. As such, the updated analysis estimated approximately 39% of employees would travel 1.5 miles to access the freeway, whereas the majority would access the freeway along Cesar Chavez Parkway, Beardsley Street, 28<sup>th</sup> Street, and Boston Avenue, all of which are much closer to the project site. With the updated analysis, the previous Impact-TRA-2 was eliminated along with the previous MM-TRA-2.

As the commenter notes, Impact-TRA-4 (now Impact-TRA-3) identifies a significant transportation impact along 28<sup>th</sup> Street between Boston and National Avenues once projects proposed under the TAMT plan generate 1,175 new daily trips. This is the point at which the project would add more than 0.01 vehicle to capacity ratio to the failing segment. To reduce impacts to a less-than-significant level, the proposed project would be responsible for a 3.7% fair-share contribution of the cost to widen the roadway to a Four-Lane Major Arterial classification, consistent with the Barrio Logan Community Plan (see MM-TRA-3). Once improved, the roadway segment would operate at LOS C, an improvement over the existing condition of LOS E. Moreover, the Draft EIR analyzed the air emissions at the busiest intersection, which was the Harbor Drive and 32<sup>nd</sup> Street intersection.

The analysis in Section 4.2, *Air Quality and Health Risk*, concluded that localized criteria pollutant impacts from the project would be less than significant. Specifically, the air quality analysis found that emissions at this intersection would not create localized CO hot-spots under the Demolition and Initial Rail Component or the full TAMT plan buildout conditions. Therefore, no changes to the Final EIR are required.

**Comment I-29:**

The comment summarizes Impact-TRA-6 (now Impact-TRA-5), which states that there would be insufficient parking by full buildout of the TAMT plan. The comment expresses that Barrio Logan is already heavily affected by vehicles due to waterfront workers. The comment also suggests that the study used to estimate parking needs for the project may lead to underestimating additional spaces that would be needed. The comment states that the TAMT plan could lead to additional parking deficiencies, which would then result in greater air quality impacts. The comment also provides the opinion that it is unacceptable to ask the community to host additional Port parking and recommends that solutions be found to accommodate the parking needs outside of the community. The comment also recommends that transit passes or shuttle be considered as well as maximizing local hire of the 524 new workers expected at full buildout.

As the commenter indicates, Impact-TRA-6 (not Impact-TRA-5) identified a significant but fully mitigable impact related to parking on the waterfront. Specifically, three mitigation measures are required to address the potential parking shortfall and avoid any significant parking impacts on the Barrio Logan community.

The first measure, MM-TRA-5, requires that the District inform all TAMT workers that they must park at the TAMT facility or at an authorized offsite parking lot or parking garage, and are prohibited from using on-street parking or from parking at the neighboring Cesar Chavez Park.

The second mitigation measure, MM-TRA-6, requires the District to

maintain a parking inventory of the TAMT site to identify when a potential parking shortage would be projected to occur (i.e., the time when supply would no longer meet demand), which is intended to assist with measures MM-TRA-5 and MM-TRA-7.

Finally, the third measure, MM-TRA-7, requires that all future projects proposed under the TAMT plan by existing and future tenants must prepare parking management plans, which shall consider the areas on the terminal that can accommodate the increased parking need and propose alternative transportation options to reduce parking demand such as subsidized transit passes, bicycle racks, and employee vanpools; preferential parking for carpools and vanpools; employee shuttles from a designated offsite location; employer coordination with the San Diego Association of Governments' iCommute Program; and reservation of parking spaces with an offsite parking provider.

Therefore, taken together, these three mitigation measures ensure that workers will not need to rely on unauthorized parking that is available in the Barrio Logan community.

Furthermore, the District will be recommending that the Board adopt the STC Alternative, which is a new reduced project alternative that equals 75% of the MPC. The STC Alternative authorizes staff to pursue cargo volumes up to 4.6 million metric tons annually (instead of 6.1 million metric tons annually), and could be used to assist in environmental compliance with future projects, consistent with the STC Alternative. Under this alternative, there would be an estimated 524 new workers at plan buildout in 2035, similar to the proposed project.

Finally, requiring local hiring would not be needed to address parking impacts, nor would it provide any certainty that workers would not drive and park just outside the TAMT boundaries. Additionally, the mitigation measures described above would still apply, resulting in a less-than-significant impact. No changes to the Final EIR are required.

**Comment I-30:**

The comment states that the cumulative impact analysis does not quantify the combined project operational impacts such as truck trips and air quality. The comment states that the cumulative impacts that result from increases in cargo throughput from the Dole cumulative project, Mitsubishi cumulative project, and TAMT plan should be combined and summed in order to avoid piecemealing in the cumulative analysis. The comment quotes case law regarding piecemealing.

See response to comment I-10. The analysis of the TAMT plan contained within the Draft EIR assumes the MPC of throughput at the TAMT. The analysis uses the net change in throughput from Fiscal Year 2014 (i.e., July 2013–June 2014; 1,044,446 metric tons), which was the most recent data at start of the Draft EIR’s analysis (July 2014), to buildout of the TAMT plan (6,154,417 metric tons). Therefore, because neither cumulative project #13 (Dole) nor #2 (Mitsubishi) was operational and contributing to the baseline throughput numbers as of July 2014, they are included in the throughput numbers associated with buildout of the TAMT plan. Consequently, any potential program-level impacts from these two projects are considered, not only as cumulative impacts, but as impacts associated with the TAMT plan directly. As such, any impacts identified with the buildout of the TAMT plan include the throughput growth associated with both the Dole and Mitsubishi projects. This includes any air emissions or truck trips, which are the two areas raised by the commenter. Likewise, any mitigation measures required for the TAMT plan (via future projects proposed under it) will help reduce these impacts.

Unlike the long-term buildout scenario, the near-term scenario (i.e., the Demolition and Initial Rail Component) excluded the throughput numbers of the Dole and Mitsubishi projects because they are separate tenant-initiated projects that have independent utility from the District-initiated Demolition and Initial Rail Component. Specifically, the Dole and Mitsubishi projects have different applicants, their own objectives and goals separate from the

Demolition and Initial Rail Component, and could be approved, implemented, and meet their objectives regardless of whether the Demolition and Initial Rail Component is approved or disapproved. For these reasons, a separate EIR was prepared for their Dole Fresh Fruit Refrigerated Rack Improvements Project, which was certified by the Board in July 2016. Similarly, an EIR will be prepared for the Mitsubishi project in the near future once more details are known about that project. Because both Dole and Mitsubishi were “reasonably foreseeable future projects” when the environmental analysis commenced for this EIR, both of them are included in the cumulative analysis for the Demolition and Initial Rail Component as separate cumulative projects.

The commenter raises the potential issue of piecemealing. Piecemealing, as used in the context of CEQA, occurs when one large project is broken up into several pieces in order to avoid environmental review of the whole of the project. However, the programmatic and project-level Draft EIR for the TAMT plan was prepared specifically to address the whole of the action, which includes future components at the TAMT, some which are known like the Demolition and Initial Rail Component, and some of which are unknown at this time but would nonetheless contribute to an increase in throughput at the TAMT. Therefore, by its very nature, the TAMT plan seeks to avoid piecemealing. As such, not only are both the Dole and Mitsubishi projects provided as cumulative projects in Chapter 5, *Cumulative Analysis*, of the Draft EIR, they are also factored into the impacts associated indirectly with the TAMT plan. Therefore, no piecemealing has occurred and no changes to the Final EIR are required.

I-31 | It is unclear why a different significance threshold (75 dB) is used in this section in place of 57 dB, which was used in the Environmental Impacts section on noise.

