

Draft Subsequent Environmental Impact Report Mitsubishi Cement Corporation at Warehouse C

Volume I of II



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Contents

Executive Summary	ES-1
Introduction.....	ES-1
Project Description	ES-1
Areas of Known Controversy/Issues Raised by Agencies and the Public	ES-13
Issues to be Resolved	ES-14
Summary of Project Alternatives	ES-14
Summary of Project Impacts	ES-16
1. Introduction.....	1-1
1.1 Project Background and Overview	1-1
1.1.1 TAMT Redevelopment Plan	1-1
1.1.2 Proposed Project	1-2
1.2 California Environmental Quality Act Requirements	1-3
1.3 Intended Uses of the Program Environmental Impact Report.....	1-4
1.3.1 Agencies Expected to Use this Program Environmental Impact Report	1-4
1.4 Scope and Content of the Draft Subsequent Environmental Impact Report.....	1-5
1.4.1 Comments Received in Response to the Notice of Preparation	1-6
1.5 Organization of the Draft Subsequent Environmental Impact Report.....	1-12
2. Environmental Setting.....	2-1
2.1 Introduction.....	2-1
2.2 Background Setting	2-1
2.2.1 San Diego Unified Port District	2-1
2.2.2 Tenth Avenue Marine Terminal.....	2-1
2.3 Proposed Project Setting.....	2-2
2.3.1 Location	2-2
2.3.2 Existing Site Conditions	2-2
2.3.3 Land Use Designations.....	2-7
2.3.4 Surrounding Conditions.....	2-7
3. Project Description.....	3-1
3.1 Introduction.....	3-1
3.2 Project Objectives.....	3-1
3.3 Project Construction.....	3-2
3.4 Project Operations	3-14
3.5 Project Review and Approvals.....	3-16
3.5.1 San Diego Unified Port District	3-16
3.5.2 City of San Diego.....	3-17
3.5.3 San Diego Air Pollution Control District.....	3-17
3.5.4 Caltrans.....	3-17
4. Environmental Analysis.....	4-1
4.1 Air Quality and Health Risk.....	4.1-1
4.1.1 Circumstances Surrounding Project Implementation	4.1-1
4.1.2 Analysis of New or More Severe Impacts.....	4.1-11
4.2 Greenhouse Gas Emissions	4.2-1
4.2.1 Circumstances Surrounding Project Implementation	4.2-1
4.2.2 Analysis of New or More Severe Impacts.....	4.2-5

4.3	Hazards and Hazardous Materials.....	4.3-1
4.3.1	Circumstances Surrounding Project Implementation	4.3-1
4.3.2	Analysis of New or More Severe Impacts.....	4.3-8
4.4	Noise and Vibration.....	4.4-1
4.4.1	Noise and Vibration Fundamentals	4.4-1
4.4.2	Circumstances Surrounding Project Implementation	4.4-1
4.4.3	Analysis of New or More Severe Impacts.....	4.4-7
4.5	Transportation, Circulation and Parking	4.5-1
4.5.1	Traffic Fundamentals.....	4.5-1
4.5.2	Circumstances Surrounding Project Implementation	4.5-1
4.5.3	Analysis of New or More Severe Impacts.....	4.5-7
5.	Cumulative Impacts	5-1
5.1	Overview.....	5-1
5.2	Cumulative Methodology.....	5-2
5.2.1	Cumulative Projects List	5-3
5.3	Cumulative Project Analysis	5-10
5.3.1	Air Quality and Health Risk.....	5-10
5.3.2	Greenhouse Gas Emissions and Global Climate Change	5-12
5.3.3	Hazards and Hazardous Materials.....	5-14
5.3.4	Noise and Vibration	5-17
5.3.5	Transportation, Circulation and Parking.....	5-19
6.	Additional Consequences of Project Implementation	6-1
6.1	Introduction.....	6-1
6.2	Significant Irreversible Environmental Changes.....	6-1
6.3	Growth-Inducing Impacts.....	6-2
6.3.1	Economic Growth	6-2
6.3.2	Population Growth	6-2
6.3.3	Construction of Additional Housing.....	6-3
6.3.4	Removal of Obstacles to Population Growth.....	6-3
6.3.5	Summary of Growth-Inducing Impacts	6-3
6.4	Significant Effects that Cannot be Avoided	6-4
6.5	Effects Found Not to be Significant	6-4
7.	Alternatives to the Proposed Project.....	7-1
7.1	Overview.....	7-1
7.2	Requirements for Alternatives Analysis	7-1
7.3	Selection of Alternatives	7-1
7.4	Alternatives Considered	7-2
7.4.1	Alternatives Considered but Rejected from Analysis.....	7-2
7.4.2	Alternatives Selected for Analysis	7-4
7.5	Environmental Effects of the Project Alternatives.....	7-5
7.5.1	Alternative 1 – No Project Alternative	7-5
7.5.2	Alternative 2 – Reduced Throughput Alternative	7-7
7.6	Environmentally Superior Alternative.....	7-9
8.	List of Preparers and Agencies Consulted	8-1
8.1	Lead Agency – San Diego Unified Port District.....	8-1
8.2	SEIR Preparers – ICF.....	8-1
8.3	Geotechnical Investigation – Group Delta Consultants, Inc.....	8-2

8.4	Health Risk Assessment – Environmental Audit, Inc.	8-2
8.5	Hazardous Materials Technical Study – Ninyo & Moore.....	8-2
8.6	Noise and Groundborne Vibration Impact Assessment – Navcon Engineering Network.....	8-2
8.7	Transportation Impact Analysis – Linscott Law & Greenspan.....	8-2
8.8	Agencies, Organizations, and Persons Consulted	8-2
9.	References.....	9-1
9.1	SEIR Executive Summary	9-1
9.2	Chapter 1, Introduction.....	9-1
9.3	Chapter 2, Environmental Setting	9-1
9.4	Chapter 3, Project Description	9-1
9.5	Section 4.1, Air Quality and Health Risk	9-1
9.6	Section 4.2, Greenhouse Gas Emissions and Global Climate Change	9-5
9.7	Section 4.3, Hazards and Hazardous Materials	9-8
9.8	Section 4.4, Noise and Vibration	9-9
9.9	Section 4.5, Traffic, Circulation and Parking	9-9
9.10	Chapter 5, Cumulative Impacts	9-10
9.11	Chapter 6, Additional Consequences of Project Implementation.....	9-10
9.12	Chapter 7, Alternatives to the Proposed Project	9-10
9.13	Chapter 8, List of Preparers and Agencies Consulted	9-10

Appendices

Appendix A	Initial Study/Environmental Checklist
Appendix B	Report of Geotechnical Investigation 10th Avenue Marine Terminal (Warehouse C) Cement Unloading Facility, San Diego, California
Appendix C	Air Quality and Greenhouse Gas Calculations
Appendix D	Mitsubishi Cement Corporation San Diego Facility Health Risk Assessment
Appendix E	Hazardous Materials Technical Study for Mitsubishi Cement Corporation at Warehouse C: Bulk Cement Warehouse and Loading Facility Project San Diego, California
Appendix F	Noise and Groundborne Vibration Impact Assessment for Mitsubishi Cement Corporation at Warehouse C: Bulk Cement Warehouse and Loading Facility Project
Appendix G	Comparative Traffic Impact Analysis, Mitsubishi Warehouse C (Supplemental), San Diego, California

Tables

ES 1	Throughput Scenario Analyzed within the TAMT Final PEIR	ES-2
ES-2	Summary of Excavation Activities (cubic yards)	ES-9
ES-3	Summary of At-Berth Vessel Operations (annual).....	ES-12
ES-4	Project Impacts and Mitigation Measures.....	ES-17
1-1	Throughput Scenario Analyzed within the TAMT Final PEIR	1-1
1-2	List of Required Discretionary Actions.....	1-5
1-3	Summary of Comments Received on the Notice of Preparation.....	1-6
2-1	Existing Structures at the TAMT	2-6
3-1	Summary of Excavation Activities (cubic yards)	3-2
3-2	Summary of At-Berth Vessel Operations (annual).....	3-15
4.1-1	Summary of TAMT Final PEIR Baseline Dry Bulk Criteria Pollutant Emissions	4.1-7
4.1-2	Summary of TAMT Final PEIR Baseline Health Risk at Nearby Receptors associated with Dry Bulk Cargo.....	4.1-8
4.1-3	Summary of TAMT Final PEIR Dry Bulk and Proposed Project Activity	4.1-12
4.1-4	Comparison of TAMT Final PEIR Thresholds and the New Appendix G Checklist	4.1-13
4.1-5	Air Quality Thresholds.....	4.1-14
4.1-6	Summary of TAMT Final PEIR Emissions for the Dry Bulk Cargo Node (pounds per day)	4.1-19
4.1-7	Estimate of Peak Daily Project Construction Emissions (pounds per day)	4.1-21
4.1-8	Proposed Project Operational Emissions – Unmitigated Condition (pounds per day).....	4.1-22
4.1-9	Proposed Project Concurrent Construction and Operations – Unmitigated Condition (pounds per day).....	4.1-22
4.1-10	Comparison of Air Quality TAMT Final PEIR Mitigation Measures to Proposed Project Draft SEIR Mitigation Measures.....	4.1-24
4.1-11	Proposed Project Operational Emissions – Mitigated Condition (pounds per day)	4.1-48
4.1-12	Proposed Project Concurrent Construction and Operations– Mitigated Condition (pounds per day).....	4.1-48
4.1-13	TAMT Final PEIR Dry Bulk Health Risk (cancer risk per million).....	4.1-50
4.1-14	Proposed Project Health Risk Relative to the TAMT Final PEIR (cancer risk per million)	4.1-53
4.2-1	Summary of TAMT Final PEIR Baseline GHG Emissions (metric tons per year)	4.2-1
4.2-2	Summary of TAMT Final PEIR Dry Bulk and Proposed Project Activity	4.2-5
4.2-3	Summary of TAMT Final PEIR GHG Emissions for the Dry Bulk Cargo Node (metric tons per year).....	4.2-8
4.2-4	Reduction Target Calculations	4.2-10
4.2-5	Estimate of Proposed Project Unmitigated GHG Emissions in 2025, 2030, and 2035 (metric tons per year)	4.2-11
4.2-6	Estimate of Proposed Project Mitigated GHG Emissions in 2025, 2030, and 2035 (metric tons per year).....	4.2-13
4.2-7	Comparison of Greenhouse Gas Emissions TAMT Final PEIR Mitigation Measures to Proposed Project Draft SEIR Mitigation Measures	4.2-15
4.3-1	Facilities of Potential Concern	4.3-4
4.3-2	Supplemental Online Regulatory Database Search and Findings	4.3-5
4.3-3	Comparison of TAMT Final PEIR Appendix G Questions and the Updated Appendix G Questions	4.3-9
4.3-4	Comparison of Hazards TAMT Final PEIR Mitigation Measures to Proposed Project Draft SEIR Mitigation Measures Comparison to TAMT Final PEIR Mitigation Measures.....	4.3-16
4.4-1	Ambient Noise Measurements	4.4-5

4.4-2	City of Coronado Noise Limits.....	4.4-6
4.4-3	Phase I and Phase II Construction – Equipment Sound Power Emission Levels.....	4.4-8
4.4-4	Phase I Operation and Full Operation – Equipment Sound Power Emission Levels.....	4.4-9
4.4-5	Construction Equipment Vibration Source Levels	4.4-10
4.4-6	Comparison of TAMT Final PEIR Appendix G Questions and the Updated Appendix G Questions	4.4-11
4.4-7	Project Operation Noise Thresholds at Sensitive Receptors	4.4-13
4.4-8	City of San Diego Traffic Noise Significance Thresholds	4.4-14
4.4-9	Caltrans Vibration Building Damage Potential Threshold Criteria.....	4.4-15
4.4-10	Reaction of People to Groundborne Vibration	4.4-15
4.4-11	Calculated Noise Levels – Project Construction (dBA).....	4.4-17
4.4-12	Calculated Noise Levels – Mitsubishi Phase I Construction and Transit Shed #2 Demolition (dBA).....	4.4-18
4.4-13	Calculated Noise Levels – Phase I Operation, Option A (Interior Truck Loading) (dBA).....	4.4-19
4.4-14	Calculated Noise Levels – Full Operation, Option A (Interior Truck Loading) (dBA).....	4.4-19
4.4-15	Calculated Noise Levels – Phase I Operation, Option B (Exterior Truck Loading) (dBA)	4.4-20
4.4-16	Calculated Noise Levels – Full Operation, Option B (Exterior Truck Loading) (dBA)	4.4-20
4.4-17	Comparison of Construction and Operational Noise TAMT Final PEIR Mitigation Measures to Proposed Project Draft SEIR Mitigation Measures	4.4-27
4.4-18	Calculated Vibration Levels and Human Response – Construction (Phase I or Phase II)	4.4-30
4.4-19	Calculated Noise Levels – Full Operation, Option A (Interior Truck Loading) vs. Measured Ambient Noise (dBA).....	4.4-32
4.4-20	Calculated Noise Levels – Full Operation, Option B (Exterior Truck Loading) vs. Measured Ambient Noise (dBA).....	4.4-32
4.4-21	Calculated Noise Levels –Project Construction vs. Measured Ambient Noise (dBA)	4.4-34
4.4-22	Calculated Noise Levels – Mitsubishi Phase I Construction & Transit Shed #2 Demolition vs. Measured Ambient Noise (dBA)	4.4-35
4.4-23	Comparison of Construction Noise TAMT Final PEIR Mitigation Measures to Proposed Project Draft SEIR Mitigation Measures	4.4-37
4.5-1	Comparison Of Study Area Roadway Conditions.....	4.5-3
4.5-2	Comparison Of Study Area Intersection Conditions	4.5-4
4.5-3	Trip Generation From STC Alternative	4.5-8
4.5-4	Peak Project Operational Trip Generation.....	4.5-8
4.5-5	Construction Trip Generation	4.5-9
4.5-6	Comparison off TAMT Final PEIR Thresholds And New Appendix G Checklist Questions	4.5-10
4.5-7	Study Area Intersections 2019 Conditions And Project Construction Traffic.....	4.5-16
4.5-8	Study Area Street Segments 2019 Conditions And Project Construction Traffic	4.5-17
4.5-9	Comparison of Construction and Operational Traffic TAMT Final PEIR Mitigation Measures to Proposed Project Draft SEIR Mitigation Measures	4.5-22
4.5-10	Comparison of Parking TAMT Final PEIR Mitigation Measures to Proposed Project Draft SEIR Mitigation Measures	4.5-30
5-1	Cumulative Projects	5-3
5-2	City of San Diego Traffic Impact Significance Thresholds	5-20
5-3	Current Cumulative Project Trip Generation	5-21
5-4	Comparison of Study Area Near-Term Roadway Conditions.....	5-22
5-5	Comparison of Study Area Near-Term Intersection Conditions	5-23
5-6	Comparison of Study Area Future Year Freeway Conditions.....	5-25
5-7	Study Area Street Segments Near-Term Base Conditions and Project Construction Traffic.....	5-29

5-8	Study Area Intersections Near-Term Base Conditions and Project Construction Traffic	5-30
6-1	Effects Found Not to Be Significant	6-5
7-1	Potential Alternate District Parcel Locations	7-3

Figures

ES-1	Regional Map	ES-4
ES-2	Aerial View of Project Site	ES-5
ES-3	Overall Site Plan for Option A (Interior Truck Loading Racks)	ES-7
ES-4	Overall Site Plan for Option B (Exterior Truck Loading Racks).....	ES-8
2-1	Regional Map	2-3
2-2	Aerial View of Project Site	2-4
2-3	Project Site Layout	2-5
3-1	Overall Site Plan for Option A (Interior Truck Loading Racks)	3-4
3-2	Overall Site Plan for Option B (Exterior Truck Loading Racks).....	3-5
3-3	Sub-Option 1 (Subterranean Pipeline).....	3-6
3-4	Sub-Option 2 (Overhead Pipeline)	3-7
3-5	Site Plan for Bays C-7 and C-9, Option A (Interior Truck Loading).....	3-8
3-6	Site Plan for Bays C-7 and C-9, Option B (Exterior Truck Loading)	3-9
3-7	West Elevation View, Options A and B	3-10
3-8	Site Plan for Bays C-8 and C-10, Option A (Interior Truck Loading).....	3-12
3-9	Site Plan for Bays C-8 and C-10, Option B (Exterior Truck Loading)	3-13
4.4-1	Noise Measurement Locations	4.4-4
4.4-2	Phase I Daytime Construction Noise Contour Map (Leq,d)	4.4-21
4.4-3	Phase I Daytime Operation Option A (Interior Truck Loading) Noise Contour Map (Leq,d) ...	4.4-22
4.4-4	Full Daytime Operation Option A (Interior Truck Loading) Noise Contour Map (Leq,d)	4.4-23
4.4-5	Phase I Daytime Operation Option B (Exterior Truck Loading) Noise Contour Map (Leq,d)...	4.4-24
4.4-6	Full Daytime Operation Option B (Exterior Truck Loading) Noise Contour Map (Leq,d).....	4.4-25
4.5-1	Traffic Volumes in TAMT Final PEIR Near-Term 2021 Conditions (Estimated).....	4.5-5
4.5-2	Traffic Volumes in 2019 (Measured)	4.5-6
4.5-3	Total Project Traffic Volumes.....	4.5-18
5-1	Cumulative Projects	5-9

Acronyms

AB	Assembly Bill
ACM	asbestos containing materials
AQIA	Air Quality Impact Analysis
ARB	California Air Resources Board
ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
BAU	business as usual
bgs	below ground surface
BMPs	best management practices
BNSF	Burlington Northern Santa Fe

CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CAPP	Community Air Protection Program
CARB	California Air Resources Board
CCMC	City of Coronado Municipal Code
CDP	Coastal Development Permit
CDPH	California Department of Public Health
CEQA	Environmental Quality Act
CHHSL	California Human Health Screening Level
CNEL	Community Equivalent Noise Level
CSLC	California State Lands Commission
cy	cubic yards
dB	decibel
dba	A-weighted decibels
DEH	Department of Environmental Health
District	San Diego Unified Port District
DPM	diesel particulate matter
DWT	deadweight tonnage
EIR	environmental impact report
EO	Executive Order
EPA	U.S. Environmental Protection Agency
FTA	Federal Transit Administration
GHG	greenhouse gas
HA	Hydrologic Area
HBMS	Hazardous Building Materials Survey
HFC	hydrofluorocarbon
HMTS	Hazardous Materials Technical Study
HPD	Harbor Police Department
I-	Interstate
ILV	Intersection Lane Volume
LCFS	Low Carbon Fuel Standard
LCS	lead-containing surfaces
LEA	Local Enforcement Agency
LOS	level of service
mg/cm ²	milligrams per centimeter square
mg/kg	milligrams per kilogram
MICR	maximum incremental cancer risk
Mitsubishi	Mitsubishi Cement Corporation
MMRP	Mitigation and Monitoring Reporting Program
MPC	Maximum Practical Capacity
MT/yr	metric tons per year
MTCO ₂ e	metric tons of carbon dioxide equivalent
NAAQS	national ambient air quality standards
NESHAP	National Emissions Standards for Hazardous Air Pollutants
NMTs	noise monitoring terminals

NO	nitric oxide
NO ₂	nitrogen dioxide
NOP	Notice of Preparation
NO _x	nitrogen oxides
OCPs	organochlorine pesticides
OEHHA	Office of Environmental Health Hazard Assessment
OGV	ocean-going vessels
OPPs	organophosphorus pesticides
Pathways	Pathways to Zero and Near-Zero Emissions
PCBs	polychlorinated biphenyls
PCE	Passenger Car Equivalent
PM	particulate matter
PM ₁₀	particulate matter less than or equal to 10 microns in diameter
PM _{2.5}	particulate matter less than or equal to 2.5 microns in diameter
PMP	Port Master Plan
Port Act	San Diego Unified Port District Act
Project or Proposed Project	Warehouse C: Bulk Cement Warehouse and Loading Facility Project
RAQS	San Diego Regional Air Quality Strategy
ReCAP	Regional Climate Action Planning Framework
RNM	roving noise monitor
ROG	reactive organic gas
RoRo	roll-on/roll-off
RPS	Renewable Portfolio Standard
RWQCB	Regional Water Quality Control Board
SANDAG	San Diego Association of Governments
SB	Senate Bill
SCAQMD	South Coast Air Quality Management District
SDAB	San Diego Air Basin
SDAPCD	San Diego Air Pollution Control District
SDFD	San Diego Fire-Rescue Department
SDG&E	San Diego Gas & Electric Company's
SDPD	San Diego Police Department
SEIR	subsequent environmental impact report
SIP	State Implementation Plan
SJVAPCD	San Joaquin Valley Air Pollution Control District
SLCP	Short-Lived Climate Pollutant
SLTs	significance level thresholds
SO ₂	sulfur dioxide
SR	State Route
STC Alternative	Sustainable Terminal Capacity Alternative
STC	Sustainable Terminal Capacity
SWPPPs	Stormwater Pollution Prevention Plans
TACs	toxic air contaminants
TAMT	Tenth Avenue Marine Terminal
TAMT Final PEIR	Final Environmental Impact Report: Tenth Avenue Marine Terminal Redevelopment Plan and Demolition and Initial Rail Component
TDM	Transportation Demand Management

TPH	total petroleum hydrocarbons
USACE	U.S. Army Corps of Engineers
VHFHSZ	Very High Fire Hazard Severity Zone
VOC	volatile organic compound
VSR	vessel speed reduction

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Executive Summary

Introduction

This chapter provides a summary of the Draft Subsequent Environmental Impact Report (SEIR) prepared for the Warehouse C: Bulk Cement Warehouse and Loading Facility Project (Project or Proposed Project), prepared in compliance with the California Environmental Quality Act (CEQA). The San Diego Unified Port District (District) is the CEQA Lead Agency for the SEIR and, as such, has the primary responsibility for evaluating the environmental effects of the Proposed Project and considering whether to approve the Proposed Project in light of these effects.

The District has determined that the Proposed Project falls within the broader scope of the Tenth Avenue Marine Terminal Redevelopment Program and the associated *Final Environmental Impact Report: Tenth Avenue Marine Terminal Redevelopment Plan and Demolition and Initial Rail Component* (TAMT Final PEIR; ICF 2016) certified by the District in December 2016 (UPD #EIR-2015-39; State Clearinghouse # 2015031046; Clerk Document Number 65901). Therefore, the District has prepared this SEIR to evaluate environmental impacts associated with the implementation of the Proposed Project.

As required by CEQA, this Draft SEIR: (1) describes the proposed project, including its location, objectives, and features; (2) describes the existing conditions at the project site and nearby environs; (3) analyzes the direct, indirect, and cumulative adverse physical effects that would occur on the existing conditions should the proposed project be implemented; (4) identifies feasible means of avoiding or substantially lessening the significant adverse effects; (5) provides a determination of significance for each impact after mitigation is incorporated; and (6) evaluates a reasonable range of feasible alternatives to the proposed project that would meet the basic project objectives and reduce a project-related significant impact.

This Executive Summary covers the following topics: (1) Project Description; (2) Areas of Controversy/Issues Raised by Agencies and the Public; and (3) Issues to Be Resolved, including significant environmental effects and the consideration of alternatives to the proposed project.

Project Description

Project Background and Overview

TAMT Redevelopment Plan

The TAMT is located along San Diego Bay, south of downtown San Diego, east of the San Diego Convention Center and the Hilton San Diego Bayfront Hotel, and adjacent to the San Diego community of Barrio Logan. The TAMT Redevelopment Plan proposed a variety of infrastructure improvements, reconfigurations, and operations that may be undertaken over the long-term at TAMT to improve the terminal's capabilities and capacity. As identified in the TAMT Final PEIR, berthing capacity at the TAMT has been deemed adequate for the increased capacity and capabilities forecasted by the TAMT Redevelopment Plan; therefore, the TAMT Final PEIR analyzed landside improvements, reconfiguration of the TAMT, and future operations. No waterside improvements and no dredging were proposed within the TAMT Redevelopment Plan or analyzed within the TAMT Final PEIR.

The Sustainable Terminal Capacity Alternative (STC Alternative), a reduced project alternative for the terminal buildout and operations that was analyzed in the TAMT Final PEIR, was adopted by the Board of

Port Commissioners (Board) by Resolution No. 2016-200. Table ES-1 provides the throughput quantities analyzed in the TAMT Final PEIR.

Table ES-1. Throughput Scenario Analyzed within the TAMT Final PEIR

Cargo Nodes	Sustainable Terminal Capacity (MT/yr)
Dry Bulk	1,987,500
Refrigerated Containers	1,716,000
Multipurpose General Cargo	733,050
Liquid Bulk	239,017
Total Throughput	4,675,567

MT/yr = metric tons per year

Since the certification of the TAMT Final PEIR, the Board has adopted two CEQA Addenda. The *1st Addendum to the TAMT Final PEIR* was approved in July 2017 to address minor modifications based on the final engineering design of the Demolition and Initial Rail Component (adopted by the Board by Resolution No. 2017-100, SCH #2015031046; Clerk Document No. 67004). The modifications included larger on-terminal office facilities, elimination of a potential third airbrake system from the project, and additional quantities of soil excavation, as well as the addition of project-specific details for stormwater and conduit/electrical improvements programmatically identified in the TAMT Final PEIR. The *2nd Addendum to the TAMT Final PEIR* was approved in April 2018 to implement and install a renewable microgrid (adopted by the Board by Resolution No. 2018-061, SCH # 2015031046; Clerk Document No. 68288) to satisfy a portion of TAMT Final PEIR Mitigation Measure GHG-6.

The TAMT Final PEIR, associated Mitigation, Monitoring, and Reporting Program (MMRP), addenda, and CEQA Findings of Fact and Statement of Overriding Consideration for the TAMT Redevelopment Plan are incorporated herein by reference pursuant to State CEQA Guidelines Sections 15150 and are available at:

<https://www.portofsandiego.org/environment/environmental-downloads/land-use-planning.html>

The documents are also available at the San Diego Unified Port District Administration Building, Office of the District Clerk, located at 3165 Pacific Highway, San Diego, CA 92101.

Proposed Project

The Proposed Project would entail the construction and operation of a cement and cementitious material import, storage, and distribution facility within the TAMT. This facility would include the potential for two separate phases of improvements to Bays C-7 through C-10 of Warehouse C for the receipt, storage, and distribution of up to 600,000 metric tons per year (MT/yr) of cement and cementitious materials including, but not limited to, cement, slag, fly ash, and pozzolans. The cementitious material would be pneumatically¹ unloaded into Warehouse C from dry bulk cargo ships using mobile vacuum unloaders. There would be up to 24 vessel calls per year at Berths 10-7/10-8 during peak operation. The operational lifetime of the Proposed Project is anticipated to be 15 years following District approval of a lease or similarly binding agreement. The proposed term of that agreement would be 5 years with two 5-year options to extend, for a maximum total of 15 years. Approval of the Proposed Project would also require

¹ Pneumatic unloading involves transporting bulk materials through a pipeline via either a negative (i.e., vacuum) or positive (i.e., pressurized air) gas stream.

issuance of a non-appealable Coastal Development Permit (CDP) by the District prior to development and operation.

Project Location

The Proposed Project site is located at 645 Switzer Street on the District's TAMT. The TAMT is located along San Diego Bay, south of downtown San Diego, east of the San Diego Convention Center and the Hilton San Diego Bayfront Hotel, and adjacent to the San Diego community of Barrio Logan. Harbor Drive is located near the northern boundary of the TAMT. Site access from Harbor Drive is provided primarily from Cesar E. Chavez Parkway, which becomes Crosby Road as it approaches the TAMT.

Major circulation facilities in the area include State Route 75 (SR-75), also known as the Coronado Bridge, approximately 0.25 mile to the south, and Interstate 5 (I-5), approximately 0.5 mile to the north. Figure ES-1 provides a regional map of the Proposed Project's location. Figure ES-2 provides an aerial view of the Proposed Project site.

Project Objectives

The majority of cementitious material used within San Diego County is trucked in from outside its jurisdictional boundaries. This includes cementitious material shipped primarily from foreign sources to other U.S. ports. To reduce the amount of cementitious material trucked in from outside the local area, Mitsubishi Cement Corporation (Mitsubishi) is proposing to use the west end of Warehouse C to import up to 600,000 MT/yr of cementitious material. The objectives for the Proposed Project are as follows:

1. Establish a terminal facility in the San Diego region to receive delivery and provide for the storage and distribution of up to 600,000 MT/yr of cementitious materials to meet current and future cement demand in the greater San Diego region.
2. Eliminate or substantially reduce truck trips and distances from other more distant ports which presently deliver cementitious material necessary to serve the San Diego region.
3. Establish a facility with onsite storage capacity sufficient to provide for the efficient offloading of bulk ships delivering cementitious materials and loading of bulk cement trucks.
4. Establish an efficient, state-of-the-art facility that is sufficiently flexible to allow for unloading, separate storage, and distribution of a diverse range of cementitious products, including, but not limited to, cement, slag, fly ash, and pozzolans, which, in turn, facilitates the use of more environmentally sustainable concrete.
5. Establish a cementitious import operation facility at TAMT that is consistent with anticipated dry bulk throughput and operational capacities in the TAMT Redevelopment Plan under the Sustainable Terminal Capacity Alternative, adopted by the District while maintaining environmental sustainability.
6. Utilize existing berths and Port infrastructure and, in doing so, optimize the use of land and identify improvements and upgrade infrastructure necessary for the Proposed Project, consistent with the objectives of the TAMT Plan.

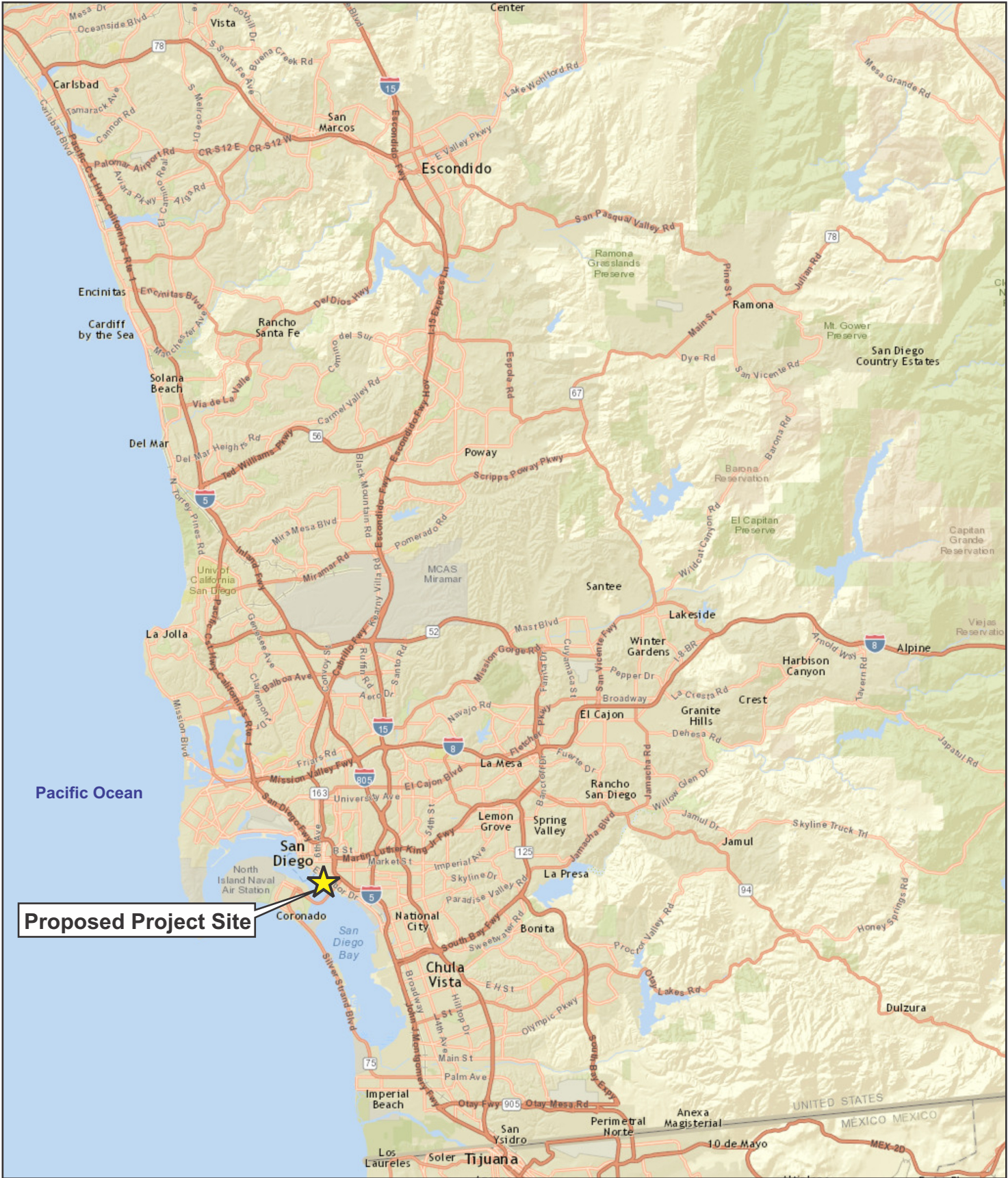
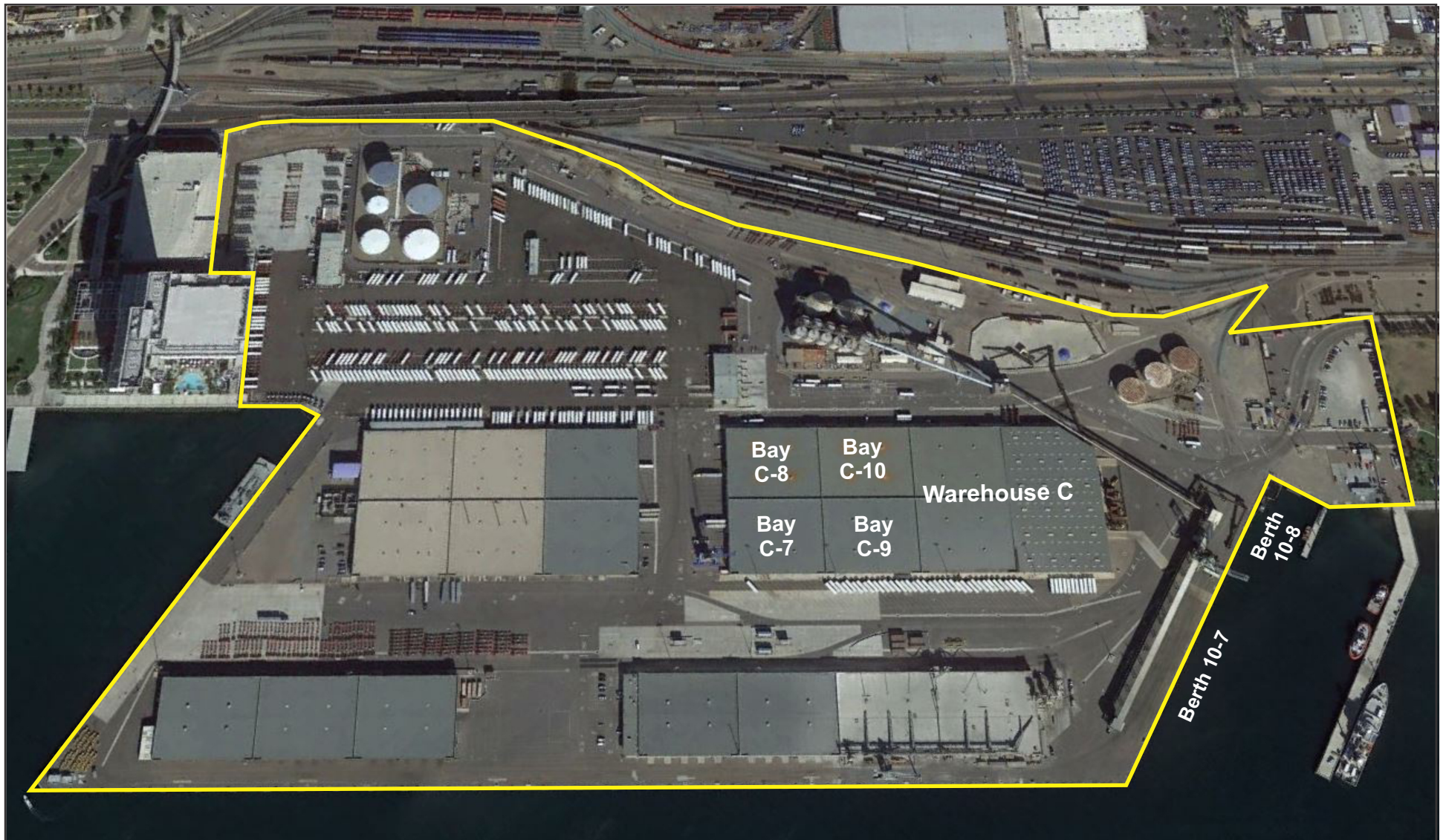
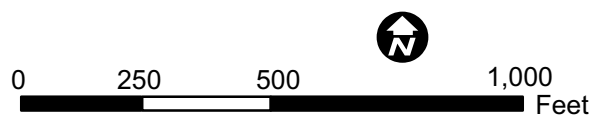


Figure ES-1
Regional Map



Source: GoogleEarth, 2017.



 Tenth Avenue Marine Terminal Boundary

Figure ES-2
Aerial View of Project Site

Project Components

The Proposed Project involves phased modifications to Bays C-7 through C-10 of TAMT Warehouse C to import, store, and distribute approximately 600,000 MT/yr of cement and cementitious material. The cementitious material would be pneumatically unloaded into Warehouse C from dry bulk cargo ships using up to two 400 MT mobile vacuum unloaders at maximum operation.

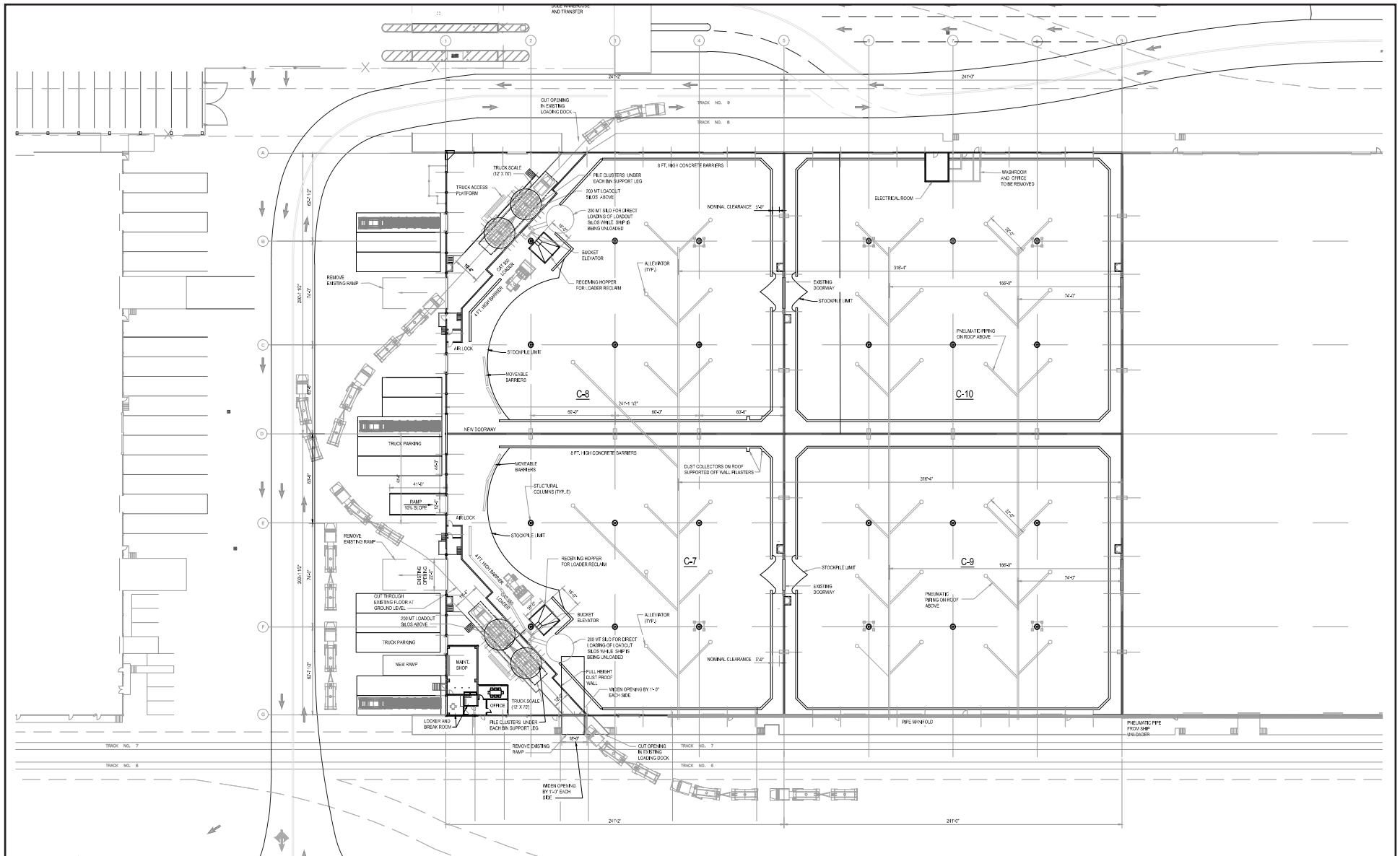
Notably, the Proposed Project's potential dry bulk cargo throughput of up to 600,000 MT/yr would be within the scope of the 1,987,500 MT/yr of dry bulk throughput analyzed in the TAMT Final PEIR. As the Proposed Project is the first large-scale project proposed by a third-party applicant at TAMT since certification of the TAMT Final PEIR in December 2016, and is the first to tier off of the TAMT Final PEIR, none of the capacity of the 1,987,500 MT/yr has been drawn down, with the exception of the existing dry bulk cargo throughput already taking place at TAMT (i.e., 289,864 MT/yr). As such, after the 600,000 MT/yr associated with the Proposed Project is removed, the capacity analyzed in the TAMT Final PEIR that would remain for future dry bulk projects would be 1,097,636 MT/yr.

The Proposed Project differs from the dry bulk project component analyzed in the TAMT Final PEIR in that it includes dry bulk operations for a maximum of 15 years at Warehouse C, which is proposed to be demolished to make way for a multipurpose general cargo area under the TAMT Final PEIR. The TAMT Final PEIR identified a consolidated dry bulk operating node that will be located on approximately 15 acres in the southeastern portion of the TAMT (known as the terminal "backlands"). However, like the Proposed Project, the TAMT Final PEIR assumed the dry bulk node would be served primarily by Berths 10-7/10-8. The TAMT Final PEIR analyzed dry bulk node improvements including construction of a consolidated multipurpose 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; the Proposed Project's upgrades to Warehouse C would serve this same purpose at a slightly different location and would require less new infrastructure and leave the possibility of demolishing Warehouse C to a later time, possibly after the lease's expiration or termination. Over the long-term, however, the dry bulk operating node is still planned to be located in a consolidated facility on "backlands" of the TAMT.

The operational lifetime of the Proposed Project is anticipated to be 15 years following District approval of a lease or similarly binding agreement. The proposed term of that agreement would be 5 years with two 5-year options to extend, for a maximum total of 15 years.

Project Construction

There are two loading options for the Proposed Project analyzed in this SEIR, both of which have alternative construction scenarios. Under either of these options, operational throughput of materials and other operational characteristics would remain the same. Loading Option A proposes truck loading inside Warehouse C, and Loading Option B proposes truck loading outside of Warehouse C. Overall site plans for Loading Option A (Interior Truck Loading) and Loading Option B (Exterior Truck Loading) are presented in Figures ES-3 and ES-4, respectively.



Source: Source: Environmental Audit, Inc. 2018

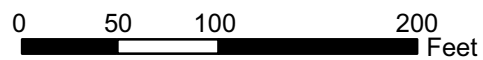
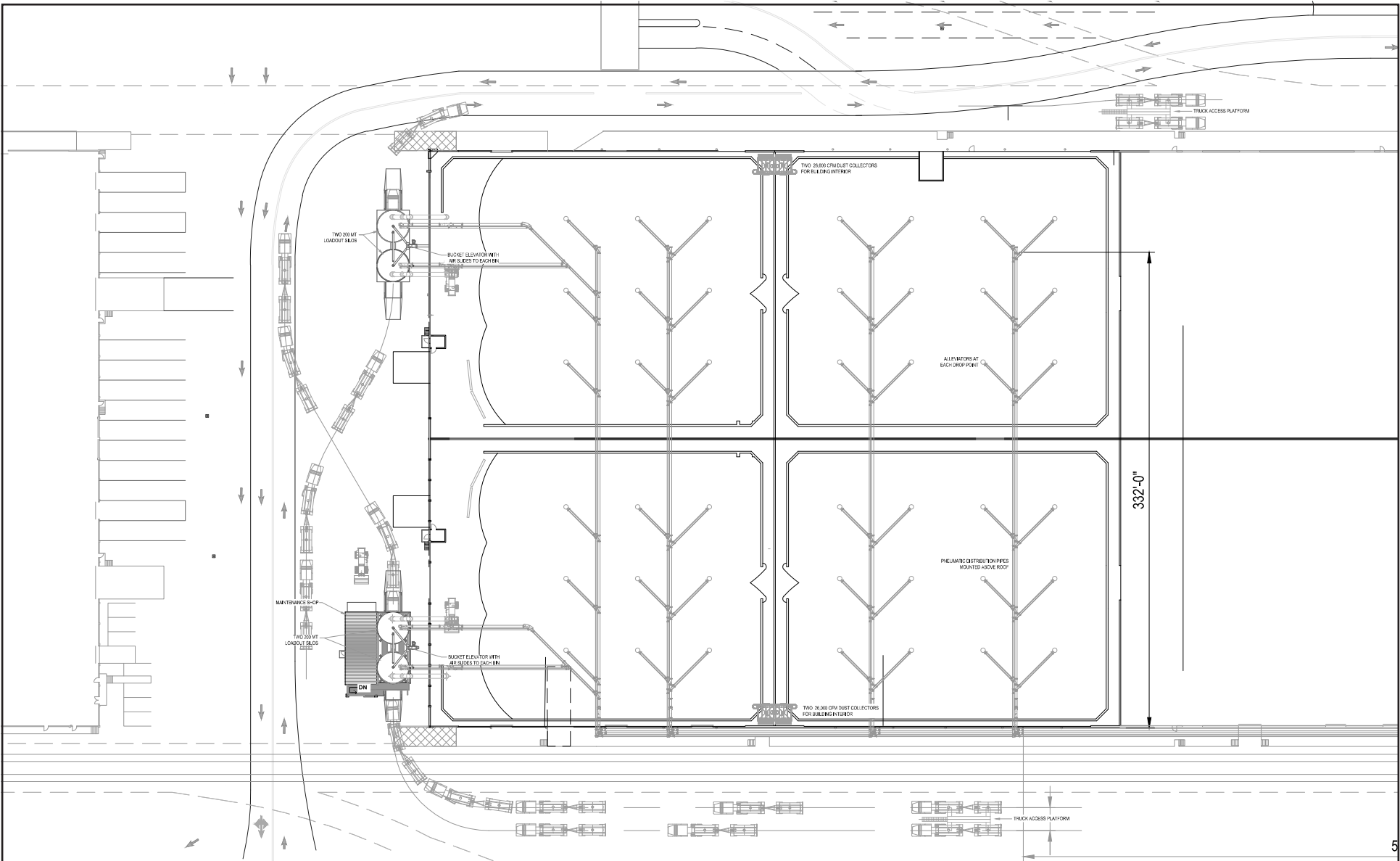


Figure ES-3

Overall Site Plan for Option A (Interior Truck Loading Racks)



Source: Source: Environmental Audit, Inc. 2018

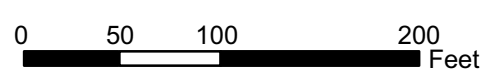


Figure ES-4

Overall Site Plan for Option B (Exterior Truck Loading Racks)

Under Loading Option A (Interior Truck Loading) and Loading Option B (Exterior Truck Loading), there are also two unloading options related to the proposed ship-to-warehouse unloading pipelines. Unloading Option 1 (Underground Pipeline) would allow for cementitious material to be pneumatically transferred to Warehouse C through an approximately 150-foot underground unloading pipeline, which would then be routed along the top edge of Warehouse C. The underground unloading pipeline would be 6 feet below the ground. Unloading Option 2 (Overhead Pipeline) would allow for cementitious material to be pneumatically transferred to Warehouse C through an approximately 150-foot overhead, unloading pipeline that would continue along the top edge of Warehouse C. The overhead pipeline would be 40 feet above ground. The pipeline alignment would be the same under both unloading options.

Construction of Loading Option A1 (truck loading inside Warehouse C with the underground unloading pipeline) would require a worst-case maximum excavation of approximately 20,220 cubic yards (cy) of material. Loading Option B1 (truck loading outside Warehouse C with the underground unloading pipeline) would require a maximum excavation of 19,540 cy of material. Total excavation activities for Loading Option A and Loading Option B, and Unloading Option 1 and Unloading Option 2 are detailed in Table ES-2.

Table ES-2. Summary of Excavation Activities (cubic yards)

Construction Option	Excavation	Imports	Export
Loading Option A (Interior Truck Loading)	19,520	19,520	Soil: 19,520 Asphalt: 3,560
Loading Option B (Exterior Truck Loading)	17,440	17,440	Soil: 17,440 Asphalt: 300
Unloading Option 1 (Underground Pipeline)	700	700	Soil: 100 Asphalt: 100
Unloading Option 2 (Overhead Pipeline)	230	0	Soil: 230 Asphalt: 30

Construction of the Proposed Project would occur in two phases (Phase I and Phase II). Bays C-7 and C-9 are anticipated to be upgraded first (Phase I), followed by Bays C-8 and C-10 (Phase II). The improvements would involve five principal construction activities: (1) concrete demolition and excavation, (2) foundation and concrete pouring (which includes the installation of the support piles for the truck loadout area), (3) roof demolition and repair, (4) installation of mechanical equipment, and (5) electrical tie-ins. Phase I improvements would take an estimated 7–10 months to complete. Upon completion of Phase I, the Proposed Project would have a throughput of up to 600,000 MT/yr of cementitious material.

Phase I of the Proposed Project would involve improvements to Bays C-7 and C-9, as follows:

- Sealing the storage bays to prevent cementitious material loss through joints and seams.
- Installing a truck loading rack, either inside or outside Bay C-7, equipped with two 200 MT silos (approximately 67 feet high) with dust control truck loading spouts.
- Installing one 12-foot by 70-foot truck scale.
- Installing piping to each bay to pneumatically transfer cementitious material from the dock to the warehouse.

- Installing a reclaim hopper, air slide, screw conveyor, and bucket elevator in the truck loading areas to mechanically transfer cementitious material from the warehouse C bays to the silos.²
- Potential structural upgrades to the roof of Warehouse C, installation of roof-mounted piping, and a berthside unloader for the pneumatic transfer of cementitious material from ships to the cementitious material storage areas.
- Installing two 26,000 cubic feet per minute dust collectors on the roof to control dust emissions from the storage areas and truck loading racks.
- Upgrading electrical equipment to support the electrical demand of the Proposed Project's operation.

The tallest of the construction equipment involved in these construction activities would be the 100-ton crane, which would have a maximum height of 180 feet.

Phase II improvements to Bays C-8 and C-10 are anticipated to begin 2–3 years after Phase I is operational. These improvements (with the exception of the installation of underground piping, which only would occur during Phase I improvements) would be identical to those undertaken for Bays C-7 and C-9, and would require approximately 7–10 months to construct. At the completion of Phase II improvements, the maximum annual throughput would remain the same; however, the additional equipment and storage would allow more flexible operations (e.g., store multiple cementitious materials concurrently within the warehouse bays) and improved ability to respond to seasonal and other market fluctuations.

Because the Proposed Project's construction would be undertaken in phases, its implementation would also involve the installation of temporary construction modular buildings and utilities within Warehouse C, as well as their removal upon completion of construction of Phase II. Construction materials would be stockpiled within different bays in Warehouse C.

For the interior truck loading option (Loading Option A), the office, break room, and maintenance areas would be located inside Warehouse C. For the exterior truck loading (Loading Option B), the office, break room, and maintenance areas would be built onto the Phase I truck loadout and housed in a 48-foot by 20-foot, two-story addition located on the west side of the truck loadout. The addition would share a common wall with the truck loadout and would have the same exterior siding.

All modifications would be made within the existing footprint of the Warehouse C and areas immediately adjacent to the warehouse. Bays C-7 through C-10 have a combined gross floor area of 192,000 square feet. The roof height would remain unchanged; however, the silos and dust collectors would extend approximately 23 feet above the existing roof height. The tallest units would be the dust collector stacks at approximately 40 feet above the roof; the equipment added to the roof would have a total maximum height of approximately 75 feet above grade.

The excavated area for the truck loading racks would be compacted and capped with reinforced concrete to support trucks, and the warehouse area would be excavated, compacted, and filled with structural fill

² Cement and cementitious materials would be fed, conveyed, elevated, stored, and measured through a series of equipment primarily consisting of reclaim hoppers, air slides, screw conveyors, bucket elevators, and holding silos. In the bucket elevator, a chain or belt carries a series of evenly spaced buckets that receive the cement or cementitious material at the lower entry chute/hopper and carry it over the top sprocket, where it is discharged due to a combination of gravitational and centrifugal effects. In the screw conveyor, the cement or cementitious material partially fills the voids between flights and is transported due to the rotating screw effect. Over-filling inhibits transport due to rotation of the particulate material. An air slide is a pneumatic fluidized conveyor that moves the cement or cementitious materials.

and capped with reinforced concrete to support equipment and cementitious material. The Proposed Project would not change the amount of impervious surface or alter existing drainage patterns.

To support the Proposed Project's truck loadouts, between 30 and 40 support piles per truck loadout spaced 12 to 14 feet center-to-center would be installed. The piles would be installed at the TAMT to at least 45 feet below grade and up to 90 feet below grade. The piles are expected to be one of three pile types: (1) auger cast; (2) cast-in-drilled hole; or (3) driven, if rig access is available.

No changes would be made to onsite parking. A number of parking spaces are available within the TAMT; however, the majority of these parking spaces are not marked in order to provide maximum flexibility for existing operations. The area immediately adjacent to the east side of Warehouse C could accommodate up to 85 passenger vehicles, and is proposed to service the Proposed Project.

No changes to the site's existing drainage system are proposed; only domestic waste would be discharged into the existing sewer system. Additionally, no changes to the existing piles at Berths 10-7/10-8 are proposed, and no in-water activity, such as dredging or fill, is proposed or required.

The estimated maximum number of onsite construction personnel would be 50 over one shift. Construction staging would occur within the TAMT and would avoid existing operations. The workforce is expected to be drawn from the local region.

Project Operations

The Proposed Project would be implemented in two phases. The facility would become operational following the completion of Phase I construction and have an estimated maximum loading, storage, and distribution capacity of 600,000 MT/yr. Based upon market demand, Phase II construction is expected to occur 2–3 years after Phase I becomes operational. At the conclusion of Phase II construction, the maximum annual throughput proposed by Mitsubishi would remain the same; however, the additional equipment and storage would allow more flexible operations and improved ability to respond to seasonal and other market fluctuations. The Proposed Project's 600,000 MT annual throughput would be considered new throughput, over and above the dry bulk throughput of 289,864 MT/yr identified in the TAMT Final PEIR as part of existing baseline conditions. However, the Proposed Project's projected throughput would still be under the total estimated future dry bulk throughput of 1,987,500 MT/yr that was analyzed within the certified TAMT Final PEIR as part of the approved STC Alternative.

At maximum operation, the Proposed Project is anticipated to unload and distribute approximately 600,000 MT of cementitious material annually. Although the demand for cementitious material fluctuates due to seasonal and economic factors, once at full throughput it is estimated that the facility would generate approximately 24,000 round-trip truck trips annually. Each truck has an average carrying capacity of 25 MT. As such, it is anticipated that over a 365-day period there would be approximately 67 total truck trips per day. When the maximum loading capabilities are considered, peak days may experience up to 176 total truck trips, but no more than 145 trucks per day on a 30-day rolling average.

The Proposed Project would add up to 24 vessel calls per year at Berths 10-7/10-8. Depending on market availability, the origins of the vessels are anticipated to include Asia, South America, Mexico, or elsewhere. The vessels would be dry-bulk ocean-going vessels with a minimum holding of 20,000 MT to a maximum holding capacity of 40,000 MT of deadweight tonnage (DWT). At maximum operation, it is anticipated that each vessel would be at berth for 168 hours (7 days), and that two 400 MT unloaders would be used. The vessels would hotel at the berths continuously; however, actual unloading activities would occur for up to 20 hours per day in two work shifts. Table ES-3 provides a summary of at-berth vessel operations.

Table ES-3. Summary of At-Berth Vessel Operations (annual)

Proposed Project Phase	Number of Unloaders and Size	Hours at Berth ¹	Weight of Material Received	Number of Vessels
Phase I (Interim Operation – 600,000 MT)	One – 200 MT	144 to 216	20,000 MT to 40,000 MT	12 to 24
	One – 200 MT and One – 400 MT	144 to 192	20,000 MT to 40,000 MT	12 to 24
	Two – 400 MT	120 to 168	20,000 MT to 40,000 MT	12 to 24
Phase II (Maximum Operation – 600,000 MT)	One – 200 MT and One – 400 MT	144 to 192	20,000 MT to 40,000 MT	12 to 24
	Two – 400 MT	120 to 168	20,000 MT to 40,000 MT	12 to 24

¹ At Phase I, when one 200 MT unloader is in use, and 40,000 MT weight of material is received, it is anticipated that each vessel would be at berth for up to 216 hours. At completion of Phase II when two 400 MT unloaders are in use, and 40,000 MT weight of material is received, it is anticipated that each vessel would be at berth up to 168 hours.

The Proposed Project would require one full-time supervisor and up to three maintenance staff workers at all times, for a total of four onsite workers. Vessel unloading and truck loading operations are considered independent activities that may either occur at different times or simultaneously. During truck loading operations, up to three additional workers would be required, for a total of seven onsite workers per shift. During ship unloading operations, up to 16 workers per shift would be required. When vessel unloading and truck loading occur at the same time, up to 20 workers would be required, for a total of 24 onsite workers per shift for two shifts per day. During simultaneous operations, the Proposed Project would operate up to 20 hours per day for marine vessel unloading in two shifts for dock workers (7 a.m. to 5 p.m. and 5 p.m. to 3 a.m.), and 24 hours per day for Mitsubishi staff for truck loading.

The Proposed Project would be designed to service the San Diego area. The exact locations served would be dependent on customer needs, but for purposes of analysis, trucks are expected to travel between the Project site and the Riverside County line. Customers beyond the Riverside County line are expected to be more efficiently supplied by other sources of cement.

The truck fleet visiting the Proposed Project site would comply with the District's Clean Truck Program, which requires all trucks visiting the District to meet the California Air Resources Board's (CARB's) emissions standards. The trucks would follow the District's prescribed transportation routes to access and exit the facility to minimize effects on the surrounding community.

The Project proposes to install infrastructure during construction to allow for vessels to utilize a shore power system while at berth. The proposed shore power system is based on a method of connecting the ships dry-dock breaker to shore-based connections via cables. This method has previously been employed at Mitsubishi's Long Beach Terminal. The dry-dock breaker is the connection aboard the ship that allows the ship to receive shore power when the ship is berthed or dry-docked for maintenance. Mitsubishi is proposing to use shore power at an annual average rate of 50 percent of hoteling time (e.g., 84 hours on shore power and 84 hours on auxiliary engines per call). Cement unloading occurs in two phases. During free digging, the shore-side (electric) vacuum unloader removes the majority of the cement from each hold of the ship. During this period, power needs are low (e.g., lights, fans) and can be handled by the shore-side electricity via the dry-dock breaker. During the clean-out phase, a payloader is placed in the first hold and then moved about the holds using the on-board cranes. The cranes require more power than the dry-dock breaker can provide, so the shore power is disconnected and the ship's auxiliary engines are turned on to provide the power needs.

The Proposed Project would not require the installation of new outdoor lighting on the TAMT that could affect nighttime views. Lighting proposed by the Proposed Project would be consistent with the lighting proposed in the TAMT Final PEIR. The Proposed Project would include lighting on equipment as necessary to provide adequate illumination to safely access the equipment and facilities and provide security during Project operations, which include the off-loading of vessels. Lighting on the exterior of the warehouse would be limited to lighting required to provide safe working areas compliant with the Federal and State Occupational Safety and Health Administration's lighting requirements. The lighting would use LED bulbs and be mounted 10 feet above finished floors to structural steel or on stanchions. These fixtures would be industrial type with 90 degree cut wherever possible. As stated in the TAMT Final PEIR, lighting proposed would be consistent with Section 142.0740 of the City of San Diego Municipal Code, which incorporates the California Energy Code (California Code of Regulations, Title 24, Part 6) and Green Building Regulations (Chapter 14, Article 10), as well as light shielding standards (TAMT Final PEIR pg. 4.1-21).

The Proposed Project involves minimal potable water use. However, a small quantity of compressor condensate is expected to be generated that would discharge to the sanitary sewer. Therefore, no water treatment processes are proposed.

Cementitious material from the ship would be transferred to storage silos pneumatically through piping to a sealed building having emissions control, which would provide for minimal loss of cementitious material during handling. The Proposed Project is expected to routinely generate small quantities of office trash. Bags from the dust collectors would require change out (once every few years) in accordance with manufacturer's requirements and industrial bag house design. Materials collected by the dust collectors would be recycled back into the inventory. All solid waste would be transported to a local landfill.

The Proposed Project's portion of Warehouse C is serviced by two fire hydrants, one each on the water and land sides of the building. The Proposed Project involves the storage of cement and cementitious materials, which are noncombustible. Therefore, no unique fire precautions would be required during either construction or operation.

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 distributed an Initial Study (IS)/Notice of Preparation (NOP) to the State Clearinghouse, interested agencies, and groups on September 18, 2017, to solicit agency and public comments on the scope and content of the environmental analysis. Pursuant to State CEQA Guidelines Section 15082, recipients of the IS/NOP were requested to provide comments within 30 days after receipt of the IS/NOP. The 30-day IS/NOP public review period ended on October 18, 2017. A scoping meeting was held on September 27, 2017, at the District's Administration Building, Training Room, 3165 Pacific Highway, San Diego, CA 92101. Comments received during the IS/NOP public review period are summarized in Table 1-2 of Chapter 1, *Introduction*, and are included in SEIR Appendix A.

Nine comment letters were received during the IS/NOP public review period. The primary issues raised are related to air quality impacts, greenhouse gases (GHGs), traffic and circulation impacts on surrounding jurisdictions and specific intersections, water quality and drainage capacity, potential to encounter hazardous materials during excavation and ground disturbance, potential to encounter contaminated soils, identification of Project objectives, potential for nighttime noise and lighting during Project operations, sufficient onsite parking to support Project personnel, potential for Project impacts not identified in the TAMT Final PEIR, and protection of cultural and tribal cultural resources.

Issues to be Resolved

This Draft SEIR examines the potential environmental effects of the Proposed Project, including information related to existing site conditions, analyses of the types and magnitude of individual and cumulative environmental impacts, and feasible mitigation measures that could reduce or avoid environmental impacts. In accordance with Appendix G of the State CEQA Guidelines, the potential environmental effects of the proposed project were analyzed for the following areas:

- Air Quality and Health Risk
- Greenhouse Gas Emissions and Climate Change
- Hazards and Hazardous Materials
- Noise and Vibration
- Transportation, Circulation, and Parking

Table ES-4, presented at the end of this chapter, provides a summary of any new or more severe environmental impacts that could result from implementation of the Proposed Project and identifies new mitigation measures or applicable mitigation measures from the TAMT Final PEIR that would reduce or avoid the impacts. For each impact, Table ES-4 identifies the significance of the impact before mitigation, applicable mitigation measures, and the level of significance of the impact after the implementation of the mitigation measures. Impacts on aesthetics, agriculture and forestry resources, biological resources, cultural resources, energy, geology and soils, hydrology and water quality, land use and planning, mineral resources, population and housing, public services, recreation, tribal cultural resources, utilities, and wildfire are considered to be “Effects Found Not to be Significant,” in accordance with Section 15128 of the State CEQA Guidelines. These issues are discussed further in Chapter 6, *Additional Consequences of Project Implementation*.

Summary of Project Alternatives

The following alternatives are analyzed in detail in Chapter 7, *Alternatives to the Proposed Project*. The objective of the alternatives analysis is to consider a reasonable range of potentially feasible alternatives to foster informed decision-making and public participation. The alternatives to the Proposed Project are summarized below.

Alternative 1 – No Project Alternative

Analysis of the No Project Alternative (Alternative 1) considers the potential impacts that would occur if the Proposed Project was not implemented. The No Project Alternative assumes that no Project-related development would occur and none of the Project’s other components would be implemented. Under the No Project Alternative, the District would maintain existing conditions at the Project site, which is currently used for dry bulk handling and consists of dry bulk and equipment storage and two clerk shacks. Bays C-7 and C-9 of Warehouse C are currently vacant, while Bays C-8 and C-10 are currently occupied by a District tenant and used for the storage of bauxite. The existing Warehouse C facilities would be left intact under this alternative. No new development or upgrades to dry bulk cargo handling equipment would be implemented on this portion of the TAMT, and operations would continue under the existing physical conditions at the site. Similar to what was described for the No Project/No Build Alternative in the TAMT Final PEIR (TAMT Final PEIR page 7-7), growth at the project site would occur in an ad hoc manner, and due to the existing capacity constraints, the maximum annual dry bulk cargo throughput

would only reach approximately 400,000 million metric tons, as identified in Table 7-2 of the TAMT Final PEIR. Because no physical modifications would occur at the terminal, the No Project Alternative would potentially reduce one or more significant impacts that were identified for the Proposed Project—impacts which are consistent with those disclosed in the certified TAMT Final PEIR.

Alternative 2 – Reduced Throughput Alternative

The Reduced Throughput Alternative was selected to reduce the operational impacts of the Proposed Project, which are predominantly tied to throughput. Under the Reduced Throughput Alternative, the footprint and improvements to Warehouse C would be identical to the Proposed Project, but the scale of operation would be smaller. The Reduced Throughput Alternative would reduce the total amount of cementitious materials that would be imported and distributed under the Proposed Project to an amount less than 600,000 MT, resulting in a corresponding decrease in vessel calls and cargo handling activities that would depend on the overall reduction of throughput proposed.

Construction activities under the Reduced Throughput Alternative would be identical to the Proposed Project, including implementation of either Option A (Interior Truck Loading) or Option B (Exterior Truck Loading), as well as either Sub-Option 1 (Subterranean Pipeline) or Sub-Option 2 (Overhead Pipeline), as described in Chapter 3, *Project Description*, Section 3.3, *Project Construction*. Construction of this alternative would be completed in two phases (Phase I and Phase II), and the construction workforce, the schedule, and earth-disturbing activities for each phase would be identical to the Proposed Project.

It should be noted that the Board of Port Commissioners adopted the STC Alternative, a reduced project alternative for the TAMT's buildout and future operations, when it certified the TAMT Final PEIR in December 2016. Because the Proposed Project falls within the scope of the STC Alternative by proposing a throughput of up to 600,000 MT from a total STC Alternative–allotted amount of 1,987,500 MT, the throughput associated with Project operations has already been environmentally analyzed in the certified TAMT Final PEIR. As such, a Reduced Throughput Alternative would simply offset throughput at the Project site with more throughput from other dry bulk tenants at TAMT.

Environmentally Superior Alternative

Pursuant to CEQA, the EIR is required to identify the environmentally superior alternative. The Proposed Project would implement a project consistent with the approved STC Alternative identified in the TAMT Plan, the environmental effects of which were analyzed and approved in the TAMT Final PEIR. The Proposed Project would not result in any new or more severe significant environmental effects than what has been analyzed in the TAMT Final PEIR, as discussed and analyzed in Chapters 4, *Environmental Analysis*, and 5, *Cumulative Impacts*, of this SEIR. Additionally, no new or more severe significant impacts were identified as a result of a substantial change in circumstances or as a result of new information that was not known at the time of the TAMT Final PEIR's certification (December 2016) and which could not have been known at that time. Moreover, there are no mitigation measures or alternatives identified in the TAMT Final PEIR that were determined to be infeasible that are now feasible that have been declined to be adopted. However, the Reduced Throughput Alternative was carried forward for full analysis in addition to the No Project Alternative to provide a comparison of impacts to the Proposed Project. Based on the analysis in Section 7.5.1, the No Project Alternative would be the environmentally superior alternative. However, because the No Project Alternative cannot be the environmentally superior alternative per CEQA, the closest such alternative would be the Reduced Throughput Alternative because it may temporarily reduce throughput by limiting the amount allowed by the Proposed Project. Nevertheless, this reduction would be offset by other projects that propose dry bulk cargo throughput up to an amount allowed by the STC

Alternative. As such, any reduction of impacts associated with the Reduced Throughput Alternative would be temporary.

Summary of Project Impacts

In accordance with CEQA, Table ES-4 summarizes all potential impacts associated with the Proposed Project, and the recommended mitigation measures to reduce significant impacts to a level of less than significant, where applicable.