#### G. IMPACTS INCOMPLETELY ASSESSED

- I-32 |
- Air Quality and Health Risk to potential residents in the Barrio Logan transition zone south of Main Street. As noted in EHC's NOP letter, the June 2014 citywide referendum overturned the Barrio Logan Community Plan adopted by the San Diego City Council in the fall of 2013, and at this time residential development in the transition zone is possible; analysis of impacts to residents must assume that residences may be present closer to TAMT than are current residences.
- I-33 |
- Additionally, the analysis fails to include location-specific factors, as EHC recommended in our NOP comments on this project. CEQA Guidelines recognize that the level of impacts and their significance depends upon a multitude of factors such as project setting, design, construction, etc. CEQA Guidelines also call for careful judgment based on scientific and factual data to the extent possible and explain, "For example, an activity which may not be significant in an urban area may be significant in a rural area." (§ 15064(b)) Similarly, emissions of 100 lbs per day of particulate matter in the middle of Barrio Logan—an urban low-income community of color already determined by the California Environmental Protection Agency (CalEPA) to be among the worst 5% in the state for cumulative pollution burden — could potentially be more significant than 100 lbs per day of particulate matter in the middle of the desert with no nearby sensitive receptors. The DEIR fails to acknowledge that the project location sits directly adjacent to an area (Barrio Logan) identified by CalEPA as having a cumulative pollution burden that is among the worst 5% of census tracts in the state.
- I-34 |
- The DEIR fails to analyze whether the project impacts, such as the potential for additional trucks, warehouses, and other supporting uses in adjacent neighborhoods, would be consistent with the Port's Transition Zone Policy -- an analysis that EHC recommended in our NOP comments. In order to ensure compliance with the Port's Transition Zone Policy and minimize impacts to local residents, the Port should require that cargo storage, warehousing, and distribution be done on-Tidelands.
- I-35 |
- Hazardous Materials. Only one previous environmental assessment investigated the presence of radioactive contaminants (Ninyo & Moore, 2002). This study found measurable radioactivity in soil stockpiles and trenches at TAMT. The study also found dioxins and furans in burn ash areas. These contaminants should be included in environmental analysis for the present project to ensure that soils unearthed and/or removed during construction do not contain these contaminants.
- I-36 |
- Environmental impacts on residents of Ballpark Village. As stated in Table 5-2, Ballpark Village Parcel C will include 646 residential units. The location is close to the

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### Comment I-31:

The comment requests further clarification as to why a different significance threshold (75 dB) was used in the cumulative impacts section instead of the 57 dB threshold, which was used in the environmental impacts section for noise.

The 75 dB threshold is applicable to construction and traffic noise and each are used in both Section 4.9, *Noise and Vibration*, and Chapter 5, *Cumulative Impacts*.

The 75 dB threshold was applied because it is the applicable City of San Diego threshold to use for construction-related noise (Draft EIR pages 4.9-12 and 4.9-13), and for traffic-related noise along Harbor Drive and 28<sup>th</sup> Street based on the types of land uses that are located within 50 feet of these roadways (Draft EIR pages 4.9-20 and 4.9-24). The Draft EIR states on these pages that "Land uses that dominate along Harbor Drive are predominantly industrial in nature and include a significant amount of land dedicated to surface parking, marine-related industrial operations (primarily south of Harbor Drive), energy facilities, and general warehouse space. Land uses along 28<sup>th</sup> Street also include surface parking, warehouses, fast food (i.e., El Pollo Loco, Del Taco, Burger King, and McDonald's), and a gas station."

The commenter refers to the use of a 57 dB threshold in Section 4.9, *Noise and Vibration*. However, there is no use of a 57 dB threshold in that Draft EIR section. The only mention of a 57 dB noise level is in reference to the existing noise level estimated at Caesar Chavez Park based on a nearby noise measurement. It is possible that the commenter is referring to the use of thresholds that vary depending on land uses, as indicated in Table 4.9-11, *Worst-case Noise Emissions from TAMT Plan Operations*. This table applies the City's noise threshold methodology of using the arithmetic mean between two different land uses such as between Industrial and Residential, or between Industrial and Commercial. This methodology is explained on page 4.9-16. As shown in Table 4.9-11, the noise thresholds for stationary sources with different land uses but within the industrial

I-36 cont.	BNSF railyard and the proposed alternative gateway at Switzer Street. No analysis is included in the DEIR of potential air quality, noise, or other impacts to these future residents.
I-37	<ul style="list-style-type: none"> <li>Air quality impacts of the proposed Alternative Gateway on Switzer Street. While this proposal seems likely to reduce impacts of truck traffic to the community, no analysis is included to verify this. According to the Project Description (p.3-7), demolition of Warehouse C would allow for future on-dock rail: "In the long term, demolition of Warehouse C would also enable the District to establish an expanded on-dock rail facility to broaden customer access to rail if market conditions allow." However, impacts of increased rail activity are not analyzed in this DEIR. A worst-case estimate should be made of the potential for increased rail movement of cargo, the resulting rail noise and air quality impacts, and the potential for decreases in truck trips if more cargo were moved via rail. There is no indication given that conducting environmental review of these impacts now would be speculative, or that addition of an on-dock rail facility is not reasonably foreseeable.</li> </ul>
I-38	<ul style="list-style-type: none"> <li>Public Services. We continue to believe that Public Services may be negatively impacted by the worst-case scenario for cargo growth at TAMT. Two areas in particular are not analyzed in the DEIR:               <ol style="list-style-type: none"> <li><b>Cesar Chavez Park.</b> The project will impose impacts on the park, including dust, diesel emissions, noise, and additional traffic on Cesar Chavez Parkway south of Harbor. TAMT workers may use the parking area for their vehicles, making it more difficult for park users to find parking.</li> <li><b>Fire Fighting Resources.</b> The project proposes a large-volume increase in the capacity for storage of liquid fuels on the terminal; the current quantity of bulk fuel stored at TAMT is given in Table 3.3 as 31,520 metric tons, whereas the worst-case scenario is given as 239,017 MT, a 758% increase. Although the Port does not foresee changes in the stored quantities of liquid fuel, the plan is market driven and new bulk fuel shipments are possible. Moreover, the worst-case scenario is the one that is analyzed in the DEIR for all other cargos. The level of preparedness for a major fire event at the terminal should be assessed to determine the potential impact on firefighting resources of the region of a major fire.</li> </ol> </li> </ul>
I-39	<p>Potential mitigations for impacts to firefighting resources include:</p> <ul style="list-style-type: none"> <li>Storage of firefighting foam onsite at TAMT;</li> <li>Secondary containment for flammable liquids;</li> <li>A warning system for workers and the surrounding community in the event of a major fire or other disaster.</li> </ul>

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areas surrounding the project site are between 60 dB (nighttime residential threshold when adjacent to Industrial land uses) and 67.5 dB (nighttime commercial threshold when adjacent to Industrial land uses).

No changes to the Final EIR are required.

#### Comment I-32:

The comment indicates that the air quality analysis and HRA should consider the effects on the possible future residences in the "transition zone" indicated in current Barrio Logan Community Plan, which would be closer to TAMT than current residences.

CEQA requires an EIR to consider the effects of the project on the existing physical environment, not on development that may be allowed to occur in the future under applicable land use and zoning laws. For CEQA purposes, existing conditions are generally the conditions that exist at the time the Notice of Preparation is issued to the public (see State CEQA Guidelines section 15125). To the District's knowledge, no residential development is proposed in this area and CEQA does not require an analysis of such a unknown use. Furthermore, the area north and east of TAMT is recommended to be developed with exclusively industrial uses and/or commercial/ industrial uses in the Barrio Logan Community Plan, while the area to the south is within District Tidelands where residential use is prohibited. Therefore, to be consistent with the requirements of CEQA, the air quality analysis and HRA analyze the net increase in air emissions and toxic air contaminants over the existing baseline conditions, which are described starting on page 4.2-35 and presented in Tables 4.2-8 and 4.2-22 of the Draft EIR.

The HRA analyzes risk at the closest existing receptors, with the highest concentrations at residences, schools, and parks seen at receptors to the southeast of the project site. The HRA did analyze risk at park receptors immediately adjacent to proposed development projects, including both Ballpark Village developments, but did not assume residents would be present in the transition zone. However, even if this transition zone would be built out and risk were to be

analyzed, impacts in the EIR would remain unchanged because the highest pollution concentrations would still be at the southeast of the project site.

No changes to the Final EIR are required.

**Comment I-33:**

The comment states that the air quality analysis and HRA failed to include location-specific factors. The comment gives the example that emissions of 100 pounds per day of particulate matter in the middle of Barrio Logan could potentially be more significant than the same emissions of particulate matter in the middle of the desert with no nearby sensitive receptors. The comment also states that the Draft EIR failed to acknowledge that the project's location is directly adjacent to an area (i.e., Barrio Logan) identified by the California Environmental Protection Agency as having a cumulative pollution burden that is among the worst 5% of census tracts in the state.

See response to comment I-13. Page 4.2-11 of the Draft EIR provides a summary of background air quality studies performed by ARB, the most recent of which is the CalEnviroScreen, which ranks neighborhoods by their respective pollution burdens and vulnerabilities. Neighborhoods near the project site were ranked some of the worst in the state, a fact that is disclosed in the Draft EIR. However, as discussed on page 4.2-11 of the Draft EIR, CalEnviroScreen provides information on background pollution only, and does not substitute for project-specific analysis. However, it should be noted that CalEnviroScreen is a tool developed to help make funding decisions for money set aside for "environmental justice" areas. The tool takes into account more than pollution, such as social, economic, and health issues. The CalEnviroScreen guidance and screening tool document states that "a lead agency must determine independently whether a proposed project's impacts may be significant under CEQA based on the evidence before it, using its own discretion and judgment. The tool's results are not a substitute for this required analysis. Also, this tool considers some social, health and economic factors that may not be relevant when doing an analysis under CEQA. Finally, [...] the tool's output should not be used



as a focused risk assessment of a given community or site. It cannot predict or quantify specific health risks or effects associated with cumulative exposures identified for a given community or individual.” Therefore, the commenter’s statement that “the project location is in an area with particularly high cumulative pollution burden as identified by CalEPA” is not accurate, as the CalEnviroScreen guidance and screening tool include a variety of factors—not just air pollution—that are not necessarily pertinent to a CEQA analysis and the tool is not intended to be used in risk assessments for a given community. Moreover, the tool, as indicated by the California Environmental Protection Agency, is not intended to be used to quantify cumulative health risks or impacts.

The Draft EIR (Section 4.2.4.2) provides a complete discussion to substantiate use of regional thresholds for criteria pollutants and the HRA in the Draft EIR provides analysis of risk to nearby receptors taking into account location-specific factors, such as receptor locations, meteorology, and emission source location. Attainment designations and the thresholds devised thereof are based on the sum of all regional sources, not just those in one location; attainment is designated for the basin (County) as a whole, and thresholds are based on that attainment designation. Moreover, revisions to mitigation have resulted in PM10 and PM2.5 emissions not only below thresholds but below baseline conditions. No changes to the Final EIR are required.

**Comment I-34:**

The comment states that the Draft EIR failed to analyze whether the project impacts, such as the potential for additional trucks and warehouses in adjacent neighborhoods, would be consistent with the District’s Transition Zone Policy. The comment recommends that the District require cargo storage, warehousing, and distribution be done on tidelands.

The EIR analyzed the project’s impacts related to truck traffic, but the proposed project does not propose (or anticipate) additional warehouses or other supporting uses in the adjacent neighborhoods. The traffic analysis assumes that the project’s truck traffic would

comply with the District's TAMT Designated Truck Route that has been in place since 2007. The District's Maritime Operations Department is currently working on a Comprehensive Truck Management Plan, which includes a Truck Violation Enforcement Plan, based on recent complaints of trucks traveling through Barrio Logan.

The District's Transition Zone Policy (BPC Policy No. 725) was adopted on June 27, 2008. "The purpose of the policy is protect maritime industrial lands and provide a transition to adjoining residential areas by establishing general guidelines to encourage the creation of transition zones between industrial lands and residential neighborhoods." As described in the "Working Waterfront Group's Transition Zone Concept Policy," which is officially referenced by the Policy Statement of the Transition Zone Policy, the transition zone:

"should be a sequence of graduated land uses that serve to insulate and protect the integrity and environmental health of residential areas and concurrently preserve the maritime industrial jobs cluster. Typically this could be accomplished by a 'transition zone' comprised of uses including but not strictly limited to, office space and greenbelt area adjacent to residential areas, bordering streets, transit corridors and boulevards, parking and high-quality maritime administrative office facilities."

The policy does not limit or prohibit growth at TAMT, but rather was established to encourage uses that would be consistent with TAMT in the transitional zone and provide a potential buffer between TAMT and existing residential uses. The proposed TAMT plan is the long-term plan to increase throughput at the terminal. The proposed increase in throughput will result in increased truck traffic associated with moving cargo from the TAMT to its First Point of Rest, and then on to its ultimate destination. However, the project does not propose any uses or development—such as warehouses or other supporting facilities—in adjacent neighborhoods. There are no plans, as part of this effort, to develop off the accessory terminal facilities to service TAMT within the transitional zone; however, such uses may be consistent with the policy because they could act as a buffer between

existing residential uses and active terminal uses. Because none are proposed or planned, the commenter's concern about the potential impacts for additional warehouses, storage, or distribution in the transitional zone or the adjacent community is speculative, outside the scope of this project and the Draft EIR analysis. The proposed project is consistent with the policy as it allows for the protection of maritime industrial lands and does not encroach into the transitional zone.

As for trucks traveling through neighborhoods, please see pages S-2 of the *Executive Summary* and 2-2 of the *Environmental Setting*, both of which indicate that trucks must travel along designated corridors of Harbor Drive and 28<sup>th</sup> Street to access the intrastate and interstate freeway system. Therefore, the project does not propose or otherwise encourage truck travel along any streets but those designated as official truck routes. For a determination of impacts associated with the effects of project-related truck traffic, please see Sections 4.2, *Air Quality and Health Risk*, 4.5, *Greenhouse Gas Emissions and Climate Change*, 4.9, *Noise and Vibration*, and 4.10, *Transportation, Circulation, and Parking*.

Therefore, it is reasonable to assume future development within the Transition Zone (which would be outside District tidelands and within the City of San Diego) would be consistent with the District's Transition Zone Policy. Because the proposed project does not propose any development within the Transition Zone, the project would not result in any inconsistencies with the Transition Zone Policy and no changes are required in the Final EIR.

**Comment I-35:**

The comment states that only one previous hazardous environmental assessment investigated the presence of radioactive contaminants. The comment recommends that the contaminants found in this study be included in the environmental analysis for the proposed project in order to ensure that soils unearthed and/or removed during construction do not contain these contaminants.

The study referred to in this comment is provided in Appendix J-2 of

the Draft EIR. However, it is important to point out that Appendix J-2 is an Historical Summary, and did not involve any soil sampling on site, and considers studies around the general vicinity going back to 1980. However, Appendices J-4 through J-7 are hazardous material technical reports that provided soil sampling and hazardous materials testing throughout the area surrounding the transit sheds. As indicated in the results of all soil and concrete testing that occurred, no unsafe levels of toxins were present and the soil to be excavated and concrete to be demolished are considered suitable for reuse or disposal. Moreover, the area proposed for grading or other earthwork is not in the location of this historical disposal and burn ash site. No grading or excavation of soils would take place in the areas to the northwest (and off site) where the burn ash dump location is known to be present.

Moreover, as noted on page 6 of the Soil Management Plan 10th Avenue Marine Terminal (Appendix J-1), as a safety precaution, radiological monitoring will be required during construction where radiological materials may be present. A radiation pager or similar hand-held radiation monitoring device will be used to screen excavation areas according to the guidelines established in the site-specific health and safety plan, which has been made into a mitigation measure as MM-HAZ-1 (Compliance with Soil Management Plan) and MM-HAZ-2 (Implement Engineering Controls and Best Management Practices during Construction). Moreover, dioxins and furans will be included in the assessment activities of MM-HAZ-1 and MM-HAZ-2, as indicated on pages 2 and 8-9 of the Soil Management Plan's work plan.

Furthermore, please see the responses to Letter H and specifically comment H-2, which indicates that MM-HAZ-1 and MM-HAZ-2 would preclude the potential for significant impacts and indicates that LEA has regulatory authority over burn ash materials and RWQCB has regulatory authority over soils that might be transported to Chula Vista for reuse. No changes to Section 4.7 other than those noted in the responses to Letter H and the addition of dioxins and furans are required to the Final EIR.

**Comment I-36:**

The comment states that the Ballpark Village Parcel C is close to the BNSF railyard and the proposed alternative gateway at Switzer Street and recommends that the Draft EIR provide an impact analysis of air quality, noise, and other issues on these future residents.

Ballpark Village Parcel C is identified as cumulative project #7 in Chapter 5, *Cumulative Impacts*, of the Draft EIR because it is currently under construction and expected to be operational sometime in 2018. Therefore, residents are not currently present on the site and, consequently, are not part of the existing conditions baseline of June 2014. As such, impacts on this site from the proposed project would be limited to the project's incremental contribution to a cumulatively significant impact, which would be the impact of past, present, and reasonably foreseeable future projects.