Table ES-4. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
4.1 Air Quality and Health Risk				
Project Impacts				
Violate an Air Quality Standard	No New or More Severe Impacts than Previously Identified in the TAMT Final PEIR	PS	<p>MM-AQ-1R: Implement Best Management Practices During Construction of Future TAMT Plan Components. The Mitsubishi Cement Corporation Project Proponent shall implement Best Management Practices (BMPs) to reduce air emissions from all construction activities implemented as part of the Proposed Project. The following measures are required to limit construction equipment exhaust from on-road trucks and heavy-duty equipment used during construction.</p> <ul style="list-style-type: none"> 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"). <p>In addition, the Mitsubishi Cement Corporation Project Proponent shall implement the relevant BMPs, consistent with the Project-specific industrial Storm Water Pollution Prevention Plan (SWPPP). In no case would any BMP be implemented if it conflicts with the SWPPP or other applicable water quality permit requirements. BMP dust control measures may include, but are not limited to, the following:</p> <ul style="list-style-type: none"> Water the grading areas at least twice daily to minimize fugitive dust. Stabilize graded areas as quickly as possible to minimize fugitive dust. 	LS

Table ES-4. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<ul style="list-style-type: none"> ▪ Apply chemical stabilizer or pave the last 100 feet of internal travel path within the construction site prior to public road entry. ▪ Install wheel washers adjacent to a paved apron prior to vehicle entry on public roads. ▪ Remove any visible track-out into traveled public streets within 30 minutes of occurrence. ▪ Wet wash the construction access point at the end of each workday if any vehicle travel on unpaved surfaces has occurred. ▪ Provide sufficient perimeter erosion control to prevent washout of silty material onto public roads. ▪ Cover haul trucks or maintain at least 12 inches of freeboard to reduce blow-off during hauling. ▪ Suspend all soil disturbance and travel on unpaved surfaces if winds exceed 25 mph. ▪ Cover/water onsite stockpiles of excavated material. ▪ Enforce a 15 mph speed limit on unpaved surfaces. ▪ 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. ▪ Develop as quickly as possible all disturbed areas as directed by the San Diego Unified Port District's Planning and Green Port Department and/or SDAPCD to reduce dust generation. ▪ Limit the daily grading volumes/area. <p>Prior to the commencement of construction activities, the Mitsubishi Cement Corporation Project Proponent shall submit evidence to the San Diego Unified Port District's Planning and Green Port Department of 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's Planning and Green Port Department during construction.</p>	

Table ES-4. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>MM-AQ-2R: Implement Diesel Emission-Reduction Measures During Construction and Operations of Future TAMT Plan Components. The Mitsubishi Cement Corporation Project Proponent shall implement the following measures during construction and project operations, subject to verification by the San Diego Unified Port District's Planning and Green Port Department.</p> <p>i. The Mitsubishi Cement Corporation Project Proponent 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. Clear signage regarding the limitation on idling time at the delivery driveway and loading areas has been installed on terminal to provide actual notice of this requirement to all drivers. This measure shall be enforced by the terminal supervisors or by a Port designated functional-equivalent, who will submit quarterly reports of violators to San Diego Unified Port District's Planning and Green Port Department 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 San Diego Unified Port District's Planning and Green Port Department 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.</p> <p>ii. The Mitsubishi Cement Corporation 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 Mitsubishi Cement Corporation 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 Mitsubishi Cement Corporation Project Proponent shall submit a report by the certified mechanic of the condition of the construction and operations vehicles and</p>	

Table ES-4. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>equipment to the San Diego Unified Port District's Engineering Department during the construction phase and the Planning and Green Port Department during the operation phase prior to commencement of their use.</p> <p>MM-AQ-3R: Comply with San Diego Unified Port District Climate Action Plan Measures. Prior to approval of all discretionary actions and/or Coastal Development Permits, the Mitsubishi Cement Corporation 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"> ▪ Vessels shall comply with the San Diego Unified Port District's voluntary vessel speed reduction program, which targets 80 percent compliance. ▪ Vessels that are subject to CARB's at-berth regulation (dry bulk vessels are not subject to the at-berth regulation) shall comply with ARB's at berth regulation that requires shore power or alternative control technology regulation for certain vessel fleets for 80 percent of eligible calls by 2020, minus idle time to clear customs consistent with California Air Resources Board regulations. The TAMT Final PEIR assumed 1.5 hours of idle time for vessels to embark/disembark, which applies to all shore power and/or alternative control technologies employed at the terminal. This is a Project feature made into a mitigation measure to ensure compliance (see MM-AQ-9 for an explanation of the Proposed Project's shore power features). ▪ Designated truck haul routes shall be used, and the Project Proponent shall decrease onsite movements where practicable. ▪ No commercial drive-through shall be implemented. ▪ 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 65 percent of all 	

Table ES-4. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>construction debris. This measure shall be applied during construction and operation of the Proposed Project.</p> <ul style="list-style-type: none"> 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. 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 San Diego Unified Port District's Planning and Green Port Department by the Project Proponent on an annual basis through the end of the lease or 2035 (buildout of the TAMT Plan), whichever occurs first. <p>MM-AQ-4R: Implement Best Available Control Technologies for Conveyor System and Bulk Discharge Unloader for Future Dry Bulk Operations associated with the TAMT Plan. As a condition of approval of any new or amended real estate agreement or Coastal Development Permit for the Mitsubishi Cement Corporation Project that would result in an increase in daily or annual throughput over baseline conditions identified in the TAMT Final PEIR, the San Diego Unified Port District shall require the Mitsubishi Cement Corporation Project Proponent to install and use the best available control technologies to achieve a minimum 95% control efficiency for particulate matter by bypassing the existing Conveyor System and Bulk Discharge Unloader and installing a new Conveyor System and Bulk Discharge Unloader that meets the minimum 95% control efficiency.</p> <p>Under no circumstance shall the 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</p>	

Table ES-4. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>with this mitigation measure to the San Diego Unified Port District on an annual basis through the end of the lease.</p> <p>MM-AQ-5R: Implement Enhanced Vessel Speed Reduction Program Beyond Climate Action Plan Compliance for Future Operations Associated with the TAMT Plan. The Mitsubishi Cement Corporation shall be required to comply with the Enhanced VSR Program.</p> <p>The Mitsubishi Cement Corporation shall, beginning with the first vessel call to the Port, comply with 80% of its OGVs reducing their speeds to 12 knots or less starting at 20 nautical miles from Point Loma.</p> <p>The Mitsubishi Cement Corporation shall comply with 90% of its OGVs calling to the Port, reduce their speeds to 12 knots starting at 40 nautical miles from Point Loma upon the occurrence of the earlier of either of the following two scenarios:</p> <ul style="list-style-type: none"> ▪ Prior to the annual number of dry bulk vessel calls reach 91 calls annually (e.g., 76 new calls over the TAMT Final PEIR’s baseline condition); or ▪ Beginning January 1, 2030, irrespective of the number of calls on an annual basis. <p>To help the District implement the Beyond 2013 CAP VSR Program before reaching 91 dry bulk vessel calls annually, Mitsubishi Cement Corporation shall provide the District with a rolling estimate of anticipated vessels calls every 6 months.</p> <p>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>MM-AQ-6: Electric Cargo Handling Equipment Upgrades. 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</p>	

Table ES-4. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>the electric cargo handling equipment may be obtained include, but are not limited to, the following:</p> <ol style="list-style-type: none"> 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. <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 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"> 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 	

Table ES-4. Project Impacts and Mitigation Measures

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 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"> 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. <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>	

Table ES-4. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<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>MM-AQ-7R: Annual Inventory Submittal and Periodic Technology Review.</p> <p>The Mitsubishi Cement Corporation shall comply with the District's Annual Inventory and Periodic Technology Review Program by (1) providing an inventory of all the mobile equipment associated with their TAMT site operations that generate criteria pollutants, toxic air contaminants, and greenhouse gases on an annual basis to be submitted by January 30 of each year of operations, and (2) working collaboratively with District staff and/or the local air pollution control district to identify new technologies or other practices that can be incorporated into their operations that help reduce emissions and improve air quality.</p> <p>The Mitsubishi Cement Corporation shall complete the District's equipment inventory spreadsheet annually, which requires tenants to identify the year, make, VIN/ID number, fuel type, 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,</p>	

Table ES-4. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>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 in the TAMT Plan MM-AQ-7, the San Diego Unified Port District's 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 actions specified in TAMT Plan MM-AQ-7.</p> <p>MM-AQ-8: Implement Exhaust Emissions Reduction Program at Tenth Avenue Marine Terminal.</p> <p>The San Diego Unified Port District is tasked with developing an incentive program, based on an emission reduction schedule, that incentivizes tenants and/or terminal operators to reduce mobile source emissions above and beyond the requirements identified in the TAMT Final PEIR. District staff is currently developing the Exhaust Emission Reduction Program as part of the District's Clean Air Plan update, per the direction of the Board of Port Commissioners in June 2019. Following completion of the Clean Air Plan update, the Project Proponent will be eligible to participate in the updated plan's Exhaust Emission Reduction Program.</p> <p>MM-AQ-9R: Use of At-Berth Emission Capture and/or Control System to Reduce Vessel Hoteling Emissions.</p> <p>In lieu of the At-Berth Emission Capture and Control System, the Mitsubishi Cement Corporation shall use electric power through connection with the ship's dry-dock breaker system to reduce Vessel Hoteling Emissions. To attain emission reductions equivalent to or greater than the At-Berth Emission Capture and Control System specified in TAMT Plan MM-AQ-8, ocean going vessels (OGVs) that call at the Mitsubishi Corporation Project facility shall use the shore-to-ship power system at least 50 percent of the time while at berth, not including the necessary 1.5 hours to embark and 1.5 hours to disembark to/from the system. Compliance with the 50 percent shore-to-ship power system requirement shall be calculated based on an annual average. Mitsubishi Cement Corporation shall submit annual reports for each year of Project operations to the San Diego Unified Port District's Planning and Green Port Department on or before January 31 of each year, demonstrating compliance</p>	

Table ES-4. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>with this environmental control measure for the previous calendar year. If an emergency event [as defined in California Air Resources Board's (CARB's) At-Berth Regulation, Title 17, CCR Section 93118.3, subsection (c)(14)], prevents Mitsubishi Cement Corporation from achieving the required annual average shore-to-ship power rate (equal to or greater than 50 percent), Mitsubishi Cement Corporation may demonstrate compliance over a 2-year period, so long as Mitsubishi Cement Corporation submits documentation to the San Diego Unified Port District's Planning and Green Port Department which describes the emergency event(s) and explains the basis for Mitsubishi Cement Corporation's inability to demonstrate compliance using an annual average.</p> <p>The San Diego Unified Port District's Planning and Green Port Department shall review the documentation submitted by the Mitsubishi Cement Corporation and, if the San Diego Unified Port District's Planning and Green Port Department determines that Mitsubishi Cement Corporation made sufficient effort to comply with the environmental control, it would notify Mitsubishi Cement Corporation in writing that use of the two-year average is acceptable.</p> <p><i>*Please note that Mitsubishi' Cement Corporation's annual dry bulk throughput will not be counted towards the 691,418 metric ton dry bulk trigger that requires use of an At-Berth Emission Capture and Control System because Mitsubishi will be relying on a shore-to-ship power system. However, the 691,418 metric ton dry bulk trigger would apply to other dry bulk tenants that do not have shore-power capabilities.</i></p> <p>MM-AQ-10: Modernization of Delivery Truck Fleet.</p> <p>No less than 90 percent of the trucks loading cement or cementitious material at the Mitsubishi Cement Corporation facility shall be equipped with an engine that meets one of the following requirements:</p> <ol style="list-style-type: none"> 1) Is no more than 5 years old, based on engine model year ("5-Year Engine") for each operational year; 2) Has been designed or retrofitted to comply with federal and state on-road heavy-duty engine emissions standards (e.g. EPA 2010 engine emission standards or successor rules or regulations for on-road heavy duty diesel 	

Table ES-4. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>engines) for a 5-Year Engine (“Emission equivalent Engine”); or</p> <p>3) Uses alternative engine technology or fuels demonstrated to produce emissions no greater than a 5-Year Engine (“Alternative Equivalent Engine”).</p> <p>The remaining 10 percent of the trucks shall comply with all applicable federal and state heavy-duty on-road truck regulations. In addition, all trucks loading cement or cementitious materials at the Mitsubishi Cement Corporation facility shall be registered and be in compliance with the CARB Truck and Bus Regulation. In order to confirm that Mitsubishi Cement Corporation’s 90 percent requirement for a Modernized Truck Fleet shall be determined on a calendar year basis. Mitsubishi Cement Corporation shall submit documentation of compliance, showing the following information, to the San Diego Unified Port District’s Planning and Green Port Department on an annual basis by January 31 following each year of operation:</p> <ol style="list-style-type: none"> 1) Truck vehicle identification number (VIN), 2) Engine model year, 3) Annual truck trips, and 4) If nondiesel technology, manufacturer engine standards. 	
Cumulatively Considerable Criteria Pollutant Contribution under an Ambient Air Quality Standard	No New or More Severe Impacts than Previously Identified in the TAMT Final PEIR	PS	Implement mitigation measures MM-AQ-1R through MM-AQ-9R and MM-AQ-10 .	LS
Sensitive Receptors		PS	Implement mitigation measures MM-AQ-1R through MM-AQ-9R , MM-HAZ-1R , and MM-HAZ-2 .	LS

Table ES-4. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
4.2 Greenhouse Gas Emissions and Climate Change				
Project Impacts				
Directly or Indirectly Generate Greenhouse Gases	No New or More Severe Impacts than Previously Identified in the TAMT Final PEIR	PS	<p>MM-GHG-1R: Implement Best Management Practices During Construction of Future TAMT Redevelopment Plan Components.</p> <p>The Mitsubishi Cement Corporation Project Proponent shall implement Best Management Practices (BMPs) to reduce air emissions from all construction activities implemented as part of the Proposed Project. The following measures are required to limit construction equipment exhaust from on-road trucks and heavy-duty equipment used during construction.</p> <ul style="list-style-type: none"> 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-GHG-2 for definition of "not in use"). <p>In addition, the Mitsubishi Cement Corporation Project Proponent shall implement the relevant BMPs, consistent with the Project-specific industrial Storm Water Pollution Prevention Plan (SWPPP). In no case would any BMP be implemented if it conflicts with the SWPPP or other applicable water quality permit requirements. BMP dust control measures may include, but are not limited to, the following:</p> <ul style="list-style-type: none"> Water the grading areas at least twice daily to minimize fugitive dust. 	SU

Table ES-4. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<ul style="list-style-type: none"> ▪ Stabilize graded areas as quickly as possible to minimize fugitive dust. ▪ Apply chemical stabilizer or pave the last 100 feet of internal travel path within the construction site prior to public road entry. ▪ Install wheel washers adjacent to a paved apron prior to vehicle entry on public roads. ▪ Remove any visible track-out into traveled public streets within 30 minutes of occurrence. ▪ Wet wash the construction access point at the end of each workday if any vehicle travel on unpaved surfaces has occurred. ▪ Provide sufficient perimeter erosion control to prevent washout of silty material onto public roads. ▪ Cover haul trucks or maintain at least 12 inches of freeboard to reduce blow-off during hauling. ▪ Suspend all soil disturbance and travel on unpaved surfaces if winds exceed 25 mph. ▪ Cover/water onsite stockpiles of excavated material. ▪ Enforce a 15 mph speed limit on unpaved surfaces. ▪ 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. ▪ Develop as quickly as possible all disturbed areas as directed by the San Diego Unified Port District's Planning and Green Port Department and/or SDAPCD to reduce dust generation. ▪ Limit the daily grading volumes/area. <p>Prior to the commencement of construction activities, the Mitsubishi Cement Corporation Project Proponent shall submit evidence to the San Diego Unified Port District's Planning and Green Port Department of the project proponent's compliance with the BMPs and that construction equipment is maintained and properly tuned in accordance with manufacturers'</p>	

Table ES-4. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>specifications, which shall be subject to confirmation by the San Diego Unified Port District's Planning and Green Port Department during construction.</p> <p>MM-GHG-2R: Comply with San Diego Unified Port District Climate Action Plan Measures. Prior to approval of all discretionary actions and/or Coastal Development Permits, the Mitsubishi Cement Corporation 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"> • Vessels shall comply with the San Diego Unified Port District's voluntary vessel speed reduction program, which targets 80 percent compliance. • Vessels that are subject to the ARB's at berth regulation (dry bulk vessels are not subject to the at-berth regulation) shall comply with ARB's at berth regulation that requires shore power or alternative control technology regulation for certain vessel fleets for 80 percent of eligible calls by 2020, minus idle time to clear customs consistent with California Air Resources Board regulations. The TAMT Final PEIR assumed 1.5 hours of idle time for vessels to embark/disembark, which applies to all shore power and/or alternative control technologies employed at the terminal. This is a Project feature made into a mitigation measure to ensure compliance (see MM-GHG-9 for an explanation of the Proposed Project's shore power features). • Designated truck haul routes shall be used, and the project proponent shall decrease onsite movements where practicable. • No commercial drive-through shall be implemented. • 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 65 percent of all construction debris. This measure shall be applied during construction and operation of the Proposed Project. 	

Table ES-4. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<ul style="list-style-type: none"> 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. 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 San Diego Unified Port District's Planning and Green Port Department by the Project Proponent on an annual basis through the end of the lease or 2035 (buildout of the TAMT Redevelopment Plan), whichever occurs first. <p>MM-GHG-3: Electric Cargo Handling Equipment Upgrades.</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"> Purchased, leased, or otherwise acquired, in whole or in part, through funding provided to a tenant by the San Diego Unified Port District; Purchased, leased, or otherwise acquired, in whole or in part, through funding provided to a tenant by other sources; or 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>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 equipment is</p>	

Table ES-4. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>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>MM-GHG-4: Electric Cargo Handling Equipment Upgrades. This measure has multiple steps for compliance, as specified below.</p> <p>A. 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"> 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. <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>	

Table ES-4. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>B. 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"> 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. <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 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>	

Table ES-4. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>MM-GHG-5R: Implement Enhanced Vessel Speed Reduction Program Beyond Climate Action Plan Compliance for Future Operations Associated with the TAMT Plan. The Mitsubishi Cement Corporation shall be required to comply with the Enhanced VSR Program.</p> <p>Mitsubishi Cement Corporation shall, beginning with the first vessel call to the Port, comply with 80% of its OGVs reducing their speeds to 12 knots or less starting at 20 nautical miles from Point Loma.</p> <p>The Mitsubishi Cement Corporation shall comply with 90% of its OGVs calling to the Port reducing their speeds to 12 knots starting at 40 nautical miles from Point Loma upon the occurrence of the earlier of either of the following two scenarios:</p> <ul style="list-style-type: none"> ▪ Prior to the annual number of dry bulk vessel calls reaching 91 calls annually (e.g., 76 new calls over the TAMT Final PEIR's baseline condition);or ▪ Beginning January 1, 2030, irrespective of the number of calls on an annual basis. <p>To help the District implement the Beyond 2013 CAP VSR Program before reaching 91 dry bulk vessel calls annually, Mitsubishi Cement Corporation shall provide the District with a rolling estimate of anticipated vessels calls every 6 months.</p> <p>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>MM-GHG-6R: Implement a Renewable Energy Project, or Other Verifiable Actions or Activities on Tidelands, 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. The Mitsubishi Cement Corporation shall do one or more of the following to achieve requisite reductions to meet the 2025, 2030, and 2035 greenhouse gas (GHG) reduction targets, in order of priority:</p> <p>(1) Incorporate a renewable energy project:</p>	

Table ES-4. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<ul style="list-style-type: none"> ▪ within the Tenth Avenue Marine Terminal; ▪ within the San Diego Unified Port District's jurisdiction; or ▪ adjacent to the San Diego Unified Port District's jurisdiction; or <p>(2) Other verifiable actions or activities on Tidelands such as electrification of equipment including vehicles and trucks, financial contribution to a future local or District GHG emission reduction program on Tidelands (locally approved equivalent program), or similar activities or actions that reduce operational GHG emissions; or</p> <p>(3) Purchase California Air Resource Board (CARB) verified GHG emission offsets.</p> <p>The option(s) implemented shall achieve requisite GHG reductions for the activities of the Project for years 2025, 2030, and 2035. As specified below, the 2025, 2030, and 2035 GHG reduction targets are based on the maximum throughput of 600,000 metric tons (MT) per year.</p> <p>The maximum metric tons of carbon dioxide equivalent (MTCO₂e) or megawatt-hours per year (MWh/year) reduction requirement for each time period is as follows (calculated assuming 600,000 MT of throughput via 24 calls to port annually) but the maximum requirement may be reduced at the discretion of the District, depending on the hours at berth and the amount of throughput in a given year and based on the other reduction requirements specified below:</p> <p>A. 2025 reduction target: 568 MTCO₂e per year or 2,345 MWh/year.</p> <p>B. 2030 reduction target: 1,622 MTCO₂e per year or 7,675 MWh/year.</p> <p>C. 2035 reduction target: 1,693 MTCO₂e per year or 8,013 MWh/year.</p> <p>Prior to the first call of the first year of operation, the Mitsubishi Cement Corporation shall either:</p> <p>I. Develop a renewable energy project(s) or take other verifiable actions or activities to meet or partially meet the amount of MTCO₂e or MWh reductions specified above.</p>	

Table ES-4. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>a. If the Mitsubishi Cement Corporation develops a renewable energy project(s), or takes actions or conducts activities to reduce GHG emissions, the Mitsubishi Cement Corporation shall submit a report specifying the annual amount of MTCO₂e or MWh reduction achieved by the project(s), actions, or activities; submit evidence that the renewable energy project, actions, or activities are not being used to offset GHG emissions for any other project or entity; and any other information needed to verify that amount to the Districts Energy Department for its review and approval (collectively, "GHG Emission Reduction Report").</p> <p>b. If the GHG Emission Reduction Report is approved, a reduction to the required offsets shall be calculated by the District's Energy Department, and the reduction of offsets shall be transmitted to the Mitsubishi Cement Corporation in writing and the amount of GHG reduction shall count towards the required GHG reduction for the Proposed Project ("GHG Reduction").</p> <p>II. Purchase the requisite GHG emission offsets to reduce the amount of MTCO₂e or MWh specified above, which may be decreased by the amount of annual MTCO₂e or MWh reduction that is achieved by the renewable energy project(s), action, or activities if developed and/or implemented. The offsets shall be purchased by a CARB verified entity and shall not have been previously used for a different GHG reduction project. The purchased offsets shall be linked to a GHG reduction project or activity that has already occurred. All certificates of purchased offsets shall be submitted to the District for its review that the criteria, above, has been met. The purchase of requisite offsets to reduce the amount of MTCO₂e or MWh, shall occur as follows:</p> <p>a. Purchase offsets for the first 2 years of operation; and</p> <p>b. Purchase offsets at least annually thereafter, prior to any calls to port for the corresponding timeframe, beginning with the third year of operation, for the life of the operation or termination of the lease agreement between the District and the Mitsubishi Cement Corporation. The Mitsubishi Cement Corporation may purchase more than 1 year of operational emissions offsets, consistent with the amount of</p>	

Table ES-4. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>MTCO₂e or MWh reduction specified above for the corresponding timeframe of 2025, 2030, or 2035.</p> <p>At this time, within the TAMT, there are no solar ready rooftops without renewable energy projects already being implemented. But such projects may be identified in the future, and the Mitsubishi Cement Corporation may choose at that time to participate or develop the future identified renewable energy project(s).</p> <p>If the Mitsubishi Cement Corporation complies with (1) or (2) above, in an amount that meets the total amount of MTCO₂e or MWh reductions specified above for 15 years of operation (to meet the 2035 reduction target) or complies with (3) above and purchases the requisite offsets for 15 years, or does a combination of (1), (2), and (3) to meet the 2035 reduction target, then nothing further shall be required under this mitigation measure.</p> <p>Subsequent to fulfilling the requirement of 3, annual purchase of offsets as specified in 3A, 3B, and 3C may be adjusted if the preceding years throughput is less than 600,000 metric tons (the maximum allowed annual throughput), and/or the annual calls to port are less than 24 (the maximum allowed number of calls; 24 calls at 168 hours per call, or 4,032 annual hours at berth). The District or a District-retained consultant (at the Mitsubishi Cement Corporation cost) shall calculate, using the best available science, the amount of unused GHG reduction offsets based on the actual throughput and/or time at berth. Any unused offsets shall be used for the next year of operation of the Proposed Project and the Mitsubishi Cement Corporation shall purchase offsets in the necessary amounts (required amount less any unused offsets) for the subject year. This procedure shall be repeated on an annual basis. At the Mitsubishi Cement Corporation's written request to the District, Mitsubishi Cement Corporation may waive the annual adjustment described above and purchase the required MTCO₂e or MWh offsets on at least an annual basis.</p> <p>Reduction of Emissions through Development of a Renewable Energy Project Requirement: Although none are identified at this time, the Mitsubishi Cement Corporation may develop a renewable energy project at any time during the life of the</p>	

Table ES-4. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>project (subject to future approvals and the priorities listed above) and may request a reduction of required offsets. If any reduction in offsets is requested by the Mitsubishi Cement Corporation because of the development of a renewable energy project(s), the Mitsubishi Cement Corporation shall submit a GHG Emission Reduction Report for the District Energy Department's review pursuant to the process specified above in (1) and required offsets shall be reduced.</p> <p>Reduction of Emissions through Verifiable Actions or Activities on Tidelands Requirement: Although none are identified at this time, the Mitsubishi Cement Corporation may take actions or implement activities at any time during the life of the project (subject to future approvals and the priorities listed above) and may request a reduction of required offsets. If any reduction in offsets is requested by the Mitsubishi Cement Corporation because of the verified actions or activities on tidelands, the Mitsubishi Cement Corporation shall submit a GHG Emission Reduction Report for the District Energy Department's review pursuant to the process specified above in (1), and required offsets shall be reduced.</p> <p>The Mitsubishi Cement Corporation shall comply with the San Diego Unified Port District's Annual Inventory and Periodic Technology Review Program by (1) providing an inventory of all the mobile equipment associated with their TAMT site operations that generate criteria pollutants, toxic air contaminants and greenhouse gases on an annual basis to be submitted by January 30th of each year of operations, and (2) working collaboratively with the San Diego Unified Port District staff and/or the local air pollution control district to identify new technologies or other practices that can be incorporated into their operations that help reduce emissions and improve air quality.</p> <p>The Mitsubishi Cement Corporation shall complete the San Diego Unified Port District's equipment inventory spreadsheet annually, which requires tenants to identify the year, make, vin/ID number, fuel type, 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</p>	

Table ES-4. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>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 in the TAMT Redevelopment Plan MM-GHG-7.</p> <p>MM-GHG-8R: Implement Exhaust Emissions Reduction Program at Tenth Avenue Marine Terminal. The San Diego Unified Port District is tasked with developing an incentive program, based on an emission reduction schedule, that incentivizes tenants and/or terminal operators to reduce mobile source emissions above and beyond the requirements identified in the TAMT Final PEIR. San Diego Unified Port District staff is currently developing the Exhaust Emission Reduction Program as part of their Clean Air Plan update, per the direction of the Board of Port Commissioner's in June 2019. Following completion of the Clean Air Plan update, the Project Proponent will be eligible to participate in the updated plan's Exhaust Emission Reduction Program.</p> <p>MM-GHG-9R: Use of At-Berth Emission Capture and/or Control System to Reduce Vessel Hoteling Emissions. In lieu of the At-Berth Emission Capture and Control System, the Mitsubishi Cement Corporation shall use electric power through connection with the ship's dry-dock breaker system to reduce Vessel Hoteling Emissions. To attain emission reductions equivalent to or greater than the At-Berth Emission Capture and Control System specified in TAMT Redevelopment Plan MM-GHG-8, OGVs that call at the Mitsubishi Corporation Project facility shall use the shore-to-ship power system at least 50 percent of the time while at berth, not including the necessary 1.5 hours to embark and 1.5 hours to disembark to/from the system. Compliance with the 50 percent shore-to-ship power system requirement shall be calculated based on an annual average. Mitsubishi Cement Corporation shall submit annual reports for each year of Project operations to the San Diego Unified Port District's Planning and Green Port Department on or before January 31 of each year, demonstrating compliance with this environmental control measure for the previous calendar year. If an emergency event (as defined in CARB's At-Berth Regulation, Title 17, CCR Section 93118.3, subsection (c)(14)), prevents Mitsubishi Cement Corporation from achieving the required annual average shore-to-ship power rate</p>	

Table ES-4. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>(equal to or greater than 50 percent), Mitsubishi Cement Corporation may demonstrate compliance over a 2-year period, so long as Mitsubishi Cement Corporation submits documentation to the San Diego Unified Port District's Planning and Green Port Department which describes the emergency event(s) and explains the basis for Mitsubishi Cement Corporation's inability to demonstrate compliance using an annual average.</p> <p>The San Diego Unified Port District's Planning and Green Port Department shall review the documentation submitted by the Mitsubishi Cement Corporation and, if the San Diego Unified Port District's Planning and Green Port Department determines that Mitsubishi Cement Corporation made sufficient effort to comply with the environmental control, it will notify Mitsubishi Cement Corporation in writing that use of the 2-year average is acceptable.</p> <p><i>*Please note that Mitsubishi' Cement Corporation's annual dry bulk throughput will not be counted towards the 691,418 metric ton dry bulk trigger that requires use of an At-Berth Emission Capture and Control System because Mitsubishi will be relying on a shore-to-ship power system. However, the 691,418 metric ton dry bulk trigger would apply to other dry bulk tenants that do not have shore-power capabilities.</i></p> <p>MM-GHG-10: Modernization of Delivery Truck Fleet.</p> <p>No less than 90 percent of the trucks loading cement or cementitious material at the Mitsubishi Cement Corporation facility shall be equipped with an engine that meets one of the following requirements:</p> <ol style="list-style-type: none"> 1) Is no more than 5 years old, based on engine model year ("5-Year Engine") for each operational year; 2) Has been designed or retrofitted to comply with Federal and State on-road heavy-duty engine emissions standards (e.g., EPA 2010 engine emission standards or successor rules or regulations for on-road heavy duty diesel engines) for a 5-Year Engine ("Emission equivalent Engine"); or 3) Uses alternative engine technology or fuels demonstrated to produce emissions no greater than a 5-Year Engine ("Alternative Equivalent Engine"). 	

Table ES-4. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>The remaining 10 percent of the trucks shall comply with all applicable Federal and State heavy-duty on-road truck regulations. In addition, all trucks loading cement or cementitious materials at the Mitsubishi Cement Corporation facility shall be registered and be in compliance with the CARB Truck and Bus Regulation. Confirming that Mitsubishi Cement Corporation's 90 percent requirement for a Modernized Truck Fleet shall be determined on a calendar year basis. Mitsubishi Cement Corporation shall submit documentation of compliance, showing the following information, to the San Diego Unified Port District's Planning and Green Port Department on an annual basis by January 31 following each year of operation:</p> <ol style="list-style-type: none"> 1) Truck vehicle identification number (VIN), 2) Engine model year, 3) Annual truck trips, and 4) If nondiesel technology, manufacturer engine standards. 	
4.3 Hazards and Hazardous Materials				
Project Impacts				
Reasonably Foreseeable Upset and Accident Conditions Involving the Release of Hazardous Materials	No New or More Severe Impacts than Previously Identified in the TAMT Final PEIR	PS	<p>MM-HAZ-1R: Compliance with Burn Ash Soil Management Plan. Prior to approval of the Project grading plans and the commencement of any construction activities that would disturb the soil, the Mitsubishi Cement Corporation Project Proponent and the contractor (collectively "Contractor") shall demonstrate compliance with the Burn Ash Management Plan – Tenth Avenue Marine Terminal, San Diego, California, prepared by Tetra Tech, Inc., June 30, 2017. Specifically, the Contractor shall demonstrate compliance with the following specific requirements of the Burn Ash Management Plan including, but not limited to, the following.</p> <ul style="list-style-type: none"> ▪ <i>Conduct Soil Testing.</i> The Contractor shall comply with the excavated soil management techniques specified in the Burn Ash Management Plan. The Contractor shall follow the soil sampling protocol and soil sampling objectives, and shall comply with the soil characterization methodology identified within the Burn Ash Management Plan. 	LS

Table ES-4. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<ul style="list-style-type: none"> <p><i>Prepare and Implement a Community Health and Safety Plan.</i> The Contractor shall develop and implement a Project specific Community Health and Safety Plan that addresses the chemical constituents of concern for the Project site. The guidelines of the Health and Safety Plan shall be in accordance with the County of San Diego's Department of Environmental Health's Site Assessment and Mitigation Manual (2017) and Environmental Protection Agency. The Health and Safety Plan 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 Health and Safety Plan and actively monitor compliance with the Health and Safety Plan 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 Code of Regulations, Title 22, Division 4.5 requirements. If soils are determined to be appropriate for reuse, they may be exported or used as fill material.</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 Burn Ash 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 5.6, Dust Control, of the Burn Ash 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</p> 	

Table ES-4. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>be responsible for proper disposal of any contaminated water generated during truck cleanout.</p> <p>MM-HAZ-2: Implement Engineering Controls and Best Management Practices during Construction. 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 Federal 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"> ▪ 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. ▪ Contractor shall monitor the area around the construction site for fugitive vapor emissions with appropriate field screening instrumentation. ▪ 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. ▪ Contractor shall water/mist soil as it is being excavated and loaded onto transportation trucks. ▪ Contractor shall place any stockpiled soil in areas shielded from prevailing winds and shall cover all stockpiles to prevent soil from eroding. ▪ Contactor shall thoroughly decontaminate all construction equipment that has encountered and/or handled lead-impacted soil prior to leaving the work site. 	

Table ES-4. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
4.4 Noise and Vibration				
Project Impacts				
Expose Persons to or Generate Noise Levels in Excess of Established Standards	No New or More Severe Impacts than Previously Identified in the TAMT Final PEIR.	PS	<p>MM-NOI 2: Initiate and Maintain a Complaint and Response Tracking Program.</p> <p>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 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.</p>	LS
4.5 Transportation, Circulation, and Parking				
Project Impacts				
Conflict with an Applicable Program, Plan, Ordinance, or Policy	No New or More Severe Impacts than Previously Identified in the TAMT Final PEIR.	PS	<p>MM-TRA 3R: Widen the Segment of 28th Street between Boston Avenue and National Avenue to a Four-Lane Major Arterial Classification Consistent with the Barrio Logan Public Facilities Financing 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 161 new daily truck trips, the District shall pay a fair-share contribution (STC would be responsible for 2.8%) of the cost to widen the roadway segment of 28th Street between Boston Avenue and National Avenue to a Four-Lane Major Arterial classification. The improvement is identified within the Barrio Logan Public</p>	SU

Table ES-4. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>Facilities Financing Plan, and therefore would be paid to the City of San Diego in accordance with Section 142.0640 of the San Diego Municipal Code.</p> <p>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 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.</p> <p>Based on the Proposed Project's contribution of new daily trips, a fair share contribution of 1.6% of the total cost to widen the roadway segment shall be paid by the Mitsubishi Cement Corporation to the City prior to 150 new daily truck trips being generated.</p> <p>MM-TRA 4R: Westbound Right-Turn Overlap Phase at Norman Scott Road/32nd 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/32nd 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</p>	

Table ES-4. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			<p>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.</p> <p>Based on the Proposed Project's contribution of new daily trips, a fair share contribution of 1.4% of the total cost to improve the intersection shall be paid by the Mitsubishi Cement Corporation to the District prior to 150 new daily trips being generated.</p>	
Result in Inadequate Parking Capacity	No New or More Severe Impacts than Previously Identified in the TAMT Final PEIR	PS	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.	LS
5.0 Cumulative				
Project Impacts				
Air Quality and Health Risk	No New or More Severe Impacts than Previously Identified in the TAMT Final PEIR	PS	Implement mitigation measures MM-AQ-1R through MM-AQ-9R and MM-AQ-10 , as described above.	LS
Greenhouse Gas Emissions and	No New or More Severe Impacts than Previously Identified in the TAMT Final PEIR	PS	Implement mitigation measures MM-GHG-1R through MM-GHG-9R and MM-GHG-10 , as described above.	SU

Table ES-4. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
Global Climate Change				
Hazards and Hazardous Materials	No New or More Severe Impacts than Previously Identified in the TAMT Final PEIR	PS	Implement mitigation measures MM-HAZ-1R and MM-HAZ-2 , as described above.	LS
Noise and Vibration	No New or More Severe Impacts than Previously Identified in the TAMT Final PEIR	PS	Implement mitigation measure MM-NOI-2 as described above.	LS
Transportation, Circulation and Parking	No New or More Severe Impacts than Previously Identified in the TAMT Final PEIR	PS	<p>Implement mitigation measures MM-TRA-3R and MM-TRA-4R, as described above.</p> <p>MM-C-TRA-1R: Construct Managed Lanes on I-5 and SR-15. 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 TAMT Plan'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 TAMT Plan's contribution to the affected freeway mainline sections reaching 0.005 change in V/C ratio.</p> <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"> ▪ 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. <p>If a fair share funding program has been identified, the District shall determine if the Mitsubishi Cement Corporation Project Proponent shall provide a fair share contribution.</p>	SU

Notes: PS = Potentially significant; LS = Less than significant; NI = No Impact; SU = Significant and Unavoidable

1. Introduction

The San Diego Unified Port District (District) is considering an application by Mitsubishi Cement Corporation (Mitsubishi) for a non-appealable Coastal Development Permit (CDP) that would allow Mitsubishi to construct and operate the Warehouse C: Bulk Cement Warehouse and Loading Facility Project (Project or Proposed Project), a cement and cementitious material import, storage, and distribution facility at 645 Switzer Street within the Tenth Avenue Marine Terminal (TAMT).

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.

The District has determined that the Proposed Project falls within the broader scope of the Tenth Avenue Marine Terminal Redevelopment Program and the associated *Final Environmental Impact Report: Tenth Avenue Marine Terminal Redevelopment Plan and Demolition and Initial Rail Component* (TAMT Final PEIR; ICF 2016) certified by the District in December 2016 (UPD #EIR-2015-39; State Clearinghouse # 2015031046; Clerk Document Number 65901). Therefore, the District has prepared a subsequent environmental impact report (SEIR) to evaluate environmental impacts associated with the implementation of the Proposed Project.

This introductory chapter provides (1) the Project background and overview, (2) the purpose of CEQA and the SEIR, (3) the intended uses of this SEIR, (4) the scope and content of the draft SEIR, and (5) the organization of the draft SEIR.

1.1 Project Background and Overview

1.1.1 TAMT Redevelopment Plan

The TAMT is located along San Diego Bay, south of downtown San Diego, east of the San Diego Convention Center and the Hilton San Diego Bayfront Hotel, and adjacent to the San Diego community of Barrio Logan. The TAMT Redevelopment Plan proposed a variety of infrastructure improvements, reconfigurations, and operations that may be undertaken over the long-term at TAMT to improve the terminal's capabilities and capacity. As identified in the TAMT Final PEIR, berthing capacity at the TAMT has been deemed adequate for the increased capacity and capabilities forecasted by the TAMT Redevelopment Plan; therefore, the TAMT Final PEIR analyzed landside improvements, reconfiguration of the TAMT, and future operations. No waterside improvements and no dredging were proposed within the TAMT Redevelopment Plan or analyzed within the TAMT Final PEIR.

The Sustainable Terminal Capacity Alternative (STC Alternative), a reduced project alternative for the terminal buildout and operations that was analyzed in the TAMT Final PEIR, was adopted by the Board of Port Commissioners (Board) by Resolution No. 2016-200. Table 1-1 provides the throughput quantities analyzed in the TAMT Final PEIR.

Table 1-1. Throughput Scenario Analyzed within the TAMT Final PEIR

Cargo Nodes	Sustainable Terminal Capacity (MT/yr)
Dry Bulk	1,987,500
Refrigerated Containers	1,716,000
Multipurpose General Cargo	733,050
Liquid Bulk	239,017
Total Throughput	4,675,567

MT/yr = metric tons per year

Since the certification of the TAMT Final PEIR, the Board has adopted two CEQA Addenda. The 1st Addendum to the TAMT Final PEIR was approved in July 2017 to address minor modifications based on the final engineering design of the Demolition and Initial Rail Component (adopted by the Board by Resolution No. 2017-100, SCH #2015031046; Clerk Document No. 67004). The modifications included larger on-terminal office facilities, elimination of a potential third airbrake system from the project, and additional quantities of soil excavation, as well as the addition of project-specific details for stormwater and conduit/electrical improvements programmatically identified in the TAMT Final PEIR. The 2nd Addendum to the TAMT Final PEIR was approved in April 2018 to implement and install a renewable microgrid (adopted by the Board by Resolution No. 2018-061, SCH # 2015031046; Clerk Document No. 68288) to satisfy a portion of TAMT Final PEIR Mitigation Measure GHG-6.

The TAMT Final PEIR, associated Mitigation, Monitoring, and Reporting Program (MMRP), addenda, and CEQA Findings of Fact and Statement of Overriding Consideration for the TAMT Redevelopment Plan are incorporated herein by reference pursuant to State CEQA Guidelines Sections 15150 and are available at:

<https://www.portofsandiego.org/environment/environmental-downloads/land-use-planning.html>

The documents are also available at the San Diego Unified Port District Administration Building, Office of the District Clerk, located at 3165 Pacific Highway, San Diego, CA 92101.

1.1.2 Proposed Project

The Proposed Project would entail the construction and operation of a cement and cementitious material import, storage, and distribution facility within the TAMT. This facility would include the potential for two separate phases of improvements to Bays C-7 through C-10 of Warehouse C for the receipt, storage, and distribution of up to 600,000 metric tons per year (MT/yr) of cement and cementitious materials including, but not limited to, cement, slag, fly ash, and pozzolans. The cementitious material would be pneumatically¹ unloaded into Warehouse C from dry bulk cargo ships using mobile vacuum unloaders. There would be up to 24 vessel calls per year at Berths 10-7/10-8 during peak operation. The operational lifetime of the Proposed Project is anticipated to be 15 years following District approval of a lease or similarly binding agreement. The proposed term of that agreement would be 5 years with two 5-year options to extend, for a maximum total of 15 years. Approval of the Proposed Project would also require issuance of a non-appealable CDP by the District prior to development and operation. Chapter 3, *Project Description*, provides a detailed description of construction and operation of the Proposed Project.

¹ Pneumatic unloading involves transporting bulk materials through a pipeline via either a negative (i.e., vacuum) or positive (i.e., pressurized air) gas stream.

Notably, the Proposed Project's potential dry bulk cargo throughput of up to 600,000 MT/yr would be within the scope of the 1,987,500 MT/yr of dry bulk throughput analyzed in the TAMT Final PEIR. As the Proposed Project is the first large-scale project proposed by a third-party applicant at TAMT since certification of the TAMT Final PEIR in December 2016, and is the first to tier off of the TAMT Final PEIR, none of the capacity of the 1,987,500 MT/yr has been drawn down, with the exception of the existing dry bulk cargo throughput already taking place at TAMT (i.e., 289,864 MT/yr). As such, after the 600,000 MT/yr associated with the Proposed Project is removed, the capacity analyzed in the TAMT Final PEIR that would remain for future dry bulk projects would be 1,097,636 MT/yr.

The Proposed Project differs from the dry bulk project component analyzed in the TAMT Final PEIR in that it includes dry bulk operations for a maximum of 15 years at Warehouse C, which is proposed to be demolished to make way for a multipurpose general cargo area under the TAMT Final PEIR. The TAMT Final PEIR identified a consolidated dry bulk operating node that will be located on approximately 15 acres in the southeastern portion of the TAMT (known as the terminal "backlands"). However, like the Proposed Project, the TAMT Final PEIR assumed the dry bulk node would be served primarily by Berths 10-7/10-8. The TAMT Final PEIR analyzed dry bulk node improvements including construction of a consolidated multipurpose 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; the Proposed Project's upgrades to Warehouse C would serve this same purpose at a slightly different location and would require less new infrastructure and leave the possibility of demolishing Warehouse C to a later time, possibly after the lease's expiration or termination. Over the long-term, however, the dry bulk operating node is still planned to be located in a consolidated facility on "backlands" of the TAMT.

1.2 California Environmental Quality Act Compliance

CEQA requires preparation of an environmental impact report (EIR) for any project that a lead agency determines may have a significant impact on the environment. EIRs are informational documents "which will inform public agency decision-makers and the public generally of the significant environmental effect of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project" (State CEQA Guidelines Section 15121). Program EIRs, like the TAMT Final PEIR, are prepared for a series of actions that can be characterized as one large project and are related either geographically, as logical parts in the chain of contemplated actions, in connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program, or as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects that can be mitigated in similar ways (State CEQA Guidelines Section 15168). When a program EIR has been prepared, CEQA encourages "tiering" off that EIR when the later project is separate but related (State CEQA Guidelines Section 15152[b]). *Tiering* refers to using the analysis of general matters contained in a broader EIR (e.g., the TAMT Final PEIR) with later EIRs on narrower projects, incorporating by reference the general discussions from the broader EIR, and concentrating the later EIR solely on the issues specific to the later project (State CEQA Guidelines Section 15152[a]). When an EIR tiers off another CEQA analysis, the later EIR should be limited to effects that were not examined in the prior EIR or are susceptible to substantial reduction or avoidance by the choice of specific revisions in the project, by the imposition of conditions, or other means (State CEQA Guidelines Section 15152[d]).

Moreover, Section 15168 of the State CEQA Guidelines provides additional guidance on tiering from a program EIR such as the TAMT Final PEIR. Later activities, such as the Proposed Project, must be examined in light of the PEIR to determine whether an additional environmental document must be

prepared. When an SEIR is determined appropriate, the PEIR is used to help focus the analysis of the SEIR on only the new effects that had not been considered before (State CEQA Guidelines 15168 [d][3]).

In accordance with CEQA, this SEIR tiers off of the TAMT Final PEIR, focusing on effects that were not examined in the TAMT Final PEIR; analyzes whether there are any new or more severe significant effects as compared to those identified in the TAMT Final PEIR; and identifies new mitigation measures or alternatives that could potentially lessen significant effects of the Proposed Project.

1.3 Intended Uses of the Program Environmental Impact Report

This section discusses the intended uses for this Draft SEIR and includes (1) a list of agencies that would be expected to use this Draft SEIR for decision-making and (2) a list of required permits and other approvals that would be required to implement the Proposed Project.

1.3.1 Agencies Expected to Use this Program Environmental Impact Report

The District is the CEQA lead agency, as defined in State CEQA Guidelines Sections 15050 and 15051, because it has principal responsibility for carrying out and approving the Proposed Project. As the lead agency, the District also has primary responsibility for complying with CEQA. As such, the District has analyzed the environmental effects of the Proposed Project, the results of which are presented in this SEIR.

This SEIR is intended to be an informational document to be used by the Board, public agencies, stakeholder organizations and individuals, and the general public during the decision-making process for the Proposed Project. In accordance with the State CEQA Guidelines and the District's *Guidelines for Compliance with CEQA*, this SEIR will inform readers of the potential significant environmental effects of the Proposed Project, identify feasible mitigation measures or project changes to lessen the Proposed Project's significant effects, and describe a range of reasonable alternatives to the Proposed Project. The Board will consider the SEIR, along with other substantial evidence in the administrative record, when making a decision whether to approve the Proposed Project and issue the non-appealable CDP. The Board, in its role as the decision-making body of the District, is responsible for certifying the Final SEIR and adopting the Mitigation Monitoring Reporting Program, Findings of Fact, and Statement of Overriding Considerations pursuant to Sections 15090–15093 of the State CEQA Guidelines prior approval of the Proposed Project.

No responsible agencies, as defined under State CEQA Guidelines Section 15381, have been identified. Coastal Commission approval is not required because the Project is consistent with the Port Master Plan and does not require an appealable CDP. The City of San Diego (City) will consider the Proposed Project as it relates to the issuance of ministerial permits, such as building permits for the construction of structures and grading permits. However, because these actions are not discretionary actions, the City is not considered a responsible agency. Other agencies that may issue ministerial permits include the California Department of Transportation (Caltrans) for potential oversize permit related to truck freight on Caltrans facilities, the Regional Water Quality Control Board for the construction general permit, the San Diego Fire Department for the storage of any combustible materials or fuels, and the Air Pollution Control District for the issuance of any air quality permits. In each case, however, it is unlikely these agencies will use this SEIR to issue these permits

As defined in State CEQA Guidelines Section 15386, a trustee agency is a State agency that has jurisdiction by law over natural resources affected by a project that are held in trust for the people of the State of California. The California State Lands Commission (CSLC) is a trustee agency because it has jurisdiction and management control over those public trust lands of the State received by the State upon its admission to the United States in 1850. CSLC has jurisdiction over submerged lands within San Diego Bay that are not under the jurisdiction of the District. CSLC may have an interest in the Proposed Project; however, CSLC would not issue approvals or permits for the Proposed Project.

Table 1-2 provides a summary list of the approvals and permits that would be required.

Table 1-2. List of Required Discretionary Actions	
Discretionary Action	San Diego Unified Port District
Certification of Final SEIR	X
Adoption of Mitigation Monitoring and Reporting Program	X
Adoption of Findings of Fact	X
Adoption of Statement of Overriding Considerations	X
Approval of the Proposed Project	X
Approval of a New Lease Agreement	X
Issuance of the Non-Appealable Coastal Development Permit	X

1.4 Scope and Content of the Draft Subsequent Environmental Impact Report

As the CEQA lead agency, the District is responsible for determining the scope and content of this Draft SEIR, a process referred to as *scoping*. As part of the scoping process, the District considered the environmental resources present within its jurisdiction and the surrounding area and identified the probable environmental effects of the Proposed Project. On September 18, 2017, the District posted a Notice of Preparation (NOP) for a 30-day review period with the County Clerk in accordance with Section 15082 of the State CEQA Guidelines. The NOP was mailed to public agencies, organizations, and other interested individuals to solicit their comments on the scope and content of the environmental analysis. The District also held a public scoping meeting on September 27, 2017, at the District's Administration Building at 3165 Pacific Highway, San Diego, CA, 92101. Free public parking was available at the surface lot in front of the building, as well as adjacent to the building.

Comments received in response to the NOP and during the public scoping meeting were used to inform the scope of this Draft SEIR. The comments are summarized in Table 1-3. Based on the District's preliminary evaluation of the probable effects of the Proposed Project and a thorough review of the comments on the NOP, the Draft SEIR analyzes effects associated with the following resources:

- Air Quality and Health Risk
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Noise and Vibration
- Transportation and Circulation

Consistent with the findings of the TAMT Final PEIR, it was determined during preparation of the Initial Study/Environmental Checklist (Appendix A) that the Proposed Project would have either a less-than-significant impact or no impact associated with the following resources: Aesthetics, Agriculture and Forestry Resources, Biological Resources, Cultural Resources, Geology and Soils, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Population and Housing, Public Services, Recreation, Tribal Cultural Resources, and Utilities and Service Systems. These issues are described in Chapter 6, Section 6.5, *Effects Not Found to be Significant*, of this Draft SEIR.

1.4.1 Comments Received in Response to the Notice of Preparation

Eleven comment letters were received during the scoping period, and the comments related to the scope of the SEIR are summarized in Table 1-3. No written comments were received at the public scoping meeting held on September 27, 2017, at the District's Administration Building. The NOP and copies of all NOP comment letters are provided in Appendix A.

Table 1-3. Summary of Comments Received on the Notice of Preparation

Letter Number/ Comment Number ¹	Subject of Comment	Relevant Draft SEIR Chapter/Section
AGENCIES		
Comment Letter 1 – State Clearinghouse and Planning Unit (Governor's Office of Planning and Research)		
1 -1	Distribution of the Notice of Preparation (NOP) for the Mitsubishi Cement Corporation at Warehouse C: Bulk Cement Warehouse and Loading Facility Project Draft Environmental Impact Report (EIR) to Reviewing Agencies. Agencies are invited to review and comment on the NOP.	N/A
Comment Letter 2 – City of San Diego Planning Department		
2-1	Discusses the City's Climate Action Plan (CAP), which was adopted on December 15, 2015, and encourages the inclusion of a consistency analysis of the Proposed Project with the City's CAP and the use of the CAP Consistency Checklist.	Section 4.2 (<i>Greenhouse Gas Emissions and Global Climate Change</i>)
2-2	States that the Initial Study found that potential impacts resulting from construction, reduced storm flow capacity, accidental spills or releases, and propeller wash would be less than significant. States the City commented on the prior Tenth Avenue Marine Terminal Draft Program EIR and raised questions regarding whether City drainage facilities could be affected by implementation of that project, and the District's response was that the District would consult with and obtain concurrence with the City if any potential effects were identified through review of subsequent projects. Requests the Draft EIR document whether the City drainage system could be affected by the Project and identify Project design features or measures acceptable to the City to reduce potential impacts to below a level of significance.	Chapter 3 (<i>Project Description</i>)
2-3	Recommends that the Transportation Impact Analysis in the Draft EIR should follow the guidelines of the City of San Diego Traffic Impact Study Manual, July 1998, including various scenarios to be included for all transportation facilities within the City of San Diego.	Section 4.5 (<i>Transportation, Circulation, and Parking</i>)
2-4	Recommends the Transportation Impact Analysis in the Draft EIR should apply the City of San Diego Significance Determination Thresholds (July 2016).	Section 4.5 (<i>Transportation, Circulation, and Parking</i>)

Table 1-3. Summary of Comments Received on the Notice of Preparation

Letter Number/ Comment Number¹	Subject of Comment	Relevant Draft SEIR Chapter/Section
2-5	Recommends the Transportation Impact Analysis in the Draft EIR should define in more detail and analyze the interim and ultimate project with all its phases (not only Phase 1) to meet demand through year 2035 and 2050. The study should identify any project near-term and horizon year significant impacts.	Section 4.5 (<i>Transportation, Circulation, and Parking</i>), Chapter 5 (<i>Cumulative Impacts</i>)
2-6	Recommends the Draft EIR should include alternatives that avoid or lessen expected transportation/circulation/parking impacts, including at least one alternative that would avoid unmitigated significant impacts on the City of San Diego's transportation facilities.	Chapter 7 (<i>Alternatives to the Proposed Project</i>)
Comment Letter 3 – California Department of Transportation		
3-1	States that a traffic impact study for the Draft EIR is necessary to determine the Proposed Project's near-term and long-term impacts on the State facilities—existing and proposed—and to propose appropriate mitigation measures.	Section 4.5 (<i>Transportation</i>); Appendix G
3-2	States that the traffic impact study for the Draft EIR must include analysis at the following locations: (1) Interstate 5/National Avenue northbound and southbound on/off ramps; (2) Interstate 5/19th Street southbound off-ramp; (3) Interstate 5/29th Street southbound on-ramp; (4) Interstate 5/17th Street southbound on/off ramps; (5) Interstate 5/Logan Avenue northbound and southbound on/off-ramps; (6) State Route 75/National Avenue off-ramp; (7) State Route 75/Cesar Chavez southbound on-ramp.	Section 4.5 (<i>Transportation, Circulation, and Parking</i>), Chapter 5 (<i>Cumulative Impacts</i>), Appendix G
3-3	States that the geographic area examined in the traffic impact study in the Draft EIR should also include, at a minimum, all regionally significant arterial system segments and intersections, including state highway facilities where the Project will add over 100 peak hour trips and state highway facilities that are experiencing noticeable delays if the Project adds 50 to 100 peak hour trips.	Section 4.5 (<i>Transportation, Circulation, and Parking</i>), Chapter 5 (<i>Cumulative Impacts</i>), Appendix G
3-4	States that a focused analysis may be required for project trips assigned to a State highway facility that is experiencing significant delay, such as where traffic queues exceed ramp storage capacity or if there is an increased risk of a potential traffic accident.	Section 4.5 (<i>Transportation, Circulation, and Parking</i>), Chapter 5 (<i>Cumulative Impacts</i>); Appendix G
3-5	Recommends implementing vehicle miles traveled (VMT) analysis into the traffic impact study's modeling projections.	Section 4.5 (<i>Transportation, Circulation, and Parking</i>), Chapter 5 (<i>Cumulative Impacts</i>); Appendix G
3-6	States that any increase in goods movement operations, including Harbor Drive and its impacts on State highway facilities, such as Interstate 5 and State Route 15, should be addressed in the traffic impact study for the Draft EIR.	Section 4.5 (<i>Transportation, Circulation, and Parking</i>), Chapter 5 (<i>Cumulative Impacts</i>), Appendix G
3-7	States the data used in the Traffic Impact Study for the Draft EIR should not be more than 2 years old.	Section 4.5 (<i>Transportation, Circulation, and Parking</i>), Chapter 5 (<i>Cumulative Impacts</i>), Appendix G
3-8	Requests for Synchro Version 8 files to be provided.	N/A
3-9	Recommends early coordination with the California Department of Transportation.	Chapter 5 (<i>Cumulative Impacts</i>)

Table 1-3. Summary of Comments Received on the Notice of Preparation

Letter Number/ Comment Number¹	Subject of Comment	Relevant Draft SEIR Chapter/Section
3-10	Discusses how the California Department of Transportation has discretionary authority with respect to issuing special transportation permits for oversize/overweight vehicles.	Section 4.5 (<i>Transportation, Circulation, and Parking</i>)
3-11	States that a Traffic Control Plan is to be submitted to District 11 at least 30 days prior to the start of any construction. Traffic must not be delayed by the project and the plan must outline suggested detours to use during the closures, including routes and signage.	Section 4.5 (<i>Transportation, Circulation, and Parking</i>)
3-12	States that hydrology and hydraulics studies, and drainage and grading plans must be submitted to the California Department of Transportation if available.	Chapter 6 (<i>Additional Consequences of Project Implementation</i>)
3-13	Discusses how all transportation improvements are opportunities to improve safety, access, and mobility for all travelers and recognizes bicycle, pedestrian, and transit modes as integral elements of the transportation system. Encourages early coordination between the California Department of Transportation, the City of San Diego, and the District.	Section 4.5 (<i>Transportation, Circulation, and Parking</i>)
3-14	Recommends working with the California Department of Transportation to reduce greenhouse gas emissions and achieve California's Climate Change Target and to evaluate potential Complete Street projects.	Section 4.2 (<i>Greenhouse Gas Emissions and Global Climate Change</i>)
3-15	Discusses link between transportation and land use and their support of collaboration with local agencies to work towards a safe, functional, interconnected, multi-modal transportation system integrated through applicable "smart growth" type land use planning and policies. Encourages the District to coordinate with the Department of Transportation to implement necessary improvements at intersections and interchanges where the agencies have joint jurisdiction, as well as coordination as development proceeds and funds become available to ensure that the capacity of on-/off-ramps is adequate.	Section 4.5 (<i>Transportation, Circulation, and Parking</i>) and Chapter 5 (<i>Cumulative Impacts</i>).
3-16	States that the Department of Transportation endeavors that any direct or cumulative impacts on the State Highway System be eliminated or reduced to a level of insignificance pursuant to CEQA and the National Environmental Policy Act standards.	Section 4.5 (<i>Transportation, Circulation, and Parking</i>) and Chapter 5 (<i>Cumulative Impacts</i>).
3-17	States that any work performed within the Department's right-of-way will require discretionary review and approval by the Department and an encroachment permit will be required for any work within the right-of-way prior to construction. As part of the encroachment permit process, the applicant must provide an approved final environmental document including a CEQA determination addressing any environmental impacts within the right-of-way, and any corresponding technical studies.	Section 4.5 (<i>Transportation, Circulation, and Parking</i>)
Comment Letter 4 – Native American Heritage Commission		
4-1	Receipt of the NOP for the Draft EIR. Discusses how CEQA deals with historical resources in the area of potential effect (APE) of a project.	Chapter 6 (<i>Additional Consequences of Project Implementation</i>)
4-2	Discusses Assembly Bill (AB) 52, the creation of a tribal cultural resources as a separate category of cultural resources, and tribal consultation requirements.	Chapter 6 (<i>Additional Consequences of Project Implementation</i>)
4-3	Discusses the applicability of Senate Bill (SB) 18 and tribal consultation requirements.	Chapter 6 (<i>Additional Consequences of Project Implementation</i>)

Table 1-3. Summary of Comments Received on the Notice of Preparation

Letter Number/ Comment Number ¹	Subject of Comment	Relevant Draft SEIR Chapter/Section
4-4	Recommends how lead agencies should consult with all California Native American tribes to avoid Native American human remains and protect tribal cultural resources.	Chapter 6 (<i>Additional Consequences of Project Implementation</i>)
4-5	Discusses AB 52's additional requirements: (1) Fourteen Day Period to provide Notice of Completion of an Application/Decision to Undertake a Project; (2) Begin Consultation within 30 days of Receiving a Tribe's Request for Consultation and Before releasing the Draft EIR; (3) Mandatory Topics of Consultation if Requested by a Tribe; (4) Discretionary Topics of Consultation; (5) Confidentiality of Information Submitted by a Tribe During the Environmental Review Process; (6) Discussion of Impacts on Tribal Cultural Resources in the Environmental Document; (7) Conclusion of Consultation; (8) Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document; (9) Required Consideration of Feasible Mitigation; (10) Examples of Mitigation Measures that, if feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts on Tribal Cultural Resources; and (11) Prerequisites for Certifying an Environmental Impact Report with a Significant Impact on an Identified Tribal Cultural Resource.	Chapter 6 (<i>Additional Consequences of Project Implementation</i>)
4-6	Discusses SB 18's applicability and provisions: (1) Tribal Consultation; (2) No Statutory Time Limit on Senate Bill 18 Tribal Consultation; (3) Confidentiality; and (4) Conclusion of SB 18 Tribal Consultation.	Chapter 6 (<i>Additional Consequences of Project Implementation</i>)
4-7	Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. Asks that the District request Native American Tribal Contact Lists and "Sacred Lands File" searches from the Native American Heritage Commission.	Chapter 6 (<i>Additional Consequences of Project Implementation</i>)
4-8	Native American Heritage Recommendations for Cultural Resources Assessments: (1) contact the appropriate regional California Historical Research Information System Center for an archaeological resources record search, (2) if an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey, (3) contact the Native American Heritage Center for a sacred lands file search and a native American tribal consultation list, and (4) remember the lack of surface evidence of archaeological resources does not preclude their subsurface existence.	Chapter 6 (<i>Additional Consequences of Project Implementation</i>)

Comment Letter 5 – California Department of Toxic Substances Control

5-1	States that the NOP concludes the Proposed Project could result in the potential to encounter soil contamination during construction that could result in a significant hazard to the public or the environment if not managed properly. Implementation of mitigation measure (MM)-HAZ-1 and MM-HAZ-2 may reduce impacts to less than significant. States that further analysis and discussion is warranted within the context of the Draft EIR to evaluate previous environmental assessments conducted at Warehouse C, as well as potential impacts associated with several of the Proposed Project's options. States that proper investigation, sampling, and remedial actions overseen by the appropriate regulatory agencies should be conducted prior to the new development or any construction.	Section 4.3 (<i>Hazards and Hazardous Materials</i>)
5-2	States that if the Project plans include discharging wastewater to a storm drain, a National Pollutant Discharge Elimination System (NPDES) permit from the overseeing Regional Water Quality Control Board may be required.	Chapter 6 (<i>Additional Consequences of Project Implementation</i>)
5-3	Recommends evaluation, proper investigation, and mitigation, if necessary, on onsite areas with current or historic PCB-containing transformers. Appropriate mitigation measures should be included in the Draft EIR.	Section 4.3 (<i>Hazards and Hazardous Materials</i>)

Table 1-3. Summary of Comments Received on the Notice of Preparation

Letter Number/ Comment Number¹	Subject of Comment	Relevant Draft SEIR Chapter/Section
5-4	States that if the Project development involves soil export/import, proper evaluation is required. If soil contamination is suspected or observed in the Project area, then excavated soil should be sampled prior to export/disposal. If the soil is contaminated, it should be disposed of properly in accordance with all applicable and relevant laws and regulations. In addition, if imported soil was used as backfill on site and/or backfill soil will be imported, proper evaluation/sampling is necessary to ensure the backfill material is free of contamination.	Section 4.3 (<i>Hazards and Hazardous Materials</i>)
Comment Letter 6 – City of San Diego Fire-Rescue Department		
6-1	States that City of San Diego Fire-Rescue Department will need to evaluate the system proposed for the cement and cementitious materials and asks if there are more buildings or structures that will be installed for the Proposed Project.	Chapter 3 (<i>Project Description</i>) and Section 4.3 (<i>Hazards and Hazardous Materials</i>)
ORGANIZATIONS		
Comment Letter 7 – Environmental Health Coalition (EHC)		
7-1	States that the Project description in the NOP does not specify the Project objectives and recommends that the Project include EHC's suggested objectives on air quality, greenhouse gas emissions, and reduction of community impacts.	Chapter 3 (<i>Project Description</i>)
7-2	States that the NOP does not indicate which scenario would produce the greatest impacts. The EIR must provide analysis for the maximum volumes of cargo, vessels, hours at berth, and peak day truck trips, for each of the scenarios. In addition, the EIR must assume that Cemex impacts will continue, given the uncertainty about whether Mitsubishi's impacts will replace or add to the existing impacts from bulk cargos at the Tenth Avenue Marine Terminal.	Chapter 7 (<i>Alternatives to the Proposed Project</i>)
7-3	States that the air quality analysis in the Draft EIR should address the following impacts in addition to the ones identified in the NOP: <ul style="list-style-type: none"> ▪ Impacts of truck trips for hauling excavated soil off site and infill soil on to the site. Trips and emissions must be quantified in the analysis. ▪ Analysis of accidental releases of cement or other cementitious materials and potential for respiratory hazards for workers and park users should be included. The TAMT Project EIR did not analyze the potential for releases of dry bulk materials in upset conditions or discuss the potential or consequences of accidental releases. States health concerns with contact with wet or dry Portland cement and disease that results from breathing cement dust. ▪ Impacts on potential residents in the Barrio Logan transition zone south of Main Street. States that the June 2014 citywide referendum overturned the Barrio Logan Community Plan Update adopted by the San Diego City Council in the fall of 2013, so residential development in the transition zone is possible. States that analysis of impacts on residents must assume that residences may be present closer to TAMT than are current residences. 	Section 4.1 (<i>Air Quality and Health Risk</i>)
7-4	States that mitigation for air quality impacts should include use of a bonnet system for ships, zero emission construction equipment and trucks, and local hire to reduce emissions for employee vehicles.	Section 4.1 (<i>Air Quality and Health Risk</i>)
7-5	States that the greenhouse gas emissions analysis in the Draft EIR must include emissions from soil excavation operations required for the Project, including from construction equipment and truck trips to haul soil off the site and transport infill soil to the site.	Section 4.2 (<i>Greenhouse Gas Emissions and Global Climate Change</i>)

Table 1-3. Summary of Comments Received on the Notice of Preparation

Letter Number/ Comment Number¹	Subject of Comment	Relevant Draft SEIR Chapter/Section
7-6	States that mitigation for GHG impacts should include zero emission construction equipment and trucks, solar PV panels on rooftops on and off the terminal, subsidized alternative transportation for workers, and local hire to reduce emissions from employee vehicles.	Section 4.2 (<i>Greenhouse Gas Emissions and Global Climate Change</i>)
7-7	As detailed in the appendices for the TAMT Redevelopment Draft EIR, 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. States that these contaminants should be included in environmental analysis for the Project to ensure that soils unearthed and/or removed during construction do not contain these contaminants.	Section 4.3 (<i>Hazards and Hazardous Materials</i>)
7-8	EHC agrees that analysis of noise is warranted in the environmental analysis for the Project. States that it will be important to include analysis of noise levels at night, given that unloading activities may occur for up to 20 hours per day.	Section 4.4 (<i>Noise and Vibration</i>)
7-9	States that the NOP does not identify light pollution as a potentially significant impact. However, the Project will entail unloading of cargo for up to 20 hours a day, and the EIR should address the issue of lighting at night that will be required during the unloading operation and the potential impacts on nearby receptors. Mitigation measures for light pollution may include: (1) use of energy efficient lighting, and (2) use of guidelines such as those put forward by Leadership in Energy and Environmental Design (LEED) or the International Dark-Sky Association for limiting total lumens and shielding light so that light pollution is minimized.	Chapter 3 (<i>Project Description</i>), Chapter 6 (<i>Additional Consequences of Project Implementation</i>)
7-10	EHC agrees that analysis of transportation and traffic impacts is warranted. Analysis of employee parking sufficiency should be included in the Transportation/Traffic section of the Draft EIR. Mitigation of parking impacts may include: (1) subsidized alternative transportation for workers, and (2) local hire to minimize employee parking requirements.	Section 4.5 (<i>Transportation, Circulation, and Parking</i>)
7-11	EHC agrees that analysis of cumulative impacts is warranted in this environmental investigation.	Chapter 5 (<i>Cumulative Impacts</i>)
7-12	States that the EIR for the Mitsubishi Bulk Cement Warehouse and Loading Facility Project will tier off of the TAMT Redevelopment FEIR [TAMT Final PEIR]. Comment states that the Project has potential impacts that were not identified in the TAMT Final PEIR. The Project EIR must include analysis of these impacts in order to ensure that the adjacent residential community and its schools and parks are not adversely impacted by the Project.	Chapter 4 (<i>Environmental Analysis</i>)
Comment Letter 8 – San Diego Port Tenants Association (SDPTA)		
8-1	SDPTA supports the Proposed Project and was involved in the Tenth Avenue Marine Terminal Program EIR process that was completed in December 2016. States that the Project is aligned with San Diego's efforts to grow the Tenth Avenue Marine Terminal and fill vacant warehouse space with companies that will enhance the San Diego community. States that the Project will support jobs, enhance opportunities for smart development, and will do so with the environment in mind. Project will bring nearly \$1 million in revenue for the District and will accelerate infrastructure revitalization and economic development throughout San Diego.	N/A

Table 1-3. Summary of Comments Received on the Notice of Preparation

Letter Number/Comment Number ¹	Subject of Comment	Relevant Draft SEIR Chapter/Section
Comment Letter 9 – Working Waterfront Group (WWG)		
9-1	WWG supports the Project and was involved in the Tenth Avenue Marine Terminal Program EIR process that was completed in December 2016. States that the Project is aligned with San Diego's efforts to grow the Tenth Avenue Marine Terminal and fill vacant warehouse space with companies that will enhance the San Diego community. The Project will support jobs, enhance opportunities for smart development, and support availability of construction materials, like cement, to accelerate infrastructure revitalization and economic development throughout San Diego.	N/A

¹ Comment letters are provided in SEIR Appendix A.

1.5 Organization of the Draft Subsequent Environmental Impact Report

The content and format of this Draft SEIR are designed to meet the requirements of CEQA and State CEQA Guidelines Article 9. This Draft SEIR is organized as follows:

The **Executive Summary** includes a brief summary of the Proposed Project; identifies each significant effect, including proposed mitigation measures and alternatives to reduce or avoid the 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 whether or how to mitigate the significant effects (State CEQA Guidelines Section 15123).

Chapter 1, Introduction, discusses the purpose of CEQA and this Draft SEIR, the scope and content of this Draft SEIR, the organization of this Draft SEIR, and the intended uses for this Draft SEIR (State CEQA Guidelines Section 15124(d)).

Chapter 2, Environmental Setting, describes the overall existing physical conditions in the vicinity of the Proposed Project when the analysis was initiated. In addition, the specific existing setting/conditions for each resource area are described in the applicable resource section in Chapter 4, *Environmental Analysis* (State CEQA Guidelines Section 15125).

Chapter 3, Project Description, contains both a map of the precise location and boundaries of the Proposed Project and its location relative to the region; lists the Proposed Project's central objectives, underlying purpose, as well as project benefits; and provides a detailed description of the Proposed Project's characteristics (State CEQA Guidelines Section 15124(a), (b), and (c)).

Chapter 4, Environmental Analysis, describes the existing physical conditions for each resource area, lists the applicable laws and regulations germane to the specific resource, describes the impact assessment methodology, lists the criteria for determining whether an impact is significant, identifies the direct and indirect significant impacts on the environment that would result from implementation of the Proposed Project, and lists feasible mitigation measures that would eliminate or reduce the identified significant impacts (State CEQA Guidelines Sections 15125–15126.4).