As noted on page 5-16 of the Draft EIR, a cumulatively significant impact was identified. Specifically, the Draft EIR states:

“because past and present projects have resulted in the current nonattainment status for ozone (ROG and NO<sub>x</sub>), PM<sub>10</sub>, and PM<sub>2.5</sub>, and reasonably foreseeable future projects would continue to contribute to the nonattainment status and potentially affect sensitive receptors, impacts related to the cumulative contribution of nonattainment pollutants (ozone precursors, PM<sub>10</sub>, and PM<sub>2.5</sub>) and *the exposure of sensitive receptors to substantial pollutant concentrations would be considered cumulatively significant.*” [Emphasis added]

The HRA provided in Section 4.2 analyzes risk at receptors placed every 50 meters throughout the neighboring communities, including residential areas immediately adjacent to the proposed Ballpark Village Parcel C, and at pathways along Park Boulevard. Furthermore, the Draft EIR finds that the proposed project's incremental contribution to the cumulatively significant impact would be cumulatively considerable. As stated on page 5-18 of the Draft EIR:

“As discussed under Threshold 4 and shown in Table 4.2-18 of

Section 4.2, operation of full TAMT plan buildout at maximum practicable throughput would result in long-term health risks at nearby sensitive receptor locations that exceed incremental risk thresholds primarily due to vessel hoteling, diesel-powered activity at the project site, and truck travel through the region. The effects from past, present, and reasonably foreseeable future projects are considered cumulatively significant, and the proposed project's incremental contribution from operational emissions would result in a net increase in toxic air contaminants that contribute to existing air quality conditions in the area after mitigation. Consequently, the proposed project's incremental contribution to cumulative health impacts during its operational stage would be cumulatively considerable after mitigation is incorporated."

Similarly, the noise analysis of the Draft EIR includes a noise measurement close to cumulative project #7—ST-5, which is taken at the ground floor of the Omni Hotel. The distance from the TAMT to both ST-5 and cumulative project #7 are approximately the same—about 1,200 feet from the TAMT facility (near the location of the Alternative Gateway on Switzer Street). Existing hourly average noise levels at ST-5 were 59.3 dBA  $L_{eq}$ . The most similar distance to a measured existing sensitive receptor is the Monarch School, which is approximately 1,200 feet from the TAMT facility. The noise analysis calculated that noise levels coming from the TAMT facility from operation of the project at the boundary lines of the Monarch School would be approximately 56 dBA  $L_{eq}$ . As such, the noise from TAMT would not be noticeable at the cumulative project #7 location because the existing noise levels are higher than what would be audible from the TAMT facility from 1,200 feet away. Moreover, cumulative project #8, Ballpark Village Parcel D, would construct a hotel tower in the future years and the presence of the hotel tower would further reduce noise emanating from the TAMT at the location of cumulative project #7.

In addition, a Marine Terminal Easement was recorded on the Ballpark Village Parcel C property on June 9, 2008. The ultimate goal of this easement is to enable operations at the TAMT to continue in

perpetuity. More specifically, Section 1.4 of the easement acknowledges persons lawfully using or occupying the property “may suffer inconvenience, annoyance, discomfort, emotional or physical distress or injury, interference with the comfortable use and enjoyment of the Property an any time (day or night).” This section goes on to identify the following “adverse effects” that may emanate from the terminal including (a) noise, (b) lights, (c) fumes and odors, (d) dust and debris, (e) traffic, and (f) any other specific causes or adverse effects resulting from the normal lawful operation of the terminal. Section 1.5 acknowledges that in connection with the desired development of the property, current and future property owners recognize the District’s legal rights and interests, and will provide appropriate protections for the District to continue to operate, manage, and grow TAMT, in its sole discretion.

By requiring the disclosure of potential terminal nuisances prior to the sale of the property (or any units), the easement is intended to help reduce land use conflicts associated with placing non-industrial uses associated with Ballpark Village Parcel C close to an existing maritime industrial use.

No changes to the Final EIR are required.

**Comment I-37:**

The comment states that the proposed Alternative Gateway at Switzer Street would likely reduce impacts of truck traffic on the community, but suggests the Draft EIR does not present any analysis to verify this anticipated benefit. The commenter also states that while increased rail activity is discussed in the Project Description, it is not analyzed in the Draft EIR. It is suggested that a worst-case estimate should be made of the potential for increased rail cargo and the resulting rail noise and air quality impacts, as well as the potential for decreases in truck trips if more cargo were moved via rail.

The Draft EIR focuses on identifying adverse impacts of the proposed project on the environment. The commenter suggests that the Draft EIR does not present any analysis to verify the anticipated benefit of the Alternative Gateway. This is not the intent of CEQA. Rather, CEQA

requires that the Draft EIR analyze the potential impacts—in this case from the Alternative Gateway—on the environment. Section 4.10 of the Draft EIR examined the changes in traffic patterns and found no significant changes (i.e., all traffic would still travel along the same roadways and would not result in any new impacts). Therefore, no changes to the Final EIR are required.

In response to the comment about rail activity and on-dock rail, page 3-7 of the Draft EIR states:

“In the long term, demolition of Warehouse C would also enable the District to establish an expanded on-dock rail facility to broaden customer access to rail if market conditions allow.”

At this time, there is no indication associated with market conditions that an increase in rail use over use of trucks would occur. Therefore, it would be speculative to attempt to determine whether and to what extent an increase in rail movement of cargo might occur under future market conditions. What is known is that Dole’s operations require the use of trucks due to the dispersed distribution needs and this is reasonably foreseeable to continue into the future. Some multipurpose cargo and dry bulk would likely continue to use rail; however, there is no indication that the percentage would change. For example, all soda ash handled at the terminal currently arrives via rail, and this is expected to continue. Overall, about 60% of current rail is for handling of dry bulk, with the remainder made up periodic multi-purpose and break bulk trips. Therefore, it is assumed the split of truck to rail would remain similar through the buildout of the TAMT plan, but would increase proportionately to the existing throughput. This would result in an overall increase in both truck and rail use, which was analyzed in the Draft EIR. No changes to the Final EIR are required. However, as the EIR acknowledges, the demolition of Warehouse C would allow the District to establish an expanded on-dock rail facility if market conditions allow in the future.

**Comment I-38:**

The commenter indicates that they believe that public services may be negatively affected by the worst-case scenario for cargo growth at



TAMT. Specifically, the commenter suggests that the proposed project would expose Cesar Chavez Park to dust, diesel emissions, noise, and additional traffic on Cesar Chavez Parkway south of Harbor and parking would be negatively affected from TAMT workers using spaces intended for park visitors.

The EIR thoroughly analyzed the potential impacts that could occur in adjacent areas, including Cesar Chavez Park, due to dust, diesel emissions, noise, and additional traffic from the proposed project. For impacts from air quality and health risk (such as dust and diesel emissions) on Cesar Chavez Park, please see Section 4.2, *Air Quality and Health Risk*. For impacts related to noise, please see Section 4.9, *Noise and Vibration*. For impacts associated with increased traffic and parking impacts, please see Section 4.10, *Transportation, Circulation, and Parking*. No changes to the Final EIR are required.

Appendix G of the State CEQA Guidelines states that a significant impact could occur if a project would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services.

For the first part of this threshold question and as indicated on page 6-14 of the Draft EIR, the “project site does not contain any parks” and does not propose any alterations to existing parks. For the second part of this threshold question, page 6-14 states further that “Although the proposed project would have a negligible effect on population growth, it is possible that use of recreational facilities in the vicinity of the project site could increase slightly due to the increase in employees, particularly at lunch breaks. However, this insignificant increase in use would result in very light use of the park (e.g., sitting at benches eating lunch) and would not substantially degrade the existing facilities.” Therefore, because there are no parks proposed for construction or alterations that would require construction, there would be no impacts associated with new or

altered park facilities. Similarly, the demand of the project for park use would be low and would not cause an increase in demand that would lead to unacceptable service ratios. As such and as indicated on page 6-14, “the proposed project would not result in an increased demand requiring the need for new or physically altered park facilities, and any related impact would be less than significant.”

**Comment I-39:**

The comment expresses concern regarding a large-volume increase in the capacity for storage of liquid fuels on the terminal and for the level of preparedness for a major fire event at the terminal, and indicates that the level of preparedness should be analyzed to determine the impact on firefighting resources in the region for a major fire. Three possible mitigation measures are suggested.

The project site is served by the City of San Diego Fire-Rescue Department and by the San Diego Harbor Police Department for fireboat operations. Proposed operations at the TAMT site would be similar to existing operations in terms of the need for fire protection services. Operations would consist of supervised cargo movements from vessels to storage areas or onto ground transportation sources such as trucks or rail. The commenter incorrectly states that the project proposes to increase the storage capacity for liquid fuel on the terminal. As disclosed in the Draft EIR, the project does not propose any changes in the existing storage capacity for liquid fuel. Any increase in liquid fuel storage that may occur could already be accommodated under existing conditions, with or without the project. Therefore, development of the TAMT plan would not increase or limit the liquid bulk storage capacity on site and would not modify the existing liquid bulk storage containers. Moreover, in the event of a fire, there are several fire-safety measures already in place. Tanks 1–5 all have a 4-inch firefighting foam pipe on them for the fire department to connect to with outside foam, and a containment area around them. The responding firefighters come equipped with the foam because they are professionally trained to fight a major fire. Maritime staff are only certified to fight vessel fires. However, the terminal has three water cannons each with a 55-gallon drum of

aqueous film-forming firefighting foam. In addition, Tanks 1–5 all have containment around them that are 6 feet high and measure 354 feet by 244 feet. No other flammable liquids can be stored within this area. In the event of a fire, the tenant has a panic alarm in their office; the alarms sirens are located high on the tank to alert everyone in the vicinity. Therefore, there is sufficient firefighting resources on site and no impacts from the lack of firefighting resources would occur.

H. OTHER IMPACTS	
I-40	Impacts that have not been quantified are nonetheless real, and affect the health, wellbeing, and quality of life of Barrio Logan residents, their neighbors, and the planet. It is important to acknowledge the full range of impacts that such a large project entails, as well as the impacts that Barrio residents have endured without mitigation for many years. Among these impacts are the following:
I-41	<ul style="list-style-type: none"> <li>Existing Port-related environmental impacts, including truck traffic and emissions, ship emissions, existing ambient noise from the terminal and railyard, and light pollution from TAMT operations at night which only exacerbate cumulative impacts;</li> </ul>
I-42	<ul style="list-style-type: none"> <li>Loss of access to waterfront;</li> </ul>
I-43	<ul style="list-style-type: none"> <li>Frequent noncompliance with the City truck ban on surface streets, and consequent near-roadway exposure to truck pollutants and the physical safety hazards of truck traffic on children's routes to school, an impact that EHC included in our NOP comments and which we brought to the Port's attention again in a 7/1/2016 letter containing photos of Dole trucks on Barrio Logan surface streets;</li> </ul>
I-44	<ul style="list-style-type: none"> <li>Extra asthma incidences, more severe asthma incidences, more school and work days missed, and other respiratory and cardiovascular illness caused or exacerbated by Port-related air pollutants;</li> </ul>
I-45	<ul style="list-style-type: none"> <li>Synergistic and additive toxic effects. Researchers agree that in the real world, exposures to multiple environmental pollutants and other stressors, amplified by effect modifiers such as poverty, occur simultaneously, act on human biology in ways that may be additive or synergistic, may carry over to future generations when epigenetic effects occur, and should be assessed together. The existing Health Risk Assessment model is simplistic and fails to capture the multitude of impacts that real world exposures impose.</li> </ul>
I-46	<ul style="list-style-type: none"> <li>Nuisance dusts, such as soda ash dusts at Cesar Chavez Park;</li> <li>Greenhouse gas emissions from ships, beyond the VSR zone. An estimated 2.5% of all global GHG is generated by shipping<sup>10</sup> and yet no mechanism exists to quantify and mitigate these GHGs. This is an impact on the planet and all its current and future life forms, and is not analyzed, acknowledged, or mitigated at any stage of the planning process.</li> </ul>

<sup>10</sup> [http://ec.europa.eu/clima/policies/transport/shipping/index\\_en.htm](http://ec.europa.eu/clima/policies/transport/shipping/index_en.htm)

### Comment I-40:

The comment states that impacts that have not been quantified can affect health, well-being, and the quality of life of Barrio Logan residents, their neighbors, and the planet. The commenter states that Barrio Logan residents contend with existing impacts from the area, including existing port-related effects associated with truck traffic and emissions, ship emissions, existing ambient noise from the terminal and railyard, and light pollution from TAMT operations at night. Therefore, the commenter is not suggesting that these impacts have been caused by the proposed project, but rather are currently present under the existing conditions.

The District understands the importance of improving environmental conditions in the project area. Steps to reduce existing emissions from the terminal include the use of shore power for vessels at berth, application of the clean air program related to trucks and VSR, progress toward the use of alternative energy sources for CHE, and implementation of the District's CAP. Existing noise from the terminal and railyard, given the proximity to the local resources such as Cesar Chavez Park, will continue to be heard from immediately adjacent properties, but generally is not noticeable from the nearest residents or schools. Light from the terminal can be observed from nearby areas, but the light is directed toward the terminal where the cargo-handling activities occur and not out into the community.

Regardless, these are existing conditions that are present without the proposed project. As indicated in Chapter 5, *Cumulative Impacts*, the effects of past, present, and reasonably foreseeable future projects (identified in Table 5-2) are considered to determine if a cumulatively significant impact is present in each of these areas. The analysis determined that the cumulative effects from light are less than significant given the urban setting and the expectation of more lighting in such a setting; cumulative impacts related to air quality and health risk are significant and mitigation is required, but the impacts would remain significant; and cumulative impacts related to traffic would also be significant, including on the roadway segment at 28<sup>th</sup> Street between Boston Avenue and National Avenue and the

intersections of National Avenue/28<sup>th</sup> Street and Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard. Therefore, the Draft EIR discloses the existing conditions (see Chapter 2, *Environmental Setting*, and Chapter 4, *Environmental Analysis*) and the cumulative impacts from past, present, and reasonably foreseeable future projects (see Chapter 5, *Cumulative Impacts*).

No changes to the Final EIR are required.

**Comment I-41:**

The comment includes another existing issue similar to comment I-40. This comment refers to the loss of access to the waterfront.

The proposed project is an existing working marine terminal and public access is not permitted due to safety and security considerations. However, the California Coastal Act prioritizes water-dependent commerce on tidelands and the terminal has been in existence since the 1950s. The proposed project will not result in any change in existing waterfront access and no change to the Final EIR is required.

**Comment I-42:**

The comment is related to comment I-40 and lists another existing condition related to non-compliance with the City of San Diego's truck ban on surface streets (i.e., Cesar Chavez Parkway and neighborhood streets) as well as exposure to truck pollutants and the physical safety hazards of truck traffic on children's routes to school.

The commenter is raising an issue with the existing condition, not the effects of the proposed project. The Draft EIR provides baseline transportation and air quality conditions in Section 4.10, *Transportation, Circulation, and Parking*, and in Section 4.2, *Air Quality and Health Risk*. The District's Maritime Operations Department is currently developing a draft Comprehensive Truck Management Program and a draft Truck Violation Enforcement Plan, and is looking to involve community residents and other stakeholders in the near future. Although subject to change, the current draft Comprehensive Truck Management Plan includes the following

components:

- Establish a Truck Drivers Registry
- Re-establish the “Truckers Customer Service Center”
- Create a “Truckers Guide to the Port of San Diego” Website
- Create a “Truckers Guide to the Port of San Diego” Video (5 to 7 minutes)
- Create Large Display Boards Showing Designated Truck Routes

Similarly, the draft Truck Violation Enforcement Plan involves distributing flyers with District telephone numbers and email addresses for community residents to report a violator by phone or email. The draft plan includes a warning for the first offense, a 1-day suspension from the terminal for the second offense, a 1-week suspension for the third offense, and a 1-year suspension from the terminal for the fourth offense. However, as this is an attempt to deal with an existing issue, it is outside the scope of the Final EIR for the proposed project.

The District looks forward to engaging the Barrio Logan community to further refine these concepts and consider additional ideas to reduce the number of existing violators. No revisions to the Final EIR are required.

**Comment I-43:**

The comment is related to comment I-40 and lists another existing condition related to increases in respiratory and cardiovascular illnesses caused by District-related air pollutants.

The commenter attempts to provide a direct link between existing environmental conditions within the District and the health effects experienced at nearby sensitive receptors. However, while it is reasonable to assume emissions associated with operations on District tidelands contribute to air quality issues in the area, there are also many other industrial land uses and major roadways (i.e., I-5) throughout the area that contribute to air quality issues, including many that are closer to sensitive receptors. The District is taking steps to reduce its air emissions associated with goods movement, such as the District’s CAP, Clean Air Program, electrification of

terminal equipment, and reductions from vessel idling at the terminal. Moreover, The District expects to do more in this area in the years to come, which is evidenced by the mitigation measures listed in the TAMT plan, as summarized in the *Executive Summary* of the Draft EIR.