Chapter 5, Cumulative Impacts, discusses the cumulative effects of the Proposed Project in combination with the effects of other past, present and reasonably foreseeable projects in its vicinity.

Chapter 6, Additional Consequences of Project Implementation, discusses the way the Proposed Project could foster economic or population growth, either directly or indirectly, in the surrounding environment; describes the significant irreversible changes associated with the Proposed Project's implementation; and provides a brief discussion of the environmental resource impacts that were found to be not significant during preparation of this Draft SEIR (State CEQA Guidelines Sections 15126.2(c) and (d), 15127, and 15128).

Chapter 7, Alternatives to the Proposed Project, describes a reasonable range of alternatives to the Proposed Project, including the No-Project Alternative; compares and contrasts the significant environmental impacts of alternatives to the Proposed Project; and identifies the environmentally superior alternative (State CEQA Guidelines Section 15126.6).

Chapter 8, List of SEIR Preparers and Agencies Consulted, lists the individuals and agencies involved in preparing this Draft SEIR (State CEQA Guidelines Section 15129).

Chapter 9, References, provides a comprehensive listing by chapter of all references cited in this Draft SEIR (State CEQA Guidelines Section 15148).

Appendices present additional background information and technical detail for several of the resource areas.

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2. Environmental Setting

2.1 Introduction

This chapter describes the physical environment in the Project vicinity, from both a local and regional perspective, as described in the TAMT Final PEIR and supplemented with conditions that existed at the time the Notice of Preparation was published in September 2017. Resource-specific conditions are provided within each section of Chapter 4, *Environmental Analysis*, which also describes any inconsistencies with applicable plans.¹

2.2 Background Setting

2.2.1 San Diego Unified Port District

The mission of the District is to protect Tidelands Trust resources by providing economic vitality and community benefit through a balanced approach to maritime industry, tourism, water and land recreation, environmental stewardship, and public safety. The District was created under the San Diego Unified Port District Act (Port Act), adopted by the California State Legislature in 1962, as amended through 2006. The Port Act recognizes the Public Trust Doctrine and states that tidelands and submerged lands are to be used only for statewide public purposes. To this end, the District is charged with management of the tidelands and diverse waterfront uses along San Diego Bay that promote commerce, navigation, fisheries, and recreation on the granted lands. The District is responsible for the management and administration of the TAMT facility.

2.2.2 Tenth Avenue Marine Terminal

The TAMT is a developed marine-related industrial area of great importance to the region's economy. Within District tidelands, the industrial and maritime commerce sectors yield an estimated 12,800 direct jobs and approximately 10,200 indirect or induced jobs, resulting in a total of 23,000 jobs (District 2015). The vast majority of these industrial and maritime-related jobs are focused within Planning District 4 of the Port Master Plan (PMP). Notably, the TAMT and the National City Marine Terminal are the only areas in the entire San Diego region that provide established waterfront industrial sites with railroad service, close freeway access, commercial port-related support functions, and deep-water berthing.

The 96-acre TAMT, completed in 1958, consists of filled lands paved with concrete, bulkheads, and rubber or timber fenders along each berth face. It serves as a dry bulk, liquid bulk, multipurpose general cargo, and specialty container facility and remains a critical gateway for cargo movement on the West Coast. Water depths at the TAMT (as well as the adjacent industrial area in Planning District 4) can accommodate vessels with drafts up to 42 feet.

The District has implemented a number of measures to help reduce environmental impacts associated with terminal activity. These efforts include implementing the "clean truck" and voluntary vessel speed-reduction programs, identifying specific truck routes away from sensitive receptors, and installing shore power on the TAMT.

¹ For example, Section 4.1, *Air Quality and Health Risk*, contains a Project consistency analysis with the applicable air quality plans.

In 2005, the District partnered with the U.S. Army Corps of Engineers (USACE) to complete dredging along San Diego Bay's primary navigational channel to accommodate commercial, cargo, and military vessels. The District invested approximately \$2 million to complete this improvement, whereas USACE invested upward of \$5 million. This significant investment in the navigational channel ensures that maritime uses consistent with the Port Act continue at the TAMT.

2.3 Proposed Project Setting

2.3.1 Location

The Proposed Project site is located at 645 Switzer Street within the District's TAMT. The TAMT is located along San Diego Bay, south of downtown San Diego, east of the San Diego Convention Center and the Hilton San Diego Bayfront Hotel, and adjacent to the San Diego community of Barrio Logan. Harbor Drive is located near the northern boundary of the TAMT. Site access from Harbor Drive is provided primarily from Cesar E. Chavez Parkway, which becomes Crosby Road as it approaches the TAMT.

Major circulation facilities in the area include State Route (SR) 75, also known as the Coronado Bridge, approximately 0.25 mile to the south, and Interstate (I-) 5, approximately 0.5 mile to the north. Figure 2-1 provides a regional map of the Proposed Project's location. Figure 2-2 provides an aerial view of the Proposed Project site.

2.3.2 Existing Site Conditions

2.3.2.1 Tenth Avenue Marine Terminal

Section 2.3.4 of the TAMT Final PEIR provides a detailed description of the existing facilities onsite, while TAMT Final PEIR Section 2.3.5 provides a discussion of the existing operations at the terminal (TAMT Final PEIR pgs. 2-3 to 2-6). As described in the TAMT Final PEIR, the TAMT consisted of two transit sheds, as well as two warehouses (Warehouses B and C), two bulk liquid storage facilities, a silo complex and conveyor system, on-dock rail tracks, and an entrance gate into the TAMT with a security guard structure at the end of Crosby Road. In addition, there are eight berths that are capable of accommodating oceangoing vessels. The entire TAMT area is highly industrialized in character, and no general public access is permitted on the terminal.

The TAMT does not include any formally dedicated streets or roads. However, three distinct paved areas essentially function as roads; these are referred to by terminal users as Terminal Street, Switzer Street, and Water Street. The TAMT does not contain any vegetation, and the majority of the terminal area is underlain by fill and covered by asphalt, although there is a small 1-acre portion of the TAMT at the entrance that is unpaved.

As analyzed in the TAMT Final PEIR as a part of the Demolition and Initial Rail Component, Transit Shed #1 has now been demolished and the area is used for more efficient cargo movement and temporary cargo laydown. Transit Shed #2 demolition is underway and is anticipated to be complete by summer 2020. All other conditions at TAMT described in the TAMT Final PEIR remain the same.

Mitsubishi Cement Corporation at Warehouse C
2. ENVIRONMENTAL SETTING

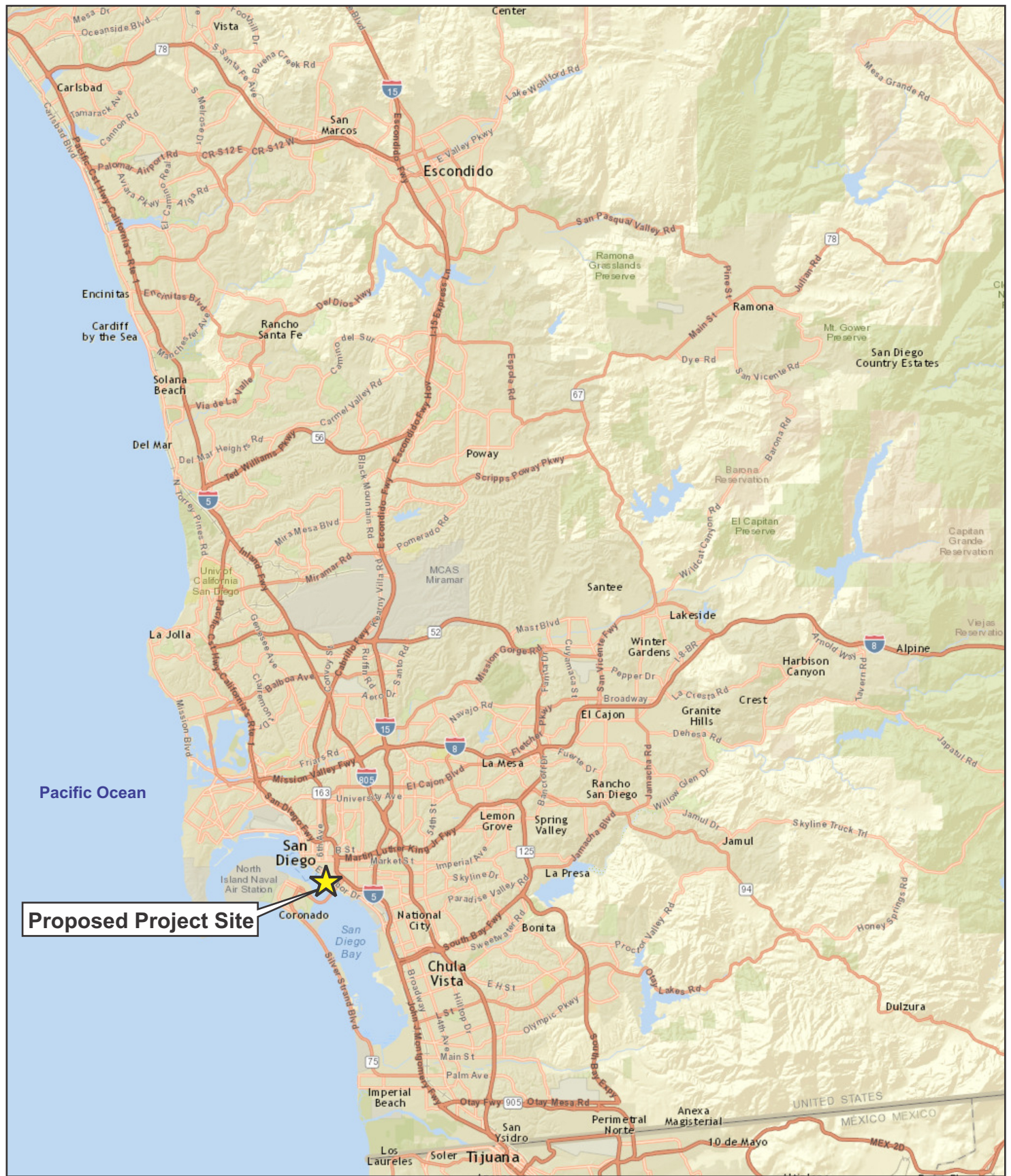
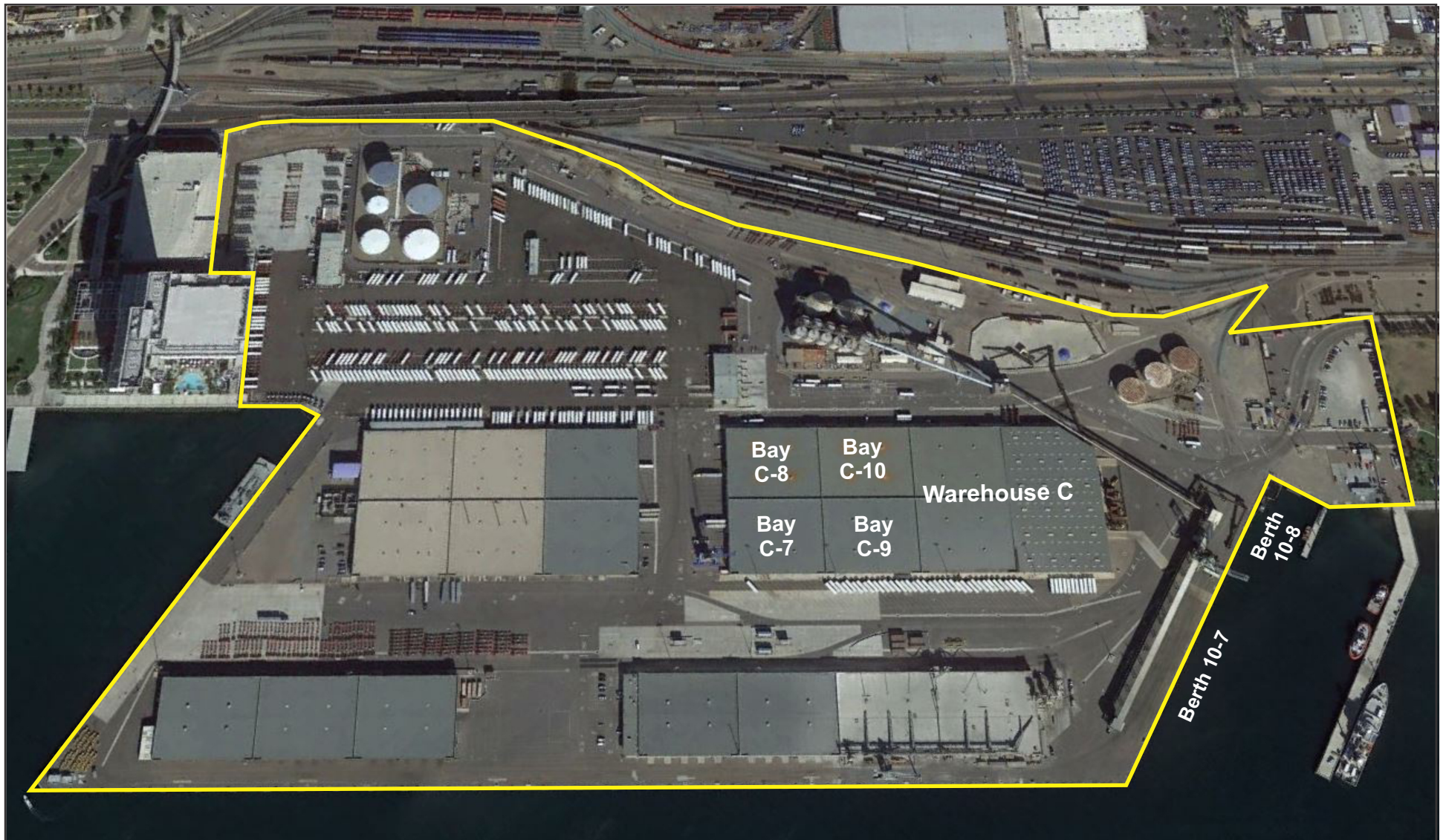
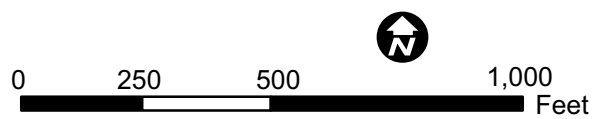


Figure 2-1
Regional Map

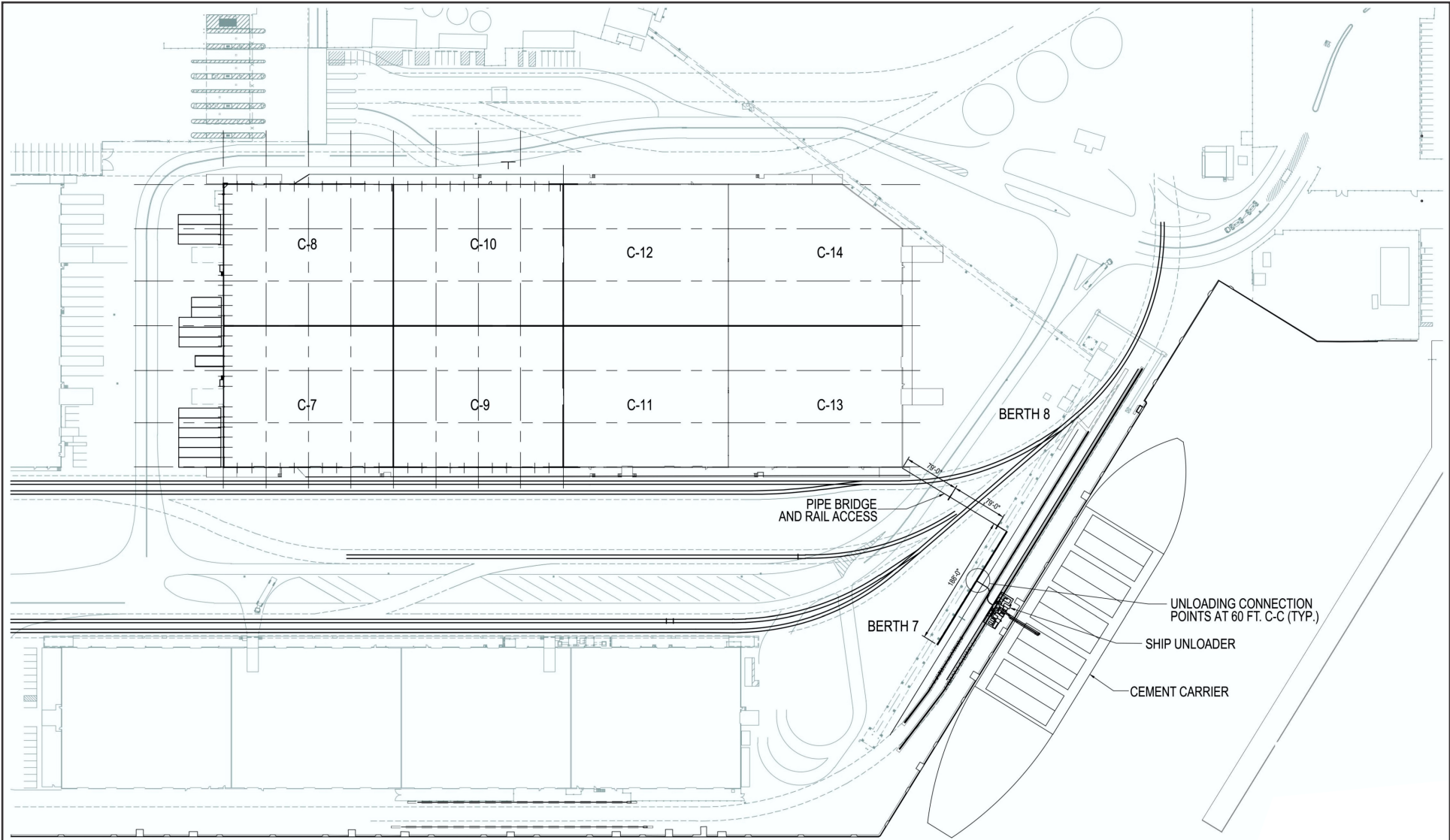


Source: GoogleEarth, 2017.



 Tenth Avenue Marine Terminal Boundary

Figure 2-2
Aerial View of Project Site



Source: Environmental Audit, Inc. 2017



Figure 2-3
Existing Site Layout

2.3.2.2 Project Site

The Project site is within the TAMT and includes Bays C-7 through C-10, which are located on the western end of Warehouse C. Bays C-7 and C-9 are currently vacant, while Bays C-8 and C-10 are currently occupied by a District tenant and used for the storage of bauxite. The current tenant's lease associated with Bays C-8 and C-10 expires on December 31, 2019, and the tenant is expected to vacate the premises at the time that the lease expires. The Project site also encompasses Berths 10-7/10-8. These two berths face south, have 650 feet of space, and have a depth of 36 to 42 feet.

Table 2-1 provides a description of the existing structures within the TAMT and identifies those structures that would be modified by the Proposed Project.

Table 2-1. Existing Structures at the TAMT

Onsite Structure	Location	Description/Use	Modified by Proposed Project?
Entrance Gate and Security Guard Structure	Southern end of Crosby Road	Primary terminal entrance; security.	No
Silo Complex and Conveyor System	East of Warehouse C	Soda ash import, export, and storage.	No
Warehouse B (San Diego Refrigerated Services Facility)	Northeast area of TAMT; served by Berths 10-1/10-2	317,802-square-foot on-dock cold storage facility; 116,163 square feet of cargo, storage, and cross-docking operations.	No
Transit Shed #1	Northwest area of TAMT; served by Berths 10-3/10-4	145,000 square feet for general cargo, military – demolished in 2018.	No
Transit Shed #2	Southwest area of TAMT; served by Berths 10-5/10-6	194,000 square feet for general cargo, bulk cement – slated for demolition in July 2019 to June 2020.	No
Warehouse C	South and center area of TAMT	384,000 square feet of dry bulk and equipment storage divided between eight bays that include two clerk sheds—one at C-10 and one at C-11.	Yes Bays C-7 – C-10
Liquid Storage Facility 1 (Jankovich Fuel Farm)	Northeast area of TAMT	Diesel and kerosene storage in five tanks with capacities of 2,344,986 gallons; 2,326,128 gallons; 1,501,584 gallons; 836,090 gallons; and 2,040,780 gallons.	No
Liquid Storage Facility 2	Southeast area of TAMT, near Crosby Street entrance	Three empty tanks, previously used for molasses storage each with one-million-gallon-capacity.	No
Dole Refrigerated Container Facility	Northeast area of TAMT, generally between Warehouse B and Harbor Drive	Open refrigerated container facility, utilized for Dole operations. Includes offices, maintenance and repair capabilities, reefer plugs, and racks within a 900,966-square-foot area of the TAMT.	No
Mobile Harbor Crane	Stored in the vicinity of Warehouse C	Lifting capacity of 100 metric tons.	No
Siwertell Bulk Unloader (Owned by Cemex)	Along crane rail at Berth 10-6	A screw auger apparatus that runs on rails and is able to pick up fine bulk materials during the discharge of an oceangoing vessel.	No
On-Dock Rail	Rails run along Berths 10-3/10-4 and 10-5/10-6, and along the western side of Warehouses B and C	N/A	No

Table 2-1. Existing Structures at the TAMT

Onsite Structure	Location	Description/Use	Modified by Proposed Project?
Berths 10-7/10-8	Southern boundary of TAMT	Vessel berthing space for primarily dry bulk cargo that includes shoreside conveyor system	Yes, shoreside electrical infrastructure

2.3.3 Land Use Designations

The District's PMP, which has been certified by the California Coastal Commission, is the guiding land use policy document for all areas under the District's jurisdiction. The TAMT, including the Proposed Project site, is located in Planning District 4, which is delineated on Precise Plan Map Figure 13 of the PMP. The PMP land use designation of the Proposed Project site is Marine Terminal. As defined in the PMP, marine terminals provide the facilities necessary for the handling, marshalling, and unloading/loading of cargo. Cargo storage space includes long- and short-term dry storage, warehouses, silos, cooler and freezer space, and open public storage areas. Marine Terminal warehouses have railroad connections and all are accessible to arterial highways.

2.3.4 Surrounding Conditions

Three water-dependent shipyards are located immediately south of the TAMT. Other industrial uses include a Burlington Northern Santa Fe (BNSF) rail facility between the TAMT and Harbor Drive, and a Metropolitan Transit System yard, located north and east of the TAMT, which serves the San Diego Trolley system. The nearby shipyards, BNSF rail facility, and Restaurant Depot (a wholesale distribution warehouse located off tidelands, just east of the TAMT) are all industrial uses in the immediate area. The Barrio Logan community, immediately east of the TAMT, includes a mix of light industrial, commercial, residential, school, and park uses.

Non-industrial land uses closest to the Proposed Project site include: residential uses approximately 2,200 feet (0.42 mile) to the east; Perkins Elementary School, approximately 1,700 feet (0.32 mile) to the northeast; the Monarch K-12 School, approximately 2,028 feet (0.38 mile) to the east; and Cesar Chavez Park and Pier, approximately 1,500 feet (0.28 mile) to the southeast. Other uses within the vicinity of the TAMT include a baseball stadium (Petco Park), several hotels, and the San Diego Convention Center.

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3. Project Description

3.1 Introduction

The Proposed Project would entail the construction and operation of a cement and cementitious material import, storage, and distribution facility within the TAMT. This facility would include the potential for two separate phases of improvements to Bays C-7 through C-10 of Warehouse C for the receipt, storage, and distribution of up to 600,000 metric tons per year (MT/yr) of cement and cementitious materials including, but not limited to, cement, slag, fly ash, and pozzolans. The cementitious material would be pneumatically¹ unloaded into Warehouse C from dry bulk cargo ships using mobile vacuum unloaders, and there would be up to 24 vessel calls per year at Berths 10-7/10-8 during peak operation. Aside from electrical upgrades for shore power, no changes to Berths 10-7/10-8 are proposed.

The operational lifetime of the Proposed Project is anticipated to be 15 years following District approval of a lease or similarly binding agreement. The proposed term of that agreement would be 5 years with two 5-year options to extend, for a maximum total of 15 years. Approval of the Proposed Project would also require issuance of a non-appealable CDP by the District prior to development and operation.

Bays C-7 and C-9 are currently vacant. Bays C-8 and C-10 are currently occupied by a District tenant and used for the storage of bauxite. It is anticipated that the other Warehouse C bays adjacent to the Proposed Project site would continue to be used for similar operations until such time that Warehouse C is demolished, as addressed in the TAMT Final PEIR. The timeframe for demolition is unknown, but would not likely occur within the next 15 years while Mitsubishi uses the bays for the Proposed Project.

3.2 Project Objectives

The majority of cementitious material used within San Diego County is trucked in from outside its jurisdictional boundaries. This includes cementitious material shipped primarily from foreign sources to other U.S. ports. To reduce the amount of cementitious material trucked in from outside the local area, Mitsubishi is proposing to use the west end of Warehouse C to import up to 600,000 MT/yr of cementitious material. The objectives for the Proposed Project are:

1. Establish a terminal facility in the San Diego region to receive delivery and provide for the storage and distribution of up to 600,000 MT/yr of cementitious materials to meet current and future cement demand in the greater San Diego region.
2. Eliminate or substantially reduce truck trips and distances from other more distant ports which presently deliver cementitious material necessary to serve the San Diego region.
3. Establish a facility with onsite storage capacity sufficient to provide for the efficient offloading of bulk ships delivering cementitious materials and loading of bulk cement trucks.
4. Establish an efficient, state-of-the-art facility that is sufficiently flexible to allow for unloading, separate storage, and distribution of a diverse range of cementitious products, including, but not limited to, cement, slag, fly ash, and pozzolans, which, in turn, facilitates the use of more environmentally sustainable concrete.
5. Establish a cementitious import operation facility at TAMT that is consistent with anticipated dry bulk throughput and operational capacities in the TAMT Redevelopment Plan under the

¹ Pneumatic unloading involves transporting bulk materials through a pipeline via either a negative (i.e., vacuum) or positive (i.e., pressurized air) gas stream.

Sustainable Terminal Capacity Alternative, adopted by the District while maintaining environmental sustainability.

6. Utilize existing berths and Port infrastructure and, in doing so, optimize the use of land and identify improvements and upgrade infrastructure necessary for the Proposed Project, consistent with the objectives of the TAMT Plan.

3.3 Project Construction

There are two loading options for the Proposed Project analyzed in this SEIR, both of which have alternative construction scenarios. Under either of these options, operational throughput of materials and other operational characteristics would remain the same. Loading Option A proposes truck loading inside Warehouse C, and Loading Option B proposes truck loading outside of Warehouse C. Overall site plans for Loading Option A (interior truck loading) and Loading Option B (exterior truck loading) are presented in Figures 3-1 and 3-2, respectively.

Under Loading Option A (interior truck loading) and Loading Option B (exterior truck loading), there are also two unloading options related to the proposed ship-to-warehouse unloading pipelines. As shown in Figure 3-3, Unloading Option 1 (Underground Pipeline) would allow for cementitious material to be pneumatically transferred to Warehouse C through an approximately 150-foot underground unloading pipeline, which would then be routed along the top edge of Warehouse C. The underground unloading pipeline would be 6 feet below the ground. As shown in Figure 3-4, Unloading Option 2 (Overhead Pipeline) would allow for cementitious material to be pneumatically transferred to Warehouse C through an approximately 150-foot overhead, unloading pipeline that would continue along the top edge of Warehouse C. The overhead pipeline would be 40 feet above ground. The pipeline alignment would be the same under both unloading options.

Construction of Loading Option A1 (Truck loading inside Warehouse C with the underground unloading pipeline) would require a worst-case maximum excavation of approximately 20,220 cubic yards (cy) of material. Loading Option B1 (Truck loading outside Warehouse C with the underground unloading pipeline) would require a maximum excavation of 19,540 cy of material. Total excavation activities for Loading Option A and Loading Option B, and Unloading Option 1 and Unloading Option 2 are detailed in Table 3-1.

Table 3-1. Summary of Excavation Activities (cubic yards)

Construction Option	Excavation	Imports	Export
Loading Option A (Interior Truck Loading)	19,520	19,520	Soil: 19,520 Asphalt: 3,560
Loading Option B (Exterior Truck Loading)	17,440	17,440	Soil: 17,440 Asphalt: 300
Unloading Option 1 (Underground Pipeline)	700	700	Soil: 100 Asphalt: 100
Unloading Option 2 (Overhead Pipeline)	230	0	Soil: 230 Asphalt: 30

Construction of the Proposed Project would occur in two phases (Phase I and Phase II). Bays C-7 and C-9 are anticipated to be upgraded first (Phase I), followed by Bays C-8 and C-10 (Phase II). The improvements would involve five principal construction activities: (1) concrete demolition and excavation, (2) foundation and concrete pouring (which includes the installation of the support piles for the truck loadout area), (3) roof demolition and repair, (4) installation of mechanical equipment, and (5) electrical tie-ins. Phase I

improvements would take an estimated 7–10 months to complete. Upon completion of Phase I, the Proposed Project would have a throughput of up to 600,000 MT/yr of cementitious material.

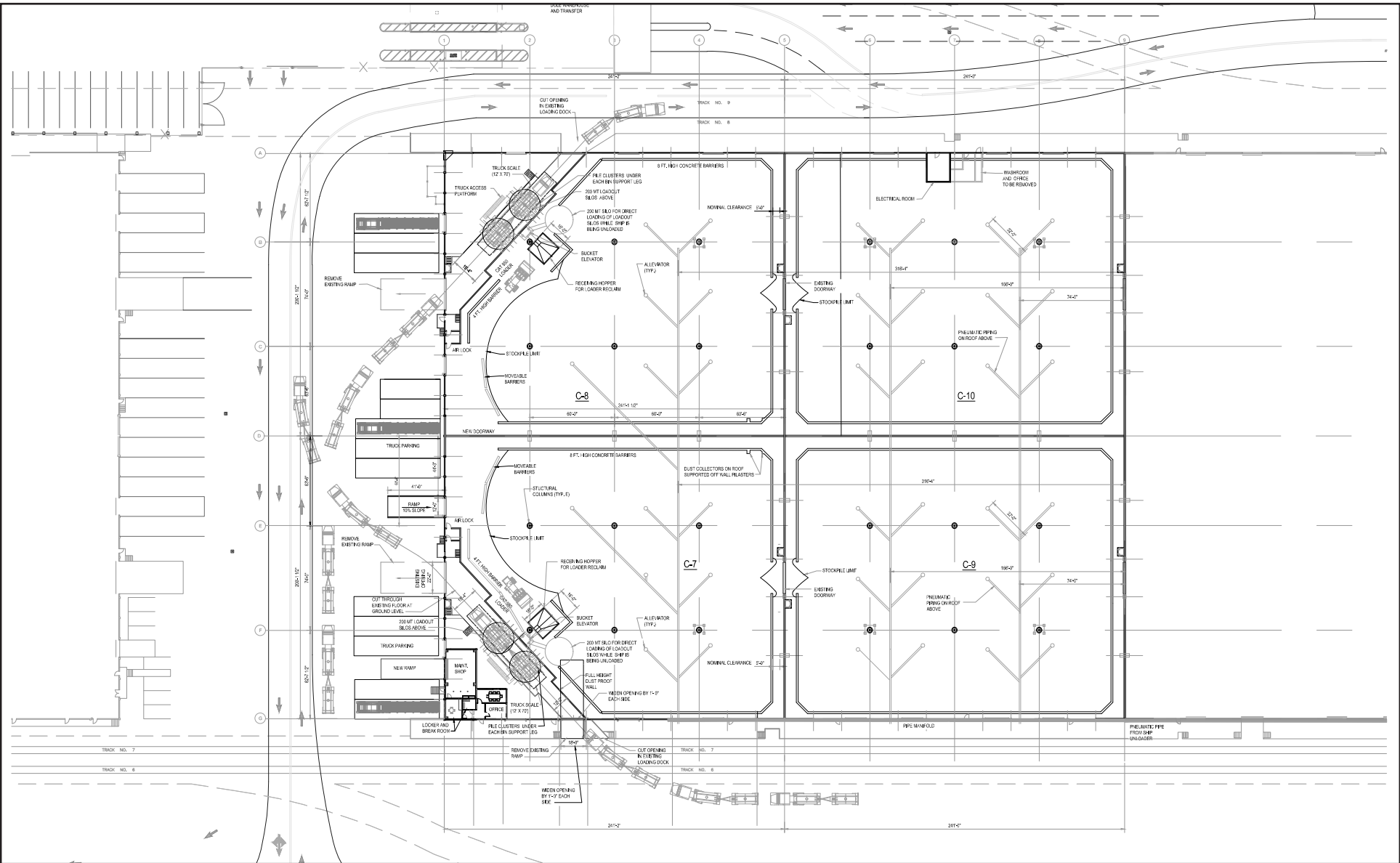
Phase I of the Proposed Project would involve improvements to Bays C-7 and C-9. These improvements are shown in Figure 3-5 for Loading Option A (interior truck loading) and Figure 3-6 for Loading Option B (exterior truck loading). Preliminary equipment elevations for Loading Options A and B are shown in Figure 3-7.

Phase I proposed improvements would include the following:

- Sealing the storage bays to prevent cementitious material loss through joints and seams.
- Installing a truck loading rack, either inside or outside Bay C-7, equipped with two 200 MT silos (approximately 67 feet high) with dust control truck loading spouts.
- Installing one 12-foot by 70-foot truck scale.
- Installing piping to each bay to pneumatically transfer cementitious material from the dock to the warehouse.
- Installing a reclaim hopper, air slide, screw conveyor, and bucket elevator in the truck loading areas to mechanically transfer cementitious material from the warehouse C bays to the silos.²
- Potential structural upgrades to the roof of Warehouse C, installation of roof-mounted piping, and a berthside unloader for the pneumatic transfer of cementitious material from ships to the cementitious material storage areas.
- Installing two 26,000 cubic feet per minute dust collectors on the roof to control dust emissions from the storage areas and truck loading racks.
- Upgrading electrical equipment to support the electrical demand of the Proposed Project's operation.

The tallest of the construction equipment involved in these construction activities would be the 100-ton crane, which would have a maximum height of 180 feet.

² Cement and cementitious materials would be fed, conveyed, elevated, stored and measured through a series of equipment primarily consisting of reclaim hoppers, air slides, screw conveyors, bucket elevators, and holding silos. In the bucket elevator, a chain or belt carries a series of evenly-spaced buckets that receive the cement or cementitious material at the lower entry chute/hopper and carry it over the top sprocket, where it is discharged due to a combination of gravitational and centrifugal effects. In the screw conveyor, the cement or cementitious material partially fills the voids between flights and is transported due to the rotating screw effect. Over-filling inhibits transport due to rotation of the particulate material. An air slide is a pneumatic fluidized conveyor that moves the cement or cementitious materials.



Source: Source: Environmental Audit, Inc. 2018

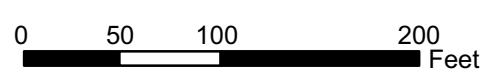
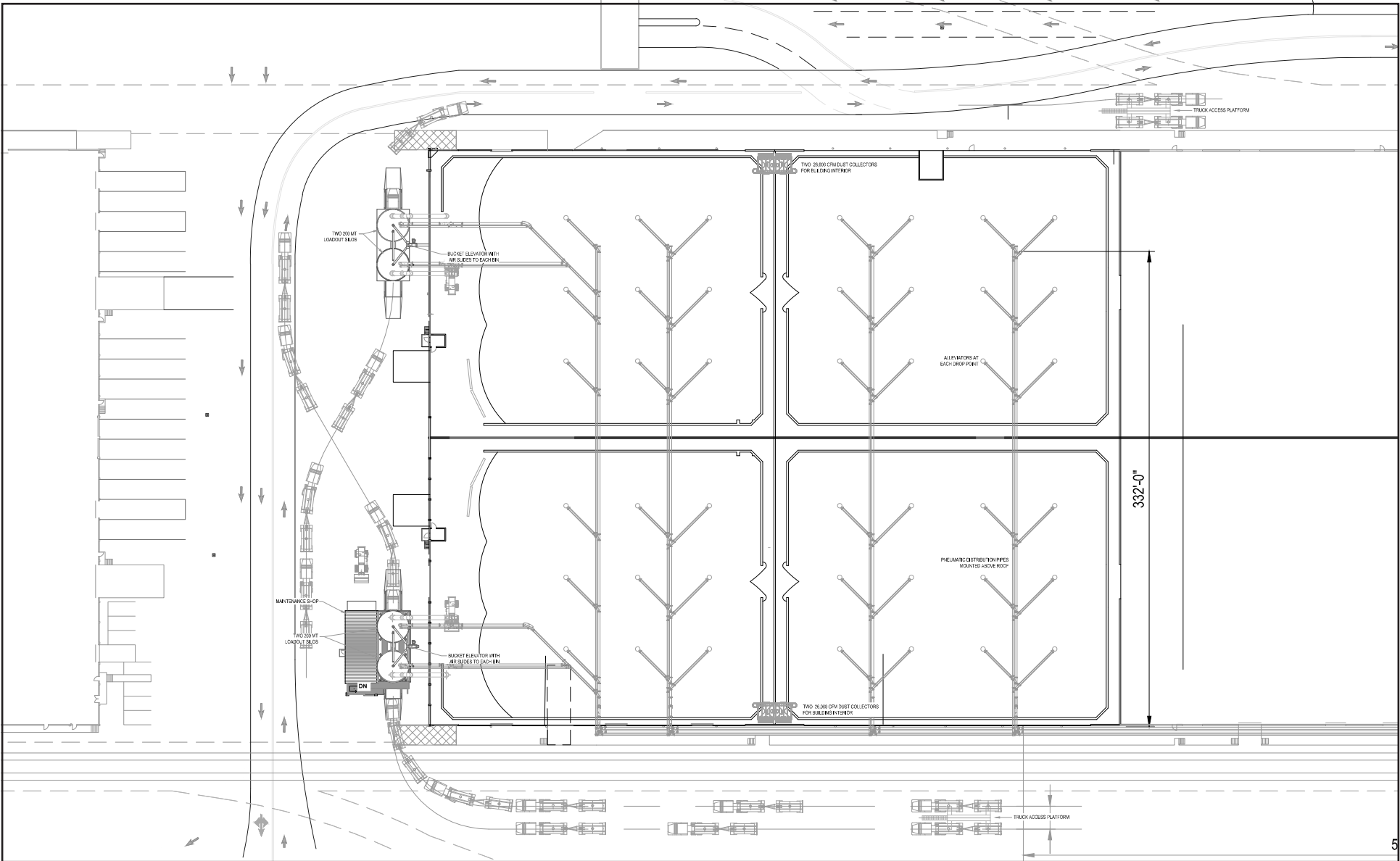
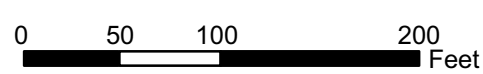


Figure 3-1

Overall Site Plan for Option A (Interior Truck Loading Racks)

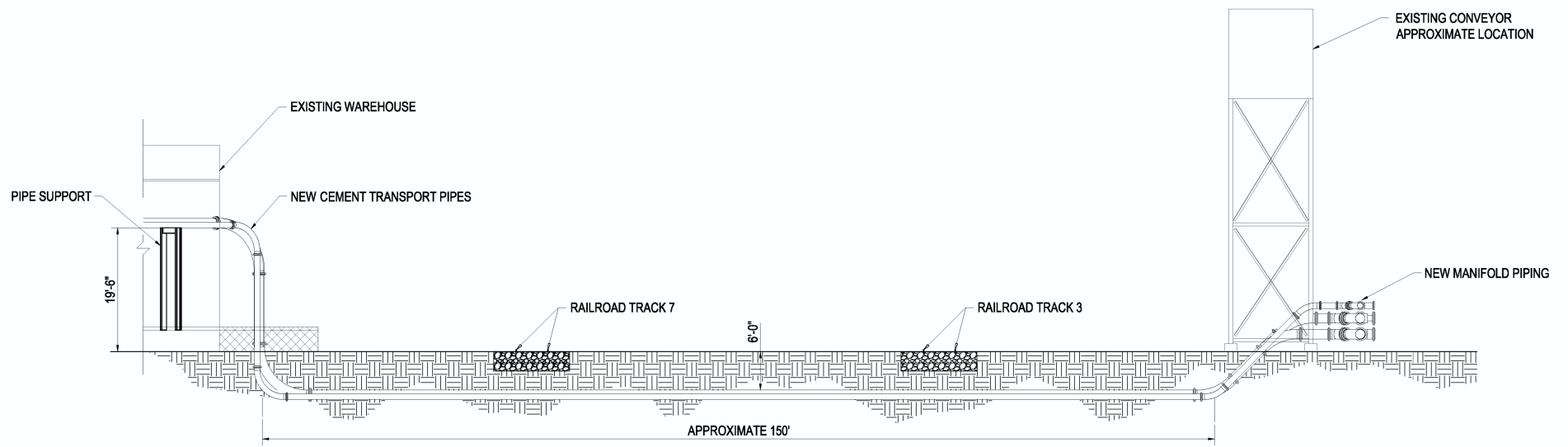


Source: Source: Environmental Audit, Inc. 2018



Overall Site Plan for Option B (Exterior Truck Loading Racks)

Figure 3-2

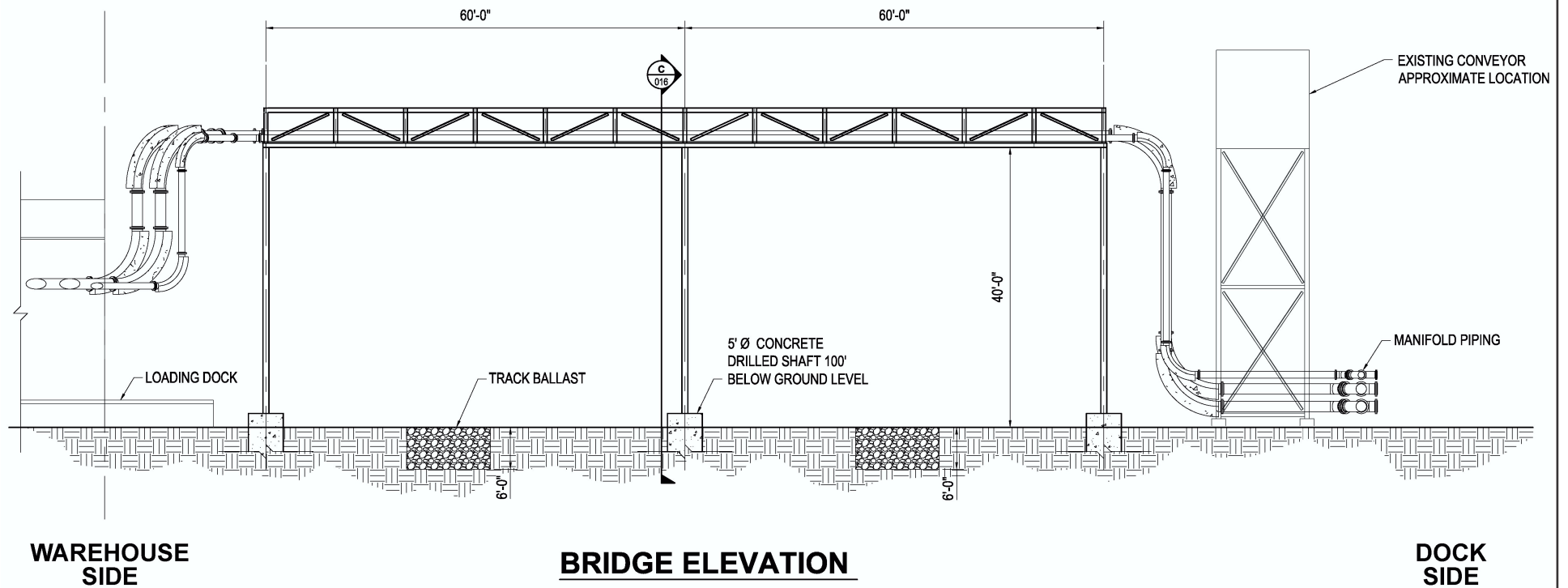


SUBTERRANEAN PIPELINE

Source: Environmental Audit, Inc. 2017

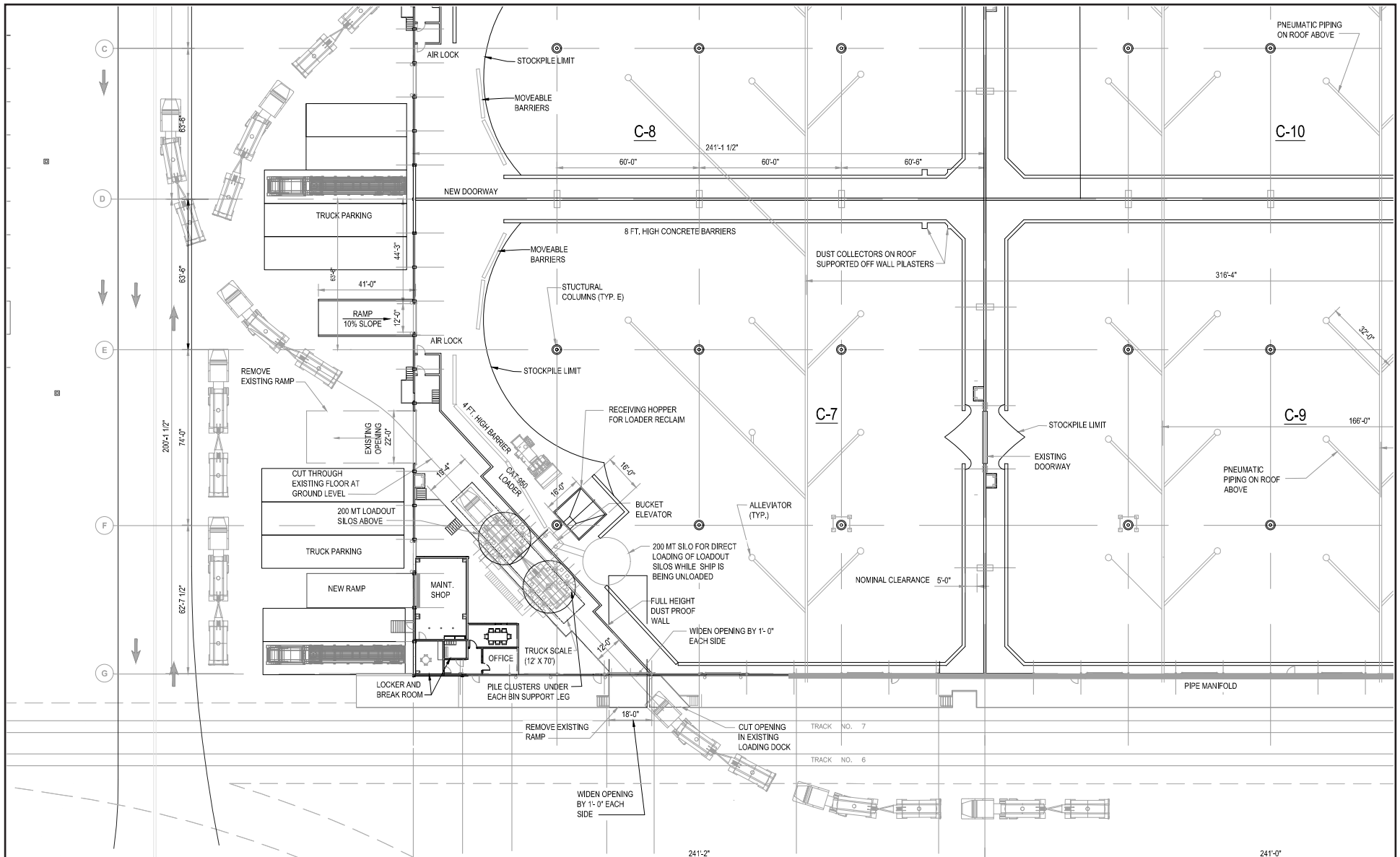
Figure 3-3
Sub-Option 1 (Subterranean Pipeline)

3. PROJECT DESCRIPTION



Source: Environmental Audit, Inc. 2017

Figure 3-4
Sub-Option 2 (Overhead Pipeline)



Source: Source: Environmental Audit, Inc. 2018

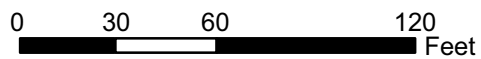
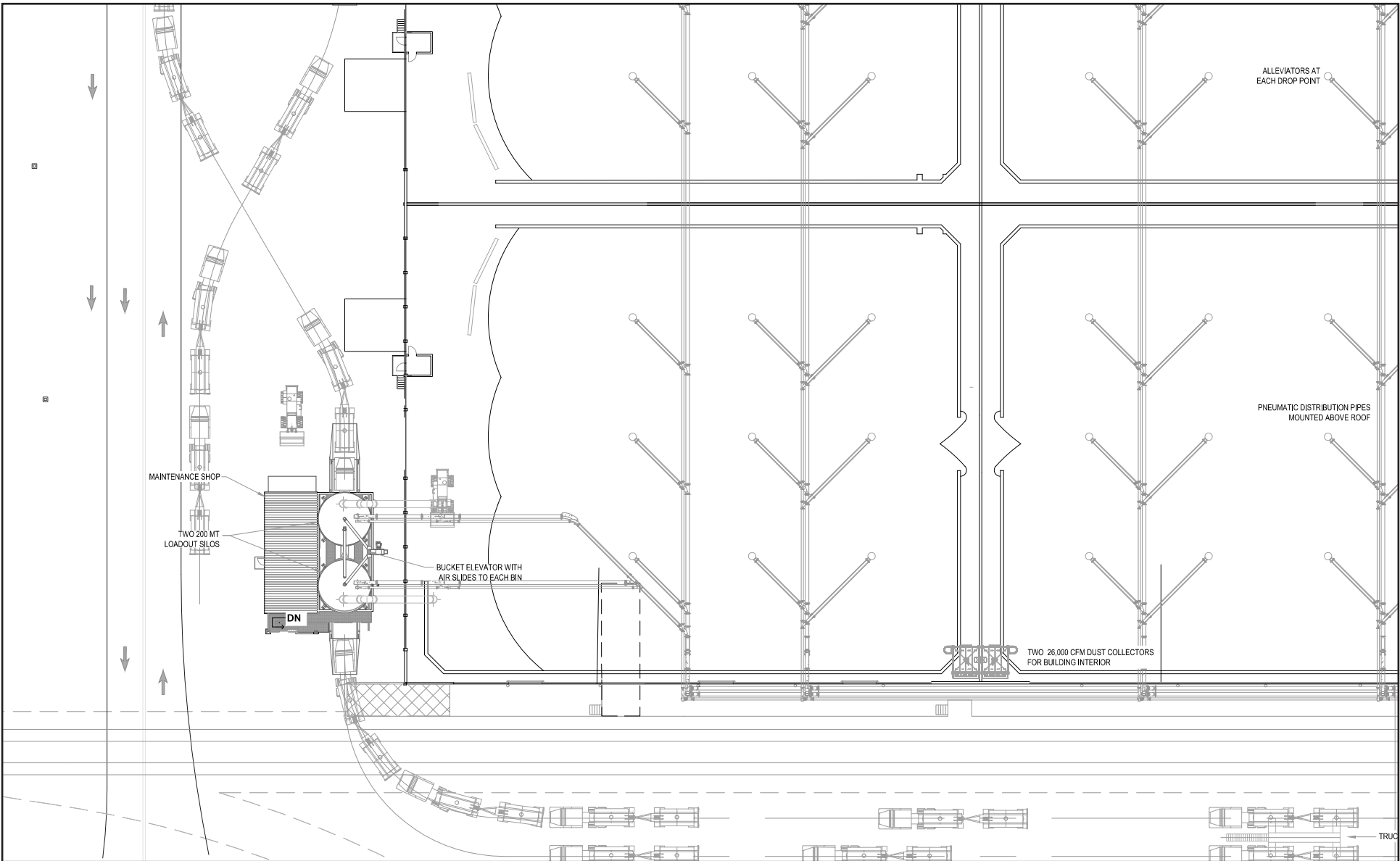


Figure 3-5

Site Plan for Bays C-7 and C-9, Option A (Interior Truck Loading)

Mitsubishi Cement Corporation at Warehouse C
3. PROJECT DESCRIPTION



Source: Source: Environmental Audit, Inc. 2018

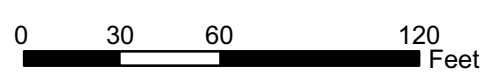
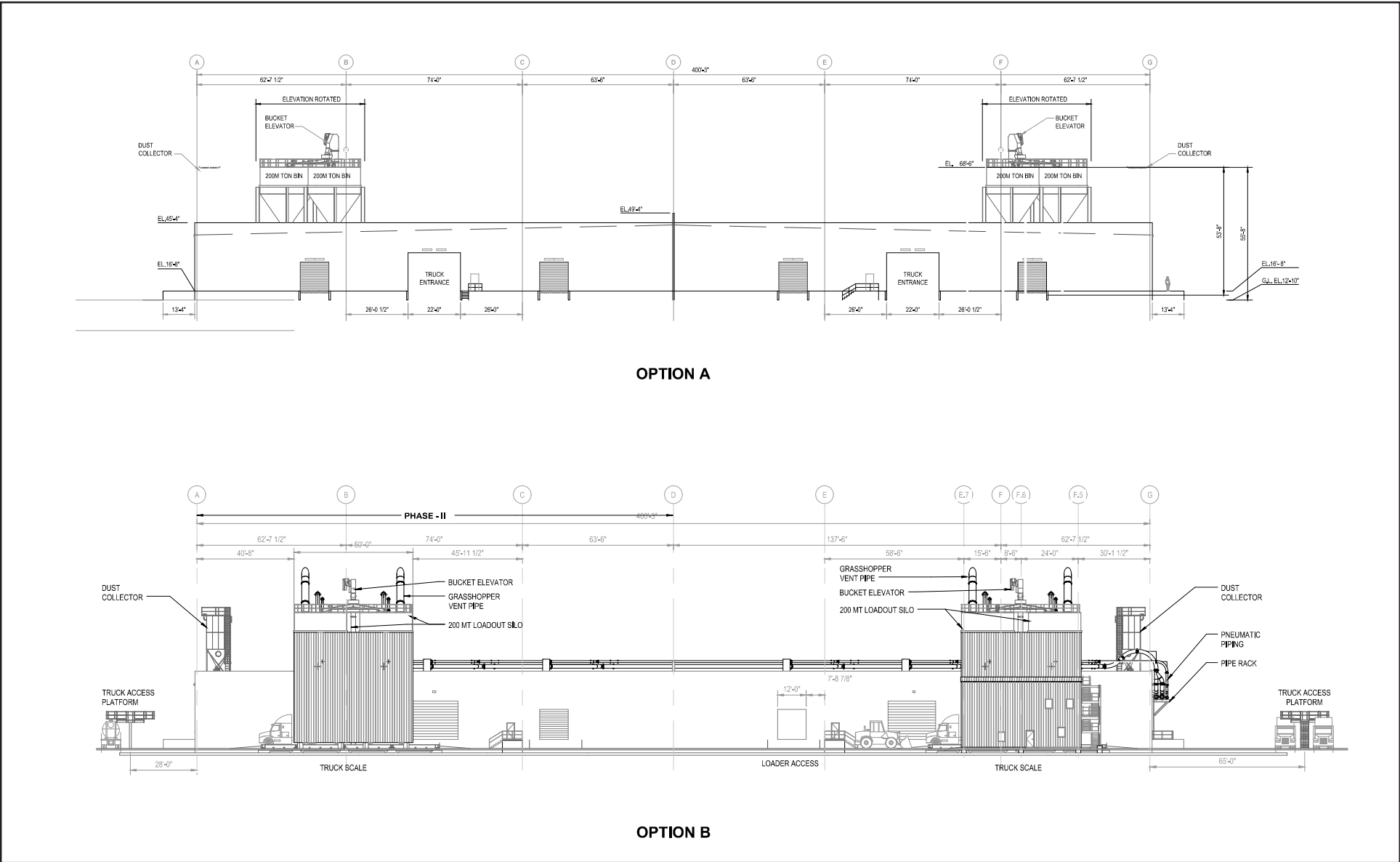


Figure 3-6

Site Plan for Bays C-7 and C-9, Option B (Exterior Truck Loading)



Source: Source: Environmental Audit, Inc. 2018

Figure 3-7

West Elevation View, Options A and B

Phase II improvements to Bays C-8 and C-10 are anticipated to begin 2–3 years after Phase I is operational. These improvements (with the exception of the installation of underground piping, which only would occur during Phase I improvements) would be identical to those undertaken for Bays C-7 and C-9, and would require approximately 7–10 months to construct. Figure 3-8 presents a site plan for Bays C-8 and C-10 with interior truck loading (Option A), while Figure 3-9 presents a site plan for Bays C-8 and C-10 with exterior truck loading (Option B). At the completion of Phase II improvements, the maximum annual throughput would remain the same; however, the additional equipment and storage would allow more flexible operations (e.g., store multiple cementitious materials concurrently within the warehouse bays) and improved ability to respond to seasonal and other market fluctuations.

Because the Proposed Project's construction would be undertaken in phases, its implementation would also involve the installation of temporary construction modular buildings and utilities within Warehouse C, as well as their removal upon completion of construction of Phase II. Construction materials would be stockpiled within different bays in Warehouse C.

For the interior truck loading option (Loading Option A), the office, break room, and maintenance areas would be located inside Warehouse C. For the exterior truck loading (Loading Option B), the office, break room, and maintenance areas would be built onto the Phase I truck loadout and housed in a 48-foot by 20-foot, two-story addition located on the west side of the truck loadout. The addition would share a common wall with the truck loadout and would have the same exterior siding.

All modifications would be made within the existing footprint of the Warehouse C and areas immediately adjacent to the warehouse. Bays C-7 through C-10 have a combined gross floor area of 192,000 square feet. The roof height would remain unchanged; however, the silos and dust collectors would extend approximately 23 feet above the existing roof height. The tallest units would be the dust collector stacks at approximately 40 feet above the roof; the equipment added to the roof would have a total maximum height of approximately 75 feet above grade.

The excavated area for the truck loading racks would be compacted and capped with reinforced concrete to support trucks, and the warehouse area would be excavated, compacted, and filled with structural fill and capped with reinforced concrete to support equipment and cementitious material. The Proposed Project would not change the amount of impervious surface or alter existing drainage patterns.

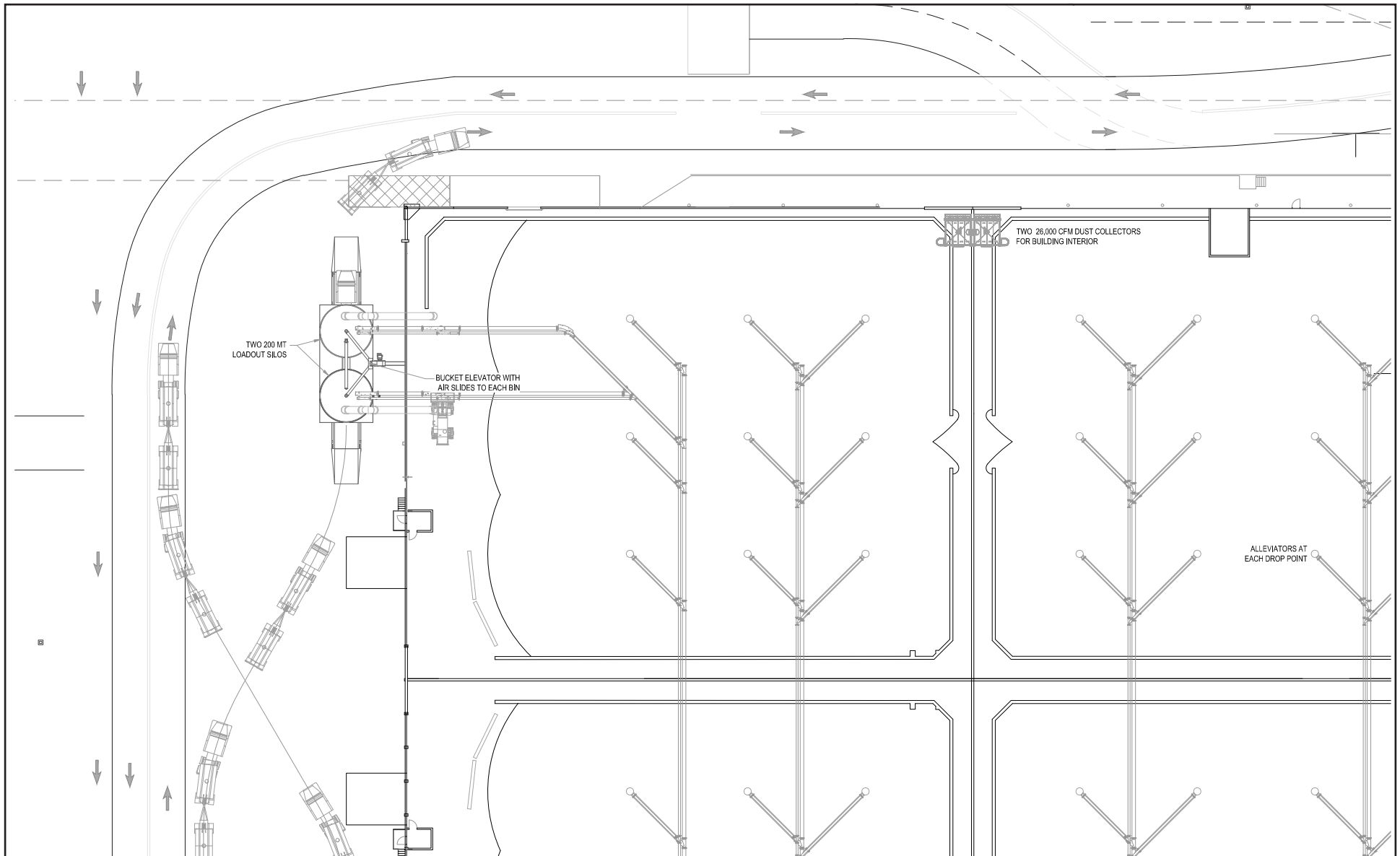
The Proposed Project would be required to adhere to the Project's Geotechnical Report recommendations (see Appendix B) through the grading and building permit process. The detailed design would incorporate requirements of the City of San Diego's ordinances (e.g., grading), the California Building Code (e.g., seismic standards), and American Society for Testing and Materials (ASTM) standards. The removal of existing surface material, excavation of existing fill, and replacement with compacted fill with an Expansion Index of 50 or less may be necessary to provide the proper foundation for the Proposed Project activities. Saturated subgrades are proposed to be treated in accordance with the Geotechnical Report's recommendations. All fill and backfill would be compacted to meet the 95 percent criterion of the maximum dry density per ASTM Standard D1557. Imported fill would be tested for soil characteristics for optimum compaction as specified in the Geotechnical Report. Any cement slurry used in lieu of structural fill would be sampled and tested pursuant to Chapter 5 of the American Concrete Institute Building Code ACI318.³

³ Project features associated with the Project's Geotechnical Report would be incorporated into the Coastal Development Permit as part of the Project's development description and, hence, must be implemented as part of the development.



Figure 3-8

Site Plan for Bays C-8 and C-10, Option A (Interior Truck Loading)



Source: Source: Environmental Audit, Inc. 2018

0 30 60 120 Feet



Figure 3-9

Site Plan for Bays C-8 and C-10, Option B (Exterior Truck Loading)

To support the Proposed Project's truck loadouts, between 30 and 40 support piles per truck loadout spaced 12 to 14 feet center-to-center would be installed. The piles would be installed at the TAMT to at least 45 feet below grade and up to 90 feet below grade. The piles are expected to be one of three pile types: (1) auger cast; (2) cast-in-drilled hole; or (3) driven, if rig access is available.

The soil borings collected for the Proposed Project's Geotechnical Report did not indicate the presence of expansive soils and indicated negligible potential for sulfate attack. However, the onsite soils were found to be corrosive to buried metals; therefore, standard measures would be taken to protect against corrosion as part of the Proposed Project design.

No changes would be made to onsite parking. A number of parking spaces are available within the TAMT; however, the majority of these parking spaces are not marked in order to provide maximum flexibility for existing operations. The area immediately adjacent to the east side of Warehouse C could accommodate up to 85 passenger vehicles, and are proposed to service the Proposed Project.

No changes to the site's existing drainage system are proposed; only domestic waste would be discharged into the existing sewer system. Additionally, no changes to the existing piles at Berths 10-7/10-8 are proposed, and no in-water activity, such as dredging or fill, is proposed or required.

The estimated maximum number of onsite construction personnel would be 50 over one shift. Construction staging would occur within the TAMT and would avoid existing operations. The workforce is expected to be drawn from the local region.

3.4 Project Operations

As noted in Section 3.3, *Project Construction*, the Proposed Project would be implemented in two phases. The facility would become operational following the completion of Phase I construction and have an estimated maximum loading, storage, and distribution capacity of 600,000 MT/yr. Based upon market demand, Phase II construction is expected to occur 2–3 years after Phase I becomes operational. At the conclusion of Phase II construction, the maximum annual throughput proposed by Mitsubishi would remain the same; however, the additional equipment and storage would allow more flexible operations and improved ability to respond to seasonal and other market fluctuations. The Proposed Project's 600,000 MT annual throughput would be considered new throughput, over and above the dry bulk throughput of 289,864 MT/yr identified in the TAMT Final PEIR as part of existing baseline conditions. However, the Proposed Project's projected throughput would still be under the total estimated future dry bulk throughput of 1,987,500 MT/yr that was analyzed within the certified TAMT Final PEIR as part of the approved STC Alternative.

At maximum operation, the Proposed Project is anticipated to unload and distribute approximately 600,000 MT of cementitious material annually. Although the demand for cementitious material fluctuates due to seasonal and economic factors, once at full throughput it is estimated that the facility would generate approximately 24,000 round-trip truck trips annually. Each truck has an average carrying capacity of 25 MT. As such, it is anticipated that over a 365-day period there would be approximately 67 total truck trips per day. When the maximum loading capabilities are considered, peak days may experience up to 176 total truck trips, but no more than 145 trucks per day on a 30-day rolling average.

The Proposed Project would add up to 24 vessel calls per year at Berths 10-7/10-8. Depending on market availability, the origins of the vessels are anticipated to include Asia, South America, Mexico, or elsewhere. The vessels would be dry-bulk ocean-going vessels with a minimum holding of 20,000 MT to a maximum holding capacity of 40,000 MT of deadweight tonnage (DWT). At maximum operation, it is anticipated

that each vessel would be at berth for 168 hours (7 days), and that two 400 MT unloaders would be used. The vessels would hotel at the berths continuously; however, actual unloading activities would occur for up to 20 hours per day in two work shifts. Table 3-2 provides a summary of at-berth vessel operations.

Table 3-2. Summary of At-Berth Vessel Operations (annual)

Proposed Project Phase	Number of Unloaders and Size	Hours at Berth ¹	Weight of Material Received	Number of Vessels
Phase I (Interim Operation – 600,000 MT)	One – 200 MT	144 to 216	20,000 MT to 40,000 MT	12 to 24
	One – 200 MT and One – 400 MT	144 to 192	20,000 MT to 40,000 MT	12 to 24
	Two – 400 MT	120 to 168	20,000 MT to 40,000 MT	12 to 24
Phase II (Maximum Operation – 600,000 MT)	One – 200 MT and One – 400 MT	144 to 192	20,000 MT to 40,000 MT	12 to 24
	Two – 400 MT	120 to 168	20,000 MT to 40,000 MT	12 to 24

¹ At Phase I, when one 200 MT unloader is in use, and 40,000 MT weight of material is received, it is anticipated that each vessel would be at berth for up to 216 hours. At completion of Phase II when two 400 MT unloaders are in use, and 40,000 MT weight of material is received, it is anticipated that each vessel would be at berth up to 168 hours.

The Proposed Project would require one full-time supervisor and up to three maintenance staff workers at all times, for a total of four onsite workers. Vessel unloading and truck loading operations are considered independent activities that may either occur at different times or simultaneously. During truck loading operations, up to three additional workers would be required, for a total of seven onsite workers per shift. During ship unloading operations, up to 16 workers per shift would be required. When vessel unloading and truck loading occur at the same time, up to 20 workers would be required, for a total of 24 onsite workers per shift for two shifts per day. During simultaneous operations, the Proposed Project would operate up to 20 hours per day for marine vessel unloading in two shifts for dock workers (7 a.m. to 5 p.m. and 5 p.m. to 3 a.m.), and 24 hours per day for Mitsubishi staff for truck loading.

The Proposed Project would be designed to service the San Diego area. The exact locations served would be dependent on customer needs, but for purposes of analysis, trucks are expected to travel between the Project site and the Riverside County line. Customers beyond the Riverside County line are expected to be more efficiently supplied by other sources of cement.

The truck fleet visiting the Proposed Project site would comply with the District's Clean Truck Program, which requires all trucks visiting the District to meet the California Air Resources Board's (CARB's) emissions standards. The trucks would follow the District's prescribed transportation routes to access and exit the facility to minimize effects on the surrounding community.

The Project proposes to install infrastructure during construction to allow for vessels to utilize a shore power system while at berth. The proposed shore power system is based on a method of connecting the ships dry-dock breaker to shore-based connections via cables. This method has previously been employed at MCC's Long Beach Terminal. The dry-dock breaker is the connection aboard the ship that allows the ship to receive shore power when the ship is berthed or dry-docked for maintenance. MCC is proposing to use shore power at an annual average rate of 50 percent of hoteling time (e.g., 84 hours on shore power and 84 hours on auxiliary engines per call). Cement unloading occurs in two phases. During free digging, the shore-side (electric) vacuum unloader removes the majority of the cement from each hold of the ship. During this period, power needs are low (e.g., lights, fans) and can be handled by the shore-side electricity

via the dry-dock breaker. During the clean-out phase, a payloaders is placed the first hold and then moved about the holds using the on-board cranes. The cranes require more power than the dry-dock breaker can provide, so the shore power is disconnected and the ship's auxiliary engines are turned on to provide the power needs.

As identified in the Proposed Project's Initial Study/Environmental Checklist (Appendix A), the Proposed Project would not require the installation of new outdoor lighting on the TAMT that could affect nighttime views. Lighting proposed by the Proposed Project would be consistent with the lighting proposed in the TAMT Final PEIR. The Proposed Project would include lighting on proposed equipment as necessary to provide adequate illumination to safely access the equipment and facilities and provide security during Project operations, which include the off-loading of vessels. Lighting on the exterior of the warehouse would be limited to lighting required to provide safe working areas compliant with the Federal and State Occupational Safety and Health Administrations' lighting requirements. The lighting would use LED bulbs and be mounted 10 feet above finished floors to structural steel or on stanchions. These fixtures would be industrial type with 90 degree cut wherever possible. As stated in the TAMT Final PEIR, lighting proposed would be consistent with Section 142.0740 of the City of San Diego Municipal Code, which incorporates the California Energy Code (California Code of Regulations, Title 24, Part 6) and Green Building Regulations (Chapter 14, Article 10), as well as light shielding standards (TAMT Final PEIR pg. 4.1-21).