As indicated in the responses to comments I-6 and I-7, the proposed project's net increase in toxic air contaminants and criteria pollutants would be significant before mitigation. As explained further in these responses, the District is taking several steps to further reduce the project's health risks. In particular, mitigation measures were added or revised to reduce emissions from the two largest contributors to health risk: vessel hoteling and CHE. Mitigation measure MM-AQ-9 has been added as new mitigation to further reduce toxic air contaminants (DPM) and criteria pollutants (including NO<sub>x</sub>, PM<sub>2.5</sub>, and PM<sub>10</sub>) from vessel emissions while at berth. MM-AQ-6 has been revised to increase the amount of zero emission equipment to be purchased at the terminal. Finally, the District has included a new feasible STC Alternative that will achieve the basic project objectives, but also further reduce air quality and health risk impacts from the proposed project. Please see the responses to comments I-6 and I-7 for details. After mitigation, NO<sub>x</sub> impacts for both the proposed project and the STC Alternative would be less than significant while health risks at the closest residential receptors would remain significant for the proposed project but less than significant for the STC Alternative. Furthermore, MM-AQ-4 has been clarified and its reductions quantified, which reduces fugitive PM<sub>10</sub> and PM<sub>2.5</sub> emissions from dry bulk handling below threshold and below existing conditions.

Revisions to the Final EIR are shown in Chapter 3, *Errata and Revisions*.

**Comment I-44:**

The comment is related to comment I-40 and lists another existing condition related to the potential for synergistic and additive toxic effects on future generations from those who are affected in the present. The comment notes that the existing HRA model is simplistic

and fails to capture the multitude of impacts that real world exposures impose.

The HRA was performed consistent with the best-available science and risk assessment procedures presented by OEHHA, as updated in its February 2015 *Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments*. Moreover, the commenter is again raising the issue of existing hazardous conditions, which are discussed in Chapter 4, *Environmental Analysis*, under sections such as Section 4.2, *Air Quality and Health Risk*, and Section 4.7, *Hazards and Hazardous Materials*, not the effects of the proposed project, which are raised in and responded to in comments I-6 and I-7. No revisions to the Final EIR beyond those indicated in responses to comments I-6 and I-7 are required.

**Comment I-45:**

The comment is related to comments I-6 and I-40 and lists another existing condition related to nuisance dusts such as soda ash dust at Cesar Chavez Park.

The existing air quality conditions, which include the emissions of fugitive particulate matter emissions associated with existing TAMT operations, are described in Section 4.2, *Air Quality and Health Risk*. The commenter is again raising the issue of existing air quality conditions, not the effects of the proposed project, which are raised in other comments. As noted in other responses, revisions and the resulting clarifications indicate that fugitive PM10 and PM2.5 emissions from dry bulk handling would be below thresholds and below existing conditions after mitigation. See detailed responses to comments I-6 and I-40. Revisions to the Final EIR are shown in Chapter 3, *Errata and Revisions*.

**Comment I-46:**

The comment is related to comment I-40 and lists another existing condition related to GHG emissions from ships beyond the VSR zone (which is beyond the District's jurisdiction, the San Diego Air Basin, and State waters). The comment states that an estimated 2.5% of all



global GHGs are generated by global shipping and there are no mechanisms to quantify or mitigate these emissions. The comment suggests that these globally produced GHG emissions will have an impact on the planet and are not analyzed, acknowledged, or mitigated in the Draft EIR.

The Draft EIR provides information on the GHG emissions associated with existing TAMT operations, including vessels within the San Diego Air Basin, as well as the projected operations with implementation of the proposed project. However, the District does not control vessel originations and destinations. Global emissions from shipping throughout the world is beyond the scope of the EIR for the TAMT plan and the Demolition and Initial Rail Component and there is no evidence that the proposed project directly or indirectly causes those global air emissions. Regardless, MM-GHG-3 of the Draft EIR includes VSR in the current speed reduction zone (20 nautical miles from Point Loma), while MM-GHG-5 expands on MM-GHG-3 and includes VSR beyond the current speed reduction zone out to up to 40 nautical miles from Point Loma (depending on the inbound and outbound direction of the vessel). These measures, combined with at-berth measures described in other responses, will help to reduce global GHG emissions from global shipping.

No specific environmental issues are raised in this comment. Therefore, no changes to the Final EIR are required.

	<b>II. PROJECT MITIGATIONS</b>
I-47	The proposed mitigations in many cases are not enforceable or adequately quantifiable as to their benefits. Even if taken at face value and assumed to be effective, the mitigations included in the DEIR do not fully mitigate the most important and harmful impacts of the project: Air Quality and Health Risk, Greenhouse Gases, Noise, or Transportation/Traffic impacts. Aesthetic/Visual impacts also remain significant and unavoidable.
	<b>A. MITIGATIONS MM-AQ-8 AND MM-GHG-8</b>
I-48	<p>Most egregiously, Mitigations MM-AQ-8 and MM-GHG-8 rely on a Sustainable Lease Policy that does not yet exist.</p> <ul style="list-style-type: none"> <li>The wording of the mitigation measures indicates that the policy will be voluntary and incentive-based: "The District shall work with tenants to develop and implement a policy incentive-based sustainable leasing program." Reliance on voluntary emission reductions is not an acceptable CEQA mitigation. Whereas the District is committing itself to "working with tenants," it is not committing to adopting a leasing program or requiring that tenants implement any emission reductions. The potential reductions in air emissions and GHG from this as-yet-nonexistent, voluntary program cannot be quantified and could very well be zero. Without mandated emission reductions, a sustainable lease policy cannot be used as a CEQA mitigation. (Pub. Res. Code §21081.6(b) ["A public agency shall provide that measures to mitigate or avoid significant effects on the environment are fully <u>enforceable</u> through permit conditions, agreements, or other measures.", emphasis added]).</li> </ul>
I-49	<ul style="list-style-type: none"> <li>Additionally, reductions in air emissions or GHG that result from voluntary tenant actions could occur anywhere on the Tidelands and do not necessarily benefit the community that is most adversely affected by the TAMT redevelopment. Commercial facilities that change out their lighting, for example, would reduce their energy use but not in a way that produces air quality benefits or reduces health risk for downwind residents. Only projects that reduce the concentration of diesel exhaust in ambient air at homes, schools, and parks in the community can be considered as mitigations for health risks to sensitive receptors.</li> </ul>
	<b>B. MITIGATIONS MM-AQ-3 AND MM-GHG-2</b>
I-50	Mitigations MM-AQ-3 and MM-GHG-3 rely on compliance with the Port's Climate Action Plan.

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**Comment I-47:**

The comment makes a general assertion that the proposed mitigation measures, in many cases, are not enforceable or adequately quantifiable as to their benefits. The comment states that the mitigation measures do not fully mitigate air quality and health risk, GHG, noise, transportation/traffic, or aesthetic/ visual impacts and provides further detail in the paragraphs below.

The terms of the proposed mitigation measures and the MMRP required by State CEQA Guidelines section 15097 will ensure the mitigation measures adopted for the TAMT plan are enforceable. Mitigation measures can often be quantified, but not always as the commenter suggests. However, there would still be a benefit and potential reduction in the associated impact, which is why mitigation measures that are not quantifiable are still provided. Likewise, however, if the measure cannot be quantified, then the quantified reduction is not taken on the impact. In other words, if there is no way to quantify a mitigation measure, then that mitigation measure's potential reduction is not factored into the final mitigated analysis even though the measure may further decrease the associated impact; this is true of air quality emissions, GHG emissions, noise, and other resource areas that lend themselves to quantification.

No specific environmental issues are raised in this comment, so no further response is possible.

**Comment I-48:**

This comment objects that MM-AQ-8 and MM-GHG-8 rely on a Sustainable Lease Policy that does not yet exist and that these mitigation measures are not enforceable and are therefore not acceptable as CEQA mitigation. The comment also suggests rewording MM-AQ-8 and MM-GHG-8 so that creation of a policy-incentive-based sustainable leasing program is mandatory, not voluntary.

As noted in the response to comment I-47 above, the Draft EIR properly includes some mitigation measures whose beneficial effects cannot be quantified but that are expected to make a positive

- I-50 cont.
- The CAP does not include any mandatory elements. Measures such as Vessel Speed Reduction (VSR) must be developed into enforceable requirements, with tracking and reporting mechanisms so that Port staff and the public can verify that VSR is occurring at least 80% of the time.
  - Additionally, given that the current level of VSR is 72%, the increment of VSR that can be considered mitigation is solely the level beyond 72%.
  - Further, the shorepower requirement in MM-GHG-2 merely requires compliance with existing state law, and will not produce emission reductions beyond what is already required. (p.4.6-48). It is inappropriate to include reductions associated with this measure to assess reductions from the "unmitigated" project. It should be noted also that compliance with the state shorepower rule using an alternative technology, such as the two alternatives already certified by California Air Resources Board,<sup>11</sup> do not produce reductions in GHG and would not mitigate GHG impacts of the project.
  - Likewise, compliance with the City's Construction and Demolition Debris Deposit Ordinance is already mandatory, and does not provide reductions in solid waste beyond what is already required by the City of San Diego. Moreover, the mitigation measure requires recycling of 50% of construction debris, whereas the City requirement is for 65% diversion for permits issued after July 1, 2016.<sup>12</sup>

#### C. MITIGATION MM-GHG-6

- I-54
- Mitigation MM-GHG-6 requires development of renewable energy on the terminal or purchase of GHG offsets if it is determined to be infeasible to implement an energy project on the terminal or elsewhere on the tidelands. However, a renewable energy project will not provide community benefits unless the project is in the community and includes local hire and job quality provisions. The mitigation measure as currently worded does not require either of these.

#### D. MITIGATIONS MM-AQ-7 AND MM-GHG-7

- I-55
- Mitigations MM-AQ-7 and MM-GHG-7 require a periodic technology review and require that new technology found to be feasible must be implemented within 12 months. However, the DEIR does not indicate what criteria are used to determine feasibility. It is possible that no new technologies will be deemed feasible and that no reductions in GHG will occur as a result of this mitigation measure.

<sup>11</sup> <http://www.arb.ca.gov/ports/shorepower/co/eq.htm>

<sup>12</sup> <https://www.sandiego.gov/environmental-services/recycling/cd>

contribution to the overall reduction of a significant impact. Also as noted above, the Draft EIR does not assume a quantified reduction in a significant impact for such non-quantifiable mitigation measures. Mitigation measures MM-AQ-8 and MM-GHG-8 are mitigation measures that were not quantified in the mitigated analysis. However, they are measures that require a good-faith effort from the District to work with tenants on a sustainable leasing policy in order to further reduce air quality and GHG emissions beyond the quantified measures.

It is also important to point out that the District is still in the process of developing and refining its sustainable leasing program, and progress continues to be made. In December 2015, the Board approved the mandatory utility reporting ordinance for all District tenants, including tenants present at TAMT. In March 2016, the Board provided funding for a sustainable leasing incentive program. In November/December 2016, District staff intends to recommend an approach for amending existing policies and/or new policies for a District-wide sustainable leasing program. The District fully expects that there will be mandatory, enforceable requirements as part of its sustainable leasing program in the future. However, identifying sustainable leasing as a mitigation measure in the EIR for the TAMT plan provides District staff with the necessary link to pursue sustainable leasing measures at TAMT, prior to the staff completing the District-wide program. Moreover, the District has revised MM-AQ-8 and MM-GHG-8 to provide more details about what the exhaust emissions reduction program would need to consider, including ensuring its enforceability, goals, and practices that generate incentives. Please see the changes to MM-AQ-8 and MM-GHG-8 in Chapter 3 of the Final EIR.

#### Comment I-49:

This comment is related to comment I-48 (i.e., regarding the Sustainable Leasing Policy) and states that reductions in air emissions or GHGs that result from voluntary tenant actions could occur anywhere on the tidelands and do not necessarily benefit the community that is most adversely affected by the TAMT

redevelopment. The commenter suggests only projects that reduce the concentration of diesel exhaust in ambient air at homes, schools, and parks in the community can be considered as mitigation for health risks to sensitive receptors.

Reductions in air emissions associated with health risk issues are location specific as indicated by the commenter. Therefore, to effectively reduce localized air pollutants, the projects that follow from the Sustainable Leasing Policy would have to be within the area affected by the project. However, there would be regional and global benefits associated with reducing regional air pollutants and GHG emissions, respectively. As such, regional air emissions such as NO<sub>x</sub> and global emissions such as GHGs would benefit from reductions anywhere on tidelands. The fact that not all types of air emissions would benefit from various future projects proposed under the Sustainable Leasing Policy is not sufficient to not allow such projects when there can be reductions in emissions of regional and global concern. No changes to the Final EIR are required.

**Comment I-50:**

This comment states that MM-AQ-3 and MM-GHG-2 (not MM-GHG-3 as noted in the comment) rely on compliance with the Port's CAP and the CAP does not include any mandatory elements. The comment suggests that measures such as VSR must be developed into enforceable requirements with tracking and reporting mechanisms so the District and public can verify VSR is occurring at least 80% of the time.

By incorporating the voluntary CAP measures into mitigation measures for the proposed project, the Draft EIR makes the CAP measures mandatory as part of the project's MMRP. The District's existing voluntary VSR program has been ongoing since April 1, 2009 as part of the District's Clean Air Program. MM-AQ-3 and MM-GHG-2 would use the same reporting that has been in use since 2009 to track compliance and to provide evidence of implementation. This involves having the project applicant record each inbound and outbound vessel and maintain monthly records. The applicant submits an annual report to the District's Planning and Green Port Department.

This report provides the monthly vessel totals and the compliance percentage for the quarter. The District verifies compliance through either an analysis of Automatic Identification System data or by requesting a vessel's Electronic Chart Display Identification System log from the captain. Evidence of implementation and compliance shall be provided to the District on an annual basis.

MM-AQ-3 and MM-GHG-2 have been updated in the Final EIR to provide further clarification on these measures and the District's independent verification of compliance. Please see Chapter 3, *Errata and Revisions*, of this Final EIR. The clarification to these mitigation measures does not require recirculation, as it does not constitute significant new information under section 15088.5 of the State CEQA Guidelines.

**Comment I-51:**

This comment is regarding MM-AQ-3 and MM-GHG-2, which rely on compliance with the Port's CAP. The comment states that given the current level of VSR is 72%, the increment of VSR that can be considered mitigation is solely the level beyond 72%.

The Draft EIR (Table 4.2-18) shows the reduction in emissions associated with the net difference between the target (80% per MM-AQ-3 and MM-GHG-2) and the existing compliance (72%), resulting in the quantification of an approximately 8% increase in compliance. No changes to the Final EIR are required.

**Comment I-52:**

This comment expands upon comment I-51. The comment states that the shore power requirement in MM-GHG-2 merely requires compliance with existing State law, and it is inappropriate to include reductions associated with this measure to assess reductions from the "unmitigated" project. The comment notes compliance with the State shore power rule does not produce reductions in GHG and would not mitigate GHG impacts of the project.

Both the AB 32 Scoping Plan and the District's CAP take into account statewide regulations passed after AB 32 was adopted, which

includes shore power and most other statewide regulations assumed in the District's CAP. The "unmitigated" or "business-as-usual" scenarios provided in both do not include reductions associated with shore power or other regulations, including Pavley, Renewables Portfolio Standard beyond 20%, and others. Of importance is that the baseline year for the CAP is 2006 and the at-berth regulations that shore power falls under were adopted in 2007. The analysis presented in Section 4.6 is consistent with the approaches presented in both the Scoping Plan and CAP. No other clarifications to the Final EIR are required.

**Comment I-53:**

This comment expands upon comment I-51 and states that compliance with the City's Construction and Demolition Debris Deposit Ordinance is already mandatory and does not provide reductions beyond what was already required. The mitigation measure requires recycling of 50% of construction debris, whereas the City requirement is for 65% diversion for permits issued after July 1, 2016.

Mitigation measure MM-GHG-2 requires consistency with the District's CAP, which identifies the recycling of 50% of construction debris in accordance with AB 939. The City may have its own permitting requirements whereby an applicant, or the District as a project proponent, may need to attain a 65% diversion of construction and demolition debris, but this has not been identified as a District CAP measure. This measure is being required as a mitigation measure so that the District can ensure ongoing monitoring and enforcement as part of the proposed project's MMRP.