The Proposed Project involves minimal potable water use. However, a small quantity of compressor condensate is expected to be generated that would discharge to the sanitary sewer. Therefore, no water treatment processes are proposed.

Cementitious material from the ship would be transferred to storage silos pneumatically through piping to a sealed building having emissions control, which would provide for minimal loss of cementitious material during handling. The Proposed Project is expected to routinely generate small quantities of office trash. Bags from the dust collectors would require change out (once every few years) in accordance with manufacturer's requirements and industrial bag house design. Materials collected by the dust collectors would be recycled back into the inventory. All solid waste would be transported to a local landfill.

The Proposed Project's portion of Warehouse C is serviced by two fire hydrants, one each on the water and land sides of the building. The Proposed Project involves the storage of cement and cementitious materials, which are noncombustible. Therefore, no unique fire precautions would be required during either construction or operation.

3.5 Project Review and Approvals

The District is the lead agency under CEQA and responsible for permitting and carrying out the Proposed Project. The following permits and approvals would be required for the Proposed Project's implementation.

3.5.1 San Diego Unified Port District

- Certification of the SEIR
- Adoption of the SEIR's Mitigation and Monitoring Reporting Program (MMRP)
- Adoption of the SEIR's Findings of Fact
- Adoption of the SEIR's Statement of Overriding Considerations
- Concept approval of the Proposed Project
- Approval of a new lease agreement
- Issuance of a non-appealable Coastal Development Permit

3.5.2 City of San Diego

The City of San Diego would not issue any discretionary permits for implementation of the Proposed Project; however, the City could issue ministerial permits (e.g., Building, Electrical, Occupancy).

3.5.3 San Diego Air Pollution Control District

The San Diego Air Pollution Control District (SDAPCD) would need to issue air quality permits per SDAPCD Regulation II (Rule 10: Authority to Construct and a Permit to Operate) to authorize construction and the use of equipment that is regulated by SDAPCD.

3.5.4 Caltrans

Caltrans would potentially consider whether or not to approve an oversize heavy load permit for truck freight on Caltrans facilities.

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4. Environmental Analysis

CEQA requires preparation of an EIR for any project that a lead agency determines may have a significant impact on the environment. EIRs are informational documents “which will inform public agency decision-makers and the public generally of the significant environmental effect of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project” (State CEQA Guidelines Section 15121). Program EIRs, such as the TAMT Final PEIR, are prepared for a series of actions that can be characterized as one large project and that are related either geographically; as logical parts in the chain of contemplated actions; in connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program; or as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects that can be mitigated in similar ways (State CEQA Guidelines Section 15168).

When a program EIR has been prepared, CEQA encourages “tiering” off that EIR when the later project is separate but related (State CEQA Guidelines Section 15152[b]). *Tiering* refers to using the analysis of general matters contained in a broader EIR (e.g., the TAMT Final PEIR) with later EIRs on narrower projects, incorporating by reference the general discussions from the broader EIR, and concentrating the later EIR solely on the issues specific to the later project (State CEQA Guidelines Section 15152[a]). When an EIR tiers off another CEQA analysis, the later EIR should be limited to effects that were not examined in the prior EIR or are susceptible to substantial reduction or avoidance by the choice of specific revisions in the project, by the imposition of conditions, or other means (State CEQA Guidelines Section 15152[d]).

Moreover, Section 15168 of the State CEQA Guidelines provides additional guidance on tiering from a program EIR such as the TAMT Final PEIR. Later activities, such as the Proposed Project, must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared. When an SEIR is determined appropriate, the program EIR is used to help focus the analysis of the SEIR on only the new effects that had not been considered before (State CEQA Guidelines 15168 [d][3]).

In accordance with CEQA, this SEIR tiers off of the TAMT Final PEIR, focusing on effects that were not examined in the TAMT Final PEIR, analyzes whether there are any new or more severe significant effects compared to those identified in the TAMT Final PEIR, and identifies new mitigation measures or alternatives that could potentially lessen significant effects of the Proposed Project.

Potential Environmental Impacts

SEIR Sections 4.1 through 4.5 contain a discussion of the following environmental resource areas and issues. The analysis considers whether the Proposed Project’s implementation would result in new or more severe significant impacts than what was previously analyzed and determined in the TAMT Final PEIR.

- 4.1 *Air Quality and Health Risk*
- 4.2 *Greenhouse Gas Emissions*
- 4.3 *Hazards and Hazardous Materials*
- 4.4 *Noise and Vibration*
- 4.5 *Transportation, Circulation, and Parking*

It was determined during preparation of the Project's Initial Study/Environmental Checklist (Appendix A) that the Proposed Project would have either a less-than-significant impact or no impact associated with the following resources: Aesthetics, Agriculture and Forestry Resources, Biological Resources, Cultural Resources, Geology and Soils, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Population and Housing, Public Services, Recreation, Tribal Cultural Resources, and Utilities and Service Systems. As such, no new or more severe impacts would occur compared to what was disclosed in the TAMT Final PEIR. These issues are described in Chapter 6, Section 6.5, *Effects Not Found to be Significant*, of this SEIR.

Format of the Environmental Analysis

Each of the resource sections in this chapter includes the following subsections.

Circumstances Surrounding Project Implementation

Changes to the Environmental Setting Disclosed in TAMT Final PEIR

Baseline conditions are provided in the TAMT Final PEIR. As such, this SEIR summarizes those conditions and then supplements that discussion with any substantial changes to the circumstances under which the Project would be undertaken. This section also considers any new information that was not, and could not have been, known at the time that the TAMT Final PEIR was certified.

Changes to the Regulatory Setting Disclosed in TAMT Final PEIR

This subsection provides a summary of regulations, plans, policies, and laws at the Federal, State, regional, and local levels that are relevant to the Proposed Project as they relate to the environmental resource area discussed. Compliance with these applicable laws and regulations is mandatory unless noted otherwise within the analysis. Therefore, as it relates to the Proposed Project's impact analysis, compliance is assumed because it is required by law and specified in a tenant lease, and mitigation would generally not be required when compliance with an existing law or regulation would ensure that a significant impact would not occur. This section also considers any new information that was not, and could not have been, known at the time that the TAMT Final PEIR was certified.

Analysis of New or More Severe Impacts

Methodology

Each methodology subsection describes the means used to analyze potential impacts on a particular resource, discussing the steps followed and listing any studies relied on for arriving at conclusions as to significance.

Thresholds of Significance

Thresholds of significance are criteria used to assess whether potential environmental effects are significant. The significance criteria used in this analysis are primarily based on the recommendations provided in Appendix G of the State CEQA Guidelines. The thresholds of significance define the type, amount, and/or extent of impact that would be considered a significant adverse change in the environment. The thresholds of significance for some environmental topics, such as air quality and noise, are quantitative, while those for other topics, such as visual quality, are qualitative. The thresholds of significance are intended to assist the reader in understanding how an impact is determined to be

significant. Of particular importance for the SEIR is whether the Proposed Project would result in new or more severe environmental impacts than what has been previously disclosed in the TAMT Final PEIR. The thresholds of significance assist in this exercise.

Project Impacts

The analysis of environmental impacts considers both the construction and operation of the Proposed Project. As required by State CEQA Guidelines Section 15126.2(a), direct, indirect, short-term, long-term, onsite, and/or offsite impacts are addressed, as appropriate, for the environmental issue being analyzed. This SEIR utilizes the following terms to describe the level of significance of impacts identified during the course of the environmental analysis.

- **No Impact:** This term is used when the Proposed Project's construction and/or operation would have no adverse effect on a resource.
- **Less than Significant:** This term is used to refer to impacts resulting from implementation of the Proposed Project that are not anticipated to exceed the defined thresholds of significance, and potentially significant impacts that are reduced to a level that does not exceed the defined thresholds of significance after implementation of mitigation measures. In the latter case, the determination may also be stated as "less than significant with mitigation incorporated."
- **Significant:** This term is used to refer to impacts resulting from implementation of the Proposed Project that exceed the defined thresholds of significance before identification of any mitigation measures. A "significant effect" is defined by State CEQA Guidelines Section 15382 as "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment [but] may be considered in determining whether the physical change is significant." For impacts that exceed a threshold of significance, mitigation measures that avoid or reduce the potential impact are identified, which may cause the impact to be reclassified as less than significant if it is sufficiently reduced, or the impact may remain significant, in which case it is referred to as a significant and unavoidable impact (or unavoidable significant impact).
- **Significant and Unavoidable:** This term is used to refer to significant impacts resulting from implementation of the Proposed Project that cannot be eliminated or reduced to below a level of significance through implementation of feasible mitigation measures.

Importantly, the impact analysis for each subject provides a discussion of the impact conclusions contained in the TAMT Final PEIR, followed by a discussion of the Proposed Project's impacts. A final determination is made as to whether the Proposed Project would result in a new or more severe impact than what was disclosed in the TAMT Final PEIR.

Mitigation Measures

State CEQA Guidelines Section 15126.4 requires an EIR to "describe feasible measures which could minimize significant adverse impacts." Mitigation includes avoiding an impact altogether, minimizing impacts, rectifying impacts, reducing or eliminating impacts over time, or compensating for impacts by replacing or providing substitute resources. The State CEQA Guidelines define *feasibility* as "capable of being accomplished in a successful manner within a reasonable period of time taking into account economic, legal, social, technological, or other considerations." This subsection identifies the mitigation measures, if required, that would avoid or reduce the severity of the Proposed Project's impacts, as identified in the impact analysis subsection. Mitigation measures are the specific environmental

requirements for construction or operation of the Proposed Project that would be included in the Mitigation Monitoring and Reporting Program and non-appealable Coastal Development Permit as conditions of approval of the Proposed Project.

At a resource-specific level, this discussion includes the identification of those mitigation measures contained in the TAMT Final PEIR that are applicable to the Proposed Project. In those instances where the language of a TAMT Final PEIR mitigation measure has been modified to reflect an impact (or impacts) associated with the Proposed Project, the modifications are presented in ~~strikeout~~ for text deletions and double underlining (double underlining) for text additions.

4.1 Air Quality and Health Risk

This section describes any changes in air quality and health risk circumstances surrounding the Proposed Project's potential implementation that may have occurred since certification of the TAMT Final PEIR in December 2016. The section also summarizes the TAMT Final PEIR air quality and health risk impact determinations, and then analyzes the Proposed Project's potential to result in new or more severe air quality and health risk impacts than what was determined in the TAMT Final PEIR. Specifically, the impact analysis considers whether the Proposed Project would: (1) conflict with or obstruct implementation of the applicable air quality plan, (2) violate any air quality standard or contribute substantially to an existing or projected air quality violation, (3) 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, (4) expose sensitive receptors to substantial pollutant concentrations, or (5) create objectionable odors affecting a substantial number of people. Appropriate mitigation measures are identified, and impact conclusions are given for both before and after implementation of those mitigation measures.

The significance criteria are based on the checklist questions contained in Appendix G of the State CEQA Guidelines at the time the TAMT Final PEIR was prepared. Appendix G of the State CEQA Guidelines was updated in December 2018. Therefore, the specific threshold questions utilized in the TAMT Final PEIR for air quality and health risk are not identical to those in the current Appendix G checklist. However, both versions of Appendix G address the same underlying air quality and health risk issues, as noted in Table 4.1-3. For the purpose of consistency between the TAMT Final PEIR and this SEIR, the analysis is presented using the previous checklist questions. This approach allows for a clearer comparison of any new or more severe significant impacts than what was disclosed in the TAMT Final PEIR. Additional discussion of Appendix G of the State CEQA Guidelines is provided in Section 4.1.2.2, *Thresholds of Significance*.

The analysis herein relies in part on the technical modeling information presented in the *Air Quality and Greenhouse Gas Calculations* in Appendix C and the *Health Risk Assessment Report* (Appendix D).

4.1.1 Circumstances Surrounding Project Implementation

4.1.1.1 Changes to the Environmental Setting Disclosed in the TAMT Final PEIR

A discussion of the current understanding of air quality and health risk is included in Section 4.2.2, *Existing Conditions*, of the TAMT Final PEIR and is incorporated here by reference. The environmental setting described in the TAMT Final PEIR included an overview of regional and local climate, and atmospheric conditions, overview of regional and local air quality condition (including monitoring data description of pollutants of concern and related health effects, description of nearby sensitive receptors, background air quality and health risk data, and a summary of emissions and health risk associated with the environmental setting at TAMT. The environmental setting for air quality and health risk described in the TAMT Final PEIR is similar to what is evaluated in this SEIR. Updates to the environmental setting since the certification of the TAMT Final PEIR that are relevant to the Proposed Project are described below.

Air Quality Conditions

The Clean Air Act (CAA) requires the U.S. Environmental Protection Agency (EPA) to designate areas within the country as either attainment or nonattainment for pollutants - collectively known as criteria air pollutants - based on whether the national ambient air quality standards (NAAQS) have been achieved. Similarly, the California CAA requires the California Air Resources Board (CARB) to designate areas within

California as either attainment or nonattainment for each criteria pollutant based on whether the California Ambient Air Quality Standards (CAAQS) have been achieved. NAAQS are developed for six criteria pollutants: ozone (O₃), lead, carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), and particulate matter (PM) less than or equal to 10 microns in diameter (PM₁₀) and PM less than or equal to 2.5 microns in diameter (PM_{2.5}). CARB has also created CAAQS for Visibility Reducing Particles, Sulfates, Hydrogen Sulfide, and Vinyl Chloride. A summary of the NAAQS and CAAQS is presented in Appendix C. If a pollutant concentration is lower than the state or federal standard, the area is classified as being in attainment for that pollutant. If a pollutant concentration is higher than the state or federal standard, the area is considered a nonattainment area. As of the time of this analysis, the San Diego Air Basin (SDAB), which covers all of San Diego County, is designated nonattainment for O₃ under NAAQS and for O₃, PM₁₀, and PM_{2.5} under CAAQS. This attainment status is unchanged from the TAMT Final PEIR. A summary of the attainment status by pollutant is presented in Appendix C.

During the preparation of the TAMT Final PEIR, the ambient monitoring station closest to TAMT was identified as the San Diego–Beardsley Street station, at Perkins Elementary School (approximately 0.3 mile to the east of the TAMT boundary). Monitoring data in the TAMT Final PEIR was provided for the 2012–2015 period. However, the San Diego–Beardsley Street station was closed in November 2016. The San Diego Air Pollution Control District (SDAPCD) is relocating the site to Sherman Elementary School (approximately 1.0 mile northeast of the TAMT boundary) and will begin operating that site sometime in mid-2019. At the time of this analysis, the Sherman Elementary School was not yet operational. Monitoring data through 2016 from the San Diego–Beardsley Street station is included in Appendix C. The monitoring data shows the following pollutant concentrations trends over the period of record (2012–2016): the 8-hour O₃ CAAQS was exceeded twice in 2014; 24-hour PM₁₀ CAAQS was exceeded once each year in 2013, 2015, and 2016; and 24-hour PM_{2.5} NAAQS was exceeded once each year in 2012, 2013, and 2014. No violations of the 1-hour O₃, CO, or NO₂ CAAQS or NAAQS were recorded.

As discussed above, the CAAQS and NAAQS define clean air and represent the maximum amount of pollution that can be present in outdoor air without any harmful effects on people and the environment. Existing violations of the O₃, PM₁₀, and PM_{2.5} ambient air quality standards indicate that some individuals exposed to these concentrations may experience health effects, including increased incidence of cardiovascular and respiratory symptoms (e.g., coughing, inflamed airways). Health and environmental effects associated with criteria pollutant emissions are discussed further in the following section.

Pollutants of Concern

The TAMT Final PEIR included a description of pollutants and the health effects of exposure to these pollutants. This SEIR discusses the correlation between pollutant emissions and health impacts, including emissions associated with toxic air contaminants (TACs) and Project activities such as cement handling.

Criteria Pollutants

As discussed above, the Federal and State governments have established NAAQS and CAAQS, respectively, for six criteria pollutants: O₃, lead; CO, NO₂, sulfur dioxide (SO₂), PM₁₀, and PM_{2.5}. Criteria pollutants are classified as either regional or localized pollutants. Regional pollutants can be transported over long distances and affect ambient air quality far from the emissions source. Localized pollutants affect ambient air quality near the emissions source. Ozone is considered a regional criteria pollutant, whereas CO, NO₂, SO₂, and lead are localized pollutants. Particulate matter can be both a local and a regional pollutant, depending on its composition. The primary criteria pollutants of concern generated by the Proposed Project, and all projects at TAMT, are ozone precursors (reactive organic gases [ROGs] and nitrogen oxides [NO_x]), NO₂, CO, PM, and SO₂.

All criteria pollutants can have human health and environmental effects at certain concentrations. The CAAQS and NAAQS have been developed to protect the health of sensitive populations such as, asthmatics, children, and the elderly. The standards define clean air and represent the maximum amount of pollution that can be present in outdoor air without any harmful effects on people and the environment. Epidemiological, controlled human exposure, and toxicology studies evaluate potential health and environmental effects of criteria pollutants, and form the scientific basis for new and revised ambient air quality standards.

Principal characteristics of criteria pollutants and the possible health and environmental effects from exposure are described below. Table 4.2-4 of the TAMT Final PEIR provides a summary of the information.

- **Ozone**, or smog, is a photochemical oxidant that is formed when ROGs and NO_x (both byproducts of the internal combustion engine) react with sunlight. Meteorology and terrain play major roles in O₃ formation, a regional pollutant that takes time and the right conditions to form in high concentrations. Ideal conditions occur during summer and early autumn, on days with low wind speeds or stagnant air, warm temperatures, and cloudless skies.

Precursors to ozone include ROGs and volatile organic compounds (VOCs). ROGs include all carbon compounds except those exempted by CARB, and VOCs include all carbon compounds except those exempted by federal law. Generally speaking, and in this analysis, ROGs and VOCs are used interchangeably to refer to the carbon compounds that are a precursor to O₃ formation. Both VOCs and ROGs are emitted from incomplete combustion of carbon-based fuels. Fuel combustion exhaust, primarily from mobile sources, and evaporative sources (solvent evaporation from paints and consumer products and petroleum marketing) are the primary sources of ROG emissions in the County. There are no separate ambient air quality standards for ROGs. ROGs can also chemically transform to PM. Carcinogenic forms of ROG, such as benzene, are considered to be TACs, which are described below.

NO_x are also integral participants in the process of photochemical smog production. The two major forms of NO_x are nitric oxide (NO) and NO₂. NO is a colorless, odorless gas formed from atmospheric nitrogen and oxygen when combustion takes place under high temperature and/or high pressure. NO₂ is a reddish-brown irritating gas formed by the combination of NO and oxygen. NO_x is a precursor to O₃ formation and a precursor to fine PM formation in the form of nitrates, primarily ammonium nitrate.

O₃ poses a higher risk to those who already suffer from respiratory diseases (e.g., asthma), children, older adults, and people who are active outdoors. Exposure to O₃ at concentrations above the CAAQS and NAAQS can make breathing more difficult, cause shortness of breath and coughing, inflame and damage the airways, aggregate lung diseases, increase the frequency of asthma attacks, and cause chronic obstructive pulmonary disease. Studies show associations between short-term ozone exposure and non-accidental mortality, including deaths from respiratory issues. Studies also suggest long-term exposure to ozone may increase the risk of respiratory-related deaths (EPA 2019a). The concentration of ozone at which health effects are observed depends on an individual's sensitivity, level of exertion (i.e., breathing rate), and duration of exposure. Studies show large individual differences in the intensity of symptomatic responses, with one study finding no symptoms to the least responsive individual after a 2-hour exposure to 400 parts per billion of ozone and a 50 percent decrement in forced airway volume in the most responsive individual. Although the results vary, evidence suggests that sensitive populations (e.g., asthmatics) may be affected on days when the 8-hour maximum ozone concentration reaches 80 parts per billion (EPA 2019b). Accordingly, the NAAQS and CAAQS for 8-hour O₃ have been set at 70 parts per billion (see Appendix C).

In addition to human health effects, ozone has been tied to crop damage, typically in the form of stunted growth, leaf discoloration, cell damage, and premature death. Ozone can also act as a corrosive and oxidant, resulting in property damage such as the degradation of rubber products and other materials.

- **Nitrogen dioxide** is formed by the combination of NO and oxygen through internal combustion. Long-term exposure to NO₂ can aggravate respiratory diseases, such as asthma, leading to increased hospital admissions (EPA 2019c). Controlled studies demonstrate effects (airway reactivity) among asthmatics at a short-term (less than 3 hours) exposure to 0.3 parts per million NO₂. Effects among healthy individuals occurred at high levels of exposure (1.5 to 2 parts per million) (McConnell et al. 2002). For reference, the 1-hour CAAQS for NO₂ is 0.18 parts per million (see Appendix C). In addition to human health effects, NO₂ can also reduce visibility and react with water, oxygen, and other chemicals to contribute to acid rain, which can harm sensitive ecosystems (EPA 2019c).
- **Carbon monoxide** is a colorless, odorless, toxic gas produced by incomplete combustion of carbon substances, such as gasoline or diesel fuel. In the study area, high CO levels are of greatest concern during the winter, when periods of light winds combine with the formation of ground-level temperature inversions from evening through early morning. These conditions trap pollutants near the ground, reducing the dispersion of vehicle emissions. Moreover, motor vehicles exhibit increased CO emission rates at low air temperatures. The primary adverse health effect associated with CO is interference with normal oxygen transfer to the blood, which may result in tissue oxygen deprivation. Exposure to CO at concentrations above the CAAQS or NAAQS (see Appendix C) can also cause fatigue, headaches, confusion, dizziness, and chest pain. There are no ecological or environmental effects to ambient CO (CARB 2019a).
- **Particulate Matter** consists of finely divided solids or liquids such as soot, dust, aerosols, fumes, and mists. Two forms of fine particulates are now regulated—inhalable coarse particles, or PM₁₀, and inhalable fine particles, or PM_{2.5}. Particulate discharge into the atmosphere results primarily from industrial, agricultural, construction, and transportation activities. However, wind on arid landscapes also contributes substantially to local particulate loading. Additionally, secondary formation of PM, primarily in the form of fine particulate, occurs through the chemical transformation of precursors such as NO_x, SO₂, ammonia, and ROGs.

Particulate pollution can be transported over long distances and may adversely affect human health, especially for people who are naturally sensitive or susceptible to breathing problems. Numerous studies have linked PM exposure to premature death in people with preexisting heart or lung disease. Other symptoms of exposure may include nonfatal heart attacks, irregular heartbeat, aggravated asthma, decreased lung function, and increased respiratory symptoms. Exposure to concentrations of PM above the current ambient air quality standards may result in these health effects (California Air Resources Board 2015). Similar to O₃, the elderly and those with preexisting heart and lung diseases are at greater risk to the harmful effects of PM exposure. Children are also at increased risk because they breathe faster than adults, and therefore inhale more air per pound of body weight and tend to spend more time outdoors. The CAAQS and NAAQS for PM are set to protect these sensitive populations and define the number of particles that can be present in outdoor air without adversely affecting the health of infants, children, or the elderly (California Air Resources Board 2015). The CAAQS and NAAQS for PM are shown in Table D-1 of Appendix C.

Depending on its composition, both PM₁₀ and PM_{2.5} can also affect water quality and acidity, deplete soil nutrients, damage sensitive forests and crops, affect ecosystem diversity, and contribute to acid rain (EPA 2019d).

- **Sulfur Dioxide** is a product of fuel combustion. The predominant source of SO₂ emissions within the County is mobile source fuel combustion, primarily aircraft, ocean going vessels (OGVs), and on-road vehicles. In recent years, emission of SO₂ have been significantly reduced by the increasingly stringent controls placed on the sulfur content of fuels used in stationary sources and mobile sources. SO₂ is a precursor to fine PM formation in the form of sulfates, such as ammonium sulfate. Short-term exposure to SO₂ can aggravate the respiratory system, making breathing difficult. Controlled laboratory studies indicate that brief exposure (5 to 10 minutes) of exercising asthmatics to an average SO₂ level of 0.4 parts per million can result in increases in air resistance. Healthy adults do not show any symptoms to SO₂ at levels as high 1 part per million, even after up to 3 hours of exposure. Based on the concentration needed to protect sensitive individuals (e.g., asthmatics), CARB and EPA have adopted the CAAQS and NAAQS for SO₂ (see Appendix C) (South Coast Air Quality Management District 2017). In addition to public health impacts, SO₂ can also affect the environment by damaging foliage and decreasing plant growth (EPA 2019e).
- **Lead** is a soft metal that was previously added to gasoline and emitted to the environment through motor vehicle exhaust. Since lead was removed from gasoline, emissions have declined, and the primary source of emissions is now metal processing facilities and leaded aviation gasoline. Lead was also an ingredient in household and commercial paints prior to 1978. Lead can also be re-suspended into the air when contaminated soil or paints are disturbed. Lead emissions can be inhaled and ingested, leading to accumulation of lead particles in bone. Lead exposure can lead to cognitive function decrements, behavioral problems, kidney and heart disease, decreased immunity and red blood cell counts, and reproductive and developmental effects (CARB 2019b).

Toxic Air Contaminants

As discussed in the TAMT Final PEIR, TACs are pollutants that have no ambient standard but pose the potential to increase the risk of developing cancer or acute or chronic health risks. The most relevant TACs associated with operations at TAMT is diesel particulate matter (DPM). In addition, cementitious material dust includes compounds that are known TACs, such as arsenic, hexavalent chromium, and copper. For TACs that are known or suspected carcinogens, CARB has consistently found that there are no levels or thresholds below which exposure is risk-free. Therefore, no NAAQS or CAAQS exist for TACs. Individual TACs vary greatly in the risks they present. At a given level of exposure, one TAC may pose a hazard that is many times greater than another. TACs are identified and their toxicity is studied by the California Office of Environmental Health Hazard Assessment (OEHHA), and TACs have been shown to cause cancer; birth defects; damage to the brain, nervous, and other organ systems; and respiratory disorders.

Sensitive Receptors

As discussed in the TAMT Final PEIR, 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. Locations that may contain a high concentration of sensitive population groups include residential areas, hospitals, daycare facilities, elder-care facilities, elementary schools, and parks. The location of sensitive receptors is the same for the Proposed Project as was analyzed in the TAMT Final PEIR. However, the sensitive receptor locations in the TAMT Final PEIR were identified in relation to the TAMT boundary. The location and distances of sensitive receptors have been updated here relative to the location of a majority of Proposed Project operations, that is, in and around Warehouse C.

Land uses within vicinity of the Proposed Project site and the TAMT area include a mix of recreational uses (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 majority of activities within the Proposed Project site (Warehouse C) are the residences across Harbor Drive, approximately 1,800 feet to the east and northeast of Warehouse C (in the Sigsbee Row neighborhood). The closest schools (Perkins Elementary and Monarch School) are approximately 1,700 feet and 2,000 feet, respectively, from Warehouse C. Trucks are expected to enter and exit the gates along Crosby Street. Cesar Chavez Park is immediately adjacent to the Crosby Street gates, and the park is as close as 500 feet from Berths 10/7–10/8. Park visitors, students and staff at the schools, and residents constitute sensitive receptors that could be exposed to emissions generated at the Project site.

The closest sensitive receptors to truck travel along Harbor Drive and 28th Street and Harbor Drive and 32nd Street are the multi- and single-family residential areas directly adjacent to truck travel along 28th Street. The closest sensitive receptors to OGV and tug travel through the Bay include the various multi- and single-family residential areas in Point Loma, Shelter Island, and Coronado; multi-family residential areas in Downtown; and the various recreational areas along Point Loma, Shelter Island, Harbor Island, the Embarcadero, and Coronado.

Background Air Quality and Health Risk

No changes to the background criteria pollutant (which are summarized from CARB's State Implementation Plan [SIP] modeling) and TAC concentrations have been identified that would alter the discussion from the TAMT Final PEIR, and therefore, the information presented previously is incorporated by reference. Updates to background conditions since certification of the TAMT Final PEIR that are relevant to the Proposed Project are described below.

California Communities Environmental Health Screening Tool (CalEnviroScreen) provides a relative ranking of communities based on a selected group of environmental, health, demographic, and socioeconomic indicators. The numerical score in CalEnviroScreen is based on the average pollution burden and population characteristics scores for each census tract. The resultant score is the relative pollution burden and vulnerabilities in one census tract compared to others; the score is not a measure of health risk. Each tract's score is then ranked relative to all areas in the state. Those areas with a high score and percentile have relatively high pollution burdens and population sensitivities; those areas with low score and percentile values have relatively lower pollution burdens and population sensitivities.

Note that while the results of CalEnviroScreen provide information on background pollution that allows the State to prioritize funding resources, the scoring results are not directly applicable to project-level or cumulative impact analyses required under CEQA (CalEPA 2017). As such, the information provided by CalEnviroScreen cannot substitute for analyzing a specific project's cumulative impacts as required under CEQA, and thus the information presented below is provided for illustrative purposes only.

Background information presented in the TAMT Final PEIR relied on results from CalEnviroScreen, Version 2.0, which was released in August 2014. Version 3.0 was released in June 2018 and includes some methodological fixes. Neighborhoods near the Proposed Project site identified in the TAMT Final PEIR represent some of the highest rankings (e.g., worst combined pollution effects) in the State. The Proposed Project site itself (census tract 6073005100) is within the worst 95 to 100 percentile impacts in the State. The Barrio Logan community both west/south (census tract 6073005000) and east/north of Interstate 5 (census tract 6073004900) is also within the worst 95 to 100 percentile in the State (OEHHA 2018). The area near the Project site (collectively known in the Community Air Protection Program as the *Portside*

Environmental Justice Neighborhoods)¹ include several census tracts with high (poor) ratings as part of the CalEnviroScreen 3.0, including four census tracts that are in the 98th percentile in the State and another eight that are in the 85th percentile. Over 50,000 residents live in this area and are subject to significant pollution exposure. The Portside Environmental Justice Neighborhoods, along with other areas selected for monitoring throughout the State, will see additional new actions through potential regulations, focused incentive investments, enforceable agreements, and engagement with local land use authorities to reduce emissions and exposure to air pollution. SDAPCD will develop and implement this program under CARB's oversight (CARB 2018d).

TAMT Emissions

Goods and materials handled at TAMT generally fit into one of the following four cargo types: dry bulk, liquid bulk, refrigerated containers, and multi-purpose general cargo. The Proposed Project is concerned with goods and materials associated with the dry bulk cargo node. Activity associated with dry bulk at the TAMT generates criteria pollutant and TAC emissions, specifically associated with the following activities and emission categories:

- OGV, assist tug, and tug and fuel barge activity both regionally, within the Bay, and both at and near TAMT.
- BNSF rail activity both regionally and between TAMT and BNSF yard. Note that this rail activity is solely associated with soda ash import and handling. There is no rail associated with the Proposed Project, and this rail activity would not be affected by Project operations.
- Truck travel both regionally and within the TAMT boundary area and Proposed Project area.
- Cargo handling equipment within the TAMT boundary area and Proposed Project area.
- Worker trip travel.
- 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 of the TAMT Final PEIR. Emissions from the dry bulk cargo node associated with existing activity, based on activity between July 2013 and June 2014, at both the daily and annual time scale are presented in Table 4.1-1.

Table 4.1-1. Summary of TAMT Final PEIR Baseline Dry Bulk Criteria Pollutant Emissions

Cargo Node	VOC	NO_x	CO	SO_x	PM10	PM2.5
Dry Bulk (289,864 MT) in Pounds Per Day	53	1,007	181	17	608	192
Dry Bulk (289,864 MT) in Tons Per Year	1.3	31.5	5.8	0.4	105.5	31.3

Source: Summarized from TAMT Final PEIR, Table 4.2-6.
MT = metric tons

¹ Community of Portside Environmental Justice Neighborhoods includes Barrio Logan and portions of National City, Sherman Heights, and Logan Heights. This includes the following census tracts: 6073005000, 6073004900, 6073003902, 6073003601, 6073003901, 6073005100, 6073003603, 6073004000, 6073003502, 6073021900, 6073004700, and 6073011602.

Baseline Health Risks Associated with TAMT Emissions

Toxic Air Contaminants

The TAMT Final PEIR included a discussion of TAC-related health risk associated with baseline TAMT operations. The TAMT Final PEIR's HRA was based on DPM emissions from diesel-powered equipment, such as OGVs, terminal equipment, locomotive activity, and truck activity at and near the Project site. The HRA also included TAC emissions from non-diesel sources, particularly non-internal combustion sources, such as auxiliary boilers on OGVs.

The maximally exposed residential areas, parks (namely Cesar Chavez Park), and school receptor locations (namely Perkins Elementary and Monarch School) are all close to TAMT. A summary of existing cancer risk, chronic hazard, and acute hazard indices at nearby sensitive receptor locations for all TAMT sources is presented in Table 4.1-2.

Table 4.1-2. Summary of TAMT Final PEIR Baseline Health Risk at Nearby Receptors associated with Dry Bulk Cargo

Receptor Type	Cancer Risk Per Million	Chronic Hazard Index	Acute Hazard Index
Residential	7	<0.01	<0.01
Park	1	<0.01	<0.01
School	1	<0.01	<0.01

Source: TAMT Final PEIR, Table 4.2-8.

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

Criteria Pollutants

The TAMT Final PEIR included a discussion of health outcomes related to TAMT operations. Because emissions associated with buildout of the TAMT Plan were determined to be below thresholds after mitigation, the incremental contribution of emissions to specific health outcomes would be limited and any effects thereof were determined to be below any health-based significance threshold (e.g., NAAQS and CAAQS).

4.1.1.2 Changes to the Regulatory Setting Disclosed in the TAMT Final PEIR

The applicable Federal, State, and local laws and regulations pertaining to air quality and health risk are described in Section 4.2.3 of the TAMT Final PEIR. A list of the applicable regulations described in the TAMT Final PEIR is provided below for reference. Additionally, Assembly Bill (AB) 617, SDAPCD regulations and rules, and updates to the San Diego Regional Air Quality Strategy (RAQS) and SIP would apply and are described below.

International

- International Maritime Organization International Convention for the Prevention of Pollution from Ships Annex VI

Federal

- Federal Clean Air Act
- General Conformity Regulation

- EPA Emission Standards for Large Marine Diesel Engines—Category 3 Engines
- EPA Emission Standards for Locomotives
- EPA Emission Standards for Non-Road Diesel Engines
- EPA Non-Road Diesel Fuel Rule
- EPA On-Road Diesel Fuel Rule

State

- California Clean Air Act
- Toxic Air Contaminants Regulations
- CARB California Diesel Fuel Regulation
- CARB Airborne Toxic Control Measure for Diesel-Fueled Transport Refrigeration Units, Generator Sets, and Facilities Where Transport Refrigeration Units Operate
- 1998 South Coast Locomotive Emissions Agreement
- 2005 Railroad Statewide Agreement
- Emission Reduction Plan for Ports and Goods Movement in California
- CARB Regulations for Fuel Sulfur and Other Operational Requirements for OGVs within California Waters and 24 Nautical Miles of the California Baseline
- CARB Regulation to Reduce Emissions from Diesel Auxiliary Engines on OGVs While at Berth at a California Port
- CARB Mobile Cargo-Handling Equipment at Ports and Intermodal Rail Yards
- CARB Emission Standards and Test Procedures for Large Spark Ignition Engine Forklifts and Other Industrial Equipment
- CARB California Drayage Truck Regulation
- CARB On-Road Heavy-Duty Diesel Vehicles (In-Use) Regulation—Truck and Bus Regulation
- CARB On-Road Heavy-Duty Diesel Vehicle Idling Emission Reduction Regulation
- EO B-32-15 and the CARB Sustainable Freight Action Plan
- Senate Bill 535 and Assembly Bill 1532 (Greenhouse Gas Reduction Fund)
- California Communities Environmental Health Screening Tool (CalEnviroScreen)

State Implementation Plan

At the time of analysis in the TAMT Final PEIR, CARB was working on an update to the SIP and had released a *Proposed 2016 State Strategy* for the SIP. In March 2017, CARB adopted the *Revised Proposed 2016 State Strategy* for the SIP and directed staff to provide an annual status report on progress in implementing the strategy. This strategy describes proposed State measures to achieve the reductions necessary from the mobile sector, fuels, and consumer products to meet O₃ and PM_{2.5} NAAQS over the next 15 years. The

strategy incorporates regional SIPs (to be developed) as well as the 2030 Target Scoping Plan Update, California's Sustainable Freight Action Plan, the Short-Lived Climate Pollutant Strategy, and implementation of Senate Bill 375. CARB notes that while existing programs have achieved tremendous success in reducing NO_x emissions, further reductions are required. Proposed SIP measures include various measures relevant to goods movement and maritime operations, including working with EPA on a low-NO_x standard and finalizing the Phase 2 greenhouse gas (GHG) standard for heavy trucks, further deployments of cleaner on- and off-road technologies; working with the International Maritime Organization on Tier 4 OGV standards, incentivizing low-emissions vessel calls, and extending at-berth requirements to more vessel types (CARB 2017d).

Assembly Bill 617

AB 617, adopted in July 2017, established the Community Air Protection Program (CAPP). AB 617 requires new community-focused and community-driven action to reduce air pollution and improve public health in communities that experience disproportionate burdens from exposure to air pollutants. The SDAPCD will implement the CAPP in San Diego County. Communities identified for monitoring include Portside Environmental Justice Neighborhoods of Barrio Logan as well as portions of National City, Sherman Heights, and Logan Heights. AB 617 is being implemented by SDAPCD under CARB's oversight.

AB 617 will focus on key sources that significantly contribute to the higher air pollution levels in heavily burdened communities, specifically aiming to implement zero emission technologies where feasible. For communities heavily impacted by freight, traffic, and stationary sources, such as the Portside Environmental Justice Neighborhoods, CARB and SDAPCD will implement various measures. For example, CARB may expand standards for clean operation for OGVs while they are in port; develop zero emission requirements for mobile equipment, such as forklifts, cargo handling equipment, trucks, and buses; petition the EPA for cleaner emission standards; and develop an expedited schedule to implement best available retrofit pollution controls on certain industrial sources that are subject to Cap-and-Trade by 2023. These regulations may ultimately affect operation of the Proposed Project, but as of the time of this analysis, no regulations have been adopted pursuant to AB 617.

Local

■ SDAPCD Rules and Regulations

- Rule 50—Visible Emissions
- Rule 51—Nuisance
- Rule 52—Particulate Matter
- Rule 54—Dust and Fumes
- Rule 55—Fugitive Dust Control
- Rule 67—Architectural Coatings
- Regulation XII, Rules 1200–1210

SDAPCD Regulation II – Permits

SDAPCD Regulation II includes a number of rules that cover the types of stationary sources that require permits and the procedures and requirements to obtain permits. The Proposed Project will require permits for the pneumatic conveying operation, truck loading operation, and dust control (baghouse)

devices that are used in the process of transferring cement from OGVs to onshore storage and then to trucks for delivery. Specific rules under this regulation include:

- Regulation II, Rule 10 – Identifies the requirement for stationary sources of air pollutants to obtain an Authority to Construct and a Permit to Operate.
- Regulation II, Rule 11 – Lists categories of equipment that are not subject to stationary source permits. For the Proposed Project, exempt sources include all mobile sources, such as OGVs, payloaders, and cement delivery trucks.
- Regulation II, Rule 20.2—New Source Review Non-Major Stationary Sources: establishes requirements for Best Available Control Technology and Air Quality Impact Analysis (AQIA) sources. For the Proposed Project, Best Available Control Technology (BACT) will be required to control particulate emissions from the cement conveying operations, but the Proposed Project would not trigger the requirement to perform an AQIA as part of the SDAPCD permitting action.

San Diego Regional Air Quality Strategy

The RAQS outlines SDAPCD's plans and control measures designed to attain and maintain the State standards while San Diego's portions of the SIP are designed to attain and maintain federal standards. At the time of analysis in the TAMT Final PEIR, the most recent update to the RAQS was the 2009 RAQS. Since the TAMT Final PEIR, the SDAPCD adopted the 2016 RAQS in December 2016. The 2016 RAQS includes emission trend and forecast updates, a discussion of existing, recently adopted, and proposed future emission control measures, a review of region-wide measures implemented by the San Diego Association of Governments (SANDAG) to reduce mobile source emissions, and an assessment of offset requirements to achieve reductions. SDAPCD also adopted the 2016 *Ozone Attainment Plan* and associated *Reasonably Available Control Technology Demonstration* in December 2016, which outlines SDAPCD plan for achieving federal ozone standards.

4.1.2 Analysis of New or More Severe Impacts

4.1.2.1 Methodology

Air quality impacts associated with construction and operation of the TAMT Final PEIR were assessed and quantified using industry standards and accepted software tools, techniques, and emission factors. The industry standards and accepted software tools, techniques, and emission factors are essentially the same as those used in the TAMT Final PEIR. A detailed methodology is provided in Appendix C.

Mass Emissions

Construction emissions were assessed using construction details provided by the Project Proponent along with CARB's OFFROAD and EMFAC models for estimating exhaust emissions from off-road equipment and on-road vehicles and EPA methodologies for estimating fugitive dust from grading, stockpiling, and truck loading and unloading.

Bulk cargo throughput would not exceed the buildout levels assumed in the TAMT Final PEIR. The Proposed Project falls within the dry bulk component analyzed in the TAMT Final PEIR. A comparison of the activity assumed for the dry bulk component of the TAMT Final PEIR and the Proposed Project is presented in Table 4.1-3. Activity related to throughput, vessel calls, trucks, and workers are consistent with and fit within the activity assumed for full buildout of the dry bulk component in the TAMT Final PEIR. The Proposed Project would include OGV calls to import cargo, diesel and electrical equipment to unload

and load materials, trucks to transport materials offsite, and worker commute vehicle trips. Descriptions of each of these sources and associated emissions modeling are provided in Appendix C. Operational emissions were assessed using Project details provided by the Project Proponent. Emissions associated with Project-related activity, including OGVs, tugboats, trucks, worker commute vehicles, equipment, and bulk handling are based on methods similar to those identified in the TAMT Final PEIR, including CARB's methodologies for OGVs and tugboats, EMFAC for estimating exhaust emissions from on-road trucks and worker commute vehicles, EPA emission factors for Tier 4 equipment, and source testing data for bulk handling (loading and unloading) fugitive dust.

Table 4.1-3. Summary of TAMT Final PEIR Dry Bulk and Proposed Project Activity

Metric	TAMT Final PEIR Existing	TAMT Final PEIR Buildout	Proposed Project	Capacity Remaining from TAMT Final PEIR Buildout Analysis
Annual Throughput (MT)	289,864	1,987,500	600,000	1,097,636
Annual Vessel Calls	15	109	24	70
Average Daily/Annual Trucks	28/10,080	191/68,760	67/24,000	34,680
Daily Workers	87	361	50	224

Source: Appendix C.
MT = metric tons

Toxic Air Contaminants and Health Risk

The TAMT Final PEIR identified that current and future operations at the Project site would emit TACs that could affect public health in neighboring communities. The main sources of TACs from TAMT operations are DPM and other TAC emissions from vessels, terminal equipment, locomotive activity, and truck activity at and near the TAMT. A source of TACs that was not assessed in the TAMT Final PEIR but is included here is TACs that result from cementitious material handling fugitive dust, which includes known TAC compounds such as arsenic, hexavalent chromium, and copper. As part of this SEIR, a HRA was conducted that quantitatively evaluated the potential impacts associated with public exposure to Project-related DPM and TAC emissions generated by these sources. The HRA evaluated three different types of health effects: individual lifetime cancer risk, chronic non-cancer hazards, and acute non-cancer hazards. The HRA was performed using EPA's AERMOD (version 18081) dispersion model and CARB's Hotspots Analysis Reporting Program (HARP2). A detailed summary of the health risk methodology is provided in Appendix D.

Criteria Pollutant Health Outcomes

Criteria pollutants are classified as either regional or localized pollutants. Regional pollutants can be transported over long distances and affect ambient air quality far from the emissions source. Localized pollutants affect ambient air quality near the emissions source. As discussed in Section 4.1.1.1, ozone is considered a regional criteria pollutant, whereas CO, NO₂, SO₂, and lead are localized pollutants. Particulate matter can be both a local and a regional pollutant, depending on its composition. The primary criteria pollutants of concern generated by the Project and all projects at TAMT are ozone precursors (ROGs and NO_x), NO₂, CO, PM, and SO₂.

Potential health effects induced by regional criteria pollutant emissions generated by the Project (ozone precursors and PM) are evaluated using the mass emissions modeling and are discussed further in Section 4.1.2.3, *Project Impacts and Mitigation Measures*. Localized pollutants (NO₂, CO, PM, and SO₂) generated

by a project are deposited and potentially affect populations near the emissions source and are discussed further in Section 4.1.2.3.

4.1.2.2 Thresholds of Significance

The significance criteria used to evaluate potential air quality impacts are based on Appendix G of the State CEQA Guidelines. The determination of whether an air quality impact would be significant is based on the applicable thresholds and the professional judgment of the District as Lead Agency, supported by evidence in the administrative record.

Appendix G of the State CEQA Guidelines was updated in December 2018. Therefore, the specific threshold questions utilized in the TAMT Final PEIR for air quality are not the same as the current Appendix G checklist. However, both versions of Appendix G address the same underlying air quality issues, and an assessment using either version will result in the same significance determination for a project. Additional comparison of the previous Appendix G checklist questions to the updated ones is provided below. However, for the purposes of this SEIR, the analysis is presented using the previous checklist questions. This approach provides continuity between the SEIR and the TAMT Final PEIR (from which this SEIR tiers) and allows for a clearer comparison of any new or more severe significant impacts than what was disclosed in the TAMT Final PEIR.

The December 2018 update to the Appendix G checklist includes removal of one checklist item (“violate air quality standard”), removal of text from another checklist item (“cumulatively considerable increase in non-attainment pollutant”), and text revisions to the “odors” discussion to remove the subjectivity of the term “objectionable” and to cast odors as a localized pollutant example. The list of five questions was condensed into four questions. Table 4.1-4 illustrates the relationship between the TAMT Final PEIR thresholds and the updated Appendix G checklist.

Table 4.1-4. Comparison of TAMT Final PEIR Thresholds and the New Appendix G Checklist

TAMT Final PEIR Thresholds	New Appendix G Threshold	Comparison
Would the project result in...	Would the project result in...	
a) Conflict with or obstruct implementation of the applicable air quality plan?	a) Conflict with or obstruct implementation of the applicable air quality plan?	No change
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	Checklist item removed	--
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	Text referring to ozone precursors removed but the threshold is effectively the same. This is now checklist item b)
d) Expose sensitive receptors to substantial pollutant concentrations?	c) Expose sensitive receptors to substantial pollutant concentrations?	No change to text but now checklist item c)

Table 4.1-4. Comparison of TAMT Final PEIR Thresholds and the New Appendix G Checklist

e) Create objectionable odors affecting a substantial number of people?	d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	Text changes to make language less subjective, but still addresses the same issue. This question is now listed as checklist item d)
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Source: Appendix G of the State CEQA Guidelines (previous and updated versions)

For consistency, the SEIR analysis uses the Appendix G questions used in the TAMT Final PEIR as they cover the same issues as the updated Appendix G questions. Impacts would be considered significant if the Proposed Project would:

1. Conflict with or obstruct implementation of the applicable air quality plan.
2. Violate any air quality standard or contribute substantially to an existing or projected air quality violation.
3. 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 (including releasing emissions that exceed quantitative thresholds for ozone precursors).
4. Expose sensitive receptors to substantial pollutant concentrations.
5. Create objectionable odors affecting a substantial number of people.

The Initial Study/Environmental Checklist prepared for the Proposed Project (Appendix A) concludes that the Project's implementation could be potentially significant for all five air quality significance criteria, as provided below. Therefore, all of these impact criteria are analyzed herein (see Section 4.1.2.3).

The thresholds used to determine significance herein are the same as those used to determine significance of air quality impacts in the TAMT Final PEIR. Further evidence regarding the basis upon which the thresholds were developed and their applicability to the Proposed Project is provided in Appendix C.

The thresholds used for determining significance of criteria pollutant emissions are presented in Table 4.1-5. These thresholds are based on criteria established by the SDAPCD and supported by additional evidence provided by the County of San Diego.

Table 4.1-5. Air Quality Thresholds

Air Contaminant	Emission Rate ¹		
	(Pounds per Hour)	(Pounds per Day)	(Tons per Year)
Respirable Particulate Matter (PM10)	—	100	15
Fine Particulate Matter (PM2.5) ²	—	55	10
Nitrogen Oxides (NO _x)	25	250	40
Sulfur Oxides (SO _x)	25	250	40
Carbon Monoxide (CO)	100	550	100
Lead (Pb) ³	—	3.2	0.6
Volatile Organic Compounds (VOCs) ⁴	—	75	13.7 ⁵

Source: SDAPCD Regulation II, Rule 20.2; County of San Diego 2007.

¹ According to the County of San Diego, the daily Screening Level Thresholds (SLTs) are most appropriate when assessing impacts from standard construction and operation emissions. Therefore, daily SLTs are used to evaluate Proposed Project significance, while hourly and annual SLTs are provided for informational purposes only.

² Based on EPA's "Proposed Rule to Implement the Fine Particle National Ambient Air Quality Standards" published September 8, 2005, and also SCAQMD's Air Quality Significance Thresholds (SCAQMD 2015).

³ Lead and lead compounds.

⁴ County SLTs for VOCs were originally based on the threshold of significance for VOCs from SCAQMD for the Coachella Valley. The terms VOC and ROG are used interchangeably, although VOC is used in this table because the City and County use the term VOC.

⁵ 13.7 tons per year threshold is based on 75 pounds per day multiplied by 365 days per year and divided by 2,000 pounds per ton.

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

The thresholds presented in Table 4.1-5 consider existing air quality concentrations and attainment or nonattainment designations under the NAAQS and CAAQS. The NAAQS and CAAQS are informed by a wide range of scientific evidence that demonstrates there are known safe concentrations of criteria pollutants. While recognizing that air quality is a cumulative problem, SDAPCD considers projects that generate criteria pollutant and ozone precursor emissions below these thresholds to be minor in nature and would not adversely affect air quality because the health-protective NAAQS or CAAQS would not be exceeded. Regional emissions generated by the Proposed Project could increase photochemical reactions and the formation of tropospheric ozone and secondary PM, which at certain concentrations, could lead to increased incidence of specific health consequences. Although these health effects are associated with ozone and particulate pollution, the effects are a result of cumulative and regional emissions. As such, for a project with relatively small emissions contributions (i.e., emissions below the regional air district thresholds), that project's incremental contribution cannot be traced to specific health outcomes on a regional scale, and a quantitative correlation of project-generated regional criteria pollutant emissions to specific human health impacts is not technically feasible. Similarly, there are no publicly available models that can precisely correlate localized CO, PM, and SO₂ emissions to health consequences at specific locations. Refer to Appendix C for additional information.

Toxic Air Contaminants

Incremental cancer and hazard thresholds used to evaluate receptor exposure to TAC emissions generated by mobile and stationary sources are adapted from SDAPCD Regulation XII, Rule 1200. Projects that would result in exposure to TACs resulting in a maximum incremental cancer risk (MICR) greater than 1 in 1 million without application of Toxics BACT,² MICR greater than 10 in 1 million with application of Toxics BACT, or a chronic and acute non-cancer health hazard index greater than 1.0 would be deemed as having a potentially significant impact related to health risks from DPM exposure. Because various Toxics BACTs are in place at the District—including CARB rules on vessels, shore power, and drayage trucks—the MICR of 10 in 1 million is utilized herein.

There are no quantitative thresholds related to receptor exposure to asbestos or lead-based paint. However, SDAPCD Rule 1206 requires that facility surveys be performed to identify the presence of asbestos containing materials (ACM) prior to commencement of demolition or renovation activities. If ACM is found then the demolition or renovation activities must comply with notification requirements and procedures for asbestos emissions control and waste handling and disposal, including complying with the limitations of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) regulations as listed in the Code of Federal Regulations (40 CFR Part 61). Title 8 of the California Code of Regulations, Section 1532.1 (8 California Code of Regulations 1532.1) covers the removal of lead-based paint and

² BACT is the level of air contaminant emission control or reduction required by State law and District rules for new, modified, relocated, and replacement emission sources. Examples of Toxics BACT include diesel particulate filters, catalytic converters, and selective catalytic reduction technology.

surfaces and provides specific guidance for removal and disposal of both ACMs and lead-containing surfaces, including their treatment by a licensed abatement contractor. See Section 4.3, *Hazards and Hazardous Materials*.

Carbon Monoxide

CO hot-spots typically occur in areas of high motor vehicle use, such as in parking lots, at congested intersections, and along highways. Because elevated CO concentrations typically occur at locations with high traffic volumes and congestion, elevated CO concentrations are often correlated with level of service (LOS) at intersections. LOS expresses the congestion level for an intersection and is designated by a letter from A to F, with LOS A representing the best operating conditions and LOS F the worst. Significant concentrations of CO sometimes occur (depending on temperature, wind speed, and other variables) at intersections where LOS is rated at D or worse.

Cumulative Impacts

Potential cumulative air quality impacts would result when cumulative projects' pollutant emissions would combine to degrade air quality conditions to below acceptable levels. This could occur on a local level, such as through increases in vehicle emissions at congested intersections, or at sensitive receptor locations due to concurrent construction activities; at a regional level, such as the potential impact of multiple past, present, and reasonably foreseeable projects on O₃ within the SDAB; or globally, such as the potential impact of GHG emissions on global climate change (see SEIR Section 4.2).

Neither the District, City of San Diego, nor SDAPCD has established quantitative thresholds to determine whether a project would have a cumulatively considerable contribution to air quality. The County's recommended thresholds (see below) for cumulative air quality impacts are utilized for the analysis of the impacts associated with the Proposed Project's construction and operation related to emissions on air quality.

Cumulatively considerable net increases during the construction phase would typically happen if two or more projects near each other are simultaneously constructed. The following thresholds are used to determine the cumulatively considerable net increase in emissions during the construction phase.

- A project that has a significant direct impact on air quality with regard to emissions of PM₁₀, PM_{2.5}, NO_x, and/or ROG_s (i.e., an exceedance of threshold values indicated in SEIR Table 4.1-5) would also have a significant cumulatively considerable net increase.
- In the event that direct impacts from the proposed project are less than significant, a project may still have a cumulatively considerable contribution to a significant cumulative impact on air quality if the emissions of concern from the project, in combination with the emissions of concern from other past, present, or reasonably foreseeable future projects within the proximity relevant to the pollutants of concern, are in excess of direct air quality impact thresholds.

The following thresholds are used to determine the cumulatively considerable net increase in emissions during the operation phase:

- A project that does not conform to the RAQS and/or has a significant direct impact on air quality with regard to operation emissions of PM₁₀, PM_{2.5}, NO_x, and/or ROG_s (i.e., an exceedance of threshold values indicated in SEIR Table 4.1-5) would also have a significant cumulatively considerable contribution to a significant cumulative impact.

4.1.2.3 Project Impacts and Mitigation Measures

Threshold 1: Implementation of the Proposed Project *would not* conflict with or obstruct implementation of the applicable air quality plan.

TAMT Final PEIR Discussion

The TAMT Final PEIR noted that buildout of the TAMT Plan would not result in changes in land uses or population growth that would conflict with the Port Master Plan (PMP), and growth associated with buildout would not hinder, conflict with, or obstruct the implementation of the applicable air quality plans. The TAMT Plan provides flexibility to meet future market conditions at TAMT, and includes a variety of infrastructure options that provides the District flexibility to meet future market demands. The improvements will allow for increased throughput for TAMT's five operating nodes (dry bulk, liquid bulk, refrigerated container, multi-purpose general cargo, and a central gate facility) while maximizing efficiency within the TAMT footprint. Full TAMT buildout was deemed consistent with control measures from the SIP, including clean vessel fuel, truck idling limits, cargo handling equipment rules, and agreements with locomotive operators to reduce emissions. In addition, mitigation would ensure buildout would be consistent with and help facilitate the proposed new SIP control measures, including future power capabilities at Berths 10-5/10-6 to accommodate additional vessel types, accommodate additional new and larger vessels equipped with shore power capabilities, and allow for concurrent cold ironing. Mitigation would further reduce Project-related emissions, including vessel speed reduction (VSR), shore power, and electric cargo handling upgrades. Therefore, implementation of the TAMT Plan was determined to not hinder, conflict with, or obstruct the implementation of the applicable air quality plan. Impacts were considered to be less than significant, and no mitigation measures were required.

The RAQS and SIP are summarized in Section 4.1.1.2 under the *Local* subheading of this SEIR. Since certification of the TAMT Final PEIR, the SDAPCD adopted updates to the RAQS and federal O₃ attainment plans in December 2016. These plans include updated emission forecasts and consideration of new NO_x and VOC control measures.

Project Impact Discussion

As identified in the TAMT Final PEIR, if a future project proposes development that is consistent with the growth anticipated by the relevant land use plans that were used in the formulation of the RAQS and SIP, the future project would be consistent with the RAQS and SIP. Moreover, if a future project is consistent with the overarching goals (i.e., to reduce emissions and attain NAAQS and CAAQS) and strategies (i.e., measures implemented to reduce emissions), then the future project would be consistent with the RAQS and SIP. Since the adoption and certification of the TAMT Final PEIR, the 2016 RAQS has been adopted by the SDAPCD. However, similar to the 2009 RAQS, no directly applicable air quality policies were identified in the 2016 RAQS that pertain to the TAMT Plan as implementation of TAMT Plan would not change land use designations on TAMT.

As discussed in the TAMT Final PEIR, the Proposed Project site is within the TAMT Precise Plan of the PMP, which has a focus on retaining and continuing marine-related, water-dependent industrial uses. The Proposed Project would result in the distribution of cement and cementitious bulk commodities via vessels and trucks, which is consistent with the PMP.

Similar to the TAMT Final PEIR, the Proposed Project would result in no changes in land uses at TAMT. Growth and cargo throughput associated with the Proposed Project is consistent with the improvements and growth proposed in the TAMT Plan. The TAMT Plan allows for up to 1,987,500 MT annual dry bulk

throughput at full buildout of the STC Alternative. The Proposed Project's 600,000 MT annual dry bulk throughput at full buildout is well within the throughput assumed and analyzed in the TAMT Final PEIR. Moreover, operation of the Proposed Project is similar to the dry bulk activity assumed in the TAMT Final PEIR, as cement and cementitious materials were considered in the TAMT Final PEIR, although specific project details, such as loading and unloading equipment and location at Warehouse C, were unknown and not specially analyzed. Regardless, the growth and land uses are within the scope of the growth and land uses analyzed in the TAMT Final PEIR.

The Proposed Project would be consistent with current land use designations of the PMP, would be consistent with the TAMT Precise Plan, would not result in changes in land use or population, and would be consistent with the dry bulk throughput analyzed in the TAMT Final PEIR. As such, the Proposed Project would be consistent with the statewide and local strategies to reduce emissions and would not hinder, conflict with, or obstruct the implementation of the applicable air quality plan. Therefore, impacts would be less than significant, and no new or more severe impacts than what has been previously disclosed in the certified TAMT Final PEIR would occur.

Level of Significance prior to Mitigation

Implementation of the TAMT Plan was determined to not hinder, conflict with, or obstruct the implementation of the applicable air quality plan, and impacts were considered to be less than significant. As discussed above, implementation of the Proposed Project would not result in conflicts associated with implementation of an applicable air quality plan. Therefore, impacts would be less than significant, and no new or more severe impacts than what has been previously disclosed in the certified TAMT Final PEIR would occur.

Mitigation Measures

No mitigation is required.

Level of Significance after Mitigation

No new or more severe impacts than what has been previously disclosed in the certified TAMT Final PEIR would occur. Impacts would be less than significant.

Threshold 2: Implementation of the Proposed Project *would not* violate any air quality standard or contribute substantially to an existing or projected air quality violation.

TAMT Final PEIR Discussion

Construction

The TAMT Final PEIR determined that construction associated with TAMT Plan buildout under the STC scenario would result in the temporary generation of emissions of ozone precursors (ROG, NO_x), CO, and PM exhaust emissions that could result in short-term impacts on ambient air quality. Emissions would originate from mobile and stationary construction equipment exhaust, employee vehicle exhaust, dust from demolishing structures and soil movement, exposed soil eroded by wind, and any architectural coatings and asphalt paving. Construction-related emissions would vary substantially depending on the level of activity, length of the construction period, specific construction operations, types of equipment, number of personnel, wind and precipitation conditions, and soil moisture content.

The TAMT Final PEIR concluded that given the life of the TAMT Plan (approximately 20 years), and considering future projects or improvements under the STC scenario would only be initiated once market

demand suggests support for them, it would be speculative to analyze the construction of these elements in any specific detail until such time that project-specific details, including duration, specific equipment used, and the location of activities, are available.

Emissions from construction of any individual component of full buildout must not exceed San Diego County's significance level thresholds (SLTs) or else a significant construction-related impact would occur. Additionally, all construction projects must abide by relevant SDAPCD rules adopted to reduce emissions throughout the region, including Rule 55 (Fugitive Dust).

The TAMT Final PEIR identified that mitigation (TAMT Final PEIR Mitigation Measures **MM-AQ-1** and **MM-AQ-2**) in the form of implementation of best management practices during construction of future TAMT Plan projects is required to reduce the significant impact. Because the timeframe and specific information regarding future projects were unknown, construction air quality impacts associated with the TAMT Plan's potential to exceed or violate any air quality standard or contribute substantially to an existing or projected air quality violation were deemed significant and unavoidable.

Operation

The TAMT Final PEIR analyzed anticipated criteria pollutant emissions associated with buildout of the TAMT Plan. The change in daily emission levels between baseline and buildout conditions was compared to County SLTs. Impacts were deemed significant prior to mitigation, and recommended mitigation measures reduced the impacts to less than significant for the STC Alternative. Emissions were presented for all cargo nodes during both existing and STC buildout conditions. Impacts in the TAMT Final PEIR were assessed based on the sum of emissions from all three cargo nodes. However, as the Proposed Project is a dry bulk project, emissions and impacts are discussed in relation to the dry bulk cargo node only.

As identified in the TAMT Final PEIR, daily activity assumed three vessels calling on TAMT under baseline conditions and four vessels under the full TAMT buildout. The maximum berthing capacity at TAMT is four vessels at a time. Daily activity under the TAMT Plan buildout under the STC scenario assumed up to four round trip calls on any given day, which represents an increase of one call per day over existing conditions. On an annual basis, there were 100 calls under TAMT Final PEIR baseline conditions for all cargo nodes, of which 15 were associated with dry bulk cargo (plus 57 associated with refrigerated containers and 28 associated with multi-purpose general cargo). At full STC buildout, it was assumed there would be 433 calls by 2035 for all cargo nodes, of which 109 would be associated with the dry bulk cargo (plus 90 associated with refrigerated containers and 234 associated with multi-purpose general cargo).

Table 4.1-6 summarizes criteria pollutant emissions associated with operation of all cargo nodes analyzed in the TAMT Final PEIR following mitigation. As shown, the net increase in buildout emissions from all cargo nodes relative to TAMT existing conditions would be below thresholds for all pollutants after implementation of mitigation measures **MM-AQ-2** through **MM-AQ-9**.

Table 4.1-6. Summary of TAMT Final PEIR Emissions for the Dry Bulk Cargo Node (pounds per day)

Scenario	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Existing (289,864 MT)	53	1,007	181	17	608	192
Unmitigated Buildout (1,987,500 MT)	82	1,360	345	26	4,496	1,279
<i>Unmitigated Net Change</i>	29	354	164	9	3,888	1,086
Mitigated Buildout (1,987,500 MT)	71	1,143	285	23	255	95
<i>Mitigated Net Change</i>	18	137	104	6	-353	-97

Source: Summarized from TAMT Final PEIR, Table 4.2-6 (Existing), Table 7-3 (Unmitigated STC Buildout), and Table 7-4 (Mitigated STC Buildout).

¹ Assumes **MM-AQ-7** would ensure net new VOC would not exceed to 75 pounds on a peak day.

Mitigation measures in the TAMT Final PEIR were prescribed to reduce criteria pollutant emissions. A brief summary of the TAMT Final PEIR mitigation measures follows:

- **MM-AQ-2** requires future TAMT Plan projects to implement diesel emission reduction measures during construction and operation.
- **MM-AQ-3** requires compliance with the District's Climate Action Plan measures—specifically, 80 percent VSR compliance with the District's existing VSR program and shore power for eligible calls (container calls only).
- **MM-AQ-4** requires future dry bulk operations to implement BACT for Conveyor System and Bulk Discharge Unloaders.
- **MM-AQ-5** requires future projects to implement VSR beyond the District's CAP when certain vessel call triggers are met, or by January 1, 2030. Vessel call triggers are 79 calls for dry bulk, 98 calls for refrigerated containers, and 78 calls for multi-purpose general cargo.
- **MM-AQ-6** is related to electric cargo handling equipment upgrade. Specifically, this measure requires three electric pieces replace diesel pieces by 2020, or similar replacement to achieve equivalent reductions within the TAMT boundary.
- **MM-AQ-7** requires future tenants to be subject to an annual inventory submittal and periodic technology review.
- **MM-AQ-8** requires the District to develop a program to reduce exhaust emissions from operations.
- **MM-AQ-9** requires the use of an At-Berth Emission Capture and/or Control System or equivalent to reduce emission from vessel hoteling once terminal throughput reaches certain levels.

Reductions associated with these measures are included in the mitigation emission levels shown in Table 4.1-6. As shown in Table 4.1-6, application of TAMT Final PEIR Mitigation Measures **MM-AQ-2** through **MM-AQ-9** would reduce operational air quality impacts to a less-than-significant level.

Project Impact Discussion

Construction

As identified in Chapter 3, construction of the Proposed Project would occur in two phases (Phase I and Phase II). Bays C-7 and C-9 are anticipated to be upgraded as part of Phase I, and Bays C-8 and C-10 would be upgraded as part of Phase II. Phase II improvements to Bays C-8 and C-10 are anticipated to begin 2 to 3 years after Phase I is operational. Improvements for each phase would take an estimated 7 to 10 months to complete. The improvements would be identical for each phase and would involve five principal construction activities: (1) concrete demolition and excavation, (2) foundation and concrete pouring, (3) roof demolition and repair, (4) installation of mechanical equipment, and (5) electrical tie-ins. For purposes of this analysis, the air quality emission calculations use a 7-month schedule to determine worst-case daily peak emissions.

An estimate of emissions associated with Phase I and Phase II construction of the Proposed Project is presented in Table 4.1-7.

Table 4.1-7. Estimate of Peak Daily Project Construction Emissions (pounds per day)

Emissions Source	VOC	NO _x	CO	SO _x	PM10	PM2.5
Phase I						
Off-road Equipment	2.3	23.8	21.8	<0.0	1.4	1.3
On-road Equipment	0.6	14.4	6.0	<0.0	0.4	0.2
Fugitive Dust	-	-	-	-	2.2	2.2
Peak Day Daily – Phase I Construction	2.9	38.1	28.3	<0.1	4.0	3.7
Threshold	75	250	550	150	100	55
Exceeds Threshold?	No	No	No	No	No	No
Phase II						
Off-road Equipment	1.4	16.5	10.6	<0.0	0.9	0.9
On-road Equipment	0.4	10.7	3.5	<0.0	0.3	0.1
Peak Day Daily – Phase II Construction	1.6	20.2	14.1	<0.1	1.0	0.9
Threshold	75	250	550	150	100	55
Exceeds Threshold?	No	No	No	No	No	No

Source: Appendix C.

Note: Peak daily emissions for each pollutant may not occur on the same day. Totals may not add exactly due to rounding.

As shown in Table 4.1-7, the peak daily emissions associated with the worst-case construction scenario would be well below thresholds. Therefore, construction of Phase I and Phase II would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. However, the TAMT Final PEIR found impacts to be potentially significant, and included various mitigation measures for construction of future TAMT projects. Therefore, although the Proposed Project would individually result in emissions below the thresholds, this is a potentially significant impact, similar to the TAMT Final PEIR, and mitigation measures are required to ensure compliance with the TAMT Final PEIR.

Phase II of construction would occur while the Proposed Project is operational. This overlap is discussed in the next section.

Operation

Table 4.1-8 shows the anticipated criteria pollutant emissions associated with operation of the Proposed Project without the application of identified mitigation measures. As shown, emissions would be below full dry bulk buildout in the TAMT Final PEIR. However, the TAMT Final PEIR was potentially significant, and includes various mitigation measures for future projects to implement. Therefore, although the Proposed Project would result in emissions below those identified for the unmitigated dry bulk buildout in the TAMT Final PEIR, this is a potentially significant impact, similar to the TAMT Final PEIR, and mitigation measures are required to ensure compliance with the TAMT Final PEIR. Note that while there is locomotive activity associated with dry bulk activity at TAMT, there is no locomotive activity associated with the Proposed Project. Locomotive activity would remain unchanged.

Phase II of construction would occur while Phase I of the Proposed Project is operational. Overlap of Phase II construction and Phase I operation related to full dry bulk buildout in the TAMT Final PEIR is presented in Table 4.1-9. This scenario assumes that operations of Phase I at maximum throughput (600,000 MT per year) overlaps with Phase II on a daily basis. As shown, emissions during combined Phase II construction and full operation would be below full dry bulk buildout in the TAMT Final PEIR. Maximum concurrent emissions would not result in an exceedance of daily criteria pollutant thresholds. Therefore, no new or

more severe air quality impacts would occur with operation of the Proposed Project than what was disclosed in the certified TAMT Final PEIR. Similar to above, mitigation measures are required to ensure compliance with the TAMT Final PEIR.

Table 4.1-8. Proposed Project Operational Emissions – Unmitigated Condition (pounds per day)

Emissions Source	VOC	NO _x	CO	SO _x	PM10	PM2.5
Proposed Project						
Ocean-Going Vessels	32	649	60	22	12	11
Assist Tugs	<1	3	3	<1	<1	<1
Tugs and Fuel Barges	5	53	40	<1	2	2
Payloaders – Loading	<1	<1	4	<1	<1	<1
Payloaders – Unloading	1	3	22	<1	<1	<1
Cement Unloading – Vacuum	--	--	--	--	23	23
Cement Loading – Trucks	--	--	--	--	1	1
Trucks	5	81	26	1	12	4
Worker Trips	<1	<1	1	<1	<1	<1
Proposed Project Total	44	789	156	23	49	40
Comparison with TAMT Final PEIR						
TAMT Final PEIR Dry Bulk Unmitigated Daily (Table 4.1-6)	82	1,360	345	26	4,496	1,279
<i>Net Change from TAMT Final PEIR</i>	<i>-39</i>	<i>-571</i>	<i>-189</i>	<i>-3</i>	<i>-4,446</i>	<i>-1,238</i>

Source: SEIR Appendix C.

Note: Totals may not add exactly due to rounding.

Table 4.1-9. Proposed Project Concurrent Construction and Operations – Unmitigated Condition (pounds per day)

Project Element	VOC	NO _x	CO	SO _x	PM10	PM2.5
Phase II Construction	1.6	20.2	14.1	<0.1	1.0	0.9
Proposed Project Unmitigated	44	789	156	23	49	40
Total Concurrent Emissions	45	809	170	23	50	41
TAMT Final PEIR Dry Bulk Unmitigated Daily (Table 4.1-6)	82	1,360	345	26	4,496	1,279
<i>Net Change from TAMT Final PEIR</i>	<i>-37</i>	<i>-551</i>	<i>-175</i>	<i>-3</i>	<i>-4,445</i>	<i>-1,237</i>

Source: SEIR Appendix C.

Note: Totals may not add exactly due to rounding.

Level of Significance prior to Mitigation

Construction

Air quality emissions related to construction activities would be well within the scope of the TAMT Final PEIR and there would be no new or more severe impacts than what has been previously disclosed in the certified TAMT Final PEIR. However, as identified in the TAMT Final PEIR, air quality impacts would be significant and mitigation would be required.

Operation

Operation of the Proposed Project would result in emissions below the emission levels assumed in the TAMT Final PEIR. However, although the Proposed Project would result in emissions below those identified for the unmitigated dry bulk buildout in the TAMT Final PEIR, this is a potentially significant impact, similar to the TAMT Final PEIR, and mitigation measures are required to ensure compliance with the TAMT Final PEIR. These conclusions, prior to mitigation, are consistent with the findings of the TAMT Final PEIR, and the Proposed Project would not result in a new or more severe significant impact than what was previously disclosed in the TAMT Final PEIR.

Mitigation Measures

Implementation of modified TAMT Final PEIR Mitigation Measures **MM-AQ-1** and **MM-AQ-2** would ensure that impacts remain less than significant, and no new or more severe impacts than what has been disclosed in the certified TAMT Final PEIR would occur. The modified mitigation measures are **MM-AQ-1R** and **MM-AQ-2R**. Implementation of Mitigation Measures **MM-AQ-1** through **MM-AQ-9** from the TAMT Final PEIR, plus new mitigation measure **MM-AQ-10**, would reduce emissions from all sources. Table 4.1-10 provides a comparison summary of the construction- and operation-related air quality mitigation measures previously identified in the TAMT Final PEIR for the TAMT Plan and how those mitigation measures apply to the Proposed Project. In instances where modification of the TAMT Final PEIR mitigation measures occurs or new Project mitigation measures are needed, an explanation is provided.

Table 4.1-10. Comparison of Air Quality TAMD Final PEIR Mitigation Measures to Proposed Project Draft SEIR Mitigation Measures

<p>TAMD Final PEIR Mitigation Measure</p> <p><i>The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMD Plan, adopted by the District in December 2016 as part of the Final Environmental Impact Report for the TAMD Plan.</i></p>	<p>Mitsubishi Cement Corporation Project SEIR Mitigation Measure</p> <p><i>Project mitigation measures are a combination of applicable TAMD Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMD Final PEIR mitigation measures are provided with additions shown in <u>double underline</u> and deletions indicated in strikeout format.</i></p>	<p>Project Applicability/Reason for Modification or New Project Mitigation Measure</p>
<p>MM-AQ-1: Implement Best Management Practices During Construction of Future TAMD Plan Components.</p> <p>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.</p> <ul style="list-style-type: none"> ■ 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. 	<p>MM-AQ-1R: Implement Best Management Practices During Construction of Future TAMD Plan Components.</p> <p><u>The Mitsubishi Cement Corporation Project Proponent</u> All proponents of future projects shall implement Best Management Practices (BMPs) to reduce air emissions from all construction activities implemented as part of <u>the Proposed Project full TAMD plan buildout</u>. The following measures are required to limit construction equipment exhaust from on-road trucks and heavy-duty equipment used during construction.</p> <ul style="list-style-type: none"> ■ 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"). 	<p>MM-AQ-1 applies to the Proposed Project. Modifications to the MM-AQ-1 are limited to changes in how the San Diego Unified Port District is referred to (e.g. San Diego Unified Port District instead of District), identification of the appropriate Department, and updates to off-road diesel powered equipment based on anticipated Proposed Project's construction schedule.</p>

Table 4.1-10. Comparison of Air Quality TAMD Final PEIR Mitigation Measures to Proposed Project Draft SEIR Mitigation Measures

<p>TAMD Final PEIR Mitigation Measure</p> <p><i>The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMD Plan, adopted by the District in December 2016 as part of the Final Environmental Impact Report for the TAMD Plan.</i></p>	<p>Mitsubishi Cement Corporation Project SEIR Mitigation Measure</p> <p><i>Project mitigation measures are a combination of applicable TAMD Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMD Final PEIR mitigation measures are provided with additions shown in <u>double underline</u> and deletions indicated in strikeout format.</i></p>	<p>Project Applicability/Reason for Modification or New Project Mitigation Measure</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"> ■ Water the grading areas at least twice daily to minimize fugitive dust. ■ Stabilize graded areas as quickly as possible to minimize fugitive dust. ■ Apply chemical stabilizer or pave the last 100 feet of internal travel path within the construction site prior to public road entry. ■ Install wheel washers adjacent to a paved apron prior to vehicle entry on public roads. ■ Remove any visible track-out into traveled public streets within 30 minutes of occurrence. ■ Wet wash the construction access point at the end of each workday if any vehicle travel on unpaved surfaces has occurred. ■ Provide sufficient perimeter erosion control to prevent washout of silty material onto public roads. ■ Cover haul trucks or maintain at least 12 inches of freeboard to reduce blow-off during hauling. 	<p>In addition, <u>the Mitsubishi Cement Corporation Project Proponent</u> all future project proponents shall implement the relevant BMPs, consistent with the <u>Project-specific applicable</u> industrial Storm Water Pollution Prevention Plan (SWPPP). In no case would any BMP be implemented if it <u>conflicts</u> conflicted with the SWPPP or other applicable water quality permit requirements. BMP dust control measures may include, but are not limited to, the following:</p> <ul style="list-style-type: none"> ■ Water the grading areas at least twice daily to minimize fugitive dust. ■ Stabilize graded areas as quickly as possible to minimize fugitive dust. ■ Apply chemical stabilizer or pave the last 100 feet of internal travel path within the construction site prior to public road entry. ■ Install wheel washers adjacent to a paved apron prior to vehicle entry on public roads. ■ Remove any visible track-out into traveled public streets within 30 minutes of occurrence. ■ Wet wash the construction access point at the end of each workday if any vehicle travel on unpaved surfaces has occurred. ■ Provide sufficient perimeter erosion control to prevent washout of silty material onto public roads. ■ Cover haul trucks or maintain at least 12 inches of freeboard to reduce blow-off during hauling. 	

Table 4.1-10. Comparison of Air Quality TAMT Final PEIR Mitigation Measures to Proposed Project Draft SEIR Mitigation Measures

<p>TAMT Final PEIR Mitigation Measure</p> <p><i>The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMT Plan, adopted by the District in December 2016 as part of the Final Environmental Impact Report for the TAMT Plan.</i></p>	<p>Mitsubishi Cement Corporation Project SEIR Mitigation Measure</p> <p><i>Project mitigation measures are a combination of applicable TAMT Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMT Final PEIR mitigation measures are provided with additions shown in <u>double underline</u> and deletions indicated in strikeout format.</i></p>	<p>Project Applicability/Reason for Modification or New Project Mitigation Measure</p>
<ul style="list-style-type: none"> ■ Suspend all soil disturbance and travel on unpaved surfaces if winds exceed 25 mph. ■ Cover/water onsite stockpiles of excavated material. ■ Enforce a 15 mph speed limit on unpaved surfaces. ■ 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. ■ Hydroseed, landscape, or develop as quickly as possible all disturbed areas as directed by the District and/or SDAPCD to reduce dust generation. ■ Limit the daily grading volumes/area. <p>Prior to the commencement of construction activities, the project proponent shall submit evidence to the 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 District during construction.</p>	<ul style="list-style-type: none"> ■ Suspend all soil disturbance and travel on unpaved surfaces if winds exceed 25 mph. ■ Cover/water onsite stockpiles of excavated material. ■ Enforce a 15 mph speed limit on unpaved surfaces. ■ 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. ■ Hydroseed, landscape, or develop <u>Develop</u> as quickly as possible all disturbed areas as directed by the <u>San Diego Unified Port District's Planning and Green Port Department</u> and/or SDAPCD to reduce dust generation. ■ Limit the daily grading volumes/area. <p>Prior to the commencement of construction activities, the <u>Mitsubishi Cement Corporation Project Proponent</u> project proponent shall submit evidence to the <u>San Diego Unified Port District's Planning and Green Port Department</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's Planning and Green Port Department</u> during construction.</p>	

Table 4.1-10. Comparison of Air Quality TAMT Final PEIR Mitigation Measures to Proposed Project Draft SEIR Mitigation Measures

<p>TAMT Final PEIR Mitigation Measure</p> <p><i>The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMT Plan, adopted by the District in December 2016 as part of the Final Environmental Impact Report for the TAMT Plan.</i></p>	<p>Mitsubishi Cement Corporation Project SEIR Mitigation Measure</p> <p><i>Project mitigation measures are a combination of applicable TAMT Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMT Final PEIR mitigation measures are provided with additions shown in <u>double underline</u> and deletions indicated in strikeout format.</i></p>	<p>Project Applicability/Reason for Modification or New Project Mitigation Measure</p>
<p>MM-AQ-2: Implement Diesel Emission-Reduction Measures During Construction and Operations of Future TAMT Plan Components.</p> <p>The project proponent shall implement the following measures during construction and project operations, subject to verification by the District.</p> <p>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.</p>	<p>MM-AQ-2R: Implement Diesel Emission-Reduction Measures During Construction and Operations of Future TAMT Plan Components.</p> <p>The <u>Mitsubishi Cement Corporation Project Proponent</u> project proponent shall implement the following measures during construction and project operations, subject to verification by the <u>San Diego Unified Port District's Planning and Green Port Department</u>.</p> <p>i. <u>The Mitsubishi Cement Corporation Project Proponent</u> 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. Clear signage regarding the limitation on idling time at the delivery driveway and loading areas has been installed on terminal to provide actual notice of this requirement to all drivers. This measure shall be enforced by the terminal supervisors or by a Port designated functional-equivalent, who will submit quarterly reports of violators to <u>San Diego Unified Port District's Planning and Green Port Department</u> and repeat violators shall be subject to penalties pursuant to California airborne toxics control measure 13 California Code of Regulations Section 2485. The <u>Project Proponent</u> project proponent shall submit evidence of the use of diesel emission reduction measures to the <u>San Diego Unified Port District's Planning and Green Port Department</u> 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</p>	<p>MM-AQ-2 applies to the Proposed Project. Modifications to the MM-AQ-2 are limited to changes in how the San Diego Unified Port District is referred to (e.g. San Diego Unified Port District instead of District).</p>

Table 4.1-10. Comparison of Air Quality TAMD Final PEIR Mitigation Measures to Proposed Project Draft SEIR Mitigation Measures

<p>TAMD Final PEIR Mitigation Measure</p> <p><i>The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMD Plan, adopted by the District in December 2016 as part of the Final Environmental Impact Report for the TAMD Plan.</i></p>	<p>Mitsubishi Cement Corporation Project SEIR Mitigation Measure</p> <p><i>Project mitigation measures are a combination of applicable TAMD Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMD Final PEIR mitigation measures are provided with additions shown in <u>double underline</u> and deletions indicated in strikeout format.</i></p>	<p>Project Applicability/Reason for Modification or New Project Mitigation Measure</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 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>information of the vehicles and drivers in violation of these measures.</p> <p>ii. The <u>Mitsubishi Cement Corporation Project Proponent</u> 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 <u>Mitsubishi Cement Corporation Project Proponent</u> 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 <u>Mitsubishi Cement Corporation Project Proponent</u> project proponent shall submit a report by the certified mechanic of the condition of the construction and operations vehicles and equipment to the <u>San Diego Unified Port District's Engineering Department during the construction phase and the Planning and Green Port Department during the operation phase</u> prior to commencement of their use.</p>	
<p>MM-AQ-3: Comply with San Diego Unified Port District Climate Action Plan Measures.</p> <p>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"> ■ Vessels shall comply with the District's voluntary vessel speed reduction program, which targets 80 percent compliance. 	<p>MM-AQ-3R: Comply with San Diego Unified Port District Climate Action Plan Measures.</p> <p>Prior to approval of all discretionary actions and/or Coastal Development Permits, the <u>Mitsubishi Cement Corporation Project Proponent</u> 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"> ■ Vessels shall comply with the <u>San Diego Unified Port District's</u> voluntary vessel speed reduction program, which targets 80 percent compliance. 	<p>MM-AQ-3 applies to the Proposed Project. Modifications to the MM-AQ-3 are limited to changes in how the San Diego Unified Port District is referred to (e.g. San Diego Unified Port District instead of District) and updates to City of San Diego's Construction and Demolition Debris Deposit Ordinance.</p>

Table 4.1-10. Comparison of Air Quality TAMT Final PEIR Mitigation Measures to Proposed Project Draft SEIR Mitigation Measures

<p>TAMT Final PEIR Mitigation Measure</p> <p><i>The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMT Plan, adopted by the District in December 2016 as part of the Final Environmental Impact Report for the TAMT Plan.</i></p>	<p>Mitsubishi Cement Corporation Project SEIR Mitigation Measure</p> <p><i>Project mitigation measures are a combination of applicable TAMT Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMT Final PEIR mitigation measures are provided with additions shown in <u>double underline</u> and deletions indicated in strikeout format.</i></p>	<p>Project Applicability/Reason for Modification or New Project Mitigation Measure</p>
<ul style="list-style-type: none"> ■ 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. ■ Designated truck haul routes shall be used, and the project proponent shall decrease onsite movements where practicable. ■ No commercial drive-through shall be implemented. ■ 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. ■ Light fixtures shall be replaced with lower-energy bulbs such as fluorescent, Light-Emitting Diodes (LEDs), Compact Fluorescent Lights (CFLs), or the most energy- 	<ul style="list-style-type: none"> ■ Vessels that are subject to CARB's at-berth regulation (dry bulk vessels are not subject to the at-berth regulation) shall comply with ARB's at berth regulation that requires shore power or alternative control technology regulation for certain vessel fleets for 80 percent of eligible calls by 2020, minus idle time to clear customs consistent with California Air Resources Board regulations. The TAMT Final PEIR assumed 1.5 hours of idle time for vessels to embark/disembark, which applies to all shore power and/or alternative control technologies employed at the terminal. This is a Project feature made into a mitigation measure to ensure compliance (see MM-AQ-9 for an explanation of the Proposed Project's shore power features). ■ Designated truck haul routes shall be used, and the <u>Project Proponent</u> project proponent shall decrease onsite movements where practicable. ■ No commercial drive-through shall be implemented. ■ 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 <u>65 percent</u> 50 percent of all construction debris. This measure shall be applied during construction and operation of the <u>Proposed Project</u> proposed project. ■ 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 	

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<p>efficient lighting that meets required lighting standards and is commercially available.</p> <ul style="list-style-type: none"> ■ 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>lighting that meets required lighting standards and is commercially available.</p> <ul style="list-style-type: none"> ■ 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 <u>San Diego Unified Port District's Planning and Green Port Department</u> by the <u>Project Proponent</u> project proponent on an annual basis through <u>the end of the lease or 2035</u> (buildout of the TAMT Plan), <u>whichever occurs first</u>. 	
<p>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.</p> <p>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"> ■ Upgrade the existing Conveyor System and Bulk Discharge Unloader (if proposed for use) to meet the minimum 95% 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% 	<p>MM-AQ-4R: Implement Best Available Control Technologies for Conveyor System and Bulk Discharge Unloader for Future Dry Bulk Operations associated with the TAMT Plan.</p> <p>As a condition of approval of any new or amended real estate agreement or Coastal Development Permit <u>for the Mitsubishi Cement Corporation Project</u> dry bulk operations that would result in an increase in daily or annual throughput over baseline conditions <u>identified in the TAMT Final PEIR</u>, the San Diego Unified Port District shall require the <u>Mitsubishi Cement Corporation Project Proponent</u> project proponent to install and use the best available control technologies to achieve a minimum 95% control efficiency for particulate matter by</p> <ul style="list-style-type: none"> ■ Upgrade the existing Conveyor System and Bulk Discharge Unloader (if proposed for use) to meet the minimum 95% 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% control efficiency 	<p>MM-AQ-4 applies to the Proposed Project. Modifications to the MM-AQ-4 are limited to identifying updates for use of best available control technologies.</p>

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<p>control efficiency and properly dispose of the existing system in compliance with all applicable laws and regulations.</p> <ul style="list-style-type: none"> ■ 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. 	<p>and properly dispose of the existing system in compliance with all applicable laws and regulations.</p> <p>bypassing the existing Conveyor System and Bulk Discharge Unloader and installing a new Conveyor System and Bulk Discharge Unloader that meets 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. 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 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 the <u>Project Proponent</u> 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>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 <u>the end of the lease 2035</u> (buildout of the TAMT Plan).</p>	

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<p>MM-AQ-5: Implement Vessel Speed Reduction Program Beyond Climate Action Plan Compliance for Future Operations Associated with the TAMT Plan.</p> <p>Every quarter following approval of the first discretionary action approval and/or issuance of the first Coastal Development Permit associated with the 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.</p> <p>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 multipurpose 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.</p> <p>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</p>	<p>MM-AQ-5R: Implement Enhanced Vessel Speed Reduction Program Beyond Climate Action Plan Compliance for Future Operations Associated with the TAMT Plan.</p> <p><u>The Mitsubishi Cement Corporation shall be required to comply with the Enhanced VSR Program.</u></p> <p><u>The Mitsubishi Cement Corporation shall, beginning with the first vessel call to the Port, comply with 80% of its OGVs reducing their speeds to 12 knots or less starting at 20 nautical miles from Point Loma.</u></p> <p><u>The Mitsubishi Cement Corporation shall comply with 90% of its OGVs calling to the Port, reduce their speeds to 12 knots starting at 40 nautical miles from Point Loma upon the occurrence of the earlier of either of the following two scenarios:</u></p> <ul style="list-style-type: none"> ▪ <u>Prior to the annual number of dry bulk vessel calls reach 91 calls annually (e.g., 76 new calls over the TAMT Final PEIR’s baseline condition); or</u> ▪ <u>Beginning January 1, 2030, irrespective of the number of calls on an annual basis.</u> <p><u>To help the District implement the Beyond 2013 CAP VSR Program before reaching 91 dry bulk vessel calls annually, Mitsubishi Cement Corporation shall provide the District with a rolling estimate of anticipated vessels calls every 6 months.</u></p> <p>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>MM-AQ-5 applies to the Proposed Project. Modifications to the MM-AQ-5 are limited to clarifying when the requirements are to be implemented as well as changes in how the San Diego Unified Port District is referred to (e.g. San Diego Unified Port District instead of District).</p>

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<p>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.</p> <p>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 & 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>MM-AQ-6: Electric Cargo Handling Equipment Upgrades. 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</p>	<p>TAMT Final PEIR MM-AQ-6 will be implemented by the San Diego Unified Port District on a terminal wide basis.</p>	<p>The San Diego Unified Port District is in the process of developing an incentive program to assist with upgrades to electric cargo handling equipment at the TAMT.</p> <p>Mitsubishi Cement Corporation is proposing electric vacuum loaders and</p>

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<p>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"> 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. <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 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</p>		<p>only minimal diesel equipment as a feature of the Project.</p>

Table 4.1-10. Comparison of Air Quality TAMT Final PEIR Mitigation Measures to Proposed Project Draft SEIR Mitigation Measures

<p>TAMT Final PEIR Mitigation Measure</p> <p><i>The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMT Plan, adopted by the District in December 2016 as part of the Final Environmental Impact Report for the TAMT Plan.</i></p>	<p>Mitsubishi Cement Corporation Project SEIR Mitigation Measure</p> <p><i>Project mitigation measures are a combination of applicable TAMT Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMT Final PEIR mitigation measures are provided with additions shown in <u>double underline</u> and deletions indicated in strikeout format.</i></p>	<p>Project Applicability/Reason for Modification or New Project Mitigation Measure</p>
<p>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"> 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. <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</p>		

Table 4.1-10. Comparison of Air Quality TAMT Final PEIR Mitigation Measures to Proposed Project Draft SEIR Mitigation Measures

<p>TAMT Final PEIR Mitigation Measure</p> <p><i>The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMT Plan, adopted by the District in December 2016 as part of the Final Environmental Impact Report for the TAMT Plan.</i></p>	<p>Mitsubishi Cement Corporation Project SEIR Mitigation Measure</p> <p><i>Project mitigation measures are a combination of applicable TAMT Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMT Final PEIR mitigation measures are provided with additions shown in <u>double underline</u> and deletions indicated in strikeout format.</i></p>	<p>Project Applicability/Reason for Modification or New Project Mitigation Measure</p>
<p>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"> 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. <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</p>		

Table 4.1-10. Comparison of Air Quality TAMD Final PEIR Mitigation Measures to Proposed Project Draft SEIR Mitigation Measures

<p>TAMD Final PEIR Mitigation Measure</p> <p><i>The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMD Plan, adopted by the District in December 2016 as part of the Final Environmental Impact Report for the TAMD Plan.</i></p>	<p>Mitsubishi Cement Corporation Project SEIR Mitigation Measure</p> <p><i>Project mitigation measures are a combination of applicable TAMD Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMD Final PEIR mitigation measures are provided with additions shown in <u>double underline</u> and deletions indicated in strikeout format.</i></p>	<p>Project Applicability/Reason for Modification or New Project Mitigation Measure</p>
<p>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 TAMD 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>MM-AQ-7: Annual Inventory Submittal and Periodic Technology Review.</p> <p>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</p>	<p>MM-AQ-7R: Annual Inventory Submittal and Periodic Technology Review.</p> <p>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>	<p>MM-AQ-7 applies to the Proposed Project. Modifications to MM-AQ-7 clarify the intent of the mitigation measure and the annual reporting requirements, as well as the Project Proponent's requirement to work cooperatively with the District in the future should new technologies become available and are feasibly implemented in the Proposed Project operations. Additional modifications are limited to changes in how the San Diego Unified Port District is referred to (e.g. San Diego Unified Port District instead of District).</p>

Table 4.1-10. Comparison of Air Quality TAMT Final PEIR Mitigation Measures to Proposed Project Draft SEIR Mitigation Measures

<p>TAMT Final PEIR Mitigation Measure</p> <p><i>The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMT Plan, adopted by the District in December 2016 as part of the Final Environmental Impact Report for the TAMT Plan.</i></p>	<p>Mitsubishi Cement Corporation Project SEIR Mitigation Measure</p> <p><i>Project mitigation measures are a combination of applicable TAMT Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMT Final PEIR mitigation measures are provided with additions shown in <u>double underline</u> and deletions indicated in strikeout format.</i></p>	<p>Project Applicability/Reason for Modification or New Project Mitigation Measure</p>
<p>emissions operated by the project proponent at the TAMT throughout the life of the lease up to 2035 (buildout of the TAMT plan).</p>	<p>project proponent at the TAMT throughout the life of the lease up to 2035 (buildout of the TAMT plan).</p>	
<p>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"> 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. 	<p>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"> 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. 	

Table 4.1-10. Comparison of Air Quality TAMT Final PEIR Mitigation Measures to Proposed Project Draft SEIR Mitigation Measures

<p>TAMT Final PEIR Mitigation Measure</p> <p><i>The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMT Plan, adopted by the District in December 2016 as part of the Final Environmental Impact Report for the TAMT Plan.</i></p>	<p>Mitsubishi Cement Corporation Project SEIR Mitigation Measure</p> <p><i>Project mitigation measures are a combination of applicable TAMT Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMT Final PEIR mitigation measures are provided with additions shown in <u>double underline</u> and deletions indicated in strikeout format.</i></p>	<p>Project Applicability/Reason for Modification or New Project Mitigation Measure</p>
<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>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.</p> <p>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.</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. 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.</p> <p>If Periodic Technology Review identifies new technology that will be effective in reducing emissions compared to the equipment in</p>	

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<p>TAMT Final PEIR Mitigation Measure</p> <p><i>The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMT Plan, adopted by the District in December 2016 as part of the Final Environmental Impact Report for the TAMT Plan.</i></p>	<p>Mitsubishi Cement Corporation Project SEIR Mitigation Measure</p> <p><i>Project mitigation measures are a combination of applicable TAMT Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMT Final PEIR mitigation measures are provided with additions shown in <u>double underline</u> and deletions indicated in strikeout format.</i></p>	<p>Project Applicability/Reason for Modification or New Project Mitigation Measure</p>
<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 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>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 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><u>The Mitsubishi Cement Corporation shall comply with the District's Annual Inventory and Periodic Technology Review Program by (1) providing an inventory of all the mobile equipment associated with their TAMT site operations that generate criteria pollutants, toxic air contaminants, and greenhouse gases on an annual basis to be submitted by January 30 of each year of operations, and (2) working collaboratively with District staff and/or the local air pollution control district to identify new technologies or other practices that can be incorporated into their operations that help reduce emissions and improve air quality.</u></p>	

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	<p><u>The Mitsubishi Cement Corporation shall complete the District's equipment inventory spreadsheet annually, which requires tenants to identify the year, make, VIN/ID number, fuel type, 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 in the TAMT Plan MM-AQ-7, the San Diego Unified Port District's 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 actions specified in TAMT Plan MM-AQ-7.</u></p>	
<p>MM-AQ-8: Implement Exhaust Emissions Reduction Program at the Tenth Avenue Marine Terminal.</p> <p>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> <p>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.</p> <p>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</p>	<p>TAMT Final PEIR MM-AQ-8 will be implemented by the San Diego Unified Port District on a terminal wide basis.</p> <p>MM-AQ-8: Implement Exhaust Emissions Reduction Program at Tenth Avenue Marine Terminal.</p> <p><u>The San Diego Unified Port District is tasked with developing an incentive program, based on an emission reduction schedule, that incentivizes tenants and/or terminal operators to reduce mobile source emissions above and beyond the requirements identified in the TAMT Final PEIR. District staff is currently developing the Exhaust Emission Reduction Program as part of the District's Clean Air Plan update, per the direction of the Board of Port Commissioners in June 2019. Following completion of the Clean Air Plan update, the Project Proponent will be eligible to participate in the updated plan's Exhaust Emission Reduction Program.</u></p>	<p>The San Diego Unified Port District is in the process of developing an incentive program to assist with exhaust emissions reductions at the TAMT.</p> <p>A condition will be included as part of the Project's Coastal Development Permit (CDP) conditions to ensure that Project would be required to participate in the incentive program once the program has been adopted by the District.</p>

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<p>TAMT Final PEIR Mitigation Measure</p> <p><i>The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMT Plan, adopted by the District in December 2016 as part of the Final Environmental Impact Report for the TAMT Plan.</i></p>	<p>Mitsubishi Cement Corporation Project SEIR Mitigation Measure</p> <p><i>Project mitigation measures are a combination of applicable TAMT Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMT Final PEIR mitigation measures are provided with additions shown in <u>double underline</u> and deletions indicated in strikeout format.</i></p>	<p>Project Applicability/Reason for Modification or New Project Mitigation Measure</p>
<p>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, 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"> ▪ 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. 		

Table 4.1-10. Comparison of Air Quality TAMD Final PEIR Mitigation Measures to Proposed Project Draft SEIR Mitigation Measures

<p>TAMD Final PEIR Mitigation Measure</p> <p><i>The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMD Plan, adopted by the District in December 2016 as part of the Final Environmental Impact Report for the TAMD Plan.</i></p>	<p>Mitsubishi Cement Corporation Project SEIR Mitigation Measure</p> <p><i>Project mitigation measures are a combination of applicable TAMD Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMD Final PEIR mitigation measures are provided with additions shown in <u>double underline</u> and deletions indicated in strikeout format.</i></p>	<p>Project Applicability/Reason for Modification or New Project Mitigation Measure</p>
<ul style="list-style-type: none"> ▪ 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 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 noncontainer, 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 and/or Control System shall be updated

MM-AQ-9R: Use of At-Berth Emission Capture and/or Control System to Reduce Vessel Hoteling Emissions.

In lieu of the At-Berth Emission Capture and Control System, the Mitsubishi Cement Corporation shall use electric power through connection with the ship's dry-dock breaker system to reduce Vessel Hoteling Emissions. To attain emission reductions equivalent to or greater than the At-Berth Emission Capture and Control System specified in TAMT Plan MM-AQ-8, ocean going vessels (OGVs) that call at the Mitsubishi Corporation Project facility shall use the shore-to-ship power system at least 50 percent of the time while at berth, not including the necessary 1.5 hours to embark and 1.5 hours to disembark to/from the system. Compliance with the 50 percent shore-to-ship power system requirement shall be calculated based on an annual average. Mitsubishi Cement Corporation shall submit annual reports for each year of Project operations to the San Diego Unified Port District's Planning and Green Port Department on or before January 31 of each year, demonstrating compliance with this environmental control measure for the previous calendar year. If an emergency event [as defined in California Air Resources Board's (CARB's) At-Berth Regulation, Title 17, CCR Section 93118.3, subsection (c)(14)], prevents Mitsubishi Cement Corporation from achieving the required annual average shore-to-ship power rate (equal to or greater than 50 percent), Mitsubishi Cement Corporation may demonstrate compliance over a 2-year period, so long as Mitsubishi Cement Corporation submits documentation to the San Diego Unified Port District's Planning and Green Port Department which describes the emergency event(s) and explains the basis for Mitsubishi Cement Corporation's inability to demonstrate compliance using an annual average.

The San Diego Unified Port District's Planning and Green Port Department shall review the documentation submitted by the Mitsubishi Cement Corporation and, if the San Diego Unified Port District's Planning and Green Port Department determines that Mitsubishi Cement Corporation made sufficient effort to comply with the environmental control, it would notify Mitsubishi Cement Corporation in writing that use of the two-year average is acceptable.

The San Diego Unified Port District is in the process of evaluating emerging emission capturing controls systems, such as acquiring, leasing, or contracting the use of technologies such as a bonnet system for use at the TAMT.

Mitsubishi Cement Corporation is proposing an alternative ship to shore system that aims to reduce berthing emissions associated with ship unloading activities. Please refer to SEIR Section 3.4 for additional details.

Table 4.1-10. Comparison of Air Quality TAMT Final PEIR Mitigation Measures to Proposed Project Draft SEIR Mitigation Measures

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<p>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, multipurpose/general cargo or dry bulk vessels will be allowed to berth without it.</p>	<p><i><u>*Please note that Mitsubishi' Cement Corporation's annual dry bulk throughput will not be counted towards the 691,418 metric ton dry bulk trigger that requires use of an At-Berth Emission Capture and Control System because Mitsubishi will be relying on a shore-to-ship power system. However, the 691,418 metric ton dry bulk trigger would apply to other dry bulk tenants that do not have shore-power capabilities.</u></i></p>	
<p>Not Applicable</p>	<p><u>MM-AQ-10: Modernization of Delivery Truck Fleet.</u></p> <p><u>No less than 90 percent of the trucks loading cement or cementitious material at the Mitsubishi Cement Corporation facility shall be equipped with an engine that meets one of the following requirements:</u></p> <ol style="list-style-type: none"> <u>1) Is no more than 5 years old, based on engine model year ("5-Year Engine") for each operational year;</u> <u>2) Has been designed or retrofitted to comply with federal and state on-road heavy-duty engine emissions standards (e.g. EPA 2010 engine emission standards or successor rules or regulations for on-road heavy duty diesel engines) for a 5-Year Engine ("Emission equivalent Engine"); or</u> <u>3) Uses alternative engine technology or fuels demonstrated to produce emissions no greater than a 5-Year Engine ("Alternative Equivalent Engine").</u> <p><u>The remaining 10 percent of the trucks shall comply with all applicable federal and state heavy-duty on-road truck</u></p>	<p>MM-AQ-10 is a new mitigation measure identified for the Proposed Project.</p>

Table 4.1-10. Comparison of Air Quality TAMT Final PEIR Mitigation Measures to Proposed Project Draft SEIR Mitigation Measures

<p>TAMT Final PEIR Mitigation Measure</p> <p><i>The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMT Plan, adopted by the District in December 2016 as part of the Final Environmental Impact Report for the TAMT Plan.</i></p>	<p>Mitsubishi Cement Corporation Project SEIR Mitigation Measure</p> <p><i>Project mitigation measures are a combination of applicable TAMT Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMT Final PEIR mitigation measures are provided with additions shown in <u>double underline</u> and deletions indicated in strikeout format.</i></p>	<p>Project Applicability/Reason for Modification or New Project Mitigation Measure</p>
	<p><u>regulations. In addition, all trucks loading cement or cementitious materials at the Mitsubishi Cement Corporation facility shall be registered and be in compliance with the CARB Truck and Bus Regulation. In order to confirm that Mitsubishi Cement Corporation's 90 percent requirement for a Modernized Truck Fleet shall be determined on a calendar year basis. Mitsubishi Cement Corporation shall submit documentation of compliance, showing the following information, to the San Diego Unified Port District's Planning and Green Port Department on an annual basis by January 31 following each year of operation:</u></p> <p><u>1) Truck vehicle identification number (VIN),</u> <u>2) Engine model year,</u> <u>3) Annual truck trips, and</u> <u>4) If nondiesel technology, manufacturer engine standards.</u></p>	

Level of Significance after Mitigation

Construction

Implementation of modified TAMT Final PEIR Mitigation Measures **MM-AQ-1** and **MM-AQ-2** would ensure that impacts remain less than significant and no new or more severe impacts than what has been disclosed in the certified TAMT Final PEIR would occur. The modified mitigation measures are **MM-AQ-1R** and **MM-AQ-2R**.

Operation

As shown in Table 4.1-11, the Proposed Project would result in emissions below full mitigated STC buildout amounts shown in the TAMT Final PEIR. The modified mitigation measures are **MM-AQ-2R** through **MM-AQ-9R**, and the new mitigation is **MM-AQ-10**. This new measure (**MM-AQ-10**) would reduce criteria pollutant emissions associated with the delivery trucks beyond the requirements in the TAMT Final PEIR. Therefore, implementation of these mitigation measures would ensure that impacts remain less than significant, and no new or more severe impacts than what has been disclosed in the certified TAMT Final PEIR would occur.

Note that **MM-AQ-9** in the TAMT Final PEIR was prescribed to reduce DPM emissions that increase health risk in surrounding neighborhoods. Thus, the primary goal of **MM-AQ-9** is to control criteria pollutant and TAC emissions (TAC emissions discussed below) from vessel hoteling. The technology assumed in the TAMT Final PEIR was the most-recently approved alternative technology at the time (the Advance Marine Emission Control Systems, approved by CARB on October 17, 2015), which reduces criteria pollutants across the board, averaging an estimated 77 percent reduction for NO_x, 80 percent reduction for DPM, and 64–71 percent reduction for ROG_s (depending on the vessel type), but increases greenhouse gases (because the vessel and at-berth technology, which is assumed to be equipped with a diesel generator, both burn fuel while the vessel remains at berth). In this SEIR, the Project Proponent intends on utilizing shoreside electricity for 50 percent of vessel power needs, which results in equivalent reductions of criteria pollutant and TAC emissions, and more reductions of GHGs, than the alternative technology assumed in the TAMT Final PEIR. A discussion of this is provided in Appendix C.

As shown in Table 4.1-12, overlap of Phase II construction and mitigated Phase I operation would result in emissions below full dry bulk buildout emissions in the TAMT Final PEIR. Similar to above, implementation of mitigation measures **MM-AQ-2R** through **MM-AQ-9R**, and **MM-AQ-10** would ensure that impacts remain less than significant and no new or more severe significant impacts than what has been previously disclosed in the TAMT Final PEIR would occur.

Table 4.1-11. Proposed Project Operational Emissions – Mitigated Condition (pounds per day)

Emission Source	VOC	NO _x	CO	SO _x	PM10	PM2.5
Unmitigated Proposed Project						
Ocean-Going Vessels	32	649	60	22	12	11
Assist Tugs	<1	3	3	<1	<1	<1
Tugs and Fuel Barges	5	53	40	<1	2	2
Payloaders – Loading	<1	<1	4	<1	<1	<1
Payloaders – Unloading	1	3	22	<1	<1	<1
Cement Unloading – Vacuum	--	--	--	--	23	23
Cement Loading – Trucks	--	--	--	--	1	1
Trucks	5	81	26	1	12	4
Worker Trips	<1	<1	1	<1	<1	<1
Mitigated Reductions						
MM-AQ-2 Idling ¹	-	-	-	-	-	-
MM-AQ-3 CAP Measures ²	-3	-58	-5	-1	-1	-1
MM-AQ-4 Dry Bulk BACT ³						
MM-AQ-5 VSR Beyond CAP ⁴	-1	-29	-3	-1	<1	<1
MM-AQ-6 Electric CHE ⁵						
MM-AQ-9 At-Berth Capture ⁶	-2	-58	-5	-2	-1	-1
MM-AQ-10 Modern Trucks ⁷	-1	-27	-7	-1	<1	<1
Mitigated Proposed Project Total	36	617	136	18	47	38
Comparison with TAMT Final PEIR						
TAMT Final PEIR Dry Bulk Mitigated Daily (Table 4.1-6)	71	1,143	285	23	255	95
<i>Net Change from TAMT Final PEIR</i>	<i>-35</i>	<i>-527</i>	<i>-148</i>	<i>-5</i>	<i>-208</i>	<i>-58</i>

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

¹ 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.

² Includes VSR compliance with the CAP target of 80% (12 knot speed within 20 nautical miles of Point Loma).

³ Baghouses are part of the Project design; therefore, no reductions are shown as mitigation.

⁴ Includes VSR compliance of 90% (12 knot speed within 40 nautical miles of Point Loma).

⁵ Vacuum unloader is electric. No further electrification is required.

⁶ At-berth capture is met with shore power.

⁷ Assumes 90% of the truck fleet is 5 years old or newer.

Table 4.1-12. Proposed Project Concurrent Construction and Operations– Mitigated Condition (pounds per day)

Project Element	VOC	NO _x	CO	SO _x	PM10	PM2.5
Phase II Construction	1.6	20.2	14.1	<0.1	1.0	0.9
Proposed Project Mitigated	36	617	136	18	47	38
Total Concurrent Emissions	37	637	150	18	48	39
TAMT Final PEIR Dry Bulk Mitigated Daily (Table 4.1-6)	71	1,143	285	23	255	95
<i>Net Change from TAMT Final PEIR</i>	<i>-34</i>	<i>-507</i>	<i>-134</i>	<i>-5</i>	<i>-207</i>	<i>-57</i>

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

Threshold 3: Implementation of the Proposed Project *would not* result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable Federal or State ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).

TAMT Final PEIR Discussion

The TAMT Final PEIR identified that operation of the TAMT Plan under the STC scenario would exceed thresholds for nonattainment pollutants (ozone precursors [VOC and NO_x], PM₁₀, and PM_{2.5}) without application of mitigation measures. When combined with cumulative projects, operation of the TAMT Plan under the STC scenario at buildout was anticipated to exceed the thresholds for nonattainment pollutants including VOC, NO_x, PM₁₀, and PM_{2.5}. As such, buildout of the TAMT Plan under the STC scenario is expected to result in a cumulatively considerable net increase in a nonattainment pollutant. However, the TAMT Final PEIR also concluded that with application of TAMT Final PEIR Mitigation Measures **MM-AQ-2** through **MM-AQ-9**, VOC, NO_x, PM₁₀, and PM_{2.5} emissions would be reduced below thresholds. The TAMT Final PEIR also concluded that after implementation of TAMT Final PEIR Mitigation Measures **MM-AQ-2** through **MM-AQ-9**, operational air quality impacts associated with the STC alternative would be reduced to a less-than-significant level.

Project Impact Discussion

The SDAB is currently in nonattainment for O₃ under NAAQS and for O₃, PM₁₀, and PM_{2.5} under CAAQS, as a result of past and present projects, and could be further impeded by reasonably foreseeable future projects (see Chapter 5, *Cumulative Impacts*). As discussed above, the Proposed Project's criteria pollutant emissions are expected to be below full dry bulk buildout in the TAMT Final PEIR. However, the TAMT Final PEIR includes various mitigation measures for future projects to implement. Therefore, while the Proposed Project would result in emissions below full dry bulk buildout in the TAMT Final PEIR, this is a potentially significant impact, and mitigation measures are required to ensure compliance with the TAMT Final PEIR.

There are approximately 30 projects identified by the District that are located within a 1-mile radius of the Proposed Project site, or the Proposed Project's local roads transportation route. Three of these projects, and the greater TAMT Plan (Cumulative Project #19; see SEIR Table 5-1), are within the TAMT including: the Demolition and Rail Component Project (part of Cumulative Project #19), San Diego Refrigerated Services Project (Cumulative Project #21), and the Dole Fresh Fruit Refrigerated Rack Improvement Project (Cumulative Project #27). Construction of one or more of these cumulative projects, including Cumulative Project #19 within the TAMT, would potentially overlap with the construction of the Proposed Project. The timeframe for Proposed Project construction is 2020. Construction of the Demolition and Rail Component Project (part of Cumulative Project #19) of TAMT – specifically, demolition of Transit Shed #2 – is anticipated to overlap with Phase I construction. Construction of the Demolition and Rail Component Project was analyzed in the TAMT Final PEIR, and emissions would be minimal. Even if emissions were combined with Proposed Project emissions on the worst-case day, emissions during combined construction activities would still remain below thresholds. However, the TAMT Final PEIR includes various mitigation measures for future construction projects to implement. Therefore, while the Proposed Project would result in emissions below thresholds, this is a potentially significant impact, and mitigation measures are required to ensure compliance with the TAMT Final PEIR.

In terms of operations, the Proposed Project would not result in emissions that exceed the emissions associated with the full dry bulk buildout in the TAMT Final PEIR, would conform to the RAQS and/SIP, and would not create a CO hot spot. The TAMT Final PEIR includes various mitigation measures for future

projects to implement. Therefore, while the Proposed Project would result in emissions below full dry bulk buildout in the TAMT Final PEIR, this is a potentially significant impact, and mitigation measures are required to ensure compliance with the TAMT Final PEIR.

Mitigation Measures

Mitigation Measures **MM-AQ-1R** through **MM-AQ-9R** and **MM-AQ-10**, as described under Threshold 2, would apply to the Proposed Project to ensure compliance with the TAMT Final PEIR.

Level of Significance after Mitigation

Implementation of Mitigation Measures **MM-AQ-1R** through **MM-AQ-9R** and **MM-AQ-10** would ensure compliance with the requirements of the TAMT Final PEIR. Therefore, when combined with contributions of nonattainment pollutant emissions of past, present, and probable future projects, the Proposed Project's incremental contribution of a nonattainment pollutant would remain less than significant with mitigation. No new or more severe impacts than what has already been previously disclosed in the TAMT Final PEIR would occur.

Threshold 4: Implementation of the Proposed Project *would not* expose sensitive receptors to substantial pollutant concentrations.

TAMT Final PEIR Discussion

Toxic Air Contaminant Emissions. The TAMT Final PEIR determined the increased activity at full buildout of the TAMT Plan would increase TAC emissions both at and near the TAMT boundary. TAC emissions are associated with vessel activity through the harbor and at TAMT, truck traffic on public roadways, locomotive switching activity between the yard and TAMT, and cargo handling equipment on TAMT.

The TAMT Final PEIR included an HRA due to the proximity of existing and future TAMT operations to neighboring communities. Cancer risk at nearby receptors is driven primary by DPM exhaust from diesel-powered vessels, primarily while at-berth; terminal equipment activity within the TAMT boundary; and rail, primarily within and near the terminal. Cancer risk associated with truck travel is lower and generally only affects those receptors immediately adjacent to roadways away from the TAMT boundary. The health risk determined in the TAMT Final PEIR is based on the sum of risk from all cargo nodes across all emission sources.

A summary of the health risk for only the dry bulk cargo node from the TAMT Final PEIR is provided in Table 4.1-13. For the dry bulk cargo node, incremental health risk was reduced to 13 cases per million under mitigated conditions.

Table 4.1-13. TAMT Final PEIR Dry Bulk Health Risk (cancer risk per million)

Cargo	Receptor Type	Unmitigated		Mitigated	
		Existing Plus TAMT Plan	Incremental Change ¹	Existing Plus TAMT Plan	Incremental Change ¹
Dry Bulk	Residential	50	43	20	13
	Park	6	5	3	2
	School	9	8	4	2

Source: Appendix D.

Totals may not add exactly due to rounding. 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.

¹ Incremental change is based on TAMT Plan buildout relative to the existing health risk shown in Table 4.1-2.

Criteria Air Pollutants. Adverse health effects induced by regional criteria pollutant emissions currently generated by activities at TAMT (ozone precursors and PM) depend on numerous interconnected variables (e.g., cumulative concentrations, local meteorology and atmospheric conditions, the number and character of exposed individuals [e.g., age, activity level]). For these reasons, ozone precursors (ROGs and NO_x) contribute to the formation of ground-borne ozone on a regional scale, where emissions of ROGs and NO_x generated in one area may not equate to a specific ozone concentration in that same area. Similarly, some types of particulate pollutants may be transported over long distances or formed through atmospheric reactions. As such, the magnitude and locations of specific health effects from exposure to increased ozone or regional PM concentrations are the product of emissions generated by numerous sources throughout a region, as opposed to a single individual project.

Technical limitations of existing models to correlate project-level regional emissions to specific health consequences are also recognized by air quality management districts throughout the state, including the San Joaquin Valley Air Pollution Control District (SJVAPCD) and South Coast Air Quality Management District (SCAQMD). While there are models capable of quantifying ozone and secondary PM formation and associated health effects, these tools were developed to support regional planning and policy analysis and have limited sensitivity to small changes in criteria pollutant concentrations induced by individual projects. TAMT is also unique in that most of the regional ROG, NO_x, and PM emissions are generated by OGVs and would therefore occur offshore. Given the limitations of existing models and unique emissions profile, translating TAMT-generated regional criteria pollutants to the locations where specific health effects could occur or the resultant number of additional days of nonattainment cannot be estimated accurately.

Carbon Monoxide Hot-spots. The TAMT Final PEIR identified the potential for additional traffic generated by the TAMT Plan to create CO hot-spots at nearby roadways and intersections. As identified in the TAMT Final PEIR, it was anticipated that multiple intersections would operate at LOS D or worse during existing and future buildout conditions. Of the TAMT Final PEIR study area intersections, the Harbor Drive and 32nd Street intersection was identified as the intersection with the most congestion and highest traffic volumes during existing and future buildout year conditions. The Harbor Drive and 32nd Street intersection was projected to carry 2,642 vehicles and operate 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. CO concentrations were modeled to estimate pollutant concentrations at the Harbor Drive and 32nd Street intersection based on existing and full TAMT buildout scenario buildout volumes. That modeling showed that TAMT traffic would not result in traffic that would violate the state or federal 1- or 8-hour CO standards during the existing, near term, and future year conditions. This impact was determined to be less than significant, and no mitigation was required in the TAMT Final PEIR.

Asbestos-Containing Materials. The TAMT Final PEIR identified that demolition of existing structures on TAMT could result in fugitive dust and other particulates that may disperse to adjacent sensitive receptor locations. ACMs were commonly used as fireproofing and insulating agents prior to 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 was presented in Section 4.7, *Hazards and Hazardous Materials* of the TAMT Final PEIR. 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 (TAMT Final PEIR **MM-HAZ-1** and **MM-HAZ-2**) related to removal of any contaminated materials. The TAMT Final PEIR concluded that potential impacts would be reduced to a less-than-significant level with application of TAMT Final PEIR **MM-HAZ-1** and **MM-HAZ-2**.

Project Impact Discussion

Construction

Construction-related activities associated with the Proposed Project would result in temporary, short-term project-generated emissions of DPM from the exhaust of off-road, heavy duty diesel equipment for site preparation, paving, and other miscellaneous activities.

Construction of the Proposed Project would occur in two phases (Phase I and Phase II), each lasting between 7 and 10 months, which is much shorter than the assumed 30- or 70-year exposure period typically used to estimate lifetime cancer risks. DPM emitted by these construction sources can remain airborne for several days. However, given the prevalence of consistent daytime winds and meteorological conditions at the Proposed Project site that disperse pollutants, pollutant emission concentrations would be expected to be well-dispersed. Construction activities would be sporadic, transitory, and short term in nature; once construction activities end, so too would the source emissions. In addition, Table 4.1-17 indicates that diesel exhaust (in the form of PM₁₀) associated with construction activities would be minimal. Diesel activity occurring both on and off site would be short term and occur at distances not expected to expose sensitive receptor locations to substantial pollutant concentrations. As such, construction of the Proposed Project would not create a health risk impact during construction and would not result in an impact that was not previously identified in the TAMT Final PEIR.

Operation

Toxic Air Contaminant Emissions. Once operational, the Proposed Project would result in new OGV activity through the harbor and at the Proposed Project site, truck traffic on the site and public roadways, cargo handling equipment activity at the site, and particulate emissions of cementitious material. OGVs, tugs, heavy-duty trucks, and cargo handling equipment are all diesel-powered and emit TACs, specifically DPM, while the OGV boilers emit other TACs. The Proposed Project's OGVs, tugs, and offsite heavy-duty truck emissions were included in the HRA completed for the TAMT Final PEIR.

Due to the lack of specific operational information for this Proposed Project, the HRA completed for the TAMT Final PEIR did not include the following emissions:

- DPM emissions from payloaders (new) for cement loading and unloading.
- Metals emissions from cement dust associated with vacuum unloaders (new) and warehouse baghouses (new).
- Metals from fugitive cementitious dust (new).
- Idling DPM emissions associated with trucks loading operations (relocated).

Given that Project-specific information is now available, a Project-specific HRA was performed to analyze the new location and introduction of TAC-emitting cementitious materials and relocated facilities. For

purposes of analysis, the HRA includes all project-related emission sources, including those that were included in the TAMT Final PEIR (i.e., OGVs, tugs, and trucks), in addition to new TAC sources (i.e., cementitious materials). The health risk associated with the Proposed Project relative to the TAMT Final PEIR is presented in Table 4.1-14. As shown, the incremental change in health risk associated with the Proposed Project would be below the risk determined for residential and school receptors under both existing and full TAMT Plan buildout mitigated conditions. While the incremental change in health risk would be higher for park receptors under project conditions, the net change from Proposed Project implementation would remain below the 10 per million threshold. As such, no new or more severe impact from TACs would occur from implementation of the Proposed Project. However, because the Proposed Project would result in emissions that contribute to background health risk associated with the TAMT Plan, this is a potentially significant impact and mitigation is required, consistent with the findings of the TAMT Final PEIR.

Table 4.1-14. Proposed Project Health Risk Relative to the TAMT Final PEIR (cancer risk per million)

	Receptor Type	TAMT Final PEIR Incremental Change ¹	Project's Incremental Change
Dry Bulk	Residential	13	5
	Park	2	4
	School	2	1

Source: Appendix D.

Totals may not add exactly due to rounding. 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.

¹ TAMT Final PEIR Health Risk is shown in Table 4.1-13.

Carbon Monoxide Hot-Spots. The CO hot-spots analysis conducted for the TAMT Final PEIR found that the full TAMT Plan buildout under full STC build scenarios would not create significant impacts. As the Proposed Project would include only a small fraction of the total full TAMT Plan buildout traffic, it can be concluded that there would be no changes in the impact determination for CO hot-spots. The employee traffic would be limited to a maximum of 50 round trips per day (compared to 361 trucks per day under full dry bulk buildout), and truck trips would be staggered as necessary for the time to load each truck, meaning that there could be a maximum of 16 trucks leaving the site each hour and 66 trucks on the average day (compared to 191 trucks per day under full dry bulk buildout). As such, no new or more severe impacts from carbon monoxide would occur when compared to what has been previously disclosed in the certified TAMT Final PEIR.

Asbestos-Containing Materials. Similar to the TAMT Final PEIR, renovation of existing structures results in fugitive dust and other particulates that may disperse to adjacent sensitive receptor locations. ACMs were commonly used as fireproofing and insulating agents prior to 1977, which is when the U.S. Consumer Product Safety Commission banned most ACM use due to their link to mesothelioma. However, as discussed in Section 4.3, *Hazards and Hazardous Materials*, several Warehouse C building components constructed prior to 1977 that would be modified by the Proposed Project do contain ACMs and could expose receptors to asbestos, which may become airborne with other particulates during renovation activities. This is a potentially significant impact and mitigation is required.

A discussion of asbestos-related impacts and mitigation (**MM-HAZ-1R** and **MM-HAZ-2**) related to removal of any contaminated materials is presented in SEIR Section 4.3, *Hazards and Hazardous Materials*. As discussed therein, only limited amounts of ACMs were discovered in the survey of the building, and 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. Additionally, SDAPCD Rule 1206 will apply if ACMs are discovered, which would provide additional requirements for ACMs removal notifications, emissions control, and waste handling and disposal. As such, no new or more severe impacts from ACM would occur when compared to what has been previously disclosed in the certified TAMT Final PEIR.

Level of Significance prior to Mitigation

As noted above, the TAC emissions associated with the Proposed Project during construction and operations would not expose sensitive receptors to an incremental change in cancer risk that exceeds 10 in 1 million or a hazard index greater than 1.0. However, because the Proposed Project would result in emissions that contribute to background health risk associated with the TAMT Plan, this is a potentially significant impact and mitigation is required, consistent with the findings of the TAMT Final PEIR. The Proposed Project is not anticipated to generate CO hot-spots. In addition, construction of the Proposed Project will comply with all applicable regulations for the handling and disposal of ACM and lead-based paint in the event that ACMs are found during Project construction, but this is a potentially significant impact given the prevalence of ACM. Therefore, no new or more severe impacts would occur when compared to what has been previously disclosed in the certified TAMT Final PEIR.

Mitigation Measures

Implementation of Mitigation Measures **MM-AQ-1R** through **MM-AQ-9R** plus new mitigation measure **MM-AQ-10** would reduce TAC emissions from all sources. In addition, Mitigation Measures **MM-HAZ-1R** and **MM-HAZ-2** would apply to the Proposed Project to ensure compliance with the TAMT Final PEIR.

Level of Significance after Mitigation

As noted above, implementation of the Proposed Project would not result in exposure of sensitive receptors to substantial pollutant concentrations with mitigation. Impacts would be less than significant with application of **MM-AQ-1R** through **MM-AQ-9R**, **MM-AQ-10**, as well as **MM-HAZ-1R** and **MM-HAZ-2**. Therefore, no new or more severe impacts than what has been previously disclosed in the certified TAMT Final PEIR would occur.

Threshold 5: Implementation of the Proposed Project *would not* create objectionable odors affecting a substantial number of people.

TAMT Final PEIR Discussion

Construction

As identified in the TAMT Final PEIR, potential odor emitters during construction activities associated with the TAMT Plan would include diesel exhaust, asphalt paving, and architectural coatings (for parking area and curb striping) to paint paved surfaces. Construction-related activities near existing receptors would be temporary in nature, and construction activities would not result in nuisance odors that would violate SDAPCD Rule 51. Therefore, construction activities associated with the TAMT Plan would not create objectionable odors affecting a substantial number of people. Impacts were found to be less than significant, and no mitigation measures were required.

Operation

As identified in the TAMT Final PEIR, potential odor emitters during operations associated with the TAMT Plan would include diesel exhaust from truck and train activity. However, odor impacts would be limited

to the circulation routes, parking areas, and areas immediately adjacent to terminal operations. Although such brief exhaust odors may be considered adverse, they would not affect a substantial number of people and any odor-related impacts were found to be less than significant, and no mitigation measures were required.

Project Impact Discussion

Although offensive odors rarely cause any physical harm, they can be unpleasant and lead to considerable distress among the public. This distress may often generate citizen complaints to local governments and air districts. Any project with the potential to frequently expose the public to objectionable odors would be deemed as having a significant impact.

According to CARB's *Air Quality and Land Use Handbook*, land uses associated with odor complaints typically include sewage treatment plants, landfills and waste transfer stations, recycling facilities, refineries, rendering plants, livestock operations, and certain types of manufacturing or commercial/industrial facilities, such as fiberglass manufacturing, foundries, and auto body and other coating operations (CARB 2005a). Odor impacts on residential areas and other sensitive receptors, such as hospitals, daycare centers, and schools, warrant the closest scrutiny, but consideration should also be given to other land uses where people may congregate, such as recreational facilities, work sites, and commercial areas. As previously identified, Cesar Chavez Park is as close as 500 feet from the Project Site (Berths 10-7/10-8), the Monarch School and Perkins Elementary are located approximately 1,500 feet from the Proposed Project site (Warehouse C), and the nearest residential land uses are located approximately 1,800 feet from the Proposed Project site. See *Sensitive Receptors* in Section 4.1.1.1) for a more detailed description of the sensitive receptor locations surrounding the Proposed Project site.

Construction

Similar to what was identified in the TAMT Final PEIR, potential odor emitters during construction activities associated with the Proposed Project would include diesel exhaust, asphalt paving, and architectural coatings. Construction-related activities associated with the Proposed Project would be located within TAMT with other similar terminal uses and would be temporary in nature. Construction activities would not result in nuisance odors that would violate SDAPCD Rule 51.

Operation

Potential odor emitters during Proposed Project operations would include diesel exhaust from trucks. However, odor impacts would be limited to the circulation routes, parking areas, and areas immediately adjacent to terminal operations. The Proposed Project would not introduce a land use listed by CARB as being associated with objectionable odors.

Level of Significance prior to Mitigation

As noted above, implementation of the Proposed Project would not result in the generation of objectionable odors affecting a substantial number of people during construction or operation of the Proposed Project. Therefore, impacts would be less than significant, and no new or more severe impacts than what has been previously disclosed in the certified TAMT Final PEIR would occur.

Mitigation Measures

No mitigation is required.

Level of Significance after Mitigation

As noted above, construction or operation of the Proposed Project would not result in the generation of objectionable odors affecting a substantial number of people. Impacts would be less than significant with no mitigation required. Therefore, no new or more severe impacts than what has been previously disclosed in the certified TAMT Final PEIR would occur.

4.2 Greenhouse Gas Emissions and Climate Change

This section evaluates the Proposed Project's potential to result in new or more severe GHG-related impacts than what was determined in the TAMT Final PEIR. This section also describes any changes in greenhouse gas (GHG) emission circumstances surrounding the Proposed Project's potential approval and implementation that may have occurred since December 2016. The *Air Quality and Greenhouse Gas Calculations* are provided in Appendix C.

4.2.1 Circumstances Surrounding Project Implementation

4.2.1.1 Changes to the Environmental Setting Disclosed in the TAMT Final PEIR

A discussion of the existing understanding of GHG emissions and climate change and their effects is included in Section 4.6.2, *Existing Conditions*, of the TAMT Final PEIR and is incorporated by reference. The existing conditions described in the TAMT Final PEIR included an overview of GHG and climate change and a summary of existing GHG emissions inventories for the United States, California, City and County of San Diego, and Port of San Diego. Descriptions included in the TAMT Final PEIR that are particularly relevant to the Proposed Project are provided herein for convenience. There have been no notable changes to the environmental setting for GHGs since the certification of the TAMT Final PEIR that are relevant to the Proposed Project.

Goods and materials handled at TAMT generally fit into one of the following four cargo types: dry bulk, liquid bulk, refrigerated containers, and multi-purpose general cargo. The Proposed Project is concerned with goods and materials associated with the dry bulk cargo node. Activity associated with dry bulk at the TAMT generates GHG emissions, specifically associated with the following activities and emission categories:

- Ocean-going vessel (OGV), assist tug, and tug and fuel barge activity both regionally, within the Bay, and both at and near TAMT.
- BNSF rail activity both regionally and between TAMT and the BNSF yard. Note that this rail activity is solely associated with soda ash import and handling. There is no rail associated with the Proposed Project, and this rail activity would not be affected by Project operations.
- Truck travel both regionally and within the TAMT boundary area and Proposed Project area.
- Cargo handling equipment within the TAMT boundary area and Proposed Project area.
- Worker trip travel.
- Loading and unloading of dry bulk.

Each of these sources and associated emissions modeling is described in Section 4.6.4.1 of the TAMT Final PEIR. GHG emissions from each cargo node associated with existing activity, based on activity between July 2013 and June 2014, at the annual time scale (metric tons per year) are presented in Table 4.2-1.

Table 4.2-1. Summary of TAMT Final PEIR Baseline GHG Emissions (metric tons per year)

Cargo Node	CO _{2e}
Dry Bulk (289,864 MT)	4,110

Source: Summarized from TAMT Final PEIR, Table 4.6-4.

CO_{2e} = carbon dioxide equivalent; MT = metric tons

4.2.1.2 Changes to the Regulatory Setting Disclosed in the TAMT Final PEIR

The applicable Federal, State, and local laws and regulations pertaining to GHG emissions and climate change are described in Section 4.6.3 of the TAMT Final PEIR. A list of the applicable regulations described in the TAMT Final PEIR is provided below for reference. Regulation revisions since publication of the TAMT Final PEIR, as well as additional regulations not previously discussed in the TAMT Final PEIR that are relevant to the GHG impact analysis for the Proposed Project, are discussed below.

International

- International Maritime Organization International Convention for the Prevention of Pollution from Ships Annex VI

Federal

- U.S. Environmental Protection Agency (EPA) Mandatory Reporting Rule for GHGs (2009)
- Update to Corporate Average Fuel Economy Standards (2009)
- U.S. Environmental Protection Agency Endangerment Finding and Cause or Contribute Finding (2009)
- Council on Environmental Quality Draft NEPA Guidance (2010/2014)
- EPA and National Highway Traffic Safety Administration (NHTSA) Fuel Economy for Medium and Heavy-Duty Engines and Vehicles (2011/2015)

State

- Assembly Bill (AB) 1493—Pavley Rules (2002), amendments (2009)/Advanced Clean Cars (2011)
- Senate Bills (SBs) 1078/107/X 1-2—Renewables Portfolio Standard and Renewable Energy Resources Act (2002, 2006, 2011)
- Executive Order (EO) S-03-05 (2005)
- AB 32—California Global Warming Solutions Act (2006)
- SB 32, California Global Warming Solutions Act of 2006: Emissions Limit, and Assembly Bill 197, State Air Resources Board, Greenhouse Gases, Regulations (2016)
- AB 1383, Short-Lived Climate Pollutants: Methane Emissions: Dairy and Livestock: Organic Waste: Landfills (2016)
- SB 375—Sustainable Communities Strategy (2008)
- California Energy Efficiency Standards for Non-Residential Buildings—Title 24 (2008)
- Tractor-Trailer Greenhouse Gas Regulation (2013)

- California Air Resources Board's (CARB's) Airborne Toxic Control Measure for Diesel-Fueled Transport Refrigeration Units, Generator Sets, and Facilities Where Transport Refrigeration Units Operate (2004)
- EO B-32-15 and the CARB Sustainable Freight Action Plan (2016)

Relevant State regulations that have changed, or that are new, since certification of the TAMT Final PEIR are discussed below.

2017 CARB Scoping Plan Update (2017)

AB 32 (Nuñez) required CARB to ensure that statewide GHG emissions are reduced to at least 1990 levels by 2020. AB 32 requires CARB to prepare a plan to achieve GHG reduction goals, called the Scoping Plan, and to update the Scoping Plan at least every 5 years. SB 32 (Pavley) requires CARB to ensure that statewide GHG emissions are reduced to at least 40 percent below the 1990 level by 2030, consistent with the target set forth in EO B-30-15.

At the time of analysis for the TAMT Final PEIR, CARB had approved the *First Update to the Scoping Plan* in 2014 (CARB 2014), which includes both a 2020 element and a post-2020 element, and had begun publishing workshop presentations that outlined the vision for the Scoping Plan update. However, the Scoping Plan to achieve the 2030 reduction target had not been drafted or approved.

CARB approved the *2017 Climate Change Scoping Plan Update* in December 2017, which builds on the programs set in place as part of the previous Scoping Plan that was drafted to meet the 2020 reduction targets per AB 32. The *2017 Scoping Plan Update* proposes meeting the 2030 goal 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), 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 to provide additional emissions reductions and flexibility in meeting the target. The Scoping Plan Update also recommends that local governments aim to achieve community-wide efficiency of 6 metric tons of carbon dioxide equivalent (MTCO₂e) per capita by 2030 and 2 MTCO₂e 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 (CARB 2017).

Assembly Bill 398/Cap-and-Trade (2017)

The original Cap-and-Trade program set a compliance schedule through 2020. AB 398 extends the Cap-and-Trade program through 2030 and requires CARB to make refinements, including establishing a price ceiling. Revenue generated from the Cap-and-Trade program is used to fund various programs. AB 398 established post-2020 funding priorities, to include (1) Air Toxics and Criteria Pollutants, (2) Low and Zero Carbon Transportation, (3) Sustainable Agricultural Practices, (4) Healthy Forests and Urban Greening, (5) Short-Lived Climate Pollutants, (6) Climate Adaptation and Resiliency, and (7) Climate and Clean Energy Research.

Short-Lived Climate Pollutant (SLCP) Reduction Strategy (2017)

SB 1383, adopted in 2013, requires CARB to develop and implement a Short-Lived Climate Pollutant Strategy. Per this directive, CARB adopted the Short-Lived Climate Pollutant Reduction Strategy in March 2017 (SLCP Strategy), establishing a path to decrease SLCPs from various sectors of the economy.

Strategies span from wastewater and landfill practices and methane recovery to reducing natural gas leaks and consumption. The SLCP strategy also identifies measures that can reduce hydrofluorocarbon (HFC) emissions through incentive programs and limitations on the use of high global warming potential (GWP) refrigerants in new refrigeration and air-conditioning equipment.

Senate Bill 100 (2018)

SB 100 (De León, also known as the “California Renewables Portfolio Standard Program: emissions of greenhouse gases”) was approved by the California legislature and signed by Governor Brown in September 2018. The bill establishes a new Renewable Portfolio Standard (RPS) target of 50 percent by 2026, increases the RPS target in 2030 from 50 percent to 60 percent, and establishes a goal of 100 percent zero-carbon energy sources by 2045.

Executive Order B-55-18 (2018)

EO B-55-18 was approved by the California legislature and signed by Governor Brown in September 2018. The order establishes a statewide policy to achieve carbon neutrality by 2045, and to achieve and maintain net negative GHG emissions thereafter. While this EO has not been codified in law, it directs CARB to ensure that future Climate Change Scoping Plans identify and recommend measures to achieve the carbon neutrality goal. Given this directive, it is likely that the carbon neutral goal by 2045 will make its way into future updates to the Scoping Plan, which must be updated every 5 years.

Low Carbon Fuel Standard Amendment (2018)

The Low Carbon Fuel Standard (LCFS) mandates a statewide goal be established to reduce the carbon intensity of California’s transportation fuels by at least 10 percent by 2020. In September 2018, the LCFS regulation was amended to increase the statewide goal to a 20 percent reduction in carbon intensity of California’s transportation fuels by at least by 2030. Note that while the LCFS regulation was amended and extended to ensure compliance with the 2030 Scoping Plan, CARB ultimately adopted a more stringent target (20 percent reduction in carbon intensity¹ by 2030) than assumed in the 2030 Scoping Plan (18 percent reduction in carbon intensity by 2030) (CARB 2018). Therefore, future updates to the Scoping Plan are likely to include the more stringent version of the LCFS.

Regional

Section 4.6.3.4 of the TAMT Final PEIR includes a discussion of regional GHG and climate efforts and discussed the lack of regional thresholds and guidance from the San Diego Air Pollution Control District (SDAPCD). The SDAPCD has not developed regional thresholds and guidance for GHG and climate efforts. However, the San Diego Association of Governments (SANDAG) released the Regional Climate Action Planning Framework (ReCAP), which establishes a technical framework for regionally consistent climate action planning that preserves local policy flexibility for the unique needs and circumstances of each local jurisdiction. ReCAP is used to inform the climate action planning services for local jurisdictions available through the Energy Roadmap Program.

Local

No changes to the following local regulations have been identified that would alter the discussion from the TAMT Final PEIR, and, therefore, the information on these regulations is incorporated by reference.

¹ Carbon intensity is determined by the amount of carbon emitted throughout a fuel’s entire life cycle, from extraction or production to combustion.

- Port of San Diego Clean Air Program
- Port of San Diego Climate Action Plan

4.2.2 Analysis of New or More Severe Impacts

4.2.2.1 Methodology

GHG impacts associated with construction and operation of the Proposed Project were assessed and quantified using industry standards and accepted software tools, techniques, and emission factors. The industry standards and accepted software tools, techniques, and emission factors are essentially the same today as those that were used in the TAMT Final PEIR. A detailed methodology is provided in Appendix C.

Construction GHG emissions were assessed using construction details provided by the Project Proponent along with CARB's OFFROAD and EMFAC models for estimating exhaust emissions from off-road equipment and on-road vehicles.

Bulk cargo throughput would not exceed the buildout levels assumed in the TAMT Final PEIR. The Proposed Project falls within the dry bulk component analyzed in the TAMT Final PEIR. A comparison of the activity assumed for the dry bulk component of the TAMT Final PEIR and the Proposed Project is presented in Table 4.2-2. Activities related to throughput, vessel calls, trucks, and workers are consistent with and fit within the activity assumed for full buildout of the dry bulk component in the TAMT Final PEIR. The Proposed Project would include OGV calls to import cargo, diesel and electrical equipment to unload and load materials, trucks to transport materials offsite, and worker vehicle commute trips. A summary of the modeling approach is provided below, and a detailed methodology is provided in Appendix C.

Operational emissions were assessed using details provided by the Project Proponent. Emissions associated with Project-related activity, including OGVs, tugboats, trucks, worker commute vehicles, equipment, and electricity consumption are based on similar methods used in the TAMT Final PEIR, including CARB's methodologies for OGVs and tugboats, EMFAC for estimating exhaust emissions from on-road trucks and worker commute vehicles, EPA emission factors for Tier 4 offroad diesel equipment, and San Diego Gas & Electric Company's (SDG&E) most recent and projected future electricity emission rates. A detailed description of the methodology for estimating emissions is provided in Appendix C.

Table 4.2-2. Summary of TAMT Final PEIR Dry Bulk and Proposed Project Activity

Metric	TAMT Final PEIR Existing	TAMT Final PEIR Buildout	Proposed Project	Capacity Remaining from TAMT Final PEIR Buildout Analysis
Annual Throughput (MT)	289,864	1,987,500	600,000	1,097,636
Annual Vessel Calls	15	109	24	70
Average Daily/Annual Trucks	28/10,080	191/68,760	66/24,000	34,680
Daily Workers	87	361	50	224

Source: Appendix C.
MT = metric tons

The new vacuum unloader would be electric. Electricity consumption is based on individual piece size (in horsepower or watts) and annual hours per year. Emissions from electricity are estimated based on the same electricity emission factors discussed above for shore power.

4.2.2.2 Thresholds of Significance

Climate change is a global problem and GHGs are global pollutants, unlike criteria air pollutants (such as ozone precursors), which are primarily pollutants of regional and local concern. Given their long atmospheric lifetimes, GHGs emitted by countless sources worldwide accumulate in the atmosphere. No single emitter of GHGs is large enough to trigger global climate change on its own. Rather, climate change is the result of the individual contributions of countless past, present, and future sources. Therefore, GHG impacts are inherently cumulative, and the analysis below is a cumulative impact analysis.

The thresholds utilized herein are based on a methodology that is similar to the TAMT Final PEIR. The TAMT Final PEIR only analyzed full buildout of the Sustainable Terminal Capacity (STC) Alternative, which was assumed to be 2035. However, as discussed in Chapter 3, *Project Description*, the Proposed Project would include a term of up to 5 years with two 5-year extension options, for a total term of up to 15 years. Because the horizon for the lease terms could comprise two additional horizons before the 2035 buildout assumed in the TAMT Final PEIR, analysis of years (2025, 2030) prior to full buildout (2035) could create a situation where the Proposed Project needs to be discussed and analyzed at interim years, as discussed below.

The significance criteria used to evaluate potential air quality impacts are based on Appendix G of the State CEQA Guidelines. The determination of whether a GHG impact would be significant is based on the applicable thresholds and the professional judgment of the District as Lead Agency based on evidence in the administrative record.

The TAMT Final PEIR included a discussion of the State CEQA Guidelines. Appendix G of the State CEQA Guidelines was updated in January 2019. The specific list of threshold questions used in the TAMT Final PEIR for GHGs is the same as the current Appendix G checklist as no changes to the GHG items were made. However, there were some changes to the State CEQA Guidelines in response to case law that summarize CEQA requirements. The California Office of Planning and Research's explanation of the changes is as follows:

...the package updates the guideline addressing greenhouse gas emissions to reflect recent case law. Among other changes, the Agency clarifies that a project's incremental contribution to the impacts of climate change should not be compared to state, national or global emissions to determine whether the project's emissions are cumulatively considerable. The changes also clarify that, if relying on consistency with state goals and policies to determine significance, the lead agency should explain how the project's emissions are consistent with those goals.

While these changes are reflected in the new State CEQA Guidelines, the analysis in both the TAMT Final PEIR and in this SEIR are consistent with those changes in that the cumulatively considerable contributions of both TAMT and the Proposed Project are not based on a comparison to State, national, or global emissions and both the TAMT Final PEIR and this SEIR explain how the Project's emissions are consistent with statewide reduction goals. Based on guidance provided in Appendix G of the State CEQA Guidelines, the Proposed Project would result in a significant impact if it were to:

- Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or
- Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

The Initial Study/Environmental Checklist prepared for the Proposed Project (Appendix A) concludes that the Project's implementation could result in new or more severe GHG impacts. Therefore, both of these impact criteria are analyzed herein (see Section 4.2.2.4, *Project Impacts and Mitigation Measures*).

4.2.2.3 Threshold Approach

The TAMT Final PEIR included analysis relative to two separate benchmark years: 2020 and post-2020.

The first component of the TAMT Final PEIR was the Demolition and Initial Rail Component, which was assumed to be built out and operational by 2020. The District's Climate Action Plan (CAP) meets the requirements of State CEQA Guidelines Section 15183.5 for the 2020 target. The analysis for the 2020 period in the TAMT Final PEIR relied on compliance with the District's CAP. However, because the CAP does not include post-2020 reduction quantification, consistency with the CAP post-2020 was deemed inappropriate as a threshold that meets the requirements of CEQA. Consistency with the Demolition and Initial Rail Component in 2020 is not discussed in this analysis as it is not part of the Proposed Project.

CEQA requires EIRs to consider both short- and long-term reduction targets. Beyond 2020, the next statewide target or milestone year is 2030 pursuant to SB 32 and the Scoping Plan. Buildout of the full TAMT plan is expected in 2035. Beyond 2030, the next statewide target or milestone year is 2050 pursuant to EO S-03-05. Therefore, this analysis treats 2035 as the post-2020 target or milestone year.

Based on the available threshold concepts recommended by air districts or other lead agencies and recent case law, the thresholds of significance applied in the TAMT Final PEIR for the post-2020 period were as follows.

For the **2020 to 2035** period, impacts from the Project on GHG emissions would be less than significant if the Project is found to be:

1. consistent with the State's overall reduction targets (including SB 32, EO S-03-05 and EO B-30-15) for post-2020, and
2. in compliance with regulatory programs adopted by CARB or other California agencies for post-2020 GHG emissions.

4.2.2.4 Project Impacts and Mitigation Measures

Threshold 1: The Proposed Project *would* generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

Threshold 2: The Proposed Project *would not* conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

TAMT Final PEIR Discussion

The analysis in the TAMT Final PEIR included a discussion of consistency with the reduction targets in the District's CAP, consistency with statewide reduction targets (including EO S-03-05 and EO B-30-15), consistency with regulations and regulatory programs adopted by CARB or other State agencies, and consistency with measures in the CAP for the post-2020 period. Analysis in the TAMT Final PEIR determined that the TAMT Plan would have a significant impact relating to GHG emissions because, prior to mitigation, the TAMT Plan buildout would not be entirely consistent with the post-2020 CAP measures; statewide reduction targets; or plans, policies, and regulatory programs adopted by CARB, other State agencies, and the District for the purpose of reducing the emissions of GHGs. Although proposed TAMT-

related 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, was determined to 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 CARB or other California agencies for post-2020 for the purpose of reducing the emissions of GHGs. The TAMT Final PEIR further determined that, with implementation of **MM-GHG-1** through **MM-GHG-9**, 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. Table 4.2-3 summarizes GHG emissions associated with operation of all cargo nodes analyzed in the TAMT Final PEIR following mitigation.

In addition, the TAMT Final PEIR includes a consistency analysis with both the District CAP Strategies and CARB strategies in the AB 32 Scoping Plan, Sustainable Freight Strategy, and other strategies. The analysis in the TAMT Final PEIR determined that after incorporating **MM-GHG-1** through **MM-GHG-9**, the TAMT Plan would implement strategies and technologies that help achieve the goals of the District's CAP, the AB 32 Scoping Plan, and the Sustainable Freight Strategy.

Table 4.2-3. Summary of TAMT Final PEIR GHG Emissions for the Dry Bulk Cargo Node (metric tons per year)

Node and Scenario	Unmitigated	Mitigated
Existing (289,864 MT)	4,110	4,110
Buildout (1,987,500 MT)	26,425	13,694
<i>Net Change</i>	22,315	9,584
Reduction from Unmitigated	--	57%

Source: Summarized from TAMT Final PEIR, Table 4.6.-4 (Existing) and Table 7-6 (STC Buildout).

Mitigation measures in the TAMT Final PEIR were prescribed to reduce GHG emissions. A brief summary of the TAMT Final PEIR mitigation measures follows.

- **MM-GHG-1** requires future TAMT Plan projects to implement diesel emission reduction measures during construction and operation.
- **MM-GHG-2** requires compliance with the District's Climate Action Plan measures—specifically, 80 percent vessel speed reduction (VSR) compliance with the District's existing VSR program and shore power for eligible calls (container calls only).
- **MM-GHG-3** is related to electric cargo handling equipment upgrade. Specifically, this measure requires three electric pieces replace diesel pieces by 2020, or similar replacement to achieve equivalent reductions within the TAMT boundary.
- **MM-GHG-4** is related to electric cargo handling equipment upgrade. Specifically, this measure requires 20 electric pieces (yard trucks) replace diesel pieces by 2025 and three existing non-electric reach stackers and 10 non-electric forklifts by 2030, or similar replacement to achieve equivalent reductions within the TAMT boundary.

- **MM-GHG-5** requires future projects to implement VSR beyond the District’s CAP when certain vessel call triggers are met, or by January 1, 2030. Vessel call triggers are 79 calls for dry bulk, 98 calls for refrigerated containers, and 78 calls for multi-purpose general cargo.
- **MM-GHG-6** requires future TAMT Plan projects to implement a renewable energy project or purchase carbon offsets to meet the prescribed reduction targets.
- **MM-GHG-7** requires future tenants to be subject to an annual inventory submittal and periodic technology review.
- **MM-GHG-8** requires the District to develop a program to reduce exhaust emissions from operations.
- **MM-GHG-9** requires the use of an At-Berth Emission Capture and/or Control System or equivalent to reduce emissions from vessel hoteling once terminal throughput reaches certain levels.

Reductions associated with these measures are included in the mitigation emission levels shown in Table 4.2-3. As shown, application of TAMT Final PEIR mitigation measures **MM-GHG-1** through **MM-GHG-9** would reduce operational emissions; however, impacts from terminal buildout were determined, in the TAMT Final PEIR, to 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 reduced emissions that would represent a fair share of the requisite reductions to achieve post-2020 targets.

Project Impact Discussion

Consistent with the framework in the TAMT Final PEIR, the GHG analysis herein is broken into two distinct sections: quantitative consistency with long-term reduction targets and qualitative compliance with the measures and regulatory programs outlined, adopted, or proposed by the District, CARB, or other California agencies.

Consistency with Long-Term Reduction Targets

The TAMT Final PEIR has a single buildout year (2035) to represent full buildout of the TAMT Plan and, correspondingly, the GHG analysis that was conducted used a single target to both benchmark performance and determine the fair share of reductions needed to demonstrate progress in the post-2020 time period. For 2035, the performance-based standard (reduction targets) uses the *Reference Case* emissions estimate from the *Pathways to Zero and Near-Zero Emissions (Pathways)* analysis (CARB 2015), after backing out the effect of current GHG policies.² The resultant 2035 emissions forecast estimate was then compared to the statewide target for 2030 (40 percent below 1990 levels) to derive a performance benchmark of 57 percent below unmitigated (or business as usual [BAU]) levels for the District and the Project in 2035. Therefore, in order to demonstrate “substantial progress” by 2035 toward meeting the State’s downward trajectory, the TAMT Plan would need to demonstrate that GHG emissions would be consistent with this 57 percent target. If the Project is determined to be consistent with the State’s overall reduction strategy by demonstrating a downward trajectory toward 2050 targets by 2035 (by using the above reduction target for 2035 as a benchmark of performance), and is determined to be in compliance

² The Energy + Environmental Economics Reference Case (current GHG policies) 2030 GHG emissions estimate is approximately 400 million MTCO₂e. In order to derive a 2030 BAU estimate, the effect of current GHG policies was assumed to be equivalent to the percentage statewide reduction from CARB’s 2014 estimate of 2020 BAU emissions (539 million MTCO₂e) to the 1990 emissions level (431 million MTCO₂e), which is 20% overall. Therefore, the Energy + Environmental Economics *Reference Case* estimate was “inflated” by 20% to result in a 2030 BAU estimate of approximately 500 million MTCO₂e. The Energy + Environmental Economics Pathways documentation can be found at: https://ethree.com/public_projects/energy_principals_study.php/.

with regulatory programs adopted by CARB or other California agencies for post-2020 GHG emissions, then the Project's cumulative contribution of GHG emissions would be considered less than cumulatively considerable. Conversely, if the Project is determined to be inconsistent with the State's overall reduction strategy for 2035 and is determined to not be in compliance with regulatory programs adopted by CARB or other California agencies for post-2020 GHG emissions, then the Project's cumulative contribution of GHG emissions would be considered significant and feasible mitigation measures are required.

Of note is that *substantial progress* means that a given project would support, or align with, reduction planning efforts for a given time period. For example, the 57 percent reduction target for the TAMT Final PEIR was based on the level of reductions required at the State level to support progress towards 2050 reduction goals in 2035. Note that this target is the level of reductions from unmitigated levels (e.g., of the same year), not from 1990 levels, which are unknown as there is no 1990 inventory of TAMT operations. As noted above, the analysis for the TAMT Plan in the TAMT Final PEIR was only for the buildout year of 2035. The Proposed Project includes up to three separate 5-year lease agreements. The Proposed Project could begin operations around the 2020 time period and could theoretically cease operations at the end of the first 5-year term, which would be around the 2025 timeframe. Similarly, the tenant could agree to two 5-year terms and cease operations in 2030. To benchmark performance and determine the fair share of reductions needed to demonstrate progress at these interim years, separate reduction targets for the various 2025 and 2030 analysis years have been quantified. The reduction targets are shown in Table 4.2-4. The analysis years assumed in this SEIR include 2025 (34 percent), 2030 (48 percent), and 2035 (57 percent).

Table 4.2-4. Reduction Target Calculations

Metric	CARB Milestone Years			Interim Years	
	2020	2030	2050	2025	2035
BAU (in MMTCO ₂ e) ¹	539	500.23	516.56	--	--
Target (in MMTCO ₂ e) ²	431	258.6	86.2	--	--
Percent below 1990	-	-40%	-80%	--	--
Percent below BAU ³	-20%	-48%	-83%	-34%	-57%

¹ 2020 BAU is from the Scoping Plan First Update (CARB 2014). 2030 and 2050 BAU are from the *Pathways* document (CARB 2015).

² The 2020 target is equal to 1990 levels. The 2030 and 2050 targets are based on reduction percentages from 1990 levels (or 2020 target).

³ The 2025 reduction target (34 percent) is estimated based on interpolating between the 2020 and 2030 targets. The 2035 target (57 percent used in the TAMT Final PEIR) is estimated based on interpolating between the 2030 and 2050 targets.

BAU = business as usual; MMTCO₂e = million metric tons of carbon dioxide-equivalent.

The comparison to the State's reduction strategy for analysis years 2025, 2030, and 2035 is an appropriate approach by which to determine the Project's fair share of mitigation because it would result in Project emissions that would be consistent with or even exceed the emissions targets for the post-2020 period. Additionally, activity related to throughput, vessel calls, trucks, and workers vehicles are consistent with and fit within the activity assumed for full buildout of the dry bulk component in the TAMT Final PEIR. Similar to analysis of the TAMT Plan, the Proposed Project is an improvement to an existing facility and not a new development project.

Mitigation measures for this Proposed Project are based on the requirements prescribed in the TAMT Final PEIR. The mitigation measures are based on the District's CAP, as well as measures and potential action items presented in CARB documentation, such as the Sustainable Freight Action Plan and supporting E3 *Pathways* analysis document (CARB 2015), which aims to improve goods movement and freight efficiency, transition to zero-emission technologies, and increase competitiveness of California's freight system.

Table 4.2-5 shows the anticipated GHG emissions associated with operation of the Proposed Project without application of mitigation measures. Emissions for each analysis year are the same because cargo throughput, activity, and emission factors are assumed to be the same under the unmitigated scenario. As shown, the Proposed Project would result in GHG emissions in lower quantities than full buildout of the dry bulk node of the TAMT Final PEIR STC Alternative, but emissions would not align with substantial progress toward the statewide reductions targets set by EO B-30-15 and EO S-03-05 nor would the Project implement its fair share of the TAMT GHG mitigation measures before mitigation. Therefore, this is a potentially significant impact, and mitigation measures are required to ensure substantial progress and compliance with the TAMT Final PEIR.

Table 4.2-5. Estimate of Proposed Project Unmitigated GHG Emissions in 2025, 2030, and 2035 (metric tons per year)

	2025	2030	2035
TAMT Final PEIR			
Full Buildout Unmitigated ¹	26,425	26,425	26,425
Proposed Project			
Ocean-Going Vessels	1,505	1,505	1,505
Assist Tugs	27	27	27
Tugs and Fuel Barges	62	62	62
Trucks	5,649	5,649	5,649
Worker Trips	204	204	204
Payloaders	90	90	90
Electricity	4,295	4,295	4,295
Amortized Construction	164	164	164
Total Proposed Project Unmitigated Emissions	11,997	11,997	11,997

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

¹ Dry Bulk only. See Table 4.2-3.

Compliance with the Measures and Regulatory Programs Outlined, Adopted, or Proposed by the District, CARB, or other California Agencies

The TAMT Final PEIR included a discussion of the TAMT Plan's compliance with local and statewide plans, policies, and regulations, including the District's CAP at the local level, and CARB's Scoping Plan the Sustainable Freight Strategy, Sustainable Freight Action Plan, and other plans at the State level that provide insight into the strategies that will likely be included and adopted into long-term planning documents in the near future.

District CAP

As discussed in the TAMT Final PEIR, the District's CAP includes numerous strategies for reducing emissions during both the 2020 and post-2020 timeframes. The District's CAP has not been updated since the TAMT Final PEIR, and the same mitigation measures designed to ensure the TAMT is consistent with the CAP apply to the Proposed Project.

CARB Regulations and Regulatory Programs

The TAMT Final PEIR included a discussion of consistency with CARB's regulatory framework, including AB 32 Scoping Plan strategies that carried through the post-2020 timeframe, as well as the Sustainable Freight Strategy and other CARB strategies that will affect goods movement-related emissions. Both the TAMT Plan and Proposed Project are consistent with most AB 32 Scoping Plan strategies (e.g., RPS, passenger car and truck fuel economy standards) prior to mitigation, as benefits to Project-related emission sources will be realized without action at the local or project level. Relevant strategies that require action at the local or project level to be in compliance include good movement efficiencies (Scoping Plan Transportation Measure T-6) and the Scoping Plan's recommendation that CARB complete the first phase of the Sustainable Freight Strategy. As part of its Sustainable Freight Strategy, CARB released the *Pathways* discussion document and the Sustainable Freight Action Plan, both of which provide vision and direction to help reach freight transport targets required by CARB to meet its emission reduction goals. Similar to the TAMT Final PEIR, this impact is significant, and feasible mitigation measures are required to ensure compliance with CARB strategies. As with the TAMT Final PEIR, the same mitigation measures, designed to ensure the TAMT is consistent with these CARB policies, apply to the Proposed Project.

Level of Significance prior to Mitigation

Construction and operation of the Proposed Project would result in emissions that would be inconsistent with 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 CARB or other California agencies for post-2020 for the purpose of reducing the emissions of GHGs. As shown in Table 4.2-5, emissions prior to mitigation would fall short of the 2025 and 2035 reduction targets, but emissions would fit within and be below full dry bulk buildout in the TAMT Final PEIR. However, the TAMT Final PEIR includes various mitigation measures that were intended for future projects to implement, thereby contributing to that project's fair share of the TAMT mitigation burden. Therefore, while the Proposed Project would result in emissions below full dry bulk buildout in the TAMT Final PEIR, emissions would fall short of the reduction targets prior to mitigation and not contribute to their fair share of the mitigation burden. Thus, this is a potentially significant impact, and mitigation measures are required to ensure compliance with the TAMT Final PEIR. These conclusions, prior to mitigation, are consistent with the findings of the TAMT Final PEIR, and the Proposed Project would not result in a new or more severe significant impact than what was previously disclosed in the TAMT Final PEIR.

Mitigation Measures

Mitigation measures **MM-GHG-1R** through **MM-GHG-9R** as revised from the TAMT Final PEIR to clearly address the Proposed Project implementation characteristics, in addition to **MM-GHG-10**, which has been developed specifically for this Proposed Project, would apply. Table 4.2-7 provides a comparison summary of the construction and operation GHG mitigation measures previously identified in the TAMT Final PEIR for the TAMT Plan and how those mitigation measures apply to the Proposed Project. In instances where modification of the TAMT Final PEIR mitigation measures occurs or new Project mitigation measures are needed, an explanation is provided. No additional mitigation measures beyond those described here are applicable to the Proposed Project.

Level of Significance after Mitigation

Implementation of **MM-GHG-1R** through **MM-GHG-9R** from the TAMT Final PEIR, plus new mitigation measure **MM-GHG-10**, would reduce GHG emissions from all sources. Note that the unmitigated

emissions in Table 4.2-6 include reductions associated with adopted statewide standards and regulations that were adopted at the time of this analysis, including the RPS (60 percent requirement by 2030 and net-zero generation by 2045), as well as truck (Phase 1 and 2) and passenger car fuel efficiency standards (Pavley I and II). Of note is that the 60 percent RPS target by 2030 and net-zero generation goal by 2045 are new since certification of the TAMT Final PEIR.

As shown in Table 4.2-6, emissions would be reduced and would be on a downward trajectory through the life of the Project, 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 in 2025, 2030, and 2035. 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.

Therefore, consistent with the TAMT Final PEIR, emissions and related GHG impacts would remain significant and unavoidable. However, the Proposed Project would not have any new or more severe impacts than were analyzed in the TAMT Final PEIR as the Proposed Project's emissions were captured in the TAMT Final PEIR analysis.

Table 4.2-6. Estimate of Proposed Project Mitigated GHG Emissions in 2025, 2030, and 2035 (metric tons per year)

	2025	2030	2035
TAMT Final PEIR			
Full Buildout Mitigated ¹	--	--	13,694
Proposed Project			
<i>Unmitigated Emissions with Legislative Reductions</i>			
Ocean-Going Vessels	1,505	1,505	1,505
Assist Tugs	27	27	27
Tugs and Fuel Barges	62	62	62
Trucks	4,787	4,218	3,979
Worker Trips	140	120	110
Payloaders	90	90	90
Electricity	2,551	2,350	1,366
Amortized Construction	164	164	164
Total Proposed Project Emissions after Legislative Reductions	9,327	8,536	7,303
Further Reduction from Unmitigated with State Measures ²	-2,670	-3,461	-4,694
<i>Percentage Reduction from Unmitigated²</i>	<i>22%</i>	<i>29%</i>	<i>39%</i>
<i>Mitigated Reductions</i>			
MM GHG-1R Idling ²	--	--	--
MM-GHG-2R CAP Measures ³	-45	-45	-45
MM-GHG-3R Electric CHE ⁴	--	--	--
MM-GHG-4R Electric CHE ⁴	--	--	--
MM-GHG-5R VSR Beyond CAP ⁵	--	-24	-24

Table 4.2-6. Estimate of Proposed Project Mitigated GHG Emissions in 2025, 2030, and 2035 (metric tons per year)

	2025	2030	2035
<i>MM-GHG-6R PV⁶</i>	-592	-1,622	-1,693
<i>MM-GHG-9R At-Berth Emissions Capture (Shore Power)⁷</i>	-214	-221	-251
<i>MM-GHG-10 Modern Trucks⁸</i>	-578	-422	-137
Total Emissions After Mitigation⁹	7,897	6,202	5,152
Reduction from Unmitigated after Mitigation	-4,099	-5,795	-6,845
<i>Percentage Reduction</i>	<i>34%</i>	<i>48%</i>	<i>57%</i>
Reduction Target	34%	48%	57%

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

¹ Dry Bulk only. See Table 4.2-5. In the TAMT Final PEIR; only 2035 was calculated.

² Reductions from unmitigated are due to reductions associated with adopted statewide standards and regulations only. Unmitigated emissions are shown in Table 4.2-5.

³ 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.

⁴ Includes VSR compliance with the CAP target of 80% (12 knot speed within 20 nautical miles of Point Loma).

⁵ Vacuum unloader is electric. No further electrification is required.

⁶ Includes VSR compliance of 90% (12 knot speed within 40 nautical miles of Point Loma). Reductions are shown relative to CAP compliance (MM-GHG-2R). It was assumed that this Enhanced VSR measure will not be triggered until 2030.

⁷ At-berth capture is met with shore power.

⁸ Assumes 90% of the truck fleet is 5 years old or newer.

⁹ Reductions from MM-GHG-7 and MM-GHG-8 are not quantified because reductions would be speculative

Table 4.2-7. Comparison of Greenhouse Gas Emissions TAMT Final PEIR Mitigation Measures to Proposed Project Draft SEIR Mitigation Measures

<p>TAMT Final PEIR Mitigation Measure</p> <p><i>The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMT Plan, adopted by the District in December 2016 as part of the Final Environmental Impact Report for the TAMT Plan.</i></p>	<p>Mitsubishi Cement Corporation Project SEIR Mitigation Measure</p> <p><i>Project mitigation measures are a combination of applicable TAMT Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMT Final PEIR mitigation measures are provided with additions shown in <u>double underline</u> and deletions indicated in strikeout format.</i></p>	<p>Project Applicability/Reason for Modification or New Project Mitigation Measure</p>
<p>GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE</p> <p>MM-GHG-1: Implement Best Management Practices During Construction of Future TAMT Plan Components.</p> <p>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.</p> <ul style="list-style-type: none"> ■ 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. 	<p>MM-GHG-1R: Implement Best Management Practices During Construction of Future TAMT <u>Redevelopment Plan</u> Components.</p> <p>The Mitsubishi Cement Corporation Project Proponent All proponents of future projects shall implement Best Management Practices (BMPs) to reduce air emissions from all construction activities implemented as part of <u>the Proposed Project full TAMT plan buildout</u>. The following measures are required to limit construction equipment exhaust from on-road trucks and heavy-duty equipment used during construction.</p> <ul style="list-style-type: none"> ■ 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-GHG-2 for definition of "not in use"). 	<p>MM-GHG-1 applies to the Proposed Project. Modifications to MM-GHG-1 are limited to changes in how the San Diego Unified Port District is referred to (e.g., San Diego Unified Port District instead of District), identification of the appropriate Department, and updates to off-road diesel powered equipment based on anticipated Proposed Project's construction schedule.</p>

Table 4.2-7. Comparison of Greenhouse Gas Emissions TAMT Final PEIR Mitigation Measures to Proposed Project Draft SEIR Mitigation Measures

<p>TAMT Final PEIR Mitigation Measure</p> <p><i>The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMT Plan, adopted by the District in December 2016 as part of the Final Environmental Impact Report for the TAMT Plan.</i></p>	<p>Mitsubishi Cement Corporation Project SEIR Mitigation Measure</p> <p><i>Project mitigation measures are a combination of applicable TAMT Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMT Final PEIR mitigation measures are provided with additions shown in <u>double underline</u> and deletions indicated in strikeout format.</i></p>	<p>Project Applicability/Reason for Modification or New Project Mitigation Measure</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"> ■ Water the grading areas at least twice daily to minimize fugitive dust. ■ Stabilize graded areas as quickly as possible to minimize fugitive dust. ■ Apply chemical stabilizer or pave the last 100 feet of internal travel path within the construction site prior to public road entry. ■ Install wheel washers adjacent to a paved apron prior to vehicle entry on public roads. ■ Remove any visible track-out into traveled public streets within 30 minutes of occurrence. ■ Wet wash the construction access point at the end of each workday if any vehicle travel on unpaved surfaces has occurred. ■ Provide sufficient perimeter erosion control to prevent washout of silty material onto public roads. ■ Cover haul trucks or maintain at least 12 inches of freeboard to reduce blow-off during hauling. 	<p>In addition, <u>the Mitsubishi Cement Corporation Project Proponent</u> all future project proponents shall implement the relevant BMPs, consistent with the <u>Project-specific applicable</u> industrial Storm Water Pollution Prevention Plan (SWPPP). In no case would any BMP be implemented if it <u>conflicts</u> conflicted with the SWPPP or other applicable water quality permit requirements. BMP dust control measures may include, but are not limited to, the following:</p> <ul style="list-style-type: none"> ■ Water the grading areas at least twice daily to minimize fugitive dust. ■ Stabilize graded areas as quickly as possible to minimize fugitive dust. ■ Apply chemical stabilizer or pave the last 100 feet of internal travel path within the construction site prior to public road entry. ■ Install wheel washers adjacent to a paved apron prior to vehicle entry on public roads. ■ Remove any visible track-out into traveled public streets within 30 minutes of occurrence. ■ Wet wash the construction access point at the end of each workday if any vehicle travel on unpaved surfaces has occurred. ■ Provide sufficient perimeter erosion control to prevent washout of silty material onto public roads. ■ Cover haul trucks or maintain at least 12 inches of freeboard to reduce blow-off during hauling. 	

Table 4.2-7. Comparison of Greenhouse Gas Emissions TAMT Final PEIR Mitigation Measures to Proposed Project Draft SEIR Mitigation Measures

<p>TAMT Final PEIR Mitigation Measure</p> <p><i>The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMT Plan, adopted by the District in December 2016 as part of the Final Environmental Impact Report for the TAMT Plan.</i></p>	<p>Mitsubishi Cement Corporation Project SEIR Mitigation Measure</p> <p><i>Project mitigation measures are a combination of applicable TAMT Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMT Final PEIR mitigation measures are provided with additions shown in <u>double underline</u> and deletions indicated in strikeout format.</i></p>	<p>Project Applicability/Reason for Modification or New Project Mitigation Measure</p>
<ul style="list-style-type: none"> ■ Suspend all soil disturbance and travel on unpaved surfaces if winds exceed 25 mph. ■ Cover/water onsite stockpiles of excavated material. ■ Enforce a 15 mph speed limit on unpaved surfaces. ■ 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. ■ Hydroseed, landscape, or develop as quickly as possible all disturbed areas as directed by the District and/or SDAPCD to reduce dust generation. ■ Limit the daily grading volumes/area. <p>Prior to the commencement of construction activities, the project proponent shall submit evidence to the 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 District during construction.</p>	<ul style="list-style-type: none"> ■ Suspend all soil disturbance and travel on unpaved surfaces if winds exceed 25 mph. ■ Cover/water onsite stockpiles of excavated material. ■ Enforce a 15 mph speed limit on unpaved surfaces. ■ 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. ■ Hydroseed, landscape, or develop <u>Develop</u> as quickly as possible all disturbed areas as directed by the <u>San Diego Unified Port District's Planning and Green Port Department</u> and/or SDAPCD to reduce dust generation. ■ Limit the daily grading volumes/area. <p>Prior to the commencement of construction activities, the <u>Mitsubishi Cement Corporation Project Proponent</u> project proponent shall submit evidence to the <u>San Diego Unified Port District's Planning and Green Port Department</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's Planning and Green Port Department</u> during construction.</p>	

MM-GHG-2: Comply with San Diego Unified Port District Climate Action Plan Measures.

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.

- Vessels shall comply with the District’s voluntary vessel speed reduction program, which targets 80 percent compliance.
- 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.
- Designated truck haul routes shall be used, and the project proponent shall decrease onsite movements where practicable.
- No commercial drive-through shall be implemented.
- 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.
- 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.
- Implementation of Climate Action Plan measures will be included as part of any discretionary actions and/or Coastal Development Permit(s) associated with this

MM-GHG-2R: Comply with San Diego Unified Port District Climate Action Plan Measures.

Prior to approval of all discretionary actions and/or Coastal Development Permits, the Mitsubishi Cement Corporation Project Proponent ~~project proponent~~ shall be required to implement the following measures to be consistent with the Climate Action Plan.

- Vessels shall comply with the San Diego Unified Port District’s voluntary vessel speed reduction program, which targets 80 percent compliance.
- Vessels that are subject to the ARB’s at berth regulation (dry bulk vessels are not subject to the at-berth regulation) shall comply with ARB’s at berth regulation that requires shore power or alternative control technology regulation for certain vessel fleets for 80 percent of eligible calls by 2020, minus idle time to clear customs consistent with California Air Resources Board regulations. The TAMT Final PEIR assumed 1.5 hours of idle time for vessels to embark/disembark, which applies to all shore power and/or alternative control technologies employed at the terminal. This is a Project feature made into a mitigation measure to ensure compliance (see MM-GHG-9 for an explanation of the Proposed Project’s shore power features).
- Designated truck haul routes shall be used, and the project proponent shall decrease onsite movements where practicable.
- No commercial drive-through shall be implemented.
- 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 65 percent ~~50 percent~~ of all construction debris. This measure shall be applied during construction and operation of the Proposed Project.
- 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

MM-GHG-2 applies to the Proposed Project. Modifications to MM-GHG-2 are limited to changes in how the San Diego Unified Port District is referred to (e.g., San Diego Unified Port District instead of District) and updates to the City of San Diego’s Construction and Demolition Debris Deposit Ordinance.

Table 4.2-7. Comparison of Greenhouse Gas Emissions TAMT Final PEIR Mitigation Measures to Proposed Project Draft SEIR Mitigation Measures

<p>TAMT Final PEIR Mitigation Measure</p> <p><i>The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMT Plan, adopted by the District in December 2016 as part of the Final Environmental Impact Report for the TAMT Plan.</i></p>	<p>Mitsubishi Cement Corporation Project SEIR Mitigation Measure</p> <p><i>Project mitigation measures are a combination of applicable TAMT Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMT Final PEIR mitigation measures are provided with additions shown in <u>double underline</u> and deletions indicated in strikeout format.</i></p>	<p>Project Applicability/Reason for Modification or New Project Mitigation Measure</p>
<p>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>lighting that meets required lighting standards and is commercially available.</p> <ul style="list-style-type: none"> ■ 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 <u>San Diego Unified Port District's Planning and Green Port Department</u> by the Project Proponent on an annual basis through <u>the end of the lease or 2035 (buildout of the TAMT Redevelopment Plan), whichever occurs first.</u> 	
<p>MM-GHG-3: Electric Cargo Handling Equipment Upgrades.</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"> 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 	<p>TAMT Final PEIR MM-GHG-3 will be implemented by the San Diego Unified Port District on a terminal-wide basis.</p>	<p>The San Diego Unified Port District is in the process of acquiring and operating electric equipment for use at the TAMT.</p> <p>Mitsubishi Cement Corporation is proposing electric vacuum loaders and only minimal diesel equipment as a feature of the Project.</p>

Table 4.2-7. Comparison of Greenhouse Gas Emissions TAMT Final PEIR Mitigation Measures to Proposed Project Draft SEIR Mitigation Measures

<p>TAMT Final PEIR Mitigation Measure</p> <p><i>The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMT Plan, adopted by the District in December 2016 as part of the Final Environmental Impact Report for the TAMT Plan.</i></p>	<p>Mitsubishi Cement Corporation Project SEIR Mitigation Measure</p> <p><i>Project mitigation measures are a combination of applicable TAMT Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMT Final PEIR mitigation measures are provided with additions shown in <u>double underline</u> and deletions indicated in strikeout format.</i></p>	<p>Project Applicability/Reason for Modification or New Project Mitigation Measure</p>
<p>discretionary approval issued by the San Diego Unified Port District.</p> <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 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>MM-GHG-4: Electric Cargo Handling Equipment Upgrades. This measure has multiple steps for compliance, as specified below.</p> <p>A. 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"> 1. Purchased, leased, or otherwise acquired, in whole or in part, through funding provided to a tenant by the San Diego Unified Port District; 	<p>TAMT Final PEIR MM-GHG-4 will be implemented by the San Diego Unified Port District on a terminal-wide basis.</p>	<p>The San Diego Unified Port District is in the process of acquiring and operating electric equipment for use at the TAMT.</p> <p>Mitsubishi Cement Corporation is proposing electric vacuum loaders and only minimal diesel equipment as a feature of the Project.</p>

Table 4.2-7. Comparison of Greenhouse Gas Emissions TAMT Final PEIR Mitigation Measures to Proposed Project Draft SEIR Mitigation Measures

<p>TAMT Final PEIR Mitigation Measure</p> <p><i>The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMT Plan, adopted by the District in December 2016 as part of the Final Environmental Impact Report for the TAMT Plan.</i></p>	<p>Mitsubishi Cement Corporation Project SEIR Mitigation Measure</p> <p><i>Project mitigation measures are a combination of applicable TAMT Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMT Final PEIR mitigation measures are provided with additions shown in <u>double underline</u> and deletions indicated in strikeout format.</i></p>	<p>Project Applicability/Reason for Modification or New Project Mitigation Measure</p>
<p>2. Purchased, leased, or otherwise acquired, in whole or in part, through funding provided to a tenant by other sources; or</p> <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 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>B. 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>		

Table 4.2-7. Comparison of Greenhouse Gas Emissions TAMT Final PEIR Mitigation Measures to Proposed Project Draft SEIR Mitigation Measures

<p>TAMT Final PEIR Mitigation Measure</p> <p><i>The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMT Plan, adopted by the District in December 2016 as part of the Final Environmental Impact Report for the TAMT Plan.</i></p>	<p>Mitsubishi Cement Corporation Project SEIR Mitigation Measure</p> <p><i>Project mitigation measures are a combination of applicable TAMT Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMT Final PEIR mitigation measures are provided with additions shown in <u>double underline</u> and deletions indicated in strikeout format.</i></p>	<p>Project Applicability/Reason for Modification or New Project Mitigation Measure</p>
<ol style="list-style-type: none"> 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. <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 C of this mitigation measure may be replaced by other technologies or other types of</p>		

Table 4.2-7. Comparison of Greenhouse Gas Emissions TAMT Final PEIR Mitigation Measures to Proposed Project Draft SEIR Mitigation Measures

<p>TAMT Final PEIR Mitigation Measure</p> <p><i>The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMT Plan, adopted by the District in December 2016 as part of the Final Environmental Impact Report for the TAMT Plan.</i></p>	<p>Mitsubishi Cement Corporation Project SEIR Mitigation Measure</p> <p><i>Project mitigation measures are a combination of applicable TAMT Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMT Final PEIR mitigation measures are provided with additions shown in <u>double underline</u> and deletions indicated in strikeout format.</i></p>	<p>Project Applicability/Reason for Modification or New Project Mitigation Measure</p>
<p>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>MM-GHG-5: Implement Vessel Speed Reduction Program Beyond Climate Action Plan Compliance for Future Operations Associated with the TAMT Plan.</p> <p>Every quarter following approval of the first discretionary action approval and/or issuance of the first Coastal Development Permit associated with the 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.</p> <p>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 multipurpose 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</p>	<p>MM-GHG-5R: Implement Enhanced Vessel Speed Reduction Program Beyond Climate Action Plan Compliance for Future Operations Associated with the TAMT Plan.</p> <p><u>The Mitsubishi Cement Corporation shall be required to comply with the Enhanced VSR Program.</u></p> <p><u>Mitsubishi Cement Corporation shall, beginning with the first vessel call to the Port, comply with 80% of its OGVs reducing their speeds to 12 knots or less starting at 20 nautical miles from Point Loma.</u></p> <p><u>The Mitsubishi Cement Corporation shall comply with 90% of its OGVs calling to the Port reducing their speeds to 12 knots starting at 40 nautical miles from Point Loma upon the occurrence of the earlier of either of the following two scenarios:</u></p> <ul style="list-style-type: none"> ■ <u>Prior to the annual number of dry bulk vessel calls reaching 91 calls annually (e.g., 76 new calls over the TAMT Final PEIR's baseline condition);or</u> ■ <u>Beginning January 1, 2030, irrespective of the number of calls on an annual basis.</u> <p><u>To help the District implement the Beyond 2013 CAP VSR Program before reaching 91 dry bulk vessel calls annually, Mitsubishi</u></p>	<p>MM-GHG-5 applies to the Proposed Project. Modifications to MM-GHG-5 are limited to clarifying when the requirements are to be implemented as well as changes in how the San Diego Unified Port District is referred to (e.g., San Diego Unified Port District instead of District).</p>

Table 4.2-7. Comparison of Greenhouse Gas Emissions TAMT Final PEIR Mitigation Measures to Proposed Project Draft SEIR Mitigation Measures

<p>TAMT Final PEIR Mitigation Measure</p> <p><i>The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMT Plan, adopted by the District in December 2016 as part of the Final Environmental Impact Report for the TAMT Plan.</i></p>	<p>Mitsubishi Cement Corporation Project SEIR Mitigation Measure</p> <p><i>Project mitigation measures are a combination of applicable TAMT Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMT Final PEIR mitigation measures are provided with additions shown in <u>double underline</u> and deletions indicated in strikeout format.</i></p>	<p>Project Applicability/Reason for Modification or New Project Mitigation Measure</p>
<p>speed reduction measures to reduce the project's criteria pollutant emissions.</p> <p>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.</p> <p>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 & 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><u>Cement Corporation shall provide the District with a rolling estimate of anticipated vessels calls every 6 months.</u></p> <p>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>	

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<p>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.</p> <p>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, Project Description), the renewable energy project must offset 27,625 metric tons of carbon dioxide equivalent (MTCO₂e) 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 MTCO₂e per year or 86,172 MWh/year or the equivalent amount of greenhouse gas offsets under the STC Alternative.</p>	<p>M-GHG-6R: Implement a Renewable Energy Project, <u>or Other Verifiable Actions or Activities on Tidelands</u>, 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.</p> <p><u>The Mitsubishi Cement Corporation shall do one or more of the following to achieve requisite reductions to meet the 2025, 2030, and 2035 greenhouse gas (GHG) reduction targets, in order of priority:</u></p> <ol style="list-style-type: none"> (1) <u>Incorporate a renewable energy project:</u> <ul style="list-style-type: none"> ▪ <u>within the Tenth Avenue Marine Terminal;</u> ▪ <u>within the San Diego Unified Port District's jurisdiction;</u> <u>or</u> ▪ <u>adjacent to the San Diego Unified Port District's jurisdiction; or</u> (2) <u>Other verifiable actions or activities on Tidelands such as electrification of equipment including vehicles and trucks, financial contribution to a future local or District GHG emission reduction program on Tidelands (locally approved equivalent program), or similar activities or actions that reduce operational GHG emissions; or</u> (3) <u>Purchase California Air Resource Board (CARB) verified GHG emission offsets.</u> 	<p>MM-GHG-6R applies to the Proposed Project. The mitigation measure has been updated to recognize the Proposed Projects specific operational parameters while maintaining the original priority of mitigation efforts, which includes taking actions or modifying operational processes before pursuing the purchase of GHG emission offsets. The mitigation measure also allows for the auditing of purchased credits to account for the potential differences between the projected activities analyzed in this Draft EIR and the real word operations that will be monitored as a normal course of TAMT business operations.</p>

Table 4.2-7. Comparison of Greenhouse Gas Emissions TAMT Final PEIR Mitigation Measures to Proposed Project Draft SEIR Mitigation Measures

<p>TAMT Final PEIR Mitigation Measure</p> <p><i>The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMT Plan, adopted by the District in December 2016 as part of the Final Environmental Impact Report for the TAMT Plan.</i></p>	<p>Mitsubishi Cement Corporation Project SEIR Mitigation Measure</p> <p><i>Project mitigation measures are a combination of applicable TAMT Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMT Final PEIR mitigation measures are provided with additions shown in <u>double underline</u> and deletions indicated in strikeout format.</i></p>	<p>Project Applicability/Reason for Modification or New Project Mitigation Measure</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 MTCO₂e under the MPC scenario or 18,206 MTCO₂e 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 three additional options are available, listed here in order of priority. The San Diego Unified Port</p>	<p>The option(s) implemented shall achieve requisite GHG reductions for the activities of the Project for years 2025, 2030, and 2035. <u>As specified below, the 2025, 2030, and 2035 GHG reduction targets are based on the maximum throughput of 600,000 metric tons (MT) per year.</u></p> <p><u>The maximum metric tons of carbon dioxide equivalent (MTCO₂e) or megawatt-hours per year (MWh/year) reduction requirement for each time period is as follows (calculated assuming 600,000 MT of throughput via 24 calls to port annually) but the maximum requirement may be reduced at the discretion of the District, depending on the hours at berth and the amount of throughput in a given year and based on the other reduction requirements specified below:</u></p> <p>A. <u>2025 reduction target: 568 MTCO₂e per year or 2,345 MWh/year.</u></p> <p>B. <u>2030 reduction target: 1,622 MTCO₂e per year or 7,675 MWh/year.</u></p> <p>C. <u>2035 reduction target: 1,693 MTCO₂e per year or 8,013 MWh/year.</u></p> <p><u>Prior to the first call of the first year of operation, the Mitsubishi Cement Corporation shall either:</u></p> <p>I. <u>Develop a renewable energy project(s) or take other verifiable actions or activities to meet or partially meet the amount of MTCO₂e or MWh reductions specified above.</u></p>	

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<p>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 MTCO₂e at full TAMT plan buildout under the MPC scenario or 18,206 MTCO₂e 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>a. <u>If the Mitsubishi Cement Corporation develops a renewable energy project(s), or takes actions or conducts activities to reduce GHG emissions, the Mitsubishi Cement Corporation shall submit a report specifying the annual amount of MTCO₂e or MWh reduction achieved by the project(s), actions, or activities; submit evidence that the renewable energy project, actions, or activities are not being used to offset GHG emissions for any other project or entity; and any other information needed to verify that amount to the Districts Energy Department for its review and approval (collectively, "GHG Emission Reduction Report").</u></p> <p>b. <u>If the GHG Emission Reduction Report is approved, a reduction to the required offsets shall be calculated by the District's Energy Department, and the reduction of offsets shall be transmitted to the Mitsubishi Cement Corporation in writing and the amount of GHG reduction shall count towards the required GHG reduction for the Proposed Project ("GHG Reduction").</u></p> <p>II. <u>Purchase the requisite GHG emission offsets to reduce the amount of MTCO₂e or MWh specified above, which may be decreased by the amount of annual MTCO₂e or MWh reduction that is achieved by the renewable energy project(s), action, or activities if developed and/or implemented. The offsets shall be purchased by a CARB verified entity and shall not have been previously used for a</u></p>	

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	<p><u>different GHG reduction project. The purchased offsets shall be linked to a GHG reduction project or activity that has already occurred. All certificates of purchased offsets shall be submitted to the District for its review that the criteria, above, has been met. The purchase of requisite offsets to reduce the amount of MTCO₂e or MWh, shall occur as follows:</u></p> <p><u>a. Purchase offsets for the first 2 years of operation; and</u></p> <p><u>b. Purchase offsets at least annually thereafter, prior to any calls to port for the corresponding timeframe, beginning with the third year of operation, for the life of the operation or termination of the lease agreement between the District and the Mitsubishi Cement Corporation. The Mitsubishi Cement Corporation may purchase more than 1 year of operational emissions offsets, consistent with the amount of MTCO₂e or MWh reduction specified above for the corresponding timeframe of 2025, 2030, or 2035.</u></p> <p><u>At this time, within the TAMT, there are no solar ready rooftops without renewable energy projects already being implemented. But such projects may be identified in the future, and the Mitsubishi Cement Corporation may choose at that time to participate or develop the future identified renewable energy project(s).</u></p> <p><u>If the Mitsubishi Cement Corporation complies with (1) or (2) above, in an amount that meets the total amount of MTCO₂e or</u></p>	

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	<p><u>MWh reductions specified above for 15 years of operation (to meet the 2035 reduction target) or complies with (3) above and purchases the requisite offsets for 15 years, or does a combination of (1), (2), and (3) to meet the 2035 reduction target, then nothing further shall be required under this mitigation measure.</u></p> <p><u>Subsequent to fulfilling the requirement of 3, annual purchase of offsets as specified in 3A, 3B, and 3C may be adjusted if the preceding years throughput is less than 600,000 metric tons (the maximum allowed annual throughput), and/or the annual calls to port are less than 24 (the maximum allowed number of calls; 24 calls at 168 hours per call, or 4,032 annual hours at berth). The District or a District-retained consultant (at the Mitsubishi Cement Corporation cost) shall calculate, using the best available science, the amount of unused GHG reduction offsets based on the actual throughput and/or time at berth. Any unused offsets shall be used for the next year of operation of the Proposed Project and the Mitsubishi Cement Corporation shall purchase offsets in the necessary amounts (required amount less any unused offsets) for the subject year. This procedure shall be repeated on an annual basis. At the Mitsubishi Cement Corporation's written request to the District, Mitsubishi Cement Corporation may waive the annual adjustment described above and purchase the required MTCO₂e or MWh offsets on at least an annual basis.</u></p> <p><u>Reduction of Emissions through Development of a Renewable Energy Project Requirement: Although none are identified at this</u></p>	

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	<p><u>time, the Mitsubishi Cement Corporation may develop a renewable energy project at any time during the life of the project (subject to future approvals and the priorities listed above) and may request a reduction of required offsets. If any reduction in offsets is requested by the Mitsubishi Cement Corporation because of the development of a renewable energy project(s), the Mitsubishi Cement Corporation shall submit a GHG Emission Reduction Report for the District Energy Department's review pursuant to the process specified above in (1) and required offsets shall be reduced.</u></p> <p><u>Reduction of Emissions through Verifiable Actions or Activities on Tidelands Requirement: Although none are identified at this time, the Mitsubishi Cement Corporation may take actions or implement activities at any time during the life of the project (subject to future approvals and the priorities listed above) and may request a reduction of required offsets. If any reduction in offsets is requested by the Mitsubishi Cement Corporation because of the verified actions or activities on tidelands, the Mitsubishi Cement Corporation shall submit a GHG Emission Reduction Report for the District Energy Department's review pursuant to the process specified above in (1), and required offsets shall be reduced.</u></p>	
<p>MM-GHG-7: Annual Inventory Submittal and Periodic Technology Review.</p>	<p>MM-GHG-7R: Annual Inventory Submittal and Periodic Technology Review.</p>	<p>MM-GHG-7 applies to the Proposed Project. Modifications to MM-GHG-7 clarify the intent of the mitigation measure and the annual reporting</p>

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<p>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 project proponent at the TAMT throughout the life of the lease up to 2035 (buildout of the TAMT plan).</p> <p>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>	<p><u>The Mitsubishi Cement Corporation shall comply with the San Diego Unified Port District's Annual Inventory and Periodic Technology Review Program by (1) providing an inventory of all the mobile equipment associated with their TAMT site operations that generate criteria pollutants, toxic air contaminants and greenhouse gases on an annual basis to be submitted by January 30th of each year of operations, and (2) working collaboratively with the San Diego Unified Port District staff and/or the local air pollution control district to identify new technologies or other practices that can be incorporated into their operations that help reduce emissions and improve air quality.</u></p> <p>The <u>Mitsubishi Cement Corporation shall complete the San Diego Unified Port District's</u> equipment inventory spreadsheet annually, which requires tenants to identify the year, make, vin/ID number, fuel type, 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 in the TAMT Redevelopment Plan MM-GHG-7.</p>	<p>requirements as well as the Project Proponent's requirement to work cooperatively with the District in the future should new technologies become available and are feasibly implemented in the Proposed Project operations. Additional modifications are limited to changes in how the San Diego Unified Port District is referred to (e.g., San Diego Unified Port District instead of District).</p>

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<ol style="list-style-type: none"> 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 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 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 		

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<p>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.</p> <p>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.</p> <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 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</p>		

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<p>TAMT Final PEIR Mitigation Measure</p> <p><i>The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMT Plan, adopted by the District in December 2016 as part of the Final Environmental Impact Report for the TAMT Plan.</i></p>	<p>Mitsubishi Cement Corporation Project SEIR Mitigation Measure</p> <p><i>Project mitigation measures are a combination of applicable TAMT Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMT Final PEIR mitigation measures are provided with additions shown in <u>double underline</u> and deletions indicated in strikeout format.</i></p>	<p>Project Applicability/Reason for Modification or New Project Mitigation Measure</p>
<p>District. Verification of compliance with this measure is the responsibility of the District.</p>		
<p>MM-GHG-8: Implement Exhaust Emissions Reduction Program at the Tenth Avenue Marine Terminal.</p> <p>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> <p>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.</p> <p>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, 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</p>	<p>MM-GHG-8R: Implement Exhaust Emissions Reduction Program at Tenth Avenue Marine Terminal.</p> <p>The San Diego Unified Port District is tasked with developing an incentive program, based on an emission reduction schedule, that incentivizes tenants and/or terminal operators to reduce mobile source emissions above and beyond the requirements identified in the TAMT Final PEIR. San Diego Unified Port District staff is currently developing the Exhaust Emission Reduction Program as part of their Clean Air Plan update, per the direction of the Board of Port Commissioner's in June 2019. Following completion of the Clean Air Plan update, the Project Proponent will be eligible to participate in the updated plan's Exhaust Emission Reduction Program.</p>	<p>The San Diego Unified Port District is in the process of developing an incentive program to assist with exhaust emissions reductions at the TAMT.</p> <p>A condition will be included as part of the Project's Coastal Development Permit (CDP) conditions to ensure that Project would be required to participate in the incentive program once the program has been adopted by the District.</p>

Table 4.2-7. Comparison of Greenhouse Gas Emissions TAMT Final PEIR Mitigation Measures to Proposed Project Draft SEIR Mitigation Measures

<p>TAMT Final PEIR Mitigation Measure</p> <p><i>The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMT Plan, adopted by the District in December 2016 as part of the Final Environmental Impact Report for the TAMT Plan.</i></p>	<p>Mitsubishi Cement Corporation Project SEIR Mitigation Measure</p> <p><i>Project mitigation measures are a combination of applicable TAMT Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMT Final PEIR mitigation measures are provided with additions shown in <u>double underline</u> and deletions indicated in strikeout format.</i></p>	<p>Project Applicability/Reason for Modification or New Project Mitigation Measure</p>
<p>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"> • 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 		

Table 4.2-7. Comparison of Greenhouse Gas Emissions TAMT Final PEIR Mitigation Measures to Proposed Project Draft SEIR Mitigation Measures

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<p>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.</p> <ul style="list-style-type: none"> • 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. 		
<p>MM-GHG-9: Use of At-Berth Emission Capture and/or Control System to Reduce Vessel Hoteling Emissions.</p> <p>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</p>	<p>MM-GHG-9R: <u>Use of At-Berth Emission Capture and/or Control System to Reduce Vessel Hoteling Emissions.</u></p> <p><u>In lieu of the At-Berth Emission Capture and Control System, the Mitsubishi Cement Corporation shall use electric power through connection with the ship's dry-dock breaker system to reduce Vessel Hoteling Emissions. To attain emission reductions equivalent to or greater than the At-Berth Emission Capture and Control System specified in TAMT Redevelopment Plan MM-GHG-8, OGVs that call at the Mitsubishi Corporation Project facility shall use the shore-to-ship power system at least 50 percent of the time while at berth, not including the necessary 1.5 hours to embark and 1.5 hours to disembark to/from the system. Compliance with the 50 percent shore-to-ship power</u></p>	<p>The San Diego Unified Port District is in the process of evaluating emerging emission capturing controls systems, such as acquiring, leasing, or contracting the use of technologies such as a bonnet system for use at the TAMT.</p> <p>Mitsubishi Cement Corporation is proposing an alternative ship to shore system that aims to reduce berthing emissions associated with ship unloading activities. Please refer to Section 3.4 for additional details.</p>

Table 4.2-7. Comparison of Greenhouse Gas Emissions TAMT Final PEIR Mitigation Measures to Proposed Project Draft SEIR Mitigation Measures

<p>TAMT Final PEIR Mitigation Measure</p> <p><i>The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMT Plan, adopted by the District in December 2016 as part of the Final Environmental Impact Report for the TAMT Plan.</i></p>	<p>Mitsubishi Cement Corporation Project SEIR Mitigation Measure</p> <p><i>Project mitigation measures are a combination of applicable TAMT Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMT Final PEIR mitigation measures are provided with additions shown in <u>double underline</u> and deletions indicated in strikeout format.</i></p>	<p>Project Applicability/Reason for Modification or New Project Mitigation Measure</p>
<p>metric tons for multi-purpose general cargo (including break bulk, neobulk, roll-on/roll-off, and other noncontainer, 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.</p> <p>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.</p> <p>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 discretion.</p>	<p><u>system requirement shall be calculated based on an annual average. Mitsubishi Cement Corporation shall submit annual reports for each year of Project operations to the San Diego Unified Port District's Planning and Green Port Department on or before January 31 of each year, demonstrating compliance with this environmental control measure for the previous calendar year. If an emergency event (as defined in CARB's At-Berth Regulation, Title 17, CCR Section 93118.3, subsection (c)(14)), prevents Mitsubishi Cement Corporation from achieving the required annual average shore-to-ship power rate (equal to or greater than 50 percent), Mitsubishi Cement Corporation may demonstrate compliance over a 2-year period, so long as Mitsubishi Cement Corporation submits documentation to the San Diego Unified Port District's Planning and Green Port Department which describes the emergency event(s) and explains the basis for Mitsubishi Cement Corporation's inability to demonstrate compliance using an annual average.</u></p> <p><u>The San Diego Unified Port District's Planning and Green Port Department shall review the documentation submitted by the Mitsubishi Cement Corporation and, if the San Diego Unified Port District's Planning and Green Port Department determines that Mitsubishi Cement Corporation made sufficient effort to comply with the environmental control, it will notify Mitsubishi Cement Corporation in writing that use of the 2-year average is acceptable.</u></p> <p><i><u>*Please note that Mitsubishi' Cement Corporation's annual dry bulk throughput will not be counted towards the 691,418 metric ton dry bulk trigger that requires use of an At-Berth Emission Capture and Control System because Mitsubishi will be relying on</u></i></p>	

Table 4.2-7. Comparison of Greenhouse Gas Emissions TAMT Final PEIR Mitigation Measures to Proposed Project Draft SEIR Mitigation Measures

<p>TAMT Final PEIR Mitigation Measure</p> <p><i>The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMT Plan, adopted by the District in December 2016 as part of the Final Environmental Impact Report for the TAMT Plan.</i></p>	<p>Mitsubishi Cement Corporation Project SEIR Mitigation Measure</p> <p><i>Project mitigation measures are a combination of applicable TAMT Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMT Final PEIR mitigation measures are provided with additions shown in <u>double underline</u> and deletions indicated in strikeout format.</i></p>	<p>Project Applicability/Reason for Modification or New Project Mitigation Measure</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, multipurpose/general cargo or dry bulk vessels will be allowed to berth without it.</p>	<p><u>a shore-to-ship power system. However, the 691,418 metric ton dry bulk trigger would apply to other dry bulk tenants that do not have shore-power capabilities.</u></p>	
<p>Not Applicable</p>	<p><u>MM-GHG-10: Modernization of Delivery Truck Fleet.</u></p> <p><u>No less than 90 percent of the trucks loading cement or cementitious material at the Mitsubishi Cement Corporation facility shall be equipped with an engine that meets one of the following requirements:</u></p> <ol style="list-style-type: none"> <u>1) Is no more than 5 years old, based on engine model year ("5-Year Engine") for each operational year;</u> <u>2) Has been designed or retrofitted to comply with Federal and State on-road heavy-duty engine emissions standards (e.g., EPA 2010 engine emission standards or successor rules or regulations for on-road heavy duty diesel engines) for a 5-Year Engine ("Emission equivalent Engine"); or</u> <u>3) Uses alternative engine technology or fuels demonstrated to produce emissions no greater than a 5-Year Engine ("Alternative Equivalent Engine").</u> <p><u>The remaining 10 percent of the trucks shall comply with all applicable Federal and State heavy-duty on-road truck regulations. In addition, all trucks loading cement or cementitious</u></p>	<p>MM-GHG-10 is a new mitigation measure identified for the Proposed Project.</p>

Table 4.2-7. Comparison of Greenhouse Gas Emissions TAMT Final PEIR Mitigation Measures to Proposed Project Draft SEIR Mitigation Measures

<p>TAMT Final PEIR Mitigation Measure</p> <p><i>The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMT Plan, adopted by the District in December 2016 as part of the Final Environmental Impact Report for the TAMT Plan.</i></p>	<p>Mitsubishi Cement Corporation Project SEIR Mitigation Measure</p> <p><i>Project mitigation measures are a combination of applicable TAMT Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMT Final PEIR mitigation measures are provided with additions shown in <u>double underline</u> and deletions indicated in strikeout format.</i></p>	<p>Project Applicability/Reason for Modification or New Project Mitigation Measure</p>
	<p><u>materials at the Mitsubishi Cement Corporation facility shall be registered and be in compliance with the CARB Truck and Bus Regulation. Confirming that Mitsubishi Cement Corporation's 90 percent requirement for a Modernized Truck Fleet shall be determined on a calendar year basis. Mitsubishi Cement Corporation shall submit documentation of compliance, showing the following information, to the San Diego Unified Port District's Planning and Green Port Department on an annual basis by January 31 following each year of operation:</u></p> <ol style="list-style-type: none"> <u>1) Truck vehicle identification number (VIN).</u> <u>2) Engine model year.</u> <u>3) Annual truck trips, and</u> <u>4) If nondiesel technology, manufacturer engine standards.</u> 	

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4.3 Hazards and Hazardous Materials

This section describes any changes in hazards and hazardous materials circumstances surrounding the Proposed Project's potential approval and implementation that may have occurred since certification of the TAMT Final PEIR in December 2016. This section also evaluates the Proposed Project's potential to result in new or more severe hazards and hazardous materials impacts than what was determined in the TAMT Final PEIR. Specifically, the impact analysis considers whether the Proposed Project would: (1) create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials; (2) create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment; and (3) impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.

These three significance criteria are based on the checklist questions contained in Appendix G of the State CEQA Guidelines at the time the TAMT Final PEIR was prepared. Appendix G of the State CEQA Guidelines was updated in December 2018. Therefore, the specific threshold questions utilized in the TAMT Final PEIR for hazards and hazardous materials are not identical to those in the current Appendix G checklist. However, both versions of Appendix G address the same underlying hazards and hazardous materials issues, as noted in Table 4.3-3. For the purpose of consistency between the TAMT Final PEIR and this SEIR, the analysis is presented using the previous checklist questions. This approach allows for a clearer comparison of any new or more severe significant impacts than what was disclosed in the TAMT Final PEIR. Additional discussion of Appendix G of the State CEQA Guidelines is provided in Section 4.3.2.2, *Thresholds of Significance*.

The analysis contained herein relies on Appendix E (*Hazardous Materials Technical Study for Mitsubishi Cement Corporation at Warehouse C: Bulk Cement Warehouse and Loading Facility Project, San Diego, California*). Please refer to Section 4.1, *Air Quality and Health Risk*, for an evaluation of the Proposed Project's potential impacts related to toxic air contaminants.

4.3.1 Circumstances Surrounding Project Implementation

4.3.1.1 Changes to the Environmental Setting Disclosed in the TAMT Final PEIR

As described in the TAMT Final PEIR, the topography at the Proposed Project site is generally flat, sloping slightly from the southwest to the southeast toward San Diego Bay at an overall elevation that is approximately 15 feet above mean sea level (MSL). The Proposed Project site is underlain by artificial fill, including deposits of fill and hydraulic fill that is both compacted engineered and non-compacted, non-engineered in places. Old Paralac Deposits sit below the fill and hydraulic fill.

The San Diego Bay is located approximately 250 feet southeast of Warehouse C. No naturally occurring surface water flows or standing water are contained within the TAMT. The Proposed Project site is located in the San Diego Mesa Hydrologic Area (HA) within the Pueblo San Diego Hydrologic Unit. The San Diego Mesa HA is exempt from municipal use. Groundwater has been encountered at a depth of approximately 12 feet below ground surface. Groundwater levels, gradient, and flow direction can fluctuate due to seasonal variations, groundwater withdrawal or injection, tidal influence, and other factors (Appendix E).

Previous Hazardous Materials Technical Studies and Investigations

Section 4.7.2 of the TAMT Final PEIR provides the environmental setting for hazards and hazardous materials for the entire TAMT, which includes the Proposed Project site. Information in the PEIR was supported by the *Soil Management Plan* and *Historical Summary of the 10th Avenue Marine Terminal* prepared by Tetra Tech EM, Inc. for the District (2010), found in TAMT Final PEIR Appendices J-1 and J-2, respectively, and the following reports by Ninyo & Moore.

- *Import Soil Evaluation for Transit Shed No. 1, Tenth Avenue Marine Terminal* (2015) (TAMT Final PEIR Appendix J-3)
- *Soil, Concrete, and Asphalt Sampling Analysis for Transit Shed No. 2 – Bays E and F of the Tenth Avenue Marine Terminal* (2014) (TAMT Final PEIR Appendix J-4)
- *Concrete/Asphalt Sampling for Transit Shed No. 1, Tenth Avenue Marine Terminal* (June 23, 2014) (TAMT Final PEIR Appendix J-5)
- *Hazardous Building Material Abatement Specifications for Warehouse C and Transit Shed No. 1, Tenth Avenue Marine Terminal* (2013) (TAMT Final PEIR Appendix J-6)
- *Pre-characterization Sampling – Transit Shed No. 1 and Warehouse C Demolition, Tenth Avenue Marine Terminal* (2013) (TAMT Final PEIR Appendix J-7)
- *Asbestos Survey Status Reports of District-Operated Facilities* (2015) (TAMT Final PEIR Appendix J-8)

A Hazardous Materials Technical Study (HMTS) was prepared for the Proposed Project (Ninyo & Moore 2017) to determine if a substantial change in circumstances has occurred since the TAMT Final PEIR was certified. The HMTS, which is provided as Appendix E, summarizes the above studies as well as more recent hazardous material-related studies.

As disclosed in Section 4.7.2.3 of the TAMT Final PEIR and the HMTS, two limited environmental assessments were performed within Bays C-7, C-8, and C-10. In 2013, a pre-characterization sampling in Bays C-8 and C-10 for a formerly proposed demolition project was completed to evaluate the fill material of the elevated Warehouse C building pad. Three soil borings (B6, B7, and B8) were advanced to a maximum depth of 4.5 feet below ground surface (bgs) using a direct-push drilling rig. Two borings (B6 and B7) were advanced within Bay C-8, and one boring (B8) was advanced within Bay C-10. A total of eight soil samples were analyzed for the following: Title 22 metals, total petroleum hydrocarbons (TPH); organochlorine pesticides (OCPs), volatile organic compounds (VOCs), SVOCs, and polychlorinated biphenyls (PCBs). With the exception of metals, the samples analyzed were not detected above their respective laboratory reporting limits. Metal concentrations were found to be within background ranges for the study area.

In 2016, three soil borings (CPT-1, CPT-2, and CPT-3) were advanced within Bay C-7 to a maximum depth of 20 feet bgs and samples were collected every 5 feet. These samples were analyzed for TPH, VOCs, Title 22 metals, PCBs, OCPs, organophosphorus pesticides (OPPs), and chlorinated herbicides. With the exception of metals and TPH, the samples analyzed were not found above their respective laboratory reporting limits. As in the 2013 investigation, metal concentrations were found to be within background ranges for the study area. TPH as diesel (TPH-d) and TPH as motor oil (TPH-mo) were detected in the deepest sample from boring CPT-1 at concentrations of 97 and 270 milligrams per kilogram (mg/kg), respectively. TPH-d was detected in the CPT-3 boring at 20 feet bgs at a concentration of 6.5 mg/kg.

A review was also conducted for soil data in the vicinity of the proposed ship unloading pipelines. In 1999, one soil boring (NMB-10) was advanced southeast of Warehouse C in the vicinity of the planned ship

unloading pipeline. Soil samples were collected at 3, 5, and 7 feet bgs and analyzed for TPH and metals (copper, lead, and zinc). TPH was not found in the samples at concentrations above the laboratory reporting limit. Copper, lead, and zinc were present within background ranges for the study area.

In addition to the 2013 building pad investigation, a Hazardous Building Materials Survey (HBMS) of Bays C-8, C-10, C-12, C-13, and C-14 of Warehouse C was also completed in 2013 for an unrelated project. The survey was performed in accordance with established guidelines for the assessment of asbestos-containing materials (ACM) and lead-containing surfaces (LCS), and based upon conditions of the warehouse at the time of survey/assessment activities. Representative samples of suspect and previously identified ACMs were collected after a determination of homogeneous sampling areas. The testing was conducted by a California Department of Public Health (CDPH) certified Lead Inspector/Assessor.

Based on the results of the HBMS technical report and visual observations of Bays C-7 and C-9 that were made during an inspection on January 3, 2017, it has been determined that ACMs and LCS found in these bays are homogeneous and consistent with materials found in the rest of the warehouse. These materials include:

- Exterior perimeter concrete walls, at metal expansion joint plates – gray expansion joint caulking (Asbestos: 3 to 4 percent chrysotile).
- Exterior warehouse door – fire door (presumed ACM).
- Interior metal components throughout – I-beams, brackets, beam supports, lid supports, fire sprinkler pipe system, round columns (Lead: 7.40-18.90 milligrams per centimeter square [mg/cm^2]).

Regulatory Database Searches Prepared for the Proposed Project Site

The 2017 HMTS (Appendix E) was prepared to determine if a substantial change in circumstances has occurred since the TAMT Final PEIR was certified and included a record search of all available regulatory Federal, State, tribal, and local hazardous materials databases. The search and review was conducted to evaluate whether the Proposed Project site or properties within its vicinity have been documented as having experienced significant unauthorized releases of hazardous substances or other events with potentially adverse environmental effects. Table 4.3-1 identifies the properties/facilities that have been interpreted to represent a potential environmental concern based on their proximity to the Proposed Project site due to the nature of the database on which they are listed and/or the assumed direction of groundwater flow in the Proposed Project vicinity (tidally influenced). In addition, the results of an online supplementary database review are summarized in Table 4.3-2.

Table 4.3-1. Facilities of Potential Concern

Facility Name & Address	Distance and Direction from Proposed Project Site	Database(s)	Summary	New Information Since TAMT Final PEIR
Freight Handlers, Inc. 1790 Water Street	47 feet ESE	<ul style="list-style-type: none"> San Diego County Hazardous Materials Management Division (HMMD) San Diego County Site Assessment and Mitigation (SAM) Spills, Leaks, Investigation and Cleanup (SLIC) database by the RWQCB 	The facility has two closed unauthorized release cases (H25935-001 and -002). The type of release and potential contaminant of concern were not listed.	No
CEMEX Construction Materials Pacific LLC 1155 Terminal Drive	99 feet SSW	<ul style="list-style-type: none"> State Registered Aboveground Storage Tanks (AST) HMMD 	The facility operated a 1,947-gallon AST of unspecified contents. Hazardous materials/waste permitted at the facility include: gear and hydraulic oils, waste oil, diesel fuel, acetylene, oxygen gases, and used oil filters. No records pertaining to spills or unauthorized releases were found.	Yes
San Diego Unified Port District 1875 Water Street and 1444 Crosby Street	230 feet ESE	<ul style="list-style-type: none"> State Historic Hazardous Waste and Substances Sites (HIST-CORTESE) HMMD State GeoTracker Leaking Underground Fuel Tanks (LUST) SAM SLIC 	The property has one open and one closed case. The closed case (H24706-001) was a diesel release that impacted soil and groundwater. The open case (H24706-002) was a petroleum hydrocarbon release from former pipelines beneath a former portion of Water Street, between 1444 Crosby Street and 1875 Water Street, at the present-day Crosby Street Park. The impacts did not extend to the west of the park (toward TAMT).	No
Burlington Northern & Santa Fe Railway Company (Santa Fe Intermodal) 1342 Crosby Street	252 feet ESE	<ul style="list-style-type: none"> LUST Statewide Environmental Evaluation Planning System Underground Storage Tanks (SWEEPS-UST) 	<p>The facility has three closed unauthorized release cases (H00076-001 to -003). Case -001 was a voluntary assistance program (VAP) case that was opened for the planned construction and redevelopment of the railyard. Historical uses of potential concern included wood treating and storage, foundry operations, ASTs, USTs, and railroad operations. Contaminated soil was removed and/or treated onsite (bioventing). The case was closed in July 2008.</p> <p>Cases -002 and -003 were administratively combined. The cases involved six USTs containing gasoline, diesel, and oily water. The petroleum hydrocarbon release extended off the property to the southwest; however, did not extended onto the TAMT.</p>	No

Table 4.3-1. Facilities of Potential Concern

Facility Name & Address	Distance and Direction from Proposed Project Site	Database(s)	Summary	New Information Since TAMT Final PEIR
Tuna Clipper 1444 Crosby Street	252 feet ESE	<ul style="list-style-type: none"> ▪ HIST-CORTESE ▪ LUST ▪ SAM ▪ SLIC ▪ SWEEPS-UST 	The facility has two closed unauthorized release cases (H05633-001 and -002). The first case was reportedly a diesel release that impacted soil only and was closed in March 1997. The second case was reportedly a gasoline release that impacted soil and groundwater. The release case was opened in August 1992 and was closed in March 1997.	No
10th Avenue Marine Terminal 920 Gull Street	859 feet NNW	<ul style="list-style-type: none"> ▪ State Underground Storage Tanks (UST) 	The facility operated unspecified USTs. No records or spill of unauthorized releases were found.	No
Tenth Avenue Marine Terminal: Berths 10-1 and 10-2	—	<ul style="list-style-type: none"> ▪ State Land Disposal Site (LDS) 	The property is listed as a closed land disposal site. According to GeoTracker, the listing is related to Water Board Monitoring and Reporting Program No. 93-17, for TAMT maintenance dredging of the San Diego Bay. Approximately 18,420 tons of sediment were removed.	No

Source: Appendix E

Table 4.3-2. Supplemental Online Regulatory Database Search and Findings

Online Database/Website	Findings	New Information Since TAMT Final PEIR
Department of Toxic Substances Control (DTSC) EnviroStor	The Proposed Project site or adjacent properties was not listed.	No
DTSC Cortese List	The Proposed Project site's zip code was not listed.	No
State Water Resources Control Board (SWRCB) GeoTracker	The Proposed Project site was not listed. Freight Handlers, Inc. (1790 Water Street), was depicted adjacent to the southeast of Warehouse C within the TAMT. The facility has two closed unauthorized release cases (H25935-001 and -002). The type of release and potential contaminant of concern were not listed.	No
DTSC List of Facilities with Deed Restrictions	The Proposed Project site's zip code was not listed.	No
U.S. Army Corps of Civil Engineers Formerly Used Defense Sites (FUDS) Database	No FUDS properties were depicted within 0.5 mile of the Proposed Project site.	No

Source: Appendix E.

Emergency Access and Response

As described in the TAMT Final PEIR, the Proposed Project site is primarily accessed via Crosby Street, from the Harbor Drive/Cesar E. Chavez Parkway intersection. All vehicles entering the Proposed Project

site from this location must pass through a secured gate and are inspected prior to admittance. Switzer Street provides a secondary point of access into/out of the TAMT via the southern end of the Hilton Hotel parking facility and adjacent to the backlands of the Dole container facility.

The Proposed Project site is served by the City of San Diego Fire-Rescue Department (SDFD), the San Diego Harbor Police Department (HPD) for fireboat operations, and the City of San Diego Police Department (SDPD). Four SDFD fire stations—Fire Stations 1, 4, 7, and 11—are within 1.5 miles of the Proposed Project site and could respond in the event of an emergency (TAMT Final PEIR); however, Fire Station 7 is the immediate responder for the Proposed Project. Fire Station 7 is located at 944 Cesar E. Chavez Parkway, approximately 0.63 mile northeast of the Proposed Project site. Although not first responders, Fire Stations 1, 4, and 11 could also respond to the Proposed Project site. Fire Station 1 is located at 1222 1st Avenue, about 1.4 miles north of the site. Fire Station 4 is located at 404 8th Avenue, about 0.71 mile north of the site. Fire Station 11 is located at 945 25th Street, about 1.4 miles northeast of the site.

The HPD is the primary law enforcement presence within San Diego Bay and its tidelands, as well as the San Diego International Airport. Its jurisdiction extends through the five member cities of the District: San Diego, Chula Vista, Coronado, Imperial Beach, and National City. As of November 2017, the HPD had 130 sworn law enforcement officers, all of whom are cross-trained as firefighters and police officers (District 2017). The HPD monitors all land activity surrounding San Diego Bay, and provides law enforcement, vehicle patrols, marine and onshore firefighting, traffic enforcement, bicycle patrols, vessel patrols and maritime response, dive response, and incident investigations (District 2017).

The SDPD provides law enforcement services for areas within the District's jurisdiction that generate tax revenue for the City of San Diego, including the TAMT. The Proposed Project site is within the SDPD's Central Division, which is headquartered at 2501 Imperial Avenue. The Central Division serves a population of approximately 103,524 and encompasses 9.7 square miles (City of San Diego 2017a). The SDPD provides numerous community crime-related services, including emergency response, air support services, armory/special response services, criminal investigations, ground- and water-based patrols, and traffic and parking enforcement, among others (City of San Diego 2017b).

Proximity to Schools

As described in Section 4.7.2.6 of the TAMT Final PEIR, TAMT is approximately 0.21 mile west of Monarch K–12 School (1625 Newton Avenue, San Diego, CA 92113), and approximately 0.25 mile west of Perkins Elementary School (1770 Main Street, San Diego, CA 92113). Other schools nearby include Logan Elementary School approximately 0.93 mile to the east, Garfield High School approximately 1.05 miles to the north, San Diego High School approximately 1.1 miles north, and Washington Elementary School approximately 2.0 miles to the north.

The Proposed Project site, which is in the southeast portion of TAMT, is located approximately 0.38 mile (2,028 feet) west of the Monarch K–12 School, and an estimated 0.32 mile (1,700 feet) west of Perkins Elementary School. Other schools nearby include: Logan Elementary School, approximately 1.3 miles (6,864 feet) to the east; Garfield High School, approximately 1.35 miles (7,128 feet) to the north; San Diego High School, approximately 1.4 miles (7,392 feet) north; and Washington Elementary School, approximately 1.9 miles (10,032 feet) to the north.

4.3.1.2 Changes to the Regulatory Setting Disclosed in the TAMT Final PEIR

The applicable Federal, State, and local laws and regulations pertaining to hazards and hazardous materials are described in Section 4.7.3 of the TAMT Final PEIR. Additionally, CCR Section 5204, the

District's Burn Ash Management Plan for the Tenth Avenue Marine Terminal (2017), and the City of San Diego Municipal Code, Chapter 5, Article 5, Division 1: Adoption of the 2016 California Fire Code would apply and are described below.

Federal

- Federal Toxic Substances Control Act/Resource Conservation and Recovery Act/Hazardous and Solid Waste Act
- Department of Transportation Hazardous Materials Regulations (49 CFR 100–185)
- United States Coast Guard 33 CFR and 46 CFR
- Emergency Planning and Community Right-To-Know Act (42 U.S.C. 11001 et seq.)
- Occupational Safety and Health Act of 1970

State

- Cortese List
- California Health and Safety Code (Hazardous Waste Control Act)
- Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (California Health and Safety Code)
- Hazardous Waste Control Act (Health & Safety Code Section 25100 et seq.)
- Environmental Health Standards for the Management of Hazardous Waste
- California Code of Regulations, Title 8—Industrial Relations
- California Labor Code (Division 5, Parts 1 and 7)
- State Water Resources Control Board Construction General Permit (2009-0009-DWQ)

California Code of Regulations, Section 5204, Occupational Exposures to Respirable Crystalline Silica

Section 5204 of the California Code of Regulations applies to all occupational exposures to respirable crystalline silica and includes standards adopted to protect workers from the health effects of silica. These standards cover all maritime and general industries except agriculture, which is exempt from the general industry standard. The maritime and general industry standards became effect on June 23, 2018.

Regional

- San Diego County Code, Title 6, Division 8
- County of San Diego Operational Area Emergency Operations Plan

Local

- City of San Diego Solid Waste Local Enforcement Agency
- Jurisdictional Runoff Management Plan
- BMP Design Manual
- San Diego Unified Port District, Article 10

Burn Ash Management Plan for the Tenth Avenue Marine Terminal

The District's adopted *Burn Ash Management Plan for the Tenth Avenue Marine Terminal* (Tetra Tech 2017) or BAMP is the most recent revision to the Soil Management Plan described in the TAMT Final PEIR. For all proposed soil disturbances at the TAMT, including any disturbance at the Project site, the BAMP provides guidance, protocols, and procedures for soil sampling, excavation, air monitoring, dust control, soil stockpiling, soil characterization, analytical testing, and the transportation of excavated soil offsite as deemed necessary by project/site-specific analytical testing and characterization (Appendix E). The BAMP specifies and helps to ensure all that all proposed excavation and soil handling work will comply with applicable local, State, and Federal regulations, as well as all health and safety requirements and in accordance with project/site-specific requirements of County DEH, RWQCB, the California Department of Resources Recycling and Recovery (CalRecycle), and the City of San Diego Development Services Department, which is the District's designated solid waste Local Enforcement Agency (LEA). The BAMP is incorporated by reference and is available for review at the Office of the District Clerk.

City of San Diego Municipal Code, Chapter 5, Article 5, Division 1: Adoption of the 2016 California Fire Code

The City of San Diego's fire code consists of portions of the 2016 California Fire Code adopted by the City in Section 55.0101 with changes as specified in Chapter 5, Article 5, of the municipal code; Section 55.0101 through 55.9401 of Chapter 5, Article 5, of the municipal code; and applicable sections of the California Code of Regulations. The 2016 California Fire Code, which incorporates and amends the International Fire Code (2015 Edition), including adopted appendices, is adopted through Section 55.0101(a) of the City's municipal code. The 2016 California Fire Code is intended to establish the minimum requirements to safeguard public health, safety, and general welfare from the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures, and premises, and to provide safety and assistance to fire fighters and emergency responders during emergency operations. The code applies to the construction, alteration, movement, enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal, and demolition of every building or structure or any appurtenances connected or attached to such building structures.

4.3.2 Analysis of New or More Severe Impacts

4.3.2.1 Methodology

The following impact analysis evaluates the effects from hazards and hazardous materials that may result with the implementation of the Proposed Project. Based upon the environmental setting of the Proposed Project site (as described in Section 4.3.1.1, *Changes to the Environmental Setting Disclosed in the TAMT Final PEIR*), the impact analysis assesses whether the Proposed Project would result in a new or more severe impact pursuant to the thresholds identified below.

4.3.2.2 Thresholds of Significance

The significance criteria used to evaluate potential hazards and hazardous materials impacts are based on Appendix G of the State CEQA Guidelines. The significance criteria used in the impact analysis below are consistent with the criteria used in the TAMT Final PEIR for hazards and hazardous materials. The determination of whether an impact would be significant is based on the applicable thresholds and the professional judgment of the District as Lead Agency supported by evidence in the administrative record.

The December 2018 update to the Appendix G checklist related to hazards and hazardous materials generally made a few small changes to the previous questions and removed one question. Table 4.3-3

illustrates the relationship between the TAMT Final PEIR thresholds and the new Appendix G checklist questions. Except for the inclusion of excessive noise under threshold e, there are no meaningful changes to the Appendix G thresholds. Moreover, excessive noise from airports is addressed in Section 4.4, *Noise and Vibration*, of this SEIR.

Table 4.3-3. Comparison of TAMT Final PEIR Appendix G Questions and the Updated Appendix G Questions

TAMT Final PEIR Appendix G Questions	New Appendix G Questions	Comparison
Would the project...	Would the project...	
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	No change.	Not applicable.
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	No change.	Not applicable.
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	No change.	Not applicable.
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	No change.	Not applicable.
e) Create a safety hazard or for people residing or working in a project area that is located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport?	e) Create a safety hazard or excessive noise for people residing or working in a project area that is located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport?	The TAMT Final PEIR threshold includes the same issue as the new Appendix G threshold; however, the new Appendix G threshold adds excessive noise as a potential impact. This addition is addressed in Section 4.3, <i>Noise and Vibration</i> , of this SEIR. As such, the TAMT Final PEIR thresholds already address this issue.

Table 4.3-3. Comparison of TAMT Final PEIR Appendix G Questions and the Updated Appendix G Questions

TAMT Final PEIR Appendix G Questions	New Appendix G Questions	Comparison
f) Create a safety hazard for people residing or working in a project area that is located within the vicinity of a private airstrip?	Removed.	This question was eliminated from Appendix G.
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	No change.	Not applicable.
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	h) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands	The new Appendix G threshold simply adds "directly or indirectly". Project impacts, which include both direct and indirect impacts, are still required to be addressed by CEQA.

Therefore, for consistency purposes, the analysis uses the Appendix G questions used in the TAMT Final PEIR because they do not differ in any substantive way (see Table 4.3-3). Impacts are considered significant if the Proposed Project would result in any of the following:

1. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
2. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.
3. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.
4. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment.
5. Create a safety hazard for people residing or working in a project area that is located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport.
6. Create a safety hazard for people residing or working in a project area that is located within the vicinity of a private airstrip.
7. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
8. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

As discussed in the Initial Study/Environmental Checklist prepared for the Proposed Project (Appendix A), Thresholds 3, 4, 5, 6, and 8 are not included in the analysis below as it was determined that the Proposed Project would not result in a significant impact requiring mitigation for the same reasons as documented in the TAMT Final PEIR. In addition, none of the changes to the Appendix G questions identified in Table 4.3-3 above would alter the conclusions for these thresholds in the Initial Study prepared for the Proposed Project. Therefore, the analysis focuses only on potential impacts related to Thresholds 1, 2, and 7.

The TAMT Final PEIR assumed that Warehouse C would be demolished to provide 20 acres of open space storage. Its demolition would enable the District to establish an expanded on-dock rail facility to broaden customer access to rail if market conditions allow. Under the Proposed Project, Warehouse C would not be demolished and its operations would continue for the duration of the Proposed Project's lease. Therefore, the TAMT Final PEIR's impact analysis for demolition of Warehouse C does not apply to implementation of the Proposed Project.

4.3.2.3 Project Impacts and Mitigation Measures

Threshold 1: Implementation of the Proposed Project *would not* create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

TAMT Final PEIR Discussion

The TAMT Final PEIR concluded that activities associated with construction and operation of buildout of the TAMT Plan, including the increased throughput of dry bulk cargo such as that proposed by the Project, would not result in a significant impact on the public or the environment due to the routine transport, use, or disposal of hazardous materials. Although construction and operation would require the use, storage, transport and disposal of hazardous materials, such as fuels, solvents, paints, oils, and grease, the handling of these materials would be undertaken in accordance with all applicable Federal, State, and local laws and regulations. As such, impacts were determined to be less than significant.

Project Impact Discussion

Construction

Consistent with the analysis provided in the TAMT Final PEIR, construction of the Proposed Project would result in increases in the amounts of common types of hazardous materials typical for the TAMT (e.g., fuel, cleaning products and solvents, paints, oils, and grease associated with equipment operation and maintenance). Proposed improvements to Warehouse C and earth disturbance/excavation associated with a subterranean pipeline under Unloading Option 1 and the facility's truck scales and loading racks may also potentially release hazardous materials, such as ACMs requiring offsite transport to an appropriately designated landfill. However, none of the hazardous materials sites within the TAMT that are identified in Section 4.3.1.1 would be directly or indirectly disturbed as a result of the Proposed Project's construction, including sites containing radioactive materials or burn ash (dioxins or furans) or areas containing existing or historic transformers that would require offsite disposal.

Consistent with the program-level construction analysis provided within the TAMT Final PEIR, the Proposed Project's transport, use, and disposal of all hazardous materials during construction, including any ACMs encountered during improvements at Warehouse C, would occur in accordance with applicable local, State, and Federal regulations, as well as the District's BAMP. Implementation of the Proposed Project would require full compliance with the specifications of the BAMP, as well as obtaining all local, State, and Federal agency hazardous material permits, where applicable.

Therefore, potential impacts would be less than significant, and no mitigation measures are required. This conclusion is consistent with the findings of the TAMT Final PEIR and the Proposed Project would not result in new or more severe significant impacts than what was previously disclosed in the TAMT Final PEIR.

Operation

Operation of the Proposed Project would be limited to the routine vessel unloading, storage, and truck distribution of cementitious materials. Cementitious materials would be pneumatically unloaded from vessels using up to two 400 metric ton per hour mobile vacuum unloaders. The pneumatic unloading would provide for a closed, self-contained system minimizing the inadvertent release of materials. Similarly, the facility would be equipped with dust collectors and truck loading racks having dust control spouts to minimize the accidental escape or emission of materials. Haul trucks would be required to meet the CARB's emissions standards and follow the City-adopted transportation routes to minimize effects on the surrounding community per City Resolution R-312086 (City of San Diego 2018). Although common types of materials for equipment operation and maintenance, such as fuels, solvents, oils and grease, may be stored and used as part of Project operation, their storage, use, and disposal would be required to comply with all applicable Federal, State, and local laws, ordinances, regulations, and standards, including the City of San Diego's Fire Code, subject to approval by the City of San Diego's Fire Department. Therefore, operation would result in less-than-significant impacts, and no mitigation measures are required. This conclusion is consistent with the findings of the TAMT Final PEIR and the Proposed Project would not result in a new or more severe impact than what was previously disclosed in the TAMT Final PEIR.

Level of Significance prior to Mitigation

Construction and operation of the Proposed Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. The Proposed Project would not result in a new or more severe impact than those already disclosed within the TAMT Final PEIR. Impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Level of Significance after Mitigation

The Proposed Project would not result in a new or more severe impact than what was already disclosed within the TAMT Final PEIR. Impacts would be less than significant.

Threshold 2: Implementation of the Proposed Project *would not* create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

TAMT Final PEIR Discussion

Construction

The TAMT Final PEIR concluded that the presence of contaminated soils within the TAMT could expose construction workers to such soils during excavation, grading, and demolition activities, but with incorporation of mitigation measures **MM-HAZ-1** and **MM-HAZ-2**, the potential significant impact would

be reduced to a less-than-significant level. In addition, hazardous materials, such as fuels, solvents, paints, oils, and grease, would be used during construction-related activities and that it is possible that limited quantities of any of these substances could be released during construction. However, the TAMT Final PEIR concluded that compliance with Federal, State, and local regulations, in combination with implementation of construction-related BMPs, would reduce impacts to a less-than-significant level. The TAMT Final PEIR also identifies potential construction-related impacts associated with exposure to ACMs and LBPs due to the age of existing onsite structures, including Warehouse C; however, the TAMT Final PEIR concluded that the handling of such materials would be required to comply with Title 8, Industrial Relations, of the California Code of Regulations, which provides specific guidance on removal and disposal of ACMs and LBPs, which would ensure that the removal of such materials is conducted in a safe manner, including proper disposal in an approved facility. As such, impacts were determined to a less-than-significant level.

Operation

The TAMT Final PEIR concluded that full buildout of the TAMT Plan, including an increase in dry bulk cargo throughput like that proposed by the Project, would not be expected to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Continued TAMT operations under full buildout would involve storage space for marine terminal operations, including handling of dry bulk, refrigerated perishable commodities, and neo bulk/break bulk/general cargo. However, all materials would be stored and handled in accordance with Federal, State, and local regulations and subject to inspection and requirements of the County DEH HMD, the local CUPA. Similarly, the TAMT Final PEIR concluded that the continued storage of oil and fuel within onsite storage tanks would occur in compliance with Federal, State, and local regulations. Impacts were determined to be less than significant.

Project Impact Discussion

Construction

Construction of the Proposed Project would occur in two phases, with Bays C-7 and C-9 upgraded first (Phase I), followed by Bays C-8 and C-10 (Phase II). The five principal construction activities would include: (1) concrete demolition and excavation, (2) foundation and concrete pouring (which includes the installation of the support piles for the truck loadout area), (3) roof demolition and repair, (4) installation of mechanical equipment; and, (5) electrical tie-ins. Each phase of construction would take an estimated 7–10 months to complete. Section 3.3, *Project Construction*, details the construction-related activities and improvements of both phases.

Total excavation for the most impactful construction alternative (Loading Option A [interior truck loading] and Unloading Option 1 [underground pipeline]) would be approximately 20,220 cubic yards (cy) of soil (including both construction phases), all of which would be exported offsite. It is estimated that up to 20,220 cy of imported material would be necessary.

Soil Disturbances

As detailed in the TAMT Final PEIR, previous assessments of the TAMT found TPHs, SVOCs, PAHs, and metals (copper, zinc, and lead) as a result of hydraulic fill material used for the reclaimed tidelands, historical uses (creosote wood treatment facility, former burn dump, metal scrap yard), and from unauthorized petroleum hydrocarbon releases in the vicinity of the Proposed Project site.

However, as outlined in Section 4.3.1.1, VOCs, PCBs, OCPs, OPPs, and chlorinated herbicides are not present, and none of the 13 Title 22 metals identified exceed Federal and State hazardous waste thresholds.¹ Additionally, arsenic concentrations do not exceed 4.01 mg/kg, which falls under the DTSC's 12 mg/kg upper background level; however, these concentrations do exceed the California Human Health Screening Level (CHHSL) for commercial land uses (0.24 mg/kg) (Group Delta Consultants, Inc. 2017b). Detected TPH at a depth of 20 feet bgs was found to contain diesel and motor oil concentrations of 97 mg/kg and 6.5 mg/kg (diesel) and 270 mg/kg (motor oil). It is noted that TPH concentrations have not been assigned State or Federal hazardous waste thresholds.

In addition, as indicated by the results of soil and concrete testing completed for the TAMT since 2002 (see TAMT Final PEIR Appendices J-4 through J-8), no unsafe levels of toxins, including radioactive materials and burn ash, have been identified that could be inadvertently released, and its soils are considered suitable for reuse or disposal as discussed in the TAMT Final PEIR. This information has been subsequently verified in the adopted BAMP.

Exported soil would be suitable for disposal at a Class III municipal solid waste facility, although TPH, lead, and mercury levels detected at 20 feet bgs exceed Tier I Screening Levels for residential reuse as stipulated by the RWQCB in Condition Waiver Number 10 (CW10), of Resolution R9-2014-0041 and the DEH's SAM Manual. However, identified lead and mercury concentrations do not exceed Tier 2 Soil Screening Levels for commercial use. As a consequence, excavated materials should be resampled and retested, in accordance with **MM-HAZ-1R**, to determine their eligibility for reuse under the oversight of the San Diego RWQCB (Group Delta Consultants, Inc. 2017b).

The presence of the materials noted above (TPH, lead, and mercury) could create a hazard to the public or the environment during soil disturbance activities, resulting in a potentially significant impact. However, with mandatory compliance with Federal, State, and local laws and regulations, and implementation of Mitigation Measure **MM-HAZ-1R** and TAMT Final PEIR Mitigation Measure **MM-HAZ-2**, impacts would be less than significant because all necessary protocols would be established and followed for the proper management of potentially contaminated soils, community health and safety monitoring, and construction worker training/monitoring. These protocols would minimize the risk of reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. With implementation of mitigation measures and full adherence to applicable laws, ordinances, regulations and standards, impacts would be less than significant. This conclusion is consistent with the findings of the TAMT Final PEIR and the Proposed Project would not result in new or more severe significant impacts than what was previously disclosed in the TAMT Final PEIR.

Hazardous Building Materials

The 2013 HBMS (see Section 4.3.1.1) of Bays C-8, C-10, C-12, C-13, and C-14 of Warehouse C identified several building components with ACMs and LCSs. Additional site reconnaissance conducted in January 2017 found that building materials within Bays C-7 and C-9 were homogeneous with materials present in the rest of the warehouse (Appendix E). As a consequence, any demolition activities associated with Warehouse C would have the potential to cause hazards to the public or the environment through the accidental release of known hazardous materials (ACMs and LCSs). However, all construction-related

¹ In the early 1990s, the District's General Services Department contracted with a company to remove all oil containing PCB from remaining transformers on the TAMT, as required by Federal regulations. Based on subsequent PCB testing conducted in 2013, no transformers associated with TAMT Warehouse C contain PCBs that could be accidentally released due to construction and operation of the Proposed Project.

activities associated with Warehouse C would be required to (1) comply with California Code of Regulations, Title 8, Industrial Relations, which provides specific guidance for removal and disposal of ACMs and LCSs, including their treatment by a licensed abatement contractor, and (2) implement the District's Hazardous Building Material Abatement Specifications for the TAMT, Warehouse C and Transit Shed No.1 (Ninyo & Moore 2013). With implementation of these regulations and specifications, impacts would be less than significant, and no mitigation measures are required. This conclusion is consistent with the findings of the TAMT Final PEIR and the Proposed Project would not result in new or more severe impacts than what was previously disclosed in the TAMT Final PEIR.

Operation

Cement and cementitious materials such as slag, fly ash, and pozzolans are not combustible and have a relatively low risk of causing hazards to the public or the environment due to their accidental release. The storage and distribution of cement and cementitious materials would require compliance with all applicable Federal, State, and local regulations. The distribution (trucking) of materials would be required to meet the CARB's emissions standards and follow the City-adopted transportation routes to minimize effects on the surrounding community per City Resolution R-312086 (City of San Diego 2018). The prohibited routes apply to all commercial vehicles with a weight of 5 tons or greater. Operation of the Proposed Project would also require the use of small quantities of hazardous materials, such as oil and lubricants, to run and maintain equipment; however, the use and storage of these materials would also be required to comply with all applicable Federal, State, and local regulations, including standardized plans and countermeasure actions to ensure that any accidents are quickly contained, cleaned up, and reported. Additionally, operation of the Proposed Project would be subject to routine inspections by the District and in cases where hazardous materials may be stored, by the San Diego Fire Department and County DEH. As such, operation of the Proposed Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. This conclusion is consistent with the findings of the TAMT Final PEIR and the Proposed Project would not result in a new or more severe significant impact than what was previously disclosed in the TAMT Final PEIR.

Level of Significance prior to Mitigation

Construction of the Proposed Project has the potential to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Operation of the Proposed Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. These conclusions, prior to mitigation, are consistent with the findings of the TAMT Final PEIR and the Proposed Project would not result in a new or more severe significant impact than what was previously disclosed in the TAMT Final PEIR.

Mitigation Measures

Table 4.3-4 provides a comparison summary of construction and operational hazards and hazardous materials mitigation measures previously identified in the TAMT Final PEIR for the TAMT Plan and how those mitigation measures apply to the Proposed Project. In instances where modification of the TAMT Final PEIR mitigation measures is necessary, the changes are indicated in Table 4.3-4 with an "R," including explanatory text.

Table 4.3-4. Comparison of Hazards TAMD Final PEIR Mitigation Measures to Proposed Project Draft SEIR Mitigation Measures

<p>TAMD Final PEIR Mitigation Measure The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMD Plan, adopted by the District in December 2016 as part of the Final Program Environmental Impact Report for the TAMD Plan.</p>	<p>Mitsubishi Cement Corporation Project SEIR Mitigation Measure <i>Project mitigation measures are a combination of applicable TAMD Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMD Final PEIR mitigation measures are provided with additions shown in <u>double underline</u> and deletions indicated in strikeout format.</i></p>	<p>Project Applicability/Reason for Modification or New Project Mitigation Measure</p>
HAZARDS AND HAZARDOUS MATERIALS		
<p>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 <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> <ul style="list-style-type: none"> • <i>Conduct Soil Testing.</i> 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 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 	<p>MM-HAZ-1R: Compliance with <u>Burn Ash Soil Management Plan</u>. Prior to approval of the <u>Project</u> grading plans and the commencement of any construction activities that would disturb the soil, the District or tenant, whichever is appropriate, the <u>Mitsubishi Cement Corporation Project Proponent</u> and the contractor (collectively “Contractor”) shall demonstrate compliance with the <u>Burn Ash Management Plan – Tenth Avenue Marine Terminal, San Diego, California, prepared by Tetra Tech, Inc., June 30, 2017</u> 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 <u>Burn Ash Management Plan</u> plan including, but not limited to, the following.</p> <ul style="list-style-type: none"> ▪ <i>Conduct Soil Testing.</i> The Contractor shall comply with the excavated soil management techniques specified in the plan <u>Burn Ash Management Plan</u>. The Contractor shall follow the soil sampling protocol and soil sampling objectives, and shall comply with the soil characterization methodology identified within the <u>Burn Ash Management Plan</u> plan. ▪ <i>Prepare and Implement a Community Health and Safety <u>Plan</u> Program.</i> The Contractor shall develop and implement a <u>Project</u> site-specific Community Health and Safety <u>Plan</u> Program (Program) that addresses the chemical constituents of concern for 	<p>MM-HAZ-1 applies to the Proposed Project. Modifications to MM-HAZ-1R are limited to identifying updates to the Burn Ash Management Plan and soil disposal. The presence of the permitted underground storage tank (UST) does not apply to the Proposed Project as the UST is not located where the Proposed Project would be located (Warehouse C).</p>

Table 4.3-4. Comparison of Hazards TAMT Final PEIR Mitigation Measures to Proposed Project Draft SEIR Mitigation Measures

<p>TAMT Final PEIR Mitigation Measure <i>The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMT Plan, adopted by the District in December 2016 as part of the Final Program Environmental Impact Report for the TAMT Plan.</i></p>	<p>Mitsubishi Cement Corporation Project SEIR Mitigation Measure <i>Project mitigation measures are a combination of applicable TAMT Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMT Final PEIR mitigation measures are provided with additions shown in <u>double underline</u> and deletions indicated in strikeout format.</i></p>	<p>Project Applicability/Reason for Modification or New Project Mitigation Measure</p>
<p>accordance with the County of 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.</p> <ul style="list-style-type: none"> • <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>If soils are determined to be hazardous and not suitable for reuse, they shall be disposed of at a regulated Class I</p>	<p>the Project project site. The guidelines of the <u>Health and Safety Plan Program</u> shall be in accordance with the County of San Diego's Department of Environmental Health's Site Assessment and Mitigation Manual (2017)(2009) and Environmental Protection Agency. <u>The Health and Safety Plan Program</u> 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 project site to approve the <u>Health and Safety Plan Program</u> and actively monitor compliance with the <u>Health and Safety Plan Program</u> during construction activities.</p> <ul style="list-style-type: none"> ■ <i>Complete Soil Disposal.</i> Any soil disturbed by construction activities shall be profiled and disposed of in accordance with California Administrative Code <u>of Regulations</u>, 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 or used 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>If soils are determined to be hazardous and not suitable for reuse, they shall be disposed of at a</p>	

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<p>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>regulated Class I landfill. Soils shall be transported in accordance with the Soil <u>Burn Ash</u> 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 5.6 <u>4.7</u>, Dust Control, of the <u>Burn Ash</u> 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>MM-HAZ-2: Implement Engineering Controls and Best Management Practices during Construction. 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>	<p>MM-HAZ-2: Implement Engineering Controls and Best Management Practices during Construction. 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 Federal 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>	<p>MM-HAZ-2 applies to the Proposed Project. No modifications to MM-HAZ-2 are proposed for the Project.</p>

Table 4.3-4. Comparison of Hazards TAMT Final PEIR Mitigation Measures to Proposed Project Draft SEIR Mitigation Measures

<p>TAMT Final PEIR Mitigation Measure <i>The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMT Plan, adopted by the District in December 2016 as part of the Final Program Environmental Impact Report for the TAMT Plan.</i></p>	<p>Mitsubishi Cement Corporation Project SEIR Mitigation Measure <i>Project mitigation measures are a combination of applicable TAMT Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMT Final PEIR mitigation measures are provided with additions shown in <u>double underline</u> and deletions indicated in strikeout format.</i></p>	<p>Project Applicability/Reason for Modification or New Project Mitigation Measure</p>
<ul style="list-style-type: none"> ▪ 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. ▪ Contractor shall monitor the area around the construction site for fugitive vapor emissions with appropriate field screening instrumentation. ▪ 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. ▪ Contractor shall water/mist soil as it is being excavated and loaded onto transportation trucks. ▪ Contractor shall place any stockpiled soil in areas shielded from prevailing winds and shall cover all stockpiles to prevent soil from eroding. ▪ Contactor shall thoroughly decontaminate all construction equipment that has encountered and/or handled lead-impacted soil prior to leaving the work site. 	<ul style="list-style-type: none"> ▪ 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. ▪ Contractor shall monitor the area around the construction site for fugitive vapor emissions with appropriate field screening instrumentation. ▪ 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. ▪ Contractor shall water/mist soil as it is being excavated and loaded onto transportation trucks. ▪ Contractor shall place any stockpiled soil in areas shielded from prevailing winds and shall cover all stockpiles to prevent soil from eroding. ▪ Contactor shall thoroughly decontaminate all construction equipment that has encountered and/or handled lead-impacted soil prior to leaving the work site. 	

Level of Significance after Mitigation

With implementation of Mitigation Measures **MM-HAZ-1R** and **MM-HAZ-2**, potential construction-related impacts associated with creating 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. Operational impacts would be less than significant because of existing regulations and regulatory agency oversight. The Proposed Project would not result in a new or more severe significant impact than what was already disclosed within the TAMT Final PEIR. Impacts would be less than significant with mitigation incorporated.

Threshold 7: Implementation of the Proposed Project *would not* impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

TAMT Final PEIR Discussion

The TAMT Final PEIR specifies that buildout of the TAMT Plan would be required to comply with applicable requirements set forth by the County of San Diego Office of Emergency Services' Operational Area Emergency Operations Plan, the SDFD, and the SDPD. Additionally, emergency response coordination is facilitated by the Operational Area Emergency Operations Center and responding agencies, including the SDPD, SDFD, and HPD. The TAMT Final PEIR concludes that impacts related to an adopted emergency response plan or emergency evacuation plan would be less than significant.

Project Impact Discussion

Construction

Construction of the Proposed Project would occur in two phases, each of which would take an estimated 7–10 months to complete. The estimated maximum number of onsite construction personnel during each phase would be 50. All onsite construction personnel and delivery trucks would use established TAMT access roads and park in existing designated parking spaces adjacent to Warehouse C. During construction-related activities, there would be the potential for an emergency incident to occur within or adjacent to the boundaries of the Proposed Project site. Such an event could require emergency response from the responders identified in Section 4.3.2.3, *Emergency Access and Response*.

Construction of the Proposed Project would be in compliance with all applicable requirements set forth by the County of San Diego Operational Area Emergency Operations Plan, as well as the HPD, SDPD, and SDFD. Because construction would be required to follow all emergency-related protocols and procedures specified by emergency responders, and would not expand the existing boundaries of the TAMT, impacts related to the implementation of an adopted emergency response plan or emergency evacuation plan would be less than significant, and no mitigation measures are required. This conclusion is consistent with the findings of the TAMT Final PEIR. The Proposed Project would not result in a new or more severe significant impact than what was already disclosed within the TAMT Final PEIR.

Operation

The portion of Warehouse C that would be used during operation of the Proposed Project is currently serviced by two fire hydrants, one each on the water and land sides of the building. Additionally, the Proposed Project's operation involves the storage of non-combustible cement and cementitious materials. Nonetheless, an upset condition requiring emergency response could occur during operation of the Proposed Project, either within or adjacent to its site boundaries. However, as with construction,

operation of the Proposed Project would be required to follow all emergency-related protocols and procedures specified by emergency responders, and would not expand the existing boundaries or overall operational parameters and capacity of the TAMT. Therefore, impacts related to impairing implementation of, or physically interfering with, an adopted emergency response plan or emergency evacuation plan would be less than significant, and no mitigation measures are required. This conclusion is consistent with the findings of the TAMT Final PEIR. The Proposed Project would not result in a new or more severe significant impact than what was already disclosed within the TAMT Final PEIR.

Level of Significance prior to Mitigation

Construction and operation of the Proposed Project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant and the Proposed Project would not result in a new or more severe impact than what was already disclosed within the TAMT Final PEIR.

Mitigation Measures

No mitigation measures are required.

Level of Significance after Mitigation

The Proposed Project would not result in a new or more severe impact than what was already disclosed within the TAMT Final PEIR.

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4.4 Noise and Vibration

This section describes any changes in noise and vibration circumstances surrounding the Proposed Project's potential approval and implementation since certification of the TAMT Final PEIR in December 2016. This section also evaluates the Proposed Project's potential to result in new or more severe noise or vibration impacts than what was determined in the TAMT Final PEIR. Specifically, the impact analysis considers whether the Proposed Project would: (1) expose persons to, or generate, noise levels in excess of established standards; (2) expose persons to, or generate, excessive groundborne vibration levels; (3) result in a substantial permanent increase in ambient noise levels; or (4) result in a substantial temporary or periodic increase in ambient noise levels.

These four significance criteria are based on the checklist questions contained in Appendix G of the State CEQA Guidelines at the time the TAMT Final PEIR was prepared. Appendix G of the State CEQA Guidelines was updated in December 2018. Therefore, the specific threshold questions utilized in the TAMT Final PEIR for noise and vibration are not the same as those in the current Appendix G checklist. However, both versions of Appendix G address the same underlying noise and vibration issues, and an assessment using either version will result in the same significance determination for a project. For the purpose of consistency between the TAMT Final PEIR and this SEIR, the analysis is presented using the previous checklist questions. This approach allows for a clearer comparison of any new or more severe significant impacts than what was disclosed in the TAMT Final PEIR. Additional discussion of Appendix G of the State CEQA Guidelines is provided in Section 4.4.3.2, *Thresholds of Significance*.

The basis for any new noise and vibration analysis of the Proposed Project contained herein (i.e., beyond the relevant information and analyses already provided by the TAMT Final PEIR) is based on *Navcon Engineering Report No. 163494 [Rev I], Noise and Groundborne Vibration Impact Assessment for Mitsubishi Cement Corporation at Warehouse C: Bulk Cement Warehouse and Loading Facility Project* (Appendix F).

4.4.1 Noise and Vibration Fundamentals

Noise and vibration fundamentals and the definition of acoustical terms are described in the TAMT Final PEIR, Section 4.9.1.1 *Noise Fundamentals* (PEIR pages 4.9-2 to 4.9-7) and Section 4.9.1.2 *Environmental Vibration Fundamentals* (PEIR page 4.9-7). The same information is applicable to the analysis of the Proposed Project and is incorporated herein by reference.

4.4.2 Circumstances Surrounding Project Implementation

4.4.2.1 Changes to the Environmental Setting Disclosed in the TAMT Final PEIR

Noise-sensitive land uses are generally defined as locations where people reside or where the presence of unwanted sound could otherwise adversely affect the use of the land. As described above, noise-sensitive land uses typically include residences, hospitals, schools, libraries, and certain types of passive recreational uses. Guest lodging facilities, such as hotels, are not considered by the District to be sensitive to daytime noise from project construction or operation; however, they are considered to be sensitive to potential evening and nighttime noise (i.e., noise generated by Project construction or operation between 7 p.m. and 7 a.m.).

The environmental setting for noise is described in the TAMT Final PEIR, in Section 4.9.2, *Existing Conditions* (pages 4.9-7 to 4.9-10). Supplemental noise measurements were also obtained as part of the

Noise and Groundborne Vibration Impact Assessment (Navcon 2018). These new measurements are helpful because they provide additional detail beyond what was included in the TAMT Final PEIR. For instance, they cover additional receivers or extend the duration of the gathered data. For ease of reference, a summary of the pertinent information from both sources is provided below and used to define the environmental setting.

The following noise sensitive land uses surrounding the Project site were identified in the TAMT Final PEIR.

- Embarcadero Marina Park South
- Hilton Bayfront Hotel (sensitive to evening and nighttime noise only)
- Bayfront Park (adjacent to Hilton Bayfront Hotel)
- Cesar Chavez Park (south of the project site)
- Single- and multi-family residences
- Perkins Elementary School
- Monarch School

These locations are shown on Figure 4.9-1 of the TAMT Final PEIR. The *Noise and Groundborne Vibration Impact Assessment* also noted the presence of the Coronado Island Marriott Resort and Spa.

A total of eight noise measurements were used to describe the existing ambient noise environment in the TAMT Final PEIR. These included both long-term (LT) (minimum 24-hour) and short-term (ST) (minimum 15 minute) measurements. Details are provided in the TAMT Final PEIR, in Section 4.9.2.1 *Long-term Noise Measurements* (PEIR pages 4.9-8) and Section 4.9.2.2 *Short-term Noise Measurements* (PEIR pages 4.9-8 to 4.9.10). A brief summary of the measurement locations is provided below.

Long-term (LT) ambient noise measurements were conducted at two locations between April 6 and April 7, 2015. LT-1 was located at the Broadstone Coronado on the Bay Apartments. LT-2 was located at Embarcadero Marina Park South.

15-minute short-term noise measurements were conducted at three locations on April 6, 2015. ST-1 was located at Cesar Chavez Park. ST-2 was located adjacent to the Mercado del Barrio Mixed-Use Residential/Commercial development. ST-3 was conducted at Perkins Elementary School. ST-4 was an extended short-term measurement that collected 6 hours of noise level data adjacent to residences at 1855 and 1861 Newton Avenue; this measurement also occurred on April 6, 2015.

As supplemental background information, two additional short-term measurements were included from a prior noise study in the project vicinity. ST-5 and ST-6 were both 15-minute noise measurements obtained in 2011. ST-5 was located adjacent to the outdoor dining patio of McCormick and Schmick's on the Ground Floor of the Omni San Diego Hotel. ST-6 was located at the Crown Bay Condominiums at 350 K Street.

As part of the *Noise and Groundborne Vibration Impact Assessment* (Navcon 2018), an environmental noise survey was conducted February 16–17, 2017, to characterize the ambient noise environment at five noise-sensitive land uses surrounding the Proposed Project site.

The data was collected using two noise monitoring terminals (NMTs) for long-term measurements and one roving noise monitor (RNM) for short-term measurements. The NMTs were stationary and collected data continuously over a 24-hour period between February 16, and February 17, 2017. The RNM was moved between locations sampling the noise for 15 minutes per hour on February 16, 2017 (8:00 a.m.,

10:00 a.m., 1:00 p.m., 5:00 p.m., and 10:00 p.m.) and February 17, 2017 (2:00 a.m.). The five measurement locations are listed below and shown in Figure 4.4-1. Table 4.4-1 provides the results of the ambient noise measurements.

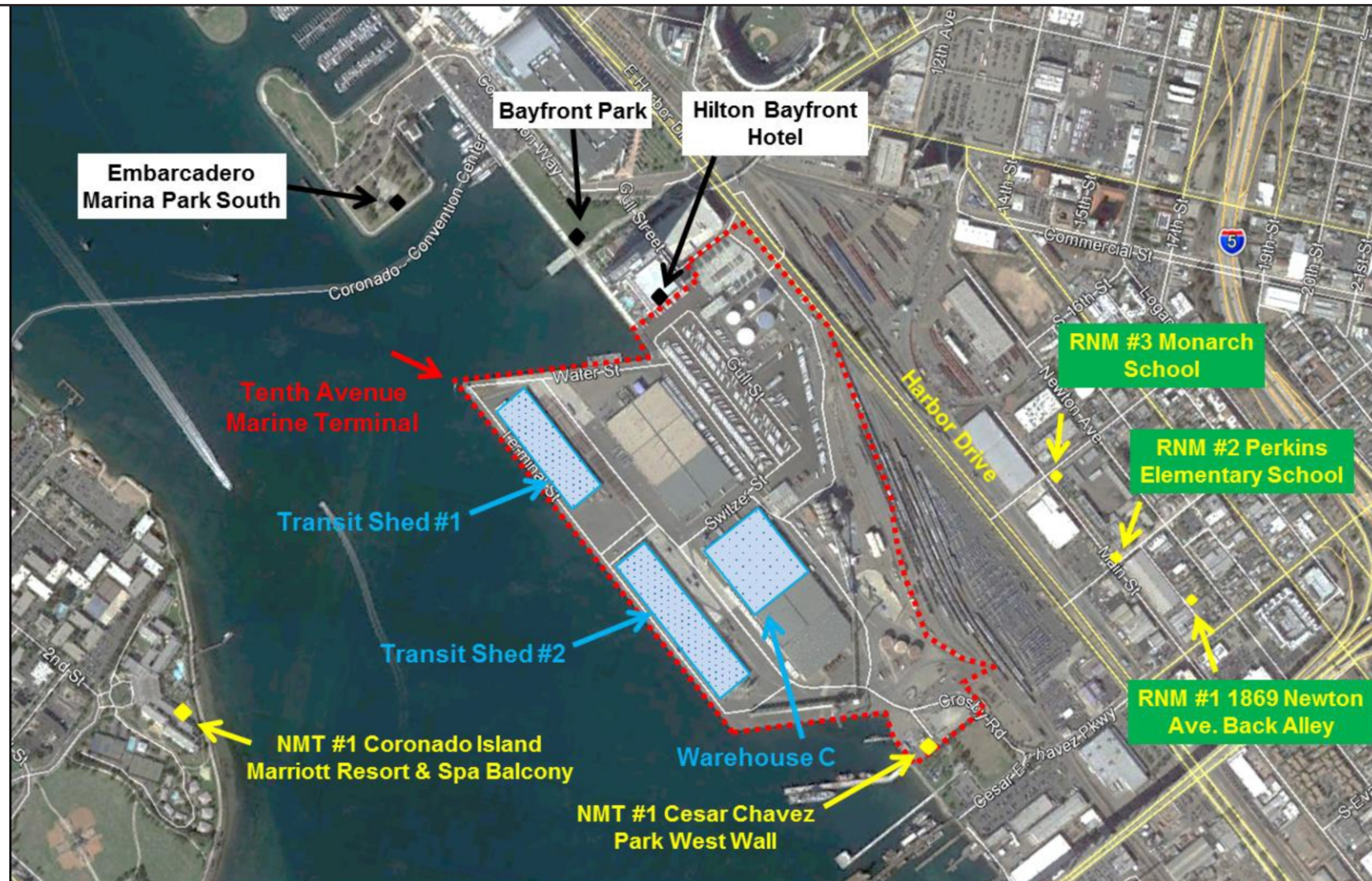
NMT #1 – Coronado Island Marriott Resort and Spa, 2000 Second Street, Coronado, CA 92118. The noise monitor was set up on the balcony of Room 383.

NMT #2 – Cesar Chavez Park, 1449 Cesar E. Chavez Pkwy, San Diego, CA 92101. The noise monitor was located next to the property line wall on the north side of Cesar Chavez Park.

RNM #1 – Residential property, 1861 Newton Avenue, San Diego, CA 92113. The noise monitoring location was on the South-West property line in the alley behind the house.

RNM #2 – Perkins Elementary School, 1770 Main Street, San Diego, CA 92113. The noise monitoring location was on the North corner of Main Street and Beardsley Street.

RNM #3 – Monarch School, 1625 Newton Avenue, San Diego, CA 92113. The noise monitoring location was on the West corner of Main Street and Sigsbee Street.



Note: The ambient noise levels reported at the Hilton Bayfront Hotel, the Bayfront Park and the Embarcadero Marina Park South are from the Tenth Avenue Marine Terminal Final Environmental Impact Report, Part 2 of 4. The data was recorded April 6-7, 2015. The ambient noise levels at RNM #1, RNM #2, RNM #3, NMT #1 & NMT #2 were recorded by Navcon Engineering on February 16-17, 2017.

Source: Navcon, 2018 (Map 4-1)

Figure 4.4-1

Noise Measurement Locations

Table 4.4-1. Ambient Noise Measurements

Location	Lmax	Leq	L90
NMT#1, Coronado Island Marriott¹			
Daytime	68.9–82.9	55.4–62.8	49.8–57.2
Evening	76.4–81.0	54.4–57.5	48.8–49.8
Nighttime	56.2–76.8	50.2–57.9	49.1–53.0
LT-1, Broadstone Coronado on the Bay Apartments²			
Daytime	66.0 – 86.7	52.4 – 61.9	47.0 – 50.5
Evening	63.0 – 84.9	49.0 – 60.6	46.5 – 47.5
Nighttime	55.5 – 81.3	45.6 – 57.4	43.5 – 52.0
LT-2, Embarcadero Marina Park South²			
Daytime	65.6 – 82.0	53.0 – 61.4	49.0 – 52.0
Evening	75.5 – 84.8	54.0 – 57.8	51.0 – 52.5
Nighttime	56.2 – 78.0	52.2 – 56.6	50.0 – 52.0
NMT#2/ST-1, Cesar Chavez Park³			
Daytime	67.4–88.9	56.6–65.4	54.6–64.0
Evening	75.3–80.8	59.6–60.5	57.2–57.5
Nighttime	67.0–83.9	59.6–63.3	57.8–61.7
RNM #1/ST-4, 1861 Newton Avenue³			
Daytime	68.5–86.3	53.1 – 60.2	49.0–54.9
Evening	—	—	—
Nighttime	61.4–73.3	54.9–55.6	52.3–53.8
RNM #2/ST-3, Perkins Elementary School³			
Daytime	77.2–82.2	64.0–66.7	54.3–56.7
Evening	—	—	—
Nighttime	65.1–72.7	56.6–60.0	51.9–54.5
RNM #3, Monarch School¹			
Daytime	74.3–81.4	59.7–64.8	52.0–54.5
Evening	—	—	—
Nighttime	74.2–79.3	56.9–61.2	50.9–53.7
ST-2, Mercado del Barrio mixed-use residential/commercial²			
Daytime	76.3	64.9	60.2
Evening	—	—	—
Nighttime	—	—	—
ST-5 McCormick and Schmick's (exterior dining patio)²			
Daytime	72.8	59.3	55.3
Evening	—	—	—
Nighttime	—	—	—
ST-6 Crown Bay Condominiums²			
Daytime	68.1	57.5	52.8
Evening	—	—	—
Nighttime	—	—	—

Source: Navcon, 2018 (Graphics 4-1 through 4-5) and TAMT Final PEIR noise measurements.

Note: Daytime: 7:00 a.m. – 7:00 p.m.; Evening: 7:00 p.m. – 10:00 p.m.; Nighttime: 10:00 p.m. – 7:00 a.m.

¹ Data from Navcon, 2018.

² Data from TAMT Final PEIR.

³ Data combined from Navcon, 2018 and TAMT Final PEIR.

4.4.2.2 Changes to the Regulatory Setting Disclosed in the TAMT Final PEIR

The applicable Federal, State, and local laws and regulations pertaining to noise are described in Section 4.9.3 of the TAMT Final PEIR. A list of the applicable regulations described in the TAMT Final PEIR is

provided below for reference. Additionally, the City of Coronado Municipal Code (CCMC), Section 41.10.010 is relevant and is described below.

Federal

- Federal Noise Control Act of 1972

State

- California Code of Regulations (Part 2, Title 24, “California Noise Insulation Standards”)

Local

- City of San Diego Municipal Code 59.5.0401 (Noise Ordinance)
- City of San Diego Municipal Code 59.5.0404 (Construction Noise)
- City of San Diego Significance Determination Thresholds

City of Coronado Municipal Code, 41.10.010 (Noise Ordinance)

The CCMC, Section 41.10.010 (Property line noise limits) Part A states that it is unlawful for any person to cause noise by any means to the extent that the 1-hour average sound level exceeds the applicable limit given in the Table 4.4-2¹ at any location in the City of Coronado on or beyond the boundaries of the property on which the noise is produced.

Table 4.4-2. City of Coronado Noise Limits

Land Use	Time of Day	One Hour Average Sound Level (dBA)
Residential: All R-1A; R-1B	7:00 a.m. – 7:00 p.m.	50
	7:00 p.m. – 10:00 p.m.	45
	10:00 p.m. – 7:00 a.m.	40
All R-3; R-4; R-PCD; and R-5	7:00 a.m. – 7:00 p.m.	55
	7:00 p.m. – 10:00 p.m.	50
	10:00 p.m. – 7:00 a.m.	45
Commercial (C); Commercial Recreation (C-R); Hotel/Motel (H-M); Civic Use (C-U); Open Space (OS); and Parking Overlay (P-1)	7:00 a.m. – 7:00 p.m.	60
	7:00 p.m. – 10:00 p.m.	60
	10:00 p.m. – 7:00 a.m.	50

Source: City of Coronado Municipal Code.

City of Coronado Municipal Code 41.10.040 and 41.10.050 (Construction Noise)

The City of Coronado’s Noise Ordinance also regulates construction noise levels. Specifically, construction that creates disturbing, excessive, or offensive noise is prohibited between the hours of 7:00 p.m. of any day and 7:00 a.m. of the following day, or on legal holidays or Sundays unless a permit is granted by the Noise Control Officer.

In granting a permit, the Noise Control Officer must consider(1) whether the construction noise in the vicinity of the proposed work site would be less objectionable at night than during the daytime; (2) if an obstruction and interference with traffic, particularly on streets of major importance, would be less

¹ 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.

objectionable at night than during the daytime; (3) whether the type of work to be performed emits noises at such a low level as to not cause significant disturbances in the vicinity of the work site; (4) the character and nature of the neighborhood of the proposed work site; (5) whether great economic hardship would occur; and (6) if the work is in the general public interest. Based on these considerations, the Noise Control Officer is authorized to prescribe such specific work conditions (e.g., working times, the types of construction equipment to be used, and permissible noise levels) as the Noise Control Officer deems necessary to protect the public.

Except under special circumstances related to emergency work as detailed in the CCMC, construction activity that creates an average sound level greater than 75 dB during a 1-hour period any time between the hours 7:00 a.m. to 7:00 p.m. at or within the property lines of any property zoned residential is prohibited by ordinance. The CCMC does not include a construction noise limit for non-residential properties.

4.4.3 Analysis of New or More Severe Impacts

4.4.3.1 Methodology

Noise

Three-dimensional noise models of the Proposed Project and the surrounding communities were developed using SoundPLAN noise modeling software. Ground topography data were imported into SoundPLAN from Google Earth (image date code November 11, 2016). The building heights were estimated based upon 3D building renderings in Google Earth (image date code November 11, 2016). See Appendix F, Figures 5-1 through 5-7 for graphical representations of the noise model geometries.

The assumed construction equipment sound power emission levels are listed in Table 4.4-3, and are based on a 7-month construction period for each phase (the Proposed Project's most impactful scenario).² The maximum worst-case sound power emission level (109.5 dBA) for the construction equipment would occur in Construction Month 4.

Construction truck noise levels, based on the Federal Highway Administration's (FHWA's) Traffic Noise Model, were determined to be 107.0 dBA (see Appendix F, Table 5-1). The noise study assumes the use of up to 25 construction trucks, including water, pickup, dump, concrete, and flatbed trucks.

The overall operational equipment sound power emission levels are listed in Table 4.4-4. Once the project is fully operational, up to two cement trucks could be loaded simultaneously. To provide a conservative analysis, the noise study assumes that up to 176 cement trucks per day would be loaded at the project site; noise emissions for these trucks are based upon the FHWA model. 176 trucks per day is based on peak-day activity over a 24-hour period. The noise study indicates that there would be no more than 145 trucks per day on a 30-day rolling average.

² The construction of each of the phases is anticipated to range from 7 to 10 months. A 7-month construction scenario is considered the most impactful scenario as it relates to noise and vibration because it would lead to the highest concentration of construction equipment working simultaneously.

Table 4.4-3. Phase I and Phase II Construction – Equipment Sound Power Emission Levels

Construction Equipment	Hours/ Day	Construction Months (1–7) Number of Equipment							Equipment 50-foot Noise Level dBA	Equipment Usage Factor (%)	Construction Months (1–7) Sound Power Level, dBA						
		1	2	3	4	5	6	7			1	2	3	4	5	6	7
Crane – 100 Ton, 260 HP	8	0	0	0	1	1	1	1	88	20	0.0	0.0	0.0	99.6	99.6	99.6	99.6
Crane – 30 Ton, 130 HP	8	0	0	0	1	1	1	0	88	20	0.0	0.0	0.0	99.6	99.6	99.6	0.0
Telescopic Man Lift, 40 foot	8	0	0	0	0	2	2	2	85	40	0.0	0.0	0.0	0.0	102.6	102.6	102.6
Fork Lift – 5 Ton	8	0	0	0	1	0	0	0	85	40	0.0	0.0	0.0	99.6	0.0	0.0	0.0
Fork Lift – 1 Ton	8	0	0	1	1	1	1	1	85	40	0.0	0.0	99.6	99.6	99.6	99.6	99.6
Bobcat	8	0	0	1	1	1	1	1	73	40	0.0	0.0	87.6	87.6	87.6	87.6	87.6
Cat 966 Loader	8	0	0	1	1	0	0	0	80	40	0.0	0.0	94.6	94.6	0.0	0.0	0.0
Excavator PC250 / Backhoe, Cat 320	8	0	0	1	1	0	0	0	80	40	0.0	0.0	94.6	94.6	0.0	0.0	0.0
Pile Driver 50 HP / Jackhammer	8	0	0	0	1	0	0	0	95	20	0.0	0.0	0.0	106.6	0.0	0.0	0.0
<i>Total Sound Power for Construction Phase Area Source:</i>											—	—	101.9	109.5	106.7	106.7	105.7

Source: Navcon 2018 (Table 5-1)
HP = horsepower

Noise levels were modeled at the eight sensitive receiver locations for the two options: Option A (interior truck loading) and Option B (exterior truck loading), each of which is described in Chapter 3, *Project Description*. Using the methodologies described in the *Noise and Groundborne Vibration Impact Assessment* (Navcon 2018), noise levels were analyzed from a wide range of operational scenarios. All of the results, including noise contour maps, can be seen in Appendix F. The impact assessment contained herein is based on a comparison of the worst-case calculated noise levels with the applicable noise limit for each modeled receiver.

Vibration

The model used for the Proposed Project vibration assessment is consistent with the TAMT Final PEIR and is described in the Federal Transit Administration (FTA) guidance manual FTA-VA-90-1003-06, *Transit Noise and Vibration Impact Assessment*. In that document, source vibration levels for various pieces of construction equipment, trucks, etc., as well as the algorithms and procedures for predicting the vibration impact at receiver locations are provided.

Vibration sources during both Phase I and Phase II construction would include pile driving, excavation, bulldozers, jack hammering, fork lift, and truck movements. The vibration levels associated with these types of equipment are listed in Table 4.4-5. It is noted that the calculations take the very conservative approach of summing together all of the vibration levels from multiple separate vibration sources. It is extremely unlikely that all of these instantaneous peak vibration levels would occur simultaneously such that they would combine to affect the same receiver at the same time.

Table 4.4-4. Phase I Operation and Full Operation – Equipment Sound Power Emission Levels

Source	Sound Power Level per Individual Source dBA
Phase I Operation (Option A or Option B)	
Two Dust Collectors (Roof of Bays C-7 and C-9)	108.1
One Baghouse Silo (Roof of Bays C-7 and C-9)	108.1
One Booster Compressor	103.1
Two Vacuum Unloaders (400 MT/hr)	110.9
Truck Loading, Weigh Station 100 Percent, 5 Minutes	107.0
Full Operation (Option A or Option B)	
Four Dust Collectors (Roof of Bays C-7, C-8, C-9, and C-10)	108.1
Two Baghouse Silo (Roof of Bays C-7, C-8, C-9, and C-10)	108.1
One Booster Compressor	103.1
Two Vacuum Unloaders (400 MT/hr)	110.9
Truck Loading, Weigh Station 100 Percent, 5 Minutes	107.0

Source: Navcon 2018 (Table 5-2)
MT/hr = metric tons per hour

Table 4.4-5. Construction Equipment Vibration Source Levels

Construction Equipment	Approximate PPV at 25 feet (in/s) ¹
Pile Driver	0.644
Large Bulldozers	0.089
Loaded Trucks	0.076
Jackhammer	0.035
Small Bulldozers	0.003
Summation of All Equipment	0.847

Source: Navcon, 2018 (Table 6-1)

¹ Peak Particle Velocity (PPV) levels listed are from Table 12.2 of FTA-VA-90-1003-06.

To determine the vibration level at a receiver, the following formula was applied:

$$PPV_{\text{receiver}} = PPV_{\text{source}} \times (25/D)^{1.5}$$

where: PPV_{receiver} is the peak particle velocity (in/s) at the receiver location
 PPV_{source} is the peak particle velocity (in/s) at 25 feet from the equipment
 D is the distance between the vibration source and the receiver location

4.4.3.2 Thresholds of Significance

The significance criteria used to evaluate potential noise and vibration impacts are based on Appendix G of the State CEQA Guidelines. The determination of whether an impact would be significant is based on the applicable thresholds and the professional judgment of the District as Lead Agency supported by evidence in the administrative record.

Appendix G of the State CEQA Guidelines was updated in December 2018. Therefore, the specific threshold questions utilized in the TAMT Final PEIR for noise and vibration are not the same as those in the current Appendix G checklist. However, both versions of Appendix G address the same underlying noise and vibration issues, and an assessment using either version will result in the same significance determination for a project. Additional comparison of the previous Appendix G checklist questions to the updated ones is provided below. However, for the purposes of this SEIR, the analysis is presented using the previous checklist questions. This approach provides continuity between the SEIR and the TAMT Final PEIR (from which this SEIR tiers), and allows for a clearer comparison of any new or more severe significant impacts than what was disclosed in the TAMT Final PEIR.

The December 2018 update to the Appendix G checklist related to noise and vibration essentially involved condensing a list of six questions into three. The issues of compliance with applicable noise standards, permanent noise increases, and temporary noise increases have been combined into a single threshold question. Similarly, the issues of noise from public airports and noise from private airstrips have been combined into a single threshold question. Table 4.4-6 illustrates the relationship between the TAMT Final PEIR thresholds and the new Appendix G checklist.

Table 4.4-6. Comparison of TAMT Final PEIR Appendix G Questions and the Updated Appendix G Questions

TAMT Final PEIR Appendix G Questions	Updated Appendix G Questions	Comparison
Would the project result in...	Would the project result in...	
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	The TAMT Final PEIR Appendix G question covers the same issue as the updated Appendix G question.
b) Exposure of persons to or generate excessive groundborne vibration or groundborne noise levels?	b) Generation of excessive groundborne vibration or groundborne noise levels?	The TAMT Final PEIR Appendix G question covers the same issue as the updated Appendix G question.
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.	See Threshold a), above.	The updated Appendix G combines this issue with others and addresses it as part of Threshold a)
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.	See Threshold a), above.	The updated Appendix G combines this issue with others and addresses it as part of Threshold a)
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	The TAMT Final PEIR Appendix G question covers the same issue as the updated Appendix G question.
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	See Threshold c), above.	The updated Appendix G combines this issue with another and addresses it as part of Threshold c).

Source: Appendix G of the State CEQA Guidelines (previous and updated versions)

For consistency, the analysis uses the Appendix G questions used in the TAMT Final PEIR because they cover the same issues as the updated Appendix G questions (see Table 4.4-6). Impacts are considered significant if the Proposed Project would result in any of the following:

1. 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 of San Diego's Noise Ordinance or City of Coronado's Noise Ordinance.
2. Expose persons to or generate excessive groundborne vibration or groundborne noise levels.
3. Result in a substantial permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project.
4. Result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project.

5. Expose people residing or working in the project area within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, to excessive noise levels.
6. Expose people residing or working in the project area within the vicinity of a private airstrip to excessive noise levels.

As discussed in the Initial Study/Environmental Checklist prepared for the Proposed Project (Appendix A), Thresholds 5 and 6 are not included in the analysis below as it was determined that the Proposed Project would not result in a significant impact from airport noise exposure for the same reasons as documented in TAMT Final PEIR Section 6.4.10 (i.e., no habitable structures would be constructed, large numbers of people would not be attracted to the TAMT, and the TAMT is not within the vicinity of a private airstrip). Additionally, the TAMT is not within the Forecast Noise Exposure areas identified in Exhibit 2-1 of the San Diego International Airport's Airport Land Use Compatibility Plan. Therefore, the analysis presented below focuses only on potential impacts for Thresholds 1, 2, 3, and 4 related to the generation or exposure to noise levels above identified noise standards and generation or exposure of groundborne vibration.

Supplemental Thresholds

Because the District does not maintain significance criteria for noise impacts, the City of San Diego and City of Coronado criteria described under *Local* regulations in Section 4.4.2.2, *Changes to the Regulatory Setting Disclosed in the TAMT Final PEIR*, are used for determining CEQA significance levels, as summarized below.

Temporary Construction Noise

Temporary construction noise that exceeds 75 dBA Leq at a sensitive receptor location is considered to be a significant impact by both the City of San Diego and City of Coronado. Construction noise levels measured at or beyond the property lines of any property zoned residential cannot exceed an average sound level greater than 75 dB during the 12-hour period from 7:00 a.m. to 7:00 p.m. In addition, construction activity is prohibited between the hours of 7:00 p.m. of any day and 7:00 a.m. of the following day or on legal holidays as specified in Section 21.04 of the City of San Diego Municipal Code. This is consistent with the analysis provided in the TAMT Final PEIR.

Operational Noise from Onsite Noise Sources

A project that would generate noise levels at the property line that exceed the City of San Diego's Noise Ordinance Standards or the City of Coronado's Noise Ordinance Standards is considered potentially significant. The applicable noise standard is determined based on the City in which the noise-sensitive receptor is located. For receptors within the City of San Diego, the sound level limit along the boundary line between two zoning districts is the arithmetic mean of the respective limits for the two districts, as set forth in Section 59.5.0401 of the Municipal Code. This is consistent with the analysis provided in the TAMT Final PEIR. Note that project noise levels that comply with the arithmetic mean noise limits permitted by the City of San Diego's Noise Ordinance Standards may still result in a significant impact if daily noise levels exceed 65 dBA CNEL at a residential property line. For the purposes of this analysis, hotels are considered a commercial use in the context of the City of San Diego's noise ordinance.

The Proposed Project's operational noise thresholds for the eight sensitive land use receptors considered in the analysis are listed in Table 4.4-7. Because the proposed project would operate up to 24 hours per day, the significance threshold for each receptor is based on the most restrictive applicable noise standard during the receptor's hours of operation/sensitivity. For instance, the most restrictive noise limit at a

residence, which is considered sensitive 24 hours per day, is determined by the applicable nighttime noise limit; whereas the critical threshold for schools, which are generally noise-sensitive during only daytime hours, is determined by applicable daytime noise limits.

Table 4.4-7. Project Operation Noise Thresholds at Sensitive Receptors

Receptor Location	Threshold of Significance	Notes
Coronado Marriott Resort	50.0	The threshold is based on the City of Coronado nighttime noise limits for hotels and motels (10:00 p.m. to 7:00 a.m.).
Cesar Chavez Park	60.0	There is no City of San Diego municipal code standard for park use. The threshold is based on the arithmetic mean of City of San Diego noise ordinance standards of 75 dBA Leq for industrial use and 45 dBA Leq for single-family residential use during evening hours (7:00 p.m. to 10:00 p.m.).
1861 Newton Avenue	57.5	The threshold is based on the arithmetic mean of City of San Diego noise ordinance standards of 75 dBA Leq for industrial use and 40 dBA Leq for single-family residential use during nighttime hours (10:00 p.m. to 7:00 a.m.).
Perkins Elementary School	62.5	There is no City of San Diego municipal code standard for school use. The threshold is based on the arithmetic mean of City of San Diego noise ordinance standards of 75 dBA Leq for industrial use and 50 dBA Leq for single-family residential use during daytime hours (7:00 a.m. to 7:00 p.m.).
Monarch School	62.5	There is no City of San Diego municipal code standard for school use. The threshold is based on the arithmetic mean of City of San Diego noise ordinance standards of 75 dBA Leq for industrial use and 50 dBA Leq for single-family residential use during daytime hours (7:00 a.m. to 7:00 p.m.).
Hilton Hotel	67.5	There is no City of San Diego municipal code standard for hotel use. The threshold is based on the arithmetic mean of City of San Diego noise ordinance standards of 75 dBA Leq for industrial use and 60 dBA Leq for commercial use during nighttime hours (10:00 p.m. to 7:00 a.m.).
Bayfront Park	60.0	There is no City of San Diego municipal code standard for park use. The threshold is based on the arithmetic mean of the City of San Diego noise ordinance standards of 75 dBA Leq for industrial use and 45 dBA Leq for single-family residential use during evening hours (7:00 p.m. to 10:00 p.m.).
Embarcadero Marina Park South	60.0	There is no City of San Diego municipal code standard for park use. The threshold is based on the arithmetic mean of the City of San Diego noise ordinance standards of 75 dBA Leq for industrial use and 45 dBA Leq for single-family residential use during evening hours (7:00 p.m. to 10:00 p.m.).

Source: Navcon 2018 (Table 3-2).

Noise from Traffic

Traffic noise significance thresholds are shown in Table 4.4-8. These remain consistent with the TAMT Final PEIR (see Table 4.9-8 of the TAMT Final PEIR).

Table 4.4-8. City of San Diego Traffic Noise Significance Thresholds

Structure to Be Affected by Traffic Noise	Interior Space (CNEL)	Exterior Usable Space ¹ (CNEL)	General Indication of Potential Significance
Single-Family Detached	45 dB	65 dB	Structure or outdoor usable area ² is <50 feet from the center of the closest (outside) lane on a street with existing or future ADT >7,500
Multi-Family, Schools, Libraries, Hospitals, Day Care, Hotels, Motels, Parks, Convalescent Homes	Development Services Department ensures 45 dB pursuant to Title 24	65 dB	
Offices Churches, Businesses, Professional Uses	N/A	70 dB	Structure or outdoor usable area is <50 feet from the center of the closest lane on a street with existing or future ADT >20,000
Commercial, Retail, Industrial, Outdoor Spectator Sports Uses	N/A	75 dB	Structure or outdoor usable area is <50 feet from the center of the closest lane on a street with existing or future ADT >40,000

Source: City of San Diego 2011

¹ If a project is currently at or exceeds the significance thresholds for traffic noise described above and noise levels would result in less than a 3 dB increase, then the impact is not considered significant.

² Exterior usable areas do not include residential front yards or balconies, unless the areas (such as balconies) are part of the required usable open space calculation for multi-family units.

ADT = average daily traffic

N/A = not applicable

Groundborne Vibration

Because neither the District, the City of San Diego, nor the City of Coronado maintain regulatory standards for vibration sources, potential structural damage and human annoyance associated with vibration from construction activities are based on California Department of Transportation (Caltrans) vibration limits, as illustrated in Tables 4.4-9 and 4.4-10, below. Consistent with the TAMT Final PEIR, a vibration level of 0.04 in/s PPV is selected to evaluate potential vibration impacts at nearby receptors because this is the level at which transient vibrations are barely perceptible, and continuous/frequent intermittent vibrations become distinctly perceptible (see Table 4.4-10); 0.04 in/s PPV is also well below all criteria for potential structural damage (see Table 4.4.9).³ For informational purposes, vibration levels are calculated at each of the eight sensitive land use receptors considered in the analysis. However, no impacts are assessed at the parks because they do not include habitable buildings where people would spend extended periods of time, and, as discussed in Section 4.4.1, *Noise and Vibration Fundamentals*, people are much less sensitive to vibration when they are outdoors.

³ It is noted that the *Noise and Groundborne Vibration Impact Assessment* (Navcon 2018) investigated compliance with additional vibration limits. However, for consistency with the approach and assessment in the TAMT Final PEIR, the previously established threshold of 0.04 in/s PPV is utilized herein to assess impacts under CEQA.

Table 4.4-9. Caltrans Vibration Building Damage Potential Threshold Criteria

Structure and Condition	Maximum PPV (in/s) ¹	
	Transient Sources	Continuous/Frequent Intermittent Sources
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern industrial/commercial buildings	2.0	0.5

Source: Caltrans 2013

¹ Equipment or activities typical of continuous vibration include excavation equipment, static compaction equipment, traffic on a highway, vibratory pile drivers, pile-extraction equipment, and vibratory compaction equipment. Equipment or activities typical of single-impact (transient) or low-rate repeated impact vibration include impact pile drivers, blasting, drop balls, "pogo stick" compactors, and crack-and-seat equipment. PPV= peak particle velocity; the maximum instantaneous positive or negative peak amplitude of the vibration velocity, measured in inches per second.

Table 4.4-10. Reaction of People to Groundborne Vibration

Human Response	Maximum PPV (in/s) ¹	
	Transient Sources	Continuous/Frequent Intermittent Sources
Barely Perceptible	0.04	0.01
Distinctly Perceptible	0.25	0.04
Strongly Perceptible	0.9	0.10
Severe	2.0	0.40

Source: Caltrans 2013.

¹ Equipment or activities typical of continuous vibration include excavation equipment, static compaction equipment, traffic on a highway, vibratory pile drivers, pile-extraction equipment, and vibratory compaction equipment. Equipment or activities typical of single-impact (transient) or low-rate repeated impact vibration include impact pile drivers, blasting, drop balls, "pogo stick" compactors, and crack-and-seat equipment. PPV= peak particle velocity; the maximum instantaneous positive or negative peak amplitude of the vibration velocity, measured in inches per second.

4.4.3.3 Project Impacts and Mitigation Measures

Threshold 1: Implementation of the Proposed Project *would not* expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

TAMT Final PEIR Discussion

Construction

The TAMT Final PEIR noted that construction activities associated with buildout of the TAMT Plan would be anticipated to increase noise levels temporarily and intermittently at nearby noise-sensitive locations and would cease once construction was complete. The analyzed receptors included the closest homes, schools, parks, and hotel (i.e., residences on Newton Avenue and Sigby Row, Broadstone Coronado on the Bay Apartments, Mercado Apartments, Monarch School, Perkins Elementary School, Cesar Chavez Park, Bayfront Park, and Embarcadero Marina Park). Noise levels were also analyzed at the Hilton Bayfront Hotel, although it was noted that hotels are only considered sensitive to nighttime noise. The magnitude

of the noise increases would depend on the type of construction activity, the noise level generated by various pieces of construction equipment, shielding from intervening terrain or other structures, and the distance between the noise source and receiver.

Construction of facilities identified in the TAMT Plan were assumed to occur over a long-term period. Construction equipment identified in the TAMT Final PEIR analysis included cranes, backhoes, loaders, hydraulic hammers, compactors, rollers, pumps, and compressors, as well as heavy trucks that would be used for delivery of materials and removal of debris from demolition phases. It was determined that the loudest TAMT Plan–related construction activities would take place in the dry bulk area of the terminal, which includes the area closest to the community of Barrio Logan. The PEIR also identified that construction activities that would generate substantial noise would be limited to the daytime hours between 7:00 a.m. and 7:00 p.m. per City regulations.

The TAMT Final PEIR concluded that construction noise impacts would be less than significant because at the sensitive receptors they would not exceed the City of San Diego’s threshold of 75 dBA Leq during construction activities and would not occur outside of the permitted daytime hours (TAMT Final PEIR pg. 4.9-22).

Operation

Traffic Noise

The TAMT Final PEIR identified that buildout of the TAMT Plan could generate up to 846 truck trips per day and 1,572 commuter vehicle trips per day. Traffic noise levels due to these trips were calculated and used to assess the noise increases that would occur relative to existing conditions. It is noted that this analysis was prepared prior to the adoption of the Sustainable Terminal Capacity (STC) Alternative for TAMT. The STC Alternative represents a 75 percent throughput scenario (i.e., a 25 percent reduction relative to the full buildout scenario considered in the TAMT Final PEIR noise analysis). Therefore, the TAMT Final PEIR noise analysis for full buildout conditions provides a conservative estimate of future traffic noise levels. The full buildout traffic from the TAMT Plan was determined to result in a traffic noise increase of 2 dB or less on Harbor Drive and adjacent roadways relative to existing conditions. As stated in the TAMT Final PEIR, the associated increase in traffic noise is less than the 3 dBA threshold and would therefore not be noticeable above the existing noise levels. The TAMT Final PEIR thus concluded the TAMT Plan’s traffic-related noise impacts to be less than significant (TAMT Final PEIR page 4.9-24).

On-terminal Activities

As described in the TAMT Final PEIR, cargo offloading and bulk handling activities at the TAMT occur 24 hours a day, 7 days a week on an intermittent basis, as cargo is delivered to TAMT by vessels, rail, and trucks. The TAMT Final PEIR identified that although buildout of the TAMT Plan would lead to an indirect increase in on-terminal activities as a result of an increase in throughput capacity, the implementation of the TAMT Plan would not be entirely responsible for all future noises as cargo offloading and bulk handling activities already take place on the TAMT (TAMT Final PEIR pg. 4.9-22). Under current conditions, vessel unloading noise could occur at any time during a 24-hour day, which would also be true under future conditions.

The TAMT Final PEIR provided worst-case noise calculations at various receptor locations that would potentially occur as a result of implementation of the TAMT Plan. Based on these calculations, noise levels could reach hourly average noise levels of up to 69 dBA Leq at the nearest park use, up to 56 dBA Leq at

the nearest school, up to 56 dBA Leq at the nearest residential use, and up to 64 dBA Leq at the nearest hotel outdoor use with implementation of the TAMT Plan (TAMT Final PEIR pg. 4.9-23).

The TAMT Final PEIR concluded that redevelopment of the TAMT would result in significant and unavoidable noise impacts related to exceedances of the City noise standard of 60 dBA Leq at two parks. The TAMT Final PEIR identified that mitigation in the form of a project-specific noise study (TAMT Final PEIR **MM-NOI-1**) and implementation of a noise complaint and response tracking program (TAMT Final PEIR **MM-NOI-2**) is required to reduce the significant impact. However, without specific details, the TAMT Final PEIR concluded that it cannot be determined with certainty that the noise impacts at nearby noise-sensitive land uses would be reduced to less-than-significant levels for future projects. Therefore, operational noise impacts on nearby noise-sensitive land uses were deemed significant and unavoidable until such time that project-specific information is available and additional environmental review is conducted.

As required by TAMT Final PEIR **MM-NOI-1**, the District prepared a project-specific noise and vibration study for the Proposed Project (Appendix F). The analysis of potential impacts which follows is based on the analysis and findings set forth in the *Noise and Groundborne Vibration Impact Assessment* (Navcon 2018).

Project Impact Discussion

Construction

The Proposed Project's daytime construction Leq levels (Leq,d) were modeled at the eight sensitive receiver locations, as shown in Table 4.4-11. See Section 4.4.3.1, *Methodology*, for a description of the assumptions used in modeling the anticipated construction noise levels, including expected construction equipment, use per day, and usage factors (Table 4.4-2). The analysis is based on the most impactful (i.e., loudest) construction scenario which is predicted to occur during month 4 of construction when pile driving would occur. The impact pile driver is the single loudest piece of equipment scheduled for the project. During month 4 it would operate simultaneously with various other noise-generating equipment including cranes, forklifts, a Bobcat, a loader, and an excavator or backhoe. Project construction would be conducted between the hours of 7:00 a.m. and 7:00 p.m. Monday through Friday per the City of San Diego's Municipal Code Section 59.5.0404. Since construction hours would be 7:00 a.m. to 7:00 p.m., evening (Leq,e) and nighttime (Leq,n) noise levels were not computed. A noise contour map showing the daytime Leq levels is provided as Figure 4.4-2. The noise levels are compared to the established standards for construction (i.e., significance thresholds), as described in Section 4.4.3.2, *Thresholds of Significance*.

Table 4.4-11. Calculated Noise Levels – Project Construction (dBA)

Receptor Location	Leq,d	Limit	Impact?
Coronado Island Marriott Resort & Spa	42.2	75.0	No
Cesar Chavez Park	46.2	75.0	No
1861 Newton Avenue	34.7	75.0	No
Perkins Elementary School	38.0	75.0	No
Monarch School	38.2	75.0	No
Hilton Hotel	40.1	75.0	No
Bayfront Park	38.2	75.0	No
Embarcadero Marina Park South	37.2	75.0	No

Source: Navcon 2018 (Table 7-1)

The construction noise threshold is provided in Section 4.4.3.2, *Thresholds of Significance*.

The calculated noise levels represent the worst-case scenario for Construction Option A (interior truck loading) or Construction Option B (exterior truck loading) and for Sub-Option A (subterranean pipeline) or Sub-Option B (overhead pipeline).

The TAMT Plan calls for the demolition of Transit Shed #2 sometime between 2017 and 2020. It is anticipated that the Transit Shed #2 demolition would overlap with Phase I construction. Therefore, in addition to the noise levels generated by Proposed Project construction alone (Table 4.4-11), the combined construction noise levels from Proposed Project construction and Transit Shed #2 demolition are also analyzed in the *Noise and Groundborne Vibration Impact Assessment* (Navcon 2018). The analysis considers the possible overlap of Proposed Project construction with two different phases of Transit Shed #2 demolition. The first is the actual demolition of Transit Shed #2, the second is the subsequent crushing of the debris. The highest noise levels varied by receiver and the worst-case results are summarized in Table 4.4-12.

Table 4.4-12. Calculated Noise Levels – Mitsubishi Phase I Construction and Transit Shed #2 Demolition (dBA)

Receptor Location	Leq,d	Limit	Impact?
Coronado Island Marriott Resort & Spa	46.3	75.0	No
Cesar Chavez Park	48.2	75.0	No
1861 Newton Avenue	36.9	75.0	No
Perkins Elementary School	39.7	75.0	No
Monarch School	39.6	75.0	No
Hilton Hotel	42.2	75.0	No
Bayfront Park	40.3	75.0	No
Embarcadero Marina Park South	38.9	75.0	No

Source: Navcon 2018 (Table 7-1)

The construction noise threshold is provided in Section 4.4.3.2, *Thresholds of Significance*.

The calculated noise levels represent the worst-case scenario for Construction Option A (interior truck loading) or Construction Option B (exterior truck loading) and for Sub-Option A (subterranean pipeline) or Sub-Option B (overhead pipeline).

As shown in Tables 4.4-11 and 4.4-12, construction of the Proposed Project would not exceed the construction noise thresholds, and therefore would not expose persons to, or generate, noise levels in excess of established standards, similar to that identified in the TAMT Final PEIR. Therefore, impacts would be less than significant, and no new or more severe significant construction-related noise impacts would occur and no mitigation measures are required.

Operation

Traffic Noise

Peak daily trip generation for the Proposed Project includes up to 352 daily truck trips and 144 daily commuter vehicle trips, based on 176 trucks per day generating two trips each and 48 commuter vehicles per day generating three trips each. These trip rates fall within the scope of the 846 truck trips per day and 1,572 commuter vehicle trips per day analyzed in TAMT Final PEIR. As discussed above, traffic noise impacts were found to be less than significant in the TAMT Final PEIR. Therefore, no new or more severe significant traffic-related noise impacts would occur and no mitigation measures are required.

Onsite Activities

Noise levels from onsite operations were modeled at the eight sensitive receiver locations for the two options identified in the Project Description: Option A (interior truck loading) and Option B (exterior truck loading). For both options, noise levels were modeled for both Phase I operation (Bays C-7 and C-9 only) and full operation (Bays C-7, C-8, C-9, and C-10). Calculated noise levels for Option A (interior truck loading) are shown in Tables 4.4-13 and 4.4-14. Calculated noise levels for Option B (exterior truck loading) are shown in Tables 4.4-15 and 4.4-16. The noise levels are compared to the established significance thresholds for each receiver, as previously shown in Table 4.4-7. As noted in Section 4.4.3.2 of this SEIR, the threshold for each receiver is based on the most restrictive applicable noise standard during the receptor's hours of operation/sensitivity. Noise contour maps showing the corresponding calculated noise levels for Options A and B are provided in Figures 4.4-3 through 4.4-6.

Table 4.4-13. Calculated Noise Levels – Phase I Operation, Option A (Interior Truck Loading) (dBA)

Receptor Location	Calculated Noise Level	Noise Threshold	Exceeds Noise Threshold?
Coronado Island Marriott Resort and Spa	47.6	50.0	No
Cesar Chavez Park	58.6	60.0	No
1861 Newton Avenue	47.6	57.5	No
Perkins Elementary School	50.0	62.5	No
Monarch School	49.3	62.5	No
Hilton Hotel	45.4	67.5	No
Bayfront Park	43.2	60.0	No
Embarcadero Marina Park South	43.5	60.0	No

Source: Navcon 2018 (Table 7-2)

The operational noise thresholds are provided in Section 4.4.3.2, Table 4.4-7.

The calculated noise levels represent the worst-case scenario for Phase I, Option A (interior truck loading) operations.

Table 4.4-14. Calculated Noise Levels – Full Operation, Option A (Interior Truck Loading) (dBA)

Receptor Location	Calculated Noise Level	Noise Threshold	Exceeds Noise Threshold?
Coronado Island Marriott Resort and Spa	49.1	50.0	No
Cesar Chavez Park	58.8	60.0	No
1861 Newton Avenue	48.5	57.5	No
Perkins Elementary School	51.0	62.5	No
Monarch School	49.7	62.5	No
Hilton Hotel	49.1	67.5	No
Bayfront Park	46.6	60.0	No
Embarcadero Marina Park South	45.1	60.0	No

Source: Navcon 2018 (Table 7-6)

The operational noise thresholds are provided in Section 4.4.3.2, Table 4.4-7.

The calculated noise levels represent the worst-case scenario for full operation of Option A (interior truck loading).

Table 4.4-15. Calculated Noise Levels – Phase I Operation, Option B (Exterior Truck Loading) (dBA)

Receptor Location	Calculated Noise Level	Noise Threshold	Exceeds Noise Threshold?
Coronado Island Marriott Resort and Spa	47.7	50.0	No
Cesar Chavez Park	58.6	60.0	No
1861 Newton Avenue	47.5	57.5	No
Perkins Elementary School	50.0	62.5	No
Monarch School	49.2	62.5	No
Hilton Hotel	45.6	67.5	No
Bayfront Park	43.7	60.0	No
Embarcadero Marina Park South	43.5	60.0	No

Source: Navcon 2018 (Table 7-3)

Notes: The operational noise thresholds are provided in Section 4.4.3.2, Table 4.4-7.

The calculated noise levels represent the worst-case scenario for Phase I, Option B (exterior truck loading) operations.

Table 4.4-16. Calculated Noise Levels – Full Operation, Option B (Exterior Truck Loading) (dBA)

Receptor Location	Calculated Noise Level	Noise Threshold	Exceeds Noise Threshold?
Coronado Island Marriott Resort and Spa	49.1	50.0	No
Cesar Chavez Park	58.8	60.0	No
1861 Newton Avenue	48.3	57.5	No
Perkins Elementary School	51.0	62.5	No
Monarch School	49.6	62.5	No
Hilton Hotel	49.4	67.5	No
Bayfront Park	47.0	60.0	No
Embarcadero Marina Park South	45.2	60.0	No

Source: Navcon, 2018 (Table 7-7)

The operational noise thresholds are provided in Section 4.4.3.2, Table 4.4-10.

The calculated noise levels represent the worst-case scenario for full operation of Option B (exterior truck loading).





Source: Navcon, 2018 (Map 5-2)

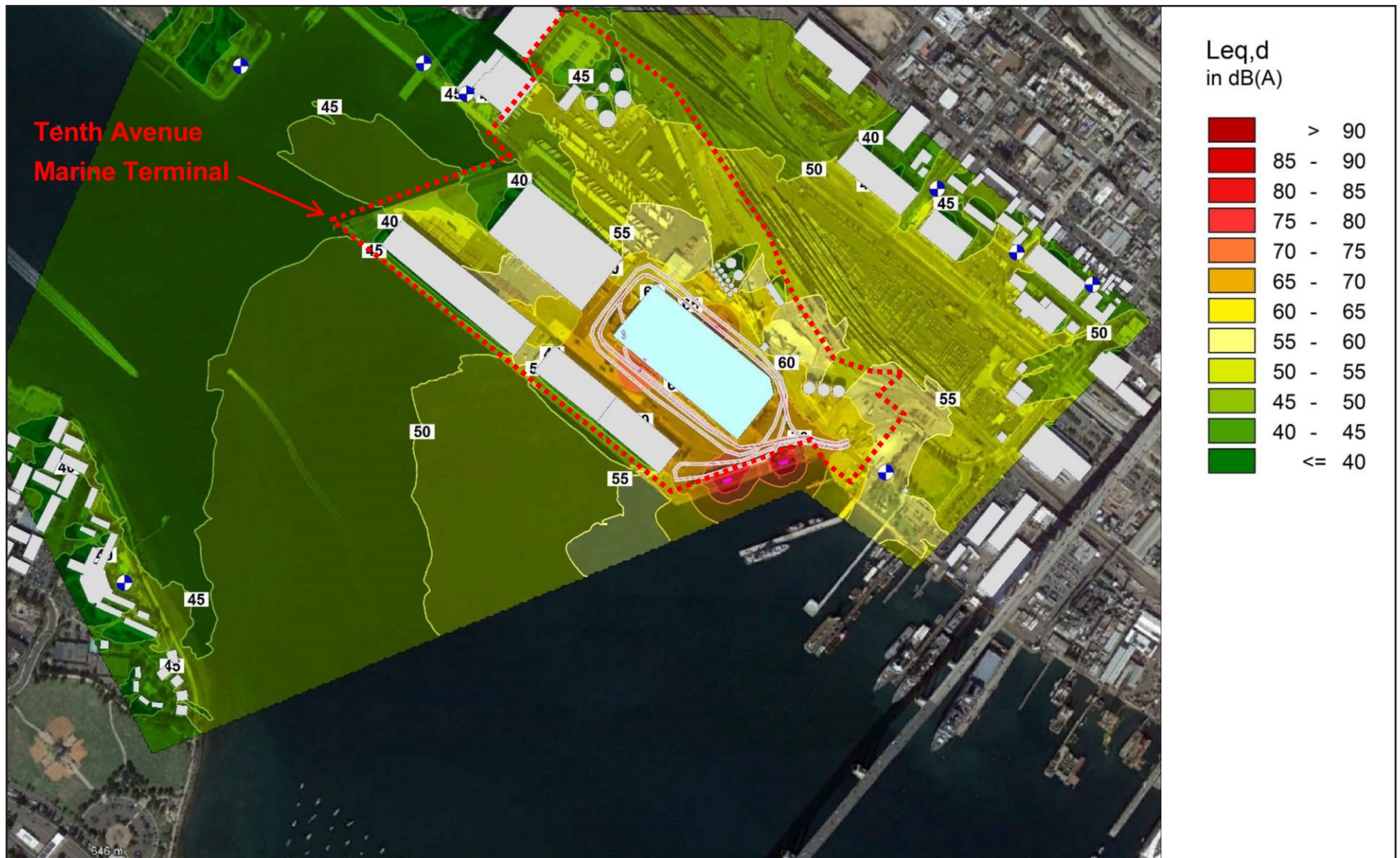
0 250 500 1000 1500 2000 feet



Figure 4.4-3
Phase I Daytime Operation Option A
(Interior Truck Loading) Noise Contour Map (Leq,d)



Figure 4.4-4
Full Daytime Operation Option A
(Interior Truck Loading) Noise Contour Map (Leq,d)



Source: Navcon, 2018 (Map 5-5)

0 250 500 1000 1500 2000 feet



Figure 4.4-5
Phase I Daytime Operation Option B
(Exterior Truck Loading) Noise Contour Map (Leq,d)



Source: Navcon, 2018 (Map 5-13)

0 250 500 1000 1500 2000 feet



Figure 4.4-6
Full Daytime Operation Option B
(Exterior Truck Loading) Noise Contour Map (Leq,d)

As shown in Tables 4.4-13 through 4.4-16, operation of the Proposed Project would not exceed applicable noise thresholds under the Phase I or full operation scenarios for either Option A (interior truck loading) or Option B (exterior truck loading). Therefore, the Proposed Project would not expose persons to, or generate, noise levels in excess of established standards. However, as identified in the TAMT Final PEIR, buildout of the TAMT Plan would result in significant operational noise impacts on nearby noise-sensitive land uses. As a component of the TAMT Plan, the Proposed Project would generate noise levels that would be contributing to the overall noise levels identified from TAMT Plan buildout. Therefore, impacts would be potentially significant, consistent with the findings of the TAMT Final PEIR. Therefore, no new or more severe significant onsite operation-related noise impacts would occur. As a result of the TAMT Final PEIR, the District is in the process of implementing TAMT Final PEIR Mitigation Measure **MM-NOI-2** to minimize nuisance noise to the surrounding community. This mitigation measure provides a complaint and response tracking program that would also cover activities associated with the Proposed Project.

Note that while the equipment locations are different for Option A and Option B (see Appendix F, Figures 5-4 through 5-7), the overall operational noise levels at the analyzed receptor locations are the same or similar for Option A and Option B (varying by no more than +/- 0.5 dBA).

Level of Significance prior to Mitigation

Construction and operation of the Proposed Project would not expose persons to or generate noise levels in excess of established standards. Construction-related impacts would be less than significant. However, although the Proposed Project would not generate operational noise levels in exceedance of established standards, the Proposed Project would generate noise levels that would contribute to the overall significant noise impact identified in the TAMT Final PEIR. These conclusions are consistent with the findings in TAMT Final PEIR, and the Proposed Project would not result in a new or more severe impact than what was already disclosed within the TAMT Final PEIR.

Mitigation Measures

Table 4.4-17 provides a comparison summary of noise mitigation measures previously identified in the TAMT Final PEIR for the TAMT Plan and how those TAMT Final PEIR mitigation measures apply to the Proposed Project. In instances where modification of the TAMT Final PEIR mitigation measures occurs or new Project mitigation measures are needed, an explanation is provided. No project-specific mitigation measure is required to reduce the project impacts to less than significant.

Level of Significance after Mitigation

Impacts would be less than significant and the Proposed Project would not result in a new or more severe impact than what was already disclosed within the TAMT Final PEIR.

Table 4.4-17. Comparison of Construction and Operational Noise TAMT Final PEIR Mitigation Measures to Proposed Project Draft SEIR Mitigation Measures

<p>TAMT Final PEIR Mitigation Measure <i>The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMT Plan, adopted by the District in December 2016 as part of the Final Program Environmental Impact Report for the TAMT Plan.</i></p>	<p>Mitsubishi Cement Corporation Project SEIR Mitigation Measure <i>Project mitigation measures are a combination of applicable TAMT Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMT Final PEIR mitigation measures are provided with additions shown in <u>double underline</u> and deletions indicated in strikeout format.</i></p>	<p>Project Applicability/Reason for Modification or New Project Mitigation Measure</p>
<p>NOISE</p> <p>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.</p> <p>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.</p> <ul style="list-style-type: none"> • Installing equipment inside of acoustical enclosures, where feasible • Installing intake and/or exhaust silencers, where feasible • Using low-noise motors • Placing sound barriers around noise-generating equipment 	<p>The project-level SEIR for the Proposed Project has satisfied and is consistent with TAMT Final PEIR MM-NOI-1.</p>	<p>As part of the Proposed Project's SEIR, a noise and vibration assessment has been prepared to assess project-specific impacts (Appendix F). Based on the Proposed Project's noise and vibration assessment, the anticipated construction and operation activity associated with the Proposed Project would not have a significant noise or vibration impact on adjacent sensitive receptors.</p>

Table 4.4-17. Comparison of Construction and Operational Noise TAMT Final PEIR Mitigation Measures to Proposed Project Draft SEIR Mitigation Measures

<p>TAMT Final PEIR Mitigation Measure <i>The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMT Plan, adopted by the District in December 2016 as part of the Final Program Environmental Impact Report for the TAMT Plan.</i></p>	<p>Mitsubishi Cement Corporation Project SEIR Mitigation Measure <i>Project mitigation measures are a combination of applicable TAMT Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMT Final PEIR mitigation measures are provided with additions shown in <u>double underline</u> and deletions indicated in strikeout format.</i></p>	<p>Project Applicability/Reason for Modification or New Project Mitigation Measure</p>
<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>MM-NOI-2: Initiate and Maintain a Complaint and Response Tracking Program. 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 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.</p>	<p>The District is in the process of implementing TAMT Final PEIR MM NOI-2.</p>	<p>The District has designated a noise disturbance coordinator to receive complaints regarding noise on the terminal via the existing TAMT Truck Hotline.</p> <p>In addition, the District is in the process of posting signage at the TAMT main entrance containing contact information to facilitate and aid in public concerns related to noise complaints.</p>

Threshold 2: Implementation of the Proposed Project *would not* expose persons to or generate excessive groundborne vibration or groundborne noise levels.

TAMT Final PEIR Discussion

The TAMT Final PEIR indicated that construction of any future components of the TAMT Plan would not require impact devices or other equipment that is typically associated with substantial vibrational impacts. Heavy-duty, non-impact construction equipment could generate intermittent localized groundborne vibration levels of up to 0.04 in/s PPV within 50 feet of a construction site. Loaded heavy trucks during operation of the buildout condition associated with the TAMT Plan may produce vibration levels up to 0.04 in/s PPV within 40 feet of each truck. The TAMT Final PEIR concluded that the construction and operation of the TAMT Plan may intermittently result in perceptible levels of groundborne vibration in buildings immediately adjacent to or within 100 feet of vibration sources, but all sensitive uses are over 100 feet from the TAMT site uses. Therefore, vibration levels from construction and operation of the TAMT Plan, including rail activity, would be well below 0.04 in/s PPV at the nearest sensitive receptor locations, and impacts would be less than significant. As such, no groundborne vibration or groundborne noise mitigation measures were identified under the TAMT Final PEIR.

Project Impact Discussion

Construction

Groundborne vibration levels during construction were calculated for the eight sensitive receptor locations using the formula presented in Section 4.4.3.1. The vibration levels for the construction equipment listed in Table 4.4-4 were summed, and that level (i.e., 0.847 in/s PPV) was used as the reference source level. As noted in Section 4.4.3.1, the summing of instantaneous peak levels is a very conservative approach. As a result, the analysis considers impact pile driving as the worst-case vibration source, as well as lesser contributions from other sources such as earthmoving equipment, loaded trucks, and jackhammers. The distance factor (D) was set as the shortest distance between the Proposed Project and the receiver location.

The groundborne vibration levels anticipated during the Phase I and Phase II construction are summarized in Table 4.4-18 and compared against the established vibration threshold of 0.04 in/s PPV. As shown in Table 4.4-18, the calculated vibration levels associated with construction activities (including pile driving) are well below 0.04 in/s PPV at all eight analyzed receptors. Vibration levels from construction of the Proposed Project would not be perceptible at the nearest sensitive uses due to the large intervening distances. Construction of the Proposed Project would not expose persons to, or generate, excessive groundborne vibration or noise levels. Construction vibration impacts are less than significant, and no mitigation is required. This conclusion is consistent with the TAMT Final PEIR's findings; no new or more severe significant impact would occur.

While not strictly related to the impact determination described above, it is noted that the *Noise and Groundborne Vibration Impact Assessment* (Navcon 2018) found the construction vibration levels to be below additional criteria. These included the most stringent Caltrans criterion for potential building damage (0.08 in/s PPV for extremely fragile historic buildings, ruins, ancient monuments) and human perceptibility (0.01 in/s PPV) (see Tables 4.4-9 and 4.4-10).⁴

⁴ These results are noted for informational purposes only. There are no extremely fragile historic buildings, ruins, or ancient monuments in the project vicinity.

Table 4.4-18. Calculated Vibration Levels and Human Response – Construction (Phase I or Phase II)

Receptor Location	PPV at Receptor (in/s) ¹	PPV Vibration Threshold (in/s) ²	Significant Impact?
Coronado Island Marriott Resort and Spa	0.0005	0.04	No
Cesar Chavez Park	0.0082	N/A	No
1861 Newton Avenue	0.0010	0.04	No
Perkins Elementary School	0.0014	0.04	No
Monarch School	0.0017	0.04	No
Hilton Hotel	0.0023	0.04	No
Bayfront Park	0.0013	N/A	No
Embarcadero Marina Park South	0.0008	N/A	No

Source: Navcon 2018 (Table 7-8)

¹ PPV is the Peak Particle Velocity (in/s). The groundborne vibration calculations were made using the methods described in Section 12.2 of FTA-VA-90-1003-06. The reference construction equipment PPV level used for the calculations is the summation of the vibration generated by all the equipment operating simultaneously and is therefore conservative.

² There is no vibration threshold for the parks because they are not considered vibration sensitive, as discussed in Section 4.4.3.2.

Operation

The groundborne vibration levels during Phase I Operation and Full Operation would be less than the groundborne vibration levels during Phase I and Phase II Construction, which were found to be below the significance threshold (see Table 4.4-18). As such, operation-related vibration impacts would be less than significant, and no mitigation is required. This conclusion is consistent with the TAMT Final PEIR's finding that groundborne vibration from operation would not be perceptible; no new or more severe significant impact would occur.

Level of Significance prior to Mitigation

Construction and operation of the Proposed Project would not expose persons to, or generate, excessive groundborne vibration or groundborne noise levels and would not result in a new or more severe significant impact than what was disclosed in the TAMT Final PEIR. Impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Level of Significance after Mitigation

Impacts would be less than significant and the Proposed Project would not result in a new or more severe impact than what was already disclosed within the TAMT Final PEIR.

Threshold 3: Implementation of the Proposed Project *would not* cause a substantial permanent increase in ambient noise levels in the Project vicinity above levels existing without the project.

TAMT Final PEIR Discussion

As identified in the TAMT Final PEIR, operation of the TAMT Plan at full buildout would result in a substantial permanent increase in ambient noise levels in the Project vicinity. A substantial permanent increase in noise levels may be characterized as a readily perceptible increase in noise, or a 5 dB increase over existing ambient noise levels. A substantial permanent increase is not applicable to construction activities (because they are temporary). Noise from the operation of added cranes and unloading systems

would increase ambient noise levels by up to 12 dB at outdoor park uses (Cesar Chavez Park, Embarcadero Marina park, and Bayfront Park), and would increase existing levels by 11 dB at the Hilton Bayfront Hotel.

The TAMT Final PEIR concluded that these noise increases would be readily noticeable to park and hotel visitors, and could be a significant impact. The TAMT Final PEIR identified that mitigation in the form of a project-specific noise study (TAMT Final PEIR **MM-NOI-1**) and implementation of a noise complaint and response tracking program (TAMT Final PEIR **MM-NOI-2**) is required to reduce the significant impact. However, without specific details, the TAMT Final PEIR concluded that it cannot be determined with certainty that the noise impacts at nearby noise-sensitive land uses would be reduced to less-than-significant levels for future projects. Therefore, permanent increases in noise levels were determined to be significant and unavoidable until such time that project-specific information is available and additional environmental review is conducted. With respect to traffic generated by the TAMT Plan, a traffic noise increase of 2 dB CNEL was calculated on Harbor Drive and adjacent roadways, which would not be a perceptible increase and would be less than significant.

As required by TAMT Final PEIR **MM-NOI-1**, the District prepared a project-specific noise and vibration study for the Proposed Project (Appendix F). The analysis of potential impacts which follows is based on the analysis and findings set forth in the *Noise and Groundborne Vibration Impact Assessment* (Navcon 2018).

Project Impact Discussion

Construction

Construction activities do not result in permanent ambient noise increases. Therefore, construction noise is discussed under Thresholds 1 and 4.

Operation

Noise levels during Proposed Project operations under Option A (interior truck loading) and Option B (exterior truck loading) at the TAMT were calculated and assessed at the eight sensitive receiver locations. In order to provide a conservative assessment of the potential impacts, the worst-case noise levels during full buildout operation of each option are compared to the lowest hourly average measured ambient noise levels for each receiver. This approach compares the loudest operational scenarios to the quietest recorded conditions so that the worst-case noise increases are calculated. The results are summarized in Tables 4.4-19 and 4.4-20. See Section 4.4.3.1 for a description of the assumptions used in modeling the anticipated operational noise levels, including expected equipment and associated sound power emission levels (see Table 4.4-4).

Table 4.4-19. Calculated Noise Levels – Full Operation, Option A (Interior Truck Loading) vs. Measured Ambient Noise (dBA)

Receptor Location	Calculated Noise Levels	Measured Ambient ¹	Combined Noise Level	Increase Over Ambient	Significant Impact?
Coronado Island Marriott Resort and Spa	49.1	56.6	52.7	2.5	No
Cesar Chavez Park	58.8	53.1	60.8	4.2	No
1861 Newton Avenue	48.5	56.6	54.4	1.3	No
Perkins Elementary School	51.0	56.9	57.7	1.1	No
Monarch School	49.7	52.2	57.7	0.8	No
Hilton Hotel	49.1	52.2	53.9	1.7	No
Bayfront Park	46.6	52.2	53.3	1.1	No
Embarcadero Marina Park South	45.1		53.0	0.8	No

Source: Navcon 2018 (Table 7-14), with additional calculations added to quantify combined noise levels and resultant noise increases.

¹ Lowest Leq value shown in Table 4.4-1. The lowest ambient readings are selected from all available data (daytime, evening, and nighttime) for each receptor. These ambient noise levels are therefore conservative. No ambient noise measurements were obtained directly at the Hilton Bayfront Hotel or Bayfront Park; the assumed ambient at these two locations is based on the 24-hour data measured at nearby Embarcadero Marina Park South (LT-2).

Table 4.4-20. Calculated Noise Levels – Full Operation, Option B (Exterior Truck Loading) vs. Measured Ambient Noise (dBA)

Receptor Location	Calculated Noise Levels	Measured Ambient ¹	Combined Noise Level	Increase Over Ambient	Significant Impact?
Coronado Island Marriott Resort and Spa	49.1	50.2	52.7	2.5	No
Cesar Chavez Park	58.8	56.6	60.8	4.2	No
1861 Newton Avenue	48.3	53.1	54.3	1.2	No
Perkins Elementary School	51.0	56.6	57.7	1.1	No
Monarch School	49.6	56.9	57.6	0.7	No
Hilton Hotel	49.4	52.2	54.0	1.8	No
Bayfront Park	47.0	52.2	53.3	1.1	No
Embarcadero Marina Park South	45.2	52.2	53.0	0.8	No

Source: Navcon 2018 (Table 7-15), with additional calculations added to quantify combined noise levels and resultant noise increases.

¹ Lowest Leq value shown in Table 4.4-1. The lowest ambient readings are selected from all available data (daytime, evening, and nighttime) for each receptor. These ambient noise levels are therefore conservative. No ambient noise measurements were obtained directly at the Hilton Bayfront Hotel or Bayfront Park; the assumed ambient at these two locations is based on the 24-hour data measured at nearby Embarcadero Marina Park South (LT-2).

As shown in Tables 4.4-19 and 4.4-20, the worst case calculated noise levels generated by the Proposed Project during operations for either Option A or Option B would be below the recorded ambient noise levels at all of the closest sensitive receptors except neighboring Cesar Chavez Park where peak operations would exceed existing ambient levels by approximately 2 dB. The maximum noise increase over ambient conditions would be 4.2 dB for either Option A or Option B operations. This is less than the threshold of 5 dB for a significant noise increase and would not exceed standards established in the applicable local noise ordinances. Therefore, the Proposed Project would not cause a substantial permanent increase in ambient noise levels in the Project vicinity above recorded noise levels. Impacts would be less than significant, and no mitigation is required. These impacts are less than the overall impacts disclosed in the TAMT Final PEIR, and no new or more severe significant impacts would occur.

Level of Significance prior to Mitigation

Construction and operation of the Proposed Project would not cause a substantial permanent increase in ambient noise levels in the Proposed Project vicinity above recorded noise levels. No new or more severe significant noise impacts than what was disclosed in the TAMT Final PEIR would occur.

Mitigation Measures

Table 4.4-17 provides a comparison summary of noise mitigation measures previously identified in the TAMT Final PEIR for the TAMT Plan and how those TAMT Final PEIR mitigation measures apply to the Proposed Project. In instances where modification of the TAMT Final PEIR mitigation measures occurs or new Project mitigation measures are needed, an explanation is provided. No project-specific mitigation measure is required to reduce the project impacts to less than significant.

Level of Significance after Mitigation

Impacts would be less than significant.

Threshold 4: Implementation of the Proposed Project *would not* cause a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the project.

TAMT Final PEIR Discussion

As identified in the TAMT Final PEIR, construction of the TAMT Plan would result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity. A substantial temporary increase in noise levels may be characterized as a readily perceptible increase in noise, or a 5 dB increase over existing ambient noise levels. Construction of the demolition and rail component of the TAMT Plan would generate average hourly noise levels of up to approximately 62 dBA Leq at outdoor use areas at Bayfront Park, and 59 dBA Leq at Embarcadero Marina Park, a 9 dB and 6 dB increase over existing levels, respectively, resulting in a significant impact. The demolition and initial rail component would not result in an increase in ambient noise levels at the nearest residential use (along National Avenue and Sigsbee Street) or at the nearest school (Monarch School). Operations would include air brake testing on a periodic basis, which would result in instantaneous noise levels as high as 68 dBA Lmax; however, on an average hourly basis this would be 59 dBA Leq, and air brake testing already occurs along the existing rail yard area near the TAMT and therefore does not represent a new noise source.

Construction of the full TAMT Plan buildout would result in an increase of 5 dB or more above existing ambient noise levels at three outdoor use areas (Cesar Chavez, Bayfront, and Embarcadero Marina Parks), which constitutes a significant impact. Construction of the full TAMT Plan buildout would not result in an increase in ambient noise levels at the nearest residential use (along National Avenue and Sigsbee Street) or at the nearest school (Monarch School).

The TAMT Final PEIR concluded that these temporary noise increases would be readily noticeable to park visitors, and could be a significant impact. The TAMT Final PEIR identified that mitigation in the form of a Construction Noise Reduction Plan prior to the commencement of demolition or construction activity, including best practices to reduce construction noise at noise-sensitive land uses (TAMT Final PEIR **MM-NOI-3**), is required to reduce the significant impact. However, without specific details, the TAMT Final PEIR concluded that it cannot be determined with certainty that the proposed measure would sufficiently reduce the temporary increases in noise levels to a less-than-significant level for future projects. Therefore, temporary increases in noise levels were determined to be significant and unavoidable until such time as project-specific information is available and additional environmental review is conducted.

As required by TAMT Final PEIR **MM-NOI-1**, the District prepared a project-specific noise and vibration study for the Proposed Project (Appendix F). The analysis of potential impacts which follows is based on the analysis and findings set forth in the *Noise and Groundborne Vibration Impact Assessment* (Navcon 2018).

Project Impact Discussion

Construction

Noise levels during Proposed Project construction were calculated at the eight sensitive receiver locations. In order to provide a conservative assessment of potential impacts the most impactful construction noise levels are compared to the lowest hourly average measured ambient noise levels for each receiver. The analyzed scenario represents month 4 of construction when pile driving would occur simultaneously with various other noise-generating equipment including cranes, forklifts, a Bobcat, a loader, and an excavator or backhoe. The results are summarized in Table 4.4-21. See Section 4.4.3.1 for a description of the assumptions used in modeling the anticipated construction noise levels, including expected construction equipment, use per day, and usage factors (see Table 4.4-3).

Table 4.4-21. Calculated Noise Levels – Project Construction vs. Measured Ambient Noise (dBA)

Receptor Location	Calculated Noise Levels ¹	Measured Ambient ²	Combined Noise Level	Increase Over Ambient	Significant Impact?
Coronado Island Marriott Resort and Spa	42.2	50.2	50.8	0.6	No
Cesar Chavez Park	46.2	56.6	57.0	0.4	No
1861 Newton Avenue	34.7	53.1	53.2	0.1	No
Perkins Elementary School	38.0	56.6	56.7	0.1	No
Monarch School	38.2	56.9	57.0	0.1	No
Hilton Hotel	40.1	52.2	52.5	0.3	No
Bayfront Park	38.2	52.2	52.4	0.2	No
Embarcadero Marina Park South	37.2	52.2	52.3	0.1	No

Source: Navcon 2018 (Table 7-9), with additional calculations added to quantify combined noise levels and resultant noise increases.

¹ Construction hours are 7:00 a.m. to 7:00 p.m.; therefore, the evening and nighttime levels were not calculated.

² Lowest Leq value shown in Table 4.4-1. The lowest ambient readings are selected from all available data (daytime, evening, and nighttime) for each receptor. These ambient noise levels are therefore conservative. No ambient noise measurements were obtained directly at the Hilton Bayfront Hotel or Bayfront Park; the assumed ambient at these two locations is based on the 24-hour data measured at nearby Embarcadero Marina Park South (LT-2).

The comparison with recorded noise levels was also conducted for the anticipated scenario of Transit Shed #2 demolition overlapping with the Mitsubishi Project Phase I construction (refer to Table 4.4-12). The results are summarized in Table 4.4-22.

Table 4.4-22. Calculated Noise Levels – Mitsubishi Phase I Construction & Transit Shed #2 Demolition vs. Measured Ambient Noise (dBA)

Receptor Location	Calculated Noise Levels ¹	Measured Ambient ²	Combined Noise Level	Increase Over Ambient	Significant Impact?
Coronado Island Marriott Resort and Spa	46.3	50.2	51.7	1.5	No
Cesar Chavez Park	48.2	56.6	57.2	0.6	No
1861 Newton Avenue	36.9	53.1	53.2	0.1	No
Perkins Elementary School	39.7	56.6	56.7	0.1	No
Monarch School	39.6	56.9	57.0	0.1	No
Hilton Hotel	42.2	52.2	52.6	0.4	No
Bayfront Park	40.3	52.2	52.5	0.3	No
Embarcadero Marina Park South	38.9	52.2	52.4	0.2	No

Source: Navcon 2018 (Table 7-9), with additional calculations added to quantify combined noise levels and resultant noise increases.

¹ Construction hours are 7:00 a.m. to 7:00 p.m.; therefore, the evening and nighttime levels were not calculated.

² Lowest Leq value shown in Table 4.4-1. The lowest ambient readings are selected from all available data (daytime, evening, and nighttime) for each receptor. These ambient noise levels are therefore conservative. No ambient noise measurements were obtained directly at the Hilton Bayfront Hotel or Bayfront Park; the assumed ambient at these two locations is based on the 24-hour data measured at nearby Embarcadero Marina Park South (LT-2).

As shown in Tables 4.4-21 and 4.4-22, the calculated short-term noise levels generated by the Proposed Project during construction would remain below the recorded ambient noise levels at the closest sensitive receptors. The maximum noise increase over ambient conditions would be 0.6 dB during Proposed Project construction alone, and 1.5 dB during overlap of the Proposed Project construction with Transit Shed #2 demolition. This is less than the threshold of 5 dB for a significant noise increase and would not exceed standards established in the applicable local noise ordinances. Therefore, construction of the Proposed Project would not cause a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above recorded noise levels. Impacts would be less than significant, and no mitigation is required. These impacts are less than the overall impacts analyzed in the TAMT Final PEIR, and no new or more severe significant impact than what was disclosed in the TAMT Final PEIR would occur.

Operation

Operational noise increases are considered permanent and, as such, are addressed under Threshold 3, above. All operational noise levels associated with the Proposed Project are considered under Threshold 3 because of their long-term presence, even though noise may fluctuate significantly when cargo unloading activities are underway compared to when they are not.

Level of Significance prior to Mitigation

Construction and operation of the Proposed Project would not cause a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above recorded noise levels. Impacts would be less than significant, and no new or more severe significant impact than what was disclosed in the TAMT Final PEIR would occur.

Mitigation Measures

Table 4.4-23 provides a comparison summary of noise mitigation measures previously identified in the TAMT Final PEIR for the TAMT Plan and how those TAMT Final PEIR mitigation measures apply or are not applicable to the Proposed Project. In instances where modification of the TAMT Final PEIR mitigation measures occur or new Project mitigation measures are needed, an explanation is provided.

Level of Significance after Mitigation

Impacts would be less than significant.

Table 4.4-23. Comparison of Construction Noise TAMT Final PEIR Mitigation Measures to Proposed Project Draft SEIR Mitigation Measures Construction Noise Mitigation Measures

TAMT Final PEIR Mitigation Measure <i>The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMT Plan, adopted by the District in December 2016 as part of the Final Environmental Impact Report for the TAMT Plan.</i>	Mitsubishi Cement Corporation Project SEIR Mitigation Measure <i>Project mitigation measures are a combination of applicable TAMT Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMT Final PEIR mitigation measures are provided with additions shown in <u>double underline</u> and deletions are indicated in strikeout format.</i>	Project Applicability/Reason for Modification or New Project Mitigation Measure
NOISE MM-NOI-3: Implement a Construction Noise Reduction Plan. <p>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.</p> <ul style="list-style-type: none"> ▪ Locating stationary equipment (e.g., generators, compressors, rock crushers, cement mixers, idling trucks) as far as possible from noise sensitive land uses ▪ Prohibiting gasoline or diesel engines from having unmuffled exhaust ▪ 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 ▪ Preventing excessive noise by limiting idle times for vehicles or equipment to 3 minutes, consistent with MM-AQ-2 ▪ Using noise-reducing enclosures around stationary noise-generating equipment ▪ 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. 		
<p>The Project-level SEIR for the Proposed Project has satisfied and is consistent with TAMT Final PEIR MM-NOI-3.</p>		
<p>As part of the Proposed Project's SEIR, a noise and vibration assessment has been prepared to assess project-specific impacts (Appendix F). Based on the Proposed Project's noise and vibration assessment, construction of the Proposed Project is not anticipated to result in a temporary increase of more than 5 dB at adjacent noise sensitive uses.</p>		

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4.5 Transportation, Circulation, and Parking

This section describes any changes in transportation, circulation, and parking circumstances surrounding the Proposed Project's potential approval and implementation since certification of the TAMT Final PEIR in December 2016. This section also evaluates the Proposed Project's potential to result in new or more severe significant impacts related to transportation, circulation, and parking than what was disclosed in the TAMT Final PEIR. Specifically, the impact analysis considers whether the Proposed Project would: (1) conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system; (2) conflict with a county congestion management plan by exceeding a level-of-service (LOS) standard; or (3) result in an insufficient supply of parking to meet the project demand.

These three significance criteria are based on the checklist questions contained in Appendix G of the State CEQA Guidelines at the time the TAMT Final PEIR was prepared. Appendix G of the State CEQA Guidelines was updated in December 2018. Therefore, the specific threshold questions utilized in the TAMT Final PEIR for transportation, circulation, and parking are not the same as those in the current Appendix G checklist. However, both versions of Appendix G address the same underlying transportation, circulation, and parking issues, and an assessment using either version will result in the same significance determination for a project. For the purpose of consistency between the TAMT Final PEIR and this SEIR, the analysis is presented using the previous checklist questions. This approach allows for a clearer comparison of any new or more severe significant impacts than what was disclosed in the TAMT Final PEIR. Additional discussion of Appendix G of the State CEQA Guidelines is provided in Section 4.5.3.2, *Thresholds of Significance*.

In order to determine if there has been a substantial change in circumstances related to the physical conditions in which the Proposed Project would be implemented, a comparison of conditions at the time of the TAMT Final PEIR to the current conditions is provided within the *Comparative Traffic Impact Analysis for Mitsubishi Warehouse C*, prepared by Linscott, Law, and Greenspan (Appendix G).

4.5.1 Traffic Fundamentals

Section 4.10.2.2 of the TAMT Final PEIR includes a detailed discussion of traffic fundamentals, including level of service (LOS) definitions, roadway classifications and LOS standards, signalized intersection LOS criteria, Intersection Lane Volume (ILV) procedures for freeway ramps, and freeway segment LOS criteria. The information presented previously is incorporated by reference.

4.5.2 Circumstances Surrounding Project Implementation

4.5.2.1 Changes to Environmental Setting Disclosed in TAMT Final PEIR

Project Study Area

Traffic generated by the Proposed Project would affect streets and intersections surrounding the Project site. These streets and intersections are within the jurisdiction of the City of San Diego. The Proposed Project's study area was defined according to published guidelines contained in the City of San Diego's *Traffic Impact Study Manual* (July 1998) and the regional San Diego Traffic Engineers' Council (SANTEC) guidelines. Based on these guidance documents, the Proposed Project study area includes segments and intersections near the site where 50 or more directional peak hour trips would be added. For purposes of this SEIR, the environmental transportation setting includes the traffic conditions described in the TAMT Final PEIR, as well as any substantial changes in circumstances related to transportation that have

occurred since certification of the TAMT Final PEIR. For consistency, the same roadway segments and intersections analyzed in the TAMT Final PEIR were evaluated for the Proposed Project. Segments and intersections that were analyzed include the following.

Roadway Segments

- Harbor Drive: Beardsley Street to Cesar E. Chavez Parkway
- Harbor Drive: Cesar E. Chavez Parkway to Sampson Street
- Harbor Drive: Sampson Street to Schley Street
- Harbor Drive: Schley Street to 28th Street
- Harbor Drive: 28th Street to Belt Street
- Harbor Drive: Belt Street to 32nd Street
- 28th Street: Harbor Drive to Main Street
- 28th Street: Main Street to Boston Avenue
- 28th Street: Boston Avenue to National Avenue
- 32nd Street: Harbor Drive to Norman Scott Road

Intersections

- Harbor Drive and Cesar E. Chavez Parkway
- Harbor Drive and Sampson Street
- Main Street and 28th Street
- National Avenue and 28th Street
- Harbor Drive and 32nd Street
- Norman Scott Road/32nd Street/Wabash Boulevard

Figures 4.10-3 and 4.10-4 of the TAMT Final PEIR provide a diagram of the roadway and intersection geometrics within the Proposed Project's study area. The following provides details on these study area roadways:

- **Harbor Drive** is classified as a Major Arterial in the current Barrio Logan/Harbor 101 Community Plan. Currently, Harbor Drive is a four-lane divided roadway with a raised median in the Proposed Project area. There is a bike lane east and west of Cesar E. Chavez Parkway. There are numerous grade inconsistencies along this road.
- **28th Street** is currently built as a four-lane roadway segment east of Harbor Drive. The San Diego Trolley Blue line (Harborside Station–San Ysidro Transit Center to Old Town Transit Center) runs through the east leg of this intersection.
- **32nd Street** is currently built as a four-lane roadway segment from Harbor Drive to the I-5 northbound on ramp and as a two-lane roadway segment thereafter. The roadway segment of 32nd Street west of Harbor Drive is the entrance to Naval Base San Diego. East of Harbor Drive, 32nd Street provides access to the Naval Exchange and Commissary, Mariners Recreation Park, and various other naval facilities. Parking is prohibited on 32nd Street east of Harbor Drive.

Changes in Traffic Conditions Disclosed in TAMT Final PEIR

The Comparative Traffic Impact Analysis (TIA) prepared for the Proposed Project (Appendix G) evaluated whether any substantial changes in circumstances related to roadway segment and intersection operations have occurred since certification of the TAMT Final PEIR that could result in new or more severe significant impacts if the Proposed Project is implemented. Updated traffic counts were taken in October 2019 at the same roadway segments and intersections analyzed in the TAMT Final PEIR. These updated counts were used to establish current traffic conditions. A comparison of the roadway segment and intersection conditions from the TAMT Final PEIR and 2019 conditions is provided below. It should be noted that since the existing traffic counts for the TAMT Plan were taken in 2014, several of the near-term year 2021 cumulative projects identified in the TAMT Final PEIR have been constructed and are now operational. As such, the comparison of traffic conditions uses the Near-Term Year 2021 Base Conditions from the TAMT Final PEIR, as these conditions most closely resemble current 2019 conditions and therefore allow for an analogous comparison.

Roadway Segments

A comparison of the roadway characteristics and traffic conditions for each of the study area roadway segments is provided in Table 4.5-1. Table 4.5-1 shows that all Proposed Project study area roadway segments currently operate at acceptable LOS D or better. This represents a change from the conditions described in the TAMT Final PEIR, which identified the roadway segment of 28th Street between Boston Avenue to National Avenue as operating at an unacceptable LOS F.

Table 4.5-1. Comparison of Study Area Roadway Conditions

	Near-Term 2021 TAMT Final PEIR Conditions			2019 Conditions	
Roadway	Capacity	ADT	LOS	ADT	LOS
Harbor Drive					
Beardsley Street to Cesar E. Chavez Parkway	40,000	24,460	C	16,800	B
Cesar E. Chavez Parkway to Sampson Street	40,000	15,744	B	11,920	A
Sampson Street to Schley Street	40,000	17,292	B	13,900	A
Schley Street to 28 th Street	40,000	16,868	B	13,440	A
28th Street to Belt Street	40,000	22,496	C	20,360	B
Belt Street to 32 nd Street	40,000	21,048	C	19,950	B
28th Street					
Harbor Drive to Main Street	40,000	17,184	B	12,820	A
Main Street to Boston Avenue	30,000	20,613	D	16,400	C
Boston Avenue to National Avenue	22,500	23,076	F	16,170	D
32 nd Street					
Harbor Drive to Norman Scott Road	50,000	24,610	B	27,340	B

Source: LLG 2019.

Intersections

Table 4.5-2 provides a comparison of the delay and corresponding LOS at each of the study area intersections during the weekday morning (7:00 a.m. to 9:00 a.m.) and afternoon (4:00 p.m. to 6:00

p.m.) peak hours. Table 4.5-2 shows that the all intersections along Harbor Drive in the study area are currently operating at acceptable LOS D or better during the morning (AM) and afternoon (PM) peak hours, except the intersection of Norman Scott Road/32nd Street/Wabash Boulevard, which operates at LOS E during the AM and PM peak hours. This represents a slight change from the conditions described in the TAMT Final PEIR, which identified this intersection as operating at LOS F during the AM peak hour.

Table 4.5-2. Comparison of Study Area Intersection Conditions

Intersection	Control Type	Peak Hour	Near-Term 2021 TAMT Final PEIR Conditions		2019 Conditions	
			Delay	LOS	Delay	LOS
Harbor Drive/Cesar E. Chavez Parkway	Signal	AM	41.0	D	22.8	C
		PM	38.0	D	23.0	C
Harbor Drive/Sampson Street	Signal	AM	43.8	D	37.5	D
		PM	44.9	D	34.1	C
Main Street/28 th Street	Signal	AM	22.2	C	18.1	B
		PM	38.8	D	26.8	C
National Avenue/28 th Street	Signal	AM	42.6	D	33.1	C
		PM	31.5	C	17.8	B
Harbor Drive/32nd Street	Signal	AM	29.3	C	19.7	B
		PM	43.3	D	35.5	D
Norman Scott Road/32 nd Street/Wabash Boulevard	Signal	AM	103.2	F	57.3	E
		PM	69.6	E	63.2	E

Source: LLG 2018.

Figures 4.5-1 and 4.5-2 show weekday peak (AM and PM) hour and daily traffic volumes at each of the roadway segments and intersections within the Proposed Project's study area.

4.5.2.2 Changes to Regulatory Setting Disclosed in TAMT Final PEIR

The applicable State, regional, and local laws and regulations pertaining to transportation, circulation, and parking are described in Section 4.7.3 of the TAMT Final PEIR. There are no applicable Federal laws or regulations pertaining to traffic flow on streets and highways. A list of the applicable regulations described in the TAMT Final PEIR is provided below for reference.

State

- California Department of Transportation Standards

Regional

- San Diego Association of Governments San Diego Forward: The Regional Plan

Local

The Proposed Project site falls under the jurisdiction and control of the District. However, because the streets and intersections serving the Proposed Project site are within the City of San Diego's jurisdiction, the following local laws, regulations, and plans were considered in the analysis of the Proposed Project's impacts on transportation, circulation, and parking.

- City of San Diego Traffic Impact Study Manual
- City of San Diego Street Design Manual

Mitsubishi Cement Corporation at Warehouse C
4.5 TRANSPORTATION, CIRCULATION AND PARKING



Source: LLG, 2019.

Figure 4.5-2

Traffic Volumes in TAMT Final PEIR Near-Term 2021 Conditions (Estimated)

Mitsubishi Cement Corporation at Warehouse C
4.5 TRANSPORTATION, CIRCULATION AND PARKING



Source: LLG, 2019.

Figure 4.5-3
Traffic Volumes in 2019 (Measured)

4.5.3 Analysis of New or More Severe Impacts

4.5.3.1 Methodology

The TAMT Final PEIR evaluated both construction and operation transportation impacts associated with buildout of the TAMT Plan. For the operational analysis, traffic volumes generated by buildout of the TAMT Plan were distributed onto study area roadway segments and intersections to determine program-level transportation impacts. Therefore, the operational impact analysis in this section focuses on whether the Proposed Project falls within the scope of the overall operation-related transportation impacts of the TAMT Plan buildout. The operational analysis for the Proposed Project also takes into consideration any substantial changes in circumstances that have occurred since certification of the TAMT Final PEIR that could cause the Proposed Project to result in new or more severe transportation impacts than previously disclosed.

For construction, the TAMT Final PEIR noted that, due the programmatic and market driven nature of the TAMT Plan, the timing, potential for overlap, and specific construction plans associated with future projects were unknown at the time of the analysis. As a result, a quantitative construction analysis of future TAMT Plan projects was not completed in the TAMT Final PEIR. Therefore, the construction impact analysis for the Proposed Project evaluates the Project's direct construction-related traffic impacts on study area roadways and intersections.

Potential construction-related transportation and circulation impacts associated with the Proposed Project are summarized below from Appendix G. Consistent with the TAMT Final PEIR, methods used to determine Project-related construction impacts are taken from the City of San Diego's *Traffic Impact Study Manual* and the City of San Diego's CEQA Significance Determination Thresholds as last amended in July 2016.

Near-term and long-term (buildout) scenarios, both of which include current and reasonably foreseeable future projects, are evaluated in Chapter 5, *Cumulative Impacts*, of this SEIR.

The methods used to determine construction-related impacts from the Proposed Project are consistent with the impact assessment methods described in the TAMT Final PEIR. Please see Section 4.10.4.1 of the TAMT Final PEIR for a complete description of the methods used to determine impacts for roadway segments, intersections, freeway segments, freeway ramp metering, freeway ramp intersections, and parking.

Trip Generation

TAMT Plan—Sustainable Terminal Capacity Alternative

As described in Section 7.5.5.10 of the TAMT Final PEIR, operation of the STC Alternative is anticipated to generate 296 truck trips each day and require an additional 524 total employees each day at TAMT. The total projected trip generation from both trucks and employees that would access TAMT under the STC Alternative is provided in Table 4.5-3. As shown, the STC Alternative would generate 3,348 new Passenger Car Equivalent (PCE) 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.

Table 4.5-3. Trip Generation from STC Alternative

Type	Units	Rate	PCE	ADT	AM Peak Hour			PM Peak Hour		
					Total	In	Out	Total	In	Out
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
Total				3,348	445	254	191	445	191	254

Source: Appendix G-1 of the TAMT Final PEIR.

Rate = number of daily trips per truck or employee.

ADT = average daily trips; PCE = Passenger Car Equivalent, based on industry standards.

Proposed Project

The Proposed Project falls under the scope of the TAMT Plan and the analysis provided for the STC Alternative in the TAMT Final PEIR. Operation of the Proposed Project is anticipated to generate 176 daily truck trips per day at peak day with a corresponding peak increase of 48 daily dock workers (Appendix G). The trip generation rates, PCE factors, and peak hour percentages and in/out splits are consistent with the metrics used in the TAMT Final PEIR's Traffic Impact Analysis, as revised (TAMT Final PEIR Appendix G). Table 4.5-4 presents a summary of the Proposed Project's operational trip generation. The Proposed Project would generate approximately 1,200 average daily trips (PCE), with 76 traffic trips occurring during both the AM and PM peak hours.

Table 4.5-4. Peak Project Operational Trip Generation

Type	Units	Rate	Maximum Total Daily Trips PCE ¹	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Trucks	176	2/truck	1,056	22	22	44	22	22	44
Workers	48	3/worker	144	16	16	32	16	16	32
Total			1,200	38	38	76	38	38	76

Source: LLG 2018

¹ Passenger Car Equivalence (PCE) factor uses a multiplication factor of 1.0 passenger car per worker trip and 3.0 passenger cars per truck trip, based on the *Tenth Avenue Marine Terminal Redevelopment Plan Final Transportation Impact Analysis Report* (TAMT Final PEIR Appendix G) and the *Tenth Avenue Marine Terminal Redevelopment Plan Sustainable Terminal Capacity Alternative Traffic Analysis* (TAMT Final PEIR Appendix G-1).

Additionally, Table 4.5-5 presents a summary of the Proposed Project's construction trip generation. Construction traffic would be composed primarily of two types of trips: construction worker trips (occurring during the AM and PM) and truck trips (occurring throughout the 8-hour workday). A maximum of 50 construction workers would be needed during the peak of project construction, and 21 trucks would access the site over the course of a typical workday. Construction activities for the Proposed Project would generally commence prior to the morning commuter peak hours (7:00 a.m. to 9:00 a.m.) and conclude prior to the afternoon commuter peak hours (4:00 p.m. to 6:00 p.m.). Therefore, no worker trips would occur during the AM and PM peak periods. A limited number of truck deliveries (3 to 5 trucks) would occur during the AM peak hour. To be conservative, a modest amount of miscellaneous vehicle trips was added to the AM and PM peak hour volumes to account for late worker arrivals/departures and inspections. As shown, construction of the Proposed Project would generate an estimated 284 trips per day (PCE), with a total of 34 trips occurring during the AM peak hour and 4 trips

occurring during the PM peak hour over an approximately 7 to 10 month period occurring over two separate phases.

Table 4.5-5. Construction Trip Generation

Vehicle Type	Units	Rate	Maximum Total Daily Trips PCE ¹	AM Peak Hours			PM Peak Hours		
				In	Out	Total	In	Out	Total
Trucks	21	2/truck	126	15	15	30	0	0	0
Workers	50	3/worker	150	0	0	0	0	0	0
Miscellaneous	4	2/trip	8	2	2	4	2	2	4
Total			284	17	17	34	2	2	4

Source: LLG 2018.

¹ Passenger Car Equivalent (PCE) uses a multiplication factor of 1.0 per worker and miscellaneous trip and 3.0 per truck trip, based on the TAMT Final PEIR.

Trip Distribution and Assignment

Two separate trip distributions for the Proposed Project were utilized, one for truck traffic and one for employee traffic. The traffic analysis in the TAMT Final PEIR assumed that truck traffic would be restricted to routes based on the District's *Port Access Projects – 10th Avenue Marine Terminal Truck O-D Study*.

4.5.3.2 Thresholds of Significance

The significance criteria used to evaluate potential transportation, circulation, and parking impacts are based on Appendix G of the State CEQA Guidelines. The determination of whether an impact would be significant is based on the applicable thresholds and the professional judgment of the District as Lead Agency supported by evidence in the administrative record.

Appendix G of the State CEQA Guidelines was updated in December 2018. Therefore, the specific list of threshold questions used in the TAMT Final PEIR for transportation, circulation, and parking is not the same as those in the current Appendix G checklist. However, both versions of Appendix G generally address the same underlying transportation, circulation, and parking issues, and an assessment using either version will generally result in the same significance determination for a project. Additional comparison of the previous Appendix G checklist questions to the updated ones is provided below. However, for the purposes of this SEIR, the analysis is presented using the previous checklist questions. This approach provides continuity between the SEIR and the TAMT Final PEIR (from which this SEIR tiers), and allows for a clearer comparison of any new or more severe significant impacts than what was disclosed in the TAMT Final PEIR.

Table 4.5-6 illustrates the relationship between the TAMT Final PEIR thresholds and the new Appendix G checklist questions.

Table 4.5-6. Comparison of TAMT Final PEIR Thresholds and New Appendix G Checklist Questions

TAMT Final PEIR Thresholds	New Appendix G Threshold	Comparison
Would the project...	Would the project...	
a) Conflict with an applicable program, plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	The TAMT Final PEIR Appendix G question covers the same issue as the updated Appendix G. question.
b) 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?	b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	Per State CEQA Guidelines section 15064.3, subdivision (c), application of this provision is not mandatory until July 1, 2020.
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	This question was eliminated from Appendix G.	This question was eliminated from Appendix G.
d) Substantially increase hazards due to a design feature (e.g. sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	c) Substantially increase hazards due to a geometric design feature (e.g. sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	The TAMT Final PEIR Appendix G question covers the same issue as the updated Appendix G question.
e) Result in inadequate emergency access?	d) Result in inadequate emergency access?	The TAMT Final PEIR Appendix G question covers the same issue as the updated Appendix G question.
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	See Threshold a), above.	The updated Appendix G question combines this issue with another and addresses it as part of Threshold a).

For consistency, the analysis uses the Appendix G questions used in the TAMT Final PEIR because they cover the same issues as the updated Appendix G questions (see Table 4.5-6). Impacts are considered significant if the Proposed Project would result in any of the following:

1. Conflict with an applicable program, plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit.

2. 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.
3. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.
4. Substantially increase hazards due to a design feature (e.g. sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
5. Result in inadequate emergency access.
6. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.
7. Result in an insufficient supply of parking to meet the project demand.

As discussed in the Initial Study/Environmental Checklist prepared for the Proposed Project (SEIR Appendix A), Thresholds 3, 4, 5, and 6 are not included in the analysis below as it was determined that the Proposed Project would not result in a significant impact requiring mitigation associated with changes in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks; a substantial increase in hazards due to a design feature; inadequate emergency access; or conflicts with adopted policies, plans, or programs supporting alternative transportation for the same reasons as documented in the TAMT Final PEIR. Therefore, the analysis presented in Section 4.5.4.3, *Project Impacts and Mitigation Measures*, focuses only on potential impacts for Thresholds 1, 2, and 7 related to the performance of the circulation system, implementation of the San Diego area's congestion management plan, and parking supply.

4.5.3.3 Project Impacts and Mitigation Measures

Threshold 1: Implementation of the Proposed Project *would* conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit.

TAMT Final PEIR Discussion

Construction

The Demolition and Initial Rail Component analyzed in the TAMT Final PEIR was the only project with sufficient details to provide a project-level analysis at the time of the TAMT Final PEIR's preparation. As such, it was the only project-level analysis that included a construction-level traffic analysis. The Demolition and Initial Rail Component includes demolition of Transit Sheds #1 and #2, as well as other various improvements. As discussed in the TAMT Final PEIR (pg. 4.10-40), construction of the Demolition and Initial Rail Component has the potential to result in a significant direct impact on the Norman Scott Road/32nd Street/Wabash Boulevard intersection.

Given the lack of construction and schedule details for future projects at the time of its preparation, the TAMT Final PEIR indicated that there would be a potential overlap between construction of the Demolition and Initial Rail Component and other TAMT Plan projects. As such, the TAMT Final PEIR

concluded that construction associated with the full TAMT Plan buildout could also result in a significant construction traffic impact on the Norman Scott Road/32nd Street/Wabash Boulevard intersection.

The TAMT Final PEIR concluded that given the life of the TAMT Plan (approximately 20 years), and considering future projects or improvements would only be initiated once market demand suggests support for them, it would be speculative to analyze the construction of these elements in any specific detail until such time that project-specific details are available.

The TAMT Final PEIR identified that mitigation (TAMT Final PEIR Mitigation Measure **MM-TRA-2**) in the form of a project-specific traffic study and construction traffic control plan is required to reduce the significant impact. However, without specific details, the TAMT Final PEIR concluded that it could not be determined with certainty that the impacts on the Norman Scott Road/32nd Street/Wabash Boulevard intersection would be reduced to less-than-significant levels. Therefore, construction traffic impacts associated with the TAMT Plan's potential to conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system were determined to be significant and unavoidable.

Operation

The TAMT Final PEIR analyzed operational impacts associated with the full buildout of the TAMT Plan for existing year plus STC scenario traffic conditions and future year plus STC scenario traffic conditions. Discussion provided in this section covers the existing year plus STC scenario traffic conditions while SEIR Section 5.3.5, *Cumulative Impacts/Transportation, Circulation and Parking*, provides a summary of future year plus STC scenario traffic conditions contemplated in the TAMT Final PEIR.

The analysis looked at the combined effect of operations associated with full buildout of the TAMT Plan, which included the Demolition and Initial Rail Component and other future components.

Roadway Segments

As identified in the TAMT Final PEIR, all study area roadway segments operate at LOS D or better under existing conditions, except for the roadway segment of 28th Street between Boston Avenue and National Avenue. That segment currently operates at LOS E. With the addition of TAMT Plan traffic under the STC scenario to existing traffic conditions, this roadway segment would worsen to LOS F and increase the V/C ratio by 0.029, which would exceed the City of San Diego's Traffic Significant Thresholds. As a result, the TAMT Final PEIR concluded that the addition of TAMT Plan traffic would result in a significant roadway segment impact.

To mitigate for the impact on the roadway segment of 28th Street between Boston Avenue and National Avenue, the TAMT Final PEIR identifies the improvement of the roadway to its ultimate classification as a Four Lane Major Arterial. Implementation of this improvement would improve the traffic operations at this affected roadway segment to LOS C, reducing the impact to a less-than-significant level. The TAMT Final PEIR identifies that full buildout of the STC scenario would have a fair-share contribution of 2.8 percent of the cost to widen the roadway to a Four Lane Major Arterial classification. The 2.8 percent fair share contribution was identified in the TAMT Final PEIR utilizing the following formula:

$$\text{Fair Share Percent (\%)} = \frac{(\text{Project Volume})}{(\text{Existing Plus Project Volume})}$$

$$\text{STC Scenario Fair Share Percent (\%)} = \frac{(\text{STC Project Volume: 647 ADT})}{(\text{Existing Volume (22,112 ADT)} + \text{Project Volume (647 ADT)})}$$

The TAMT Final PEIR also identifies that the roadway segment impact would occur when future projects contemplated under the TAMT Plan generate 161 new daily truck trips. This is the point at which TAMT operations would increase the V/C ratio by more than 0.01 at the failing roadway segment.

To ensure that the fair share contribution is triggered once TAMT operations reach a certain traffic volume, the TAMT Final PEIR identified Mitigation Measure **MM-TRA-3**, which outlines when the fair share contribution to the affected roadway is triggered, the mechanism for how the fair share contribution for the roadway improvement would be paid, a tracking program to monitor the number of trucks that enter and exit TAMT, and how the District may seek reimbursement from future projects that would contribute new daily trips in proportion to their contribution.

Implementation of TAMT Final PEIR Mitigation Measure **MM-TRA-3** would reduce the TAMT Plan's impact on the 28th Street segment between Boston Avenue and National Avenue. However, as the TAMT Final PEIR concludes, the timing and implementation of the necessary improvement are within the exclusive jurisdiction of the City of San