**Comment I-54:**

This comment states that MM-GHG-6, a mitigation measure to provide renewable energy on the terminal, within the District, or to purchase GHG offsets, will not benefit the community unless the project is in the community and includes local hire and job quality provisions. The comment states the mitigation measure as currently worded does not require either of these.

The mitigation measure is specific to reducing GHG emissions at an annual reduction of 34,044 MTCO<sub>2e</sub> at full TAMT plan buildout. GHG emissions contribute to global climate change and as such are a global concern. Emitting GHGs at a specific site does not result in any greater harm to that immediate area than the rest of the globe. As such, mitigation may take place anywhere on the globe as long as there is a reduction that meets the reduction targets of the project's threshold. As such, while the measure indicates that on site is the preferred location for a GHG-offsetting project like renewable energy, there are two additional options available. The District may require the renewable energy project to be built off site (i.e., at a location not within the TAMT but within the District's jurisdiction) or it can require the proponent to purchase the equivalent amount of GHG offsets from sources listed on the American Carbon Registry and/or the Climate Action Reserve (or any other such registry approved by ARB). The District may also choose a combination of two or more of these options as long as the total annual reduction of 34,044 MTCO<sub>2e</sub> at full TAMT plan buildout is achieved. Providing requirements for local hires and job quality provisions is not a necessary condition to achieve the GHG emissions reduction requirement. No changes to the Final EIR are required.

**Comment I-55:**

This comment indicates that no criteria are identified regarding feasibility for MM-AQ-7 and MM-GHG-7 (i.e., Periodic Technology Review). The comment suggests it is possible that no new technologies will be deemed feasible and that no reductions in GHG may occur as a result of this mitigation measure.

The feasibility of new technology will be determined pursuant to CEQA. State CEQA Guidelines section 15364 provides that "feasible" means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors. MM-AQ-7 and MM-GHG-7 are mitigation measures that were not quantified in the mitigated analysis. As a result, they are measures that require a good-faith effort from the District to identify feasible technological

advancements as they become available and are is commitments on the District's part to actively review new developments in technology to reduce air pollutant and GHG emissions over the life of the TAMT plan, which is important given that the life of the plan could be up to 20 years and it is reasonable to assume alternatively powered CHE and goods movement equipment will be more readily available in the future. Because the analysis did not assume any reductions in the mitigated analysis, no changes are needed to the Final EIR.



### III. SUPPORT FOR REDUCED PLAN ALTERNATIVE

I-56 The TAMT Redevelopment Plan, as currently envisioned and analyzed in the DEIR, will create large and incompletely mitigated impacts in the areas of Aesthetics, Air Quality and Health Risk, Greenhouse Gases, Noise, and Transportation/Circulation/Parking. The most immediately adjacent and downwind community, Barrio Logan, is already adversely impacted by industrial activity by the Port and its tenants, and will receive the brunt of health impacts, noise, traffic, and other impacts of the proposed project. The proposed mitigations are not adequate to reduce the impacts. Nor are there any tangible benefits for the community from the project. Barrio Logan residents are being asked to shoulder additional burdens, without any corresponding benefits in terms of local hire, job quality, improved infrastructure, increases in renewable energy, improved waterfront access or other park area, increased public safety, improved filtration and sound attenuation in buildings, or other improvements to quality of life. In contrast, the Reduced Plan Alternative is the Environmentally Preferred alternative. Environmental Health Coalition rejects the proposed plan and views the Reduced Plan Alternative, with mitigations, as the least harmful alternative other than the No Project alternative.

Sincerely,



Joy Williams  
Research Director

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### Comment I-56:

The comment suggests that the Draft EIR will create large and incompletely mitigated impacts in the areas of aesthetics, air quality and health risk, GHGs, noise, and transportation/ circulation/parking. The comment notes that the Barrio Logan neighborhood will be the primary recipient of these impacts without receiving any benefits, such as local hire provisions, job quality assurances, improved infrastructure, increases in renewable energy, improved access to the waterfront or parks, increased public safety, improved filtration and sound attenuation in buildings, or other improvements to the quality of life. The comment concludes by indicating support for the Reduced Plan Alternative, with mitigations.

This comment summarizes the information disclosed in the Draft EIR, including in the *Executive Summary*, Table ES-4, that the proposed project would result in significant and unavoidable impacts on aesthetics (from the installation of gantry cranes), air quality and health risk (construction and operation), GHGs (post-2020), noise (construction and operation), and transportation (traffic congestion from construction and operation). To address the impacts of the proposed project on the affected area, including Barrio Logan, nine mitigation measures are proposed for air quality and health risk impacts, nine mitigation measures are proposed for GHG impacts, three mitigation measures are proposed for noise impacts, seven mitigation measures are proposed for transportation impacts, and a total of 34 mitigation measures are proposed for all potentially significant impacts. As such, there are extensive mitigation measures to reduce the potentially significant impacts of the proposed project. The proposed project would improve on-terminal infrastructure that would result in lower emissions over time. In addition, the proposed project would provide fair-share contributions to improvements at 28<sup>th</sup> Street between Boston Avenue and National Avenue and the intersection of Norman Scott Road/32<sup>nd</sup> Street/Wabash Boulevard to improve the LOS to acceptable levels. The project mitigation would also require noise attenuation devices and equipment on the terminal once future projects are proposed and design schematics are

available. The project mitigation would also include requirements for renewable energy, including the potential use of a microgrid, if such a use is determined feasible on the terminal or within the District tidelands. The project has no significant effect on public safety and, therefore, no mitigation is required for public safety facilities. The project also has no significant impact on waterfront access or access to the nearby parks, and, therefore, no mitigation is required for waterfront or park access. Although CEQA requires the EIR to identify mitigation measures and alternatives that can avoid or reduce the significant impacts of the proposed project, CEQA does not require a proposed project to provide community benefits such as local hire provisions, job quality assurances, improved infrastructure, or other such measures. In addition, CEQA requires the District to take into account not only local benefits, but also statewide and region-wide benefits when balancing the benefits of the project against its potential significant and unavoidable impacts under State CEQA Guidelines section 15093. No changes to the Final EIR are required. However, this comment will be included in the materials presented to the Board of Port Commissioners for consideration in the decision whether or not to approve the proposed project.

## 4.2.10 Letter J – San Diego County Archaeological Society, Inc.



### San Diego County Archaeological Society, Inc.

Environmental Review Committee

1 August 2016

PGP 2 AUG '16 PM 4:03

To: Mr. Larry Hofreiter  
Planning & Green Port  
San Diego Unified Port District  
3165 Pacific Highway  
San Diego, California 92101-1128

Subject: Draft Environmental Impact Report  
Tenth Avenue Marine Terminal Redevelopment Plan and  
Demolition and Initial Rail Component

Dear Mr. Hofreiter:

I have reviewed cultural resources aspects of the subject DEIR on behalf of this committee of the San Diego County Archaeological Society.

Based on the information contained in the DEIR and its Appendix H, we agree with the cultural resources impact analysis included therein. We also agree with the included mitigation measures, but would suggest that archaeological and Native American monitoring be extended to include any geotechnical testing that may be conducted. This could help identify the presence and extent of buried sites within the TAMT area.

Thank you for the opportunity to review and comment on this DEIR, and for your assistance in locating it on the SDUPD website.

Sincerely,

  
James W. Royle, Jr., Chairperson  
Environmental Review Committee

cc: ICF International  
SDCAS President  
File

P.O. Box 81106 San Diego, CA 92138-1106 (858) 538-0935

### Comment J-1:

This comment confirms review of the Draft EIR on behalf of the San Diego County Archaeological Society and agrees with the cultural resources impact analysis included. The comment further agrees with the mitigation measures included in the Draft EIR, but suggests that archaeological and Native American monitoring be extended to include any geotechnical testing that may be conducted in order to help identify the presence and extent of buried sites within the TAMT area.

The District appreciates the San Diego Archaeological Society's interest in the project and its review of the Draft EIR. The majority of the project site is located on fill land and was previously underwater. However, the portion of the site that was not fill is the area with the potential for archaeological resources. As such, MM-CUL-1 provides a requirement for an archaeological monitor and Native American monitor to be present for any grading, excavation, and ground-disturbing work in the boundaries indicated in Figure 4.4.-1. The District has modified the measure to include this requirement for any geotechnical testing in this area, as well. Please see the updates in Chapter 3, *Errata and Revisions*, of this Final EIR.

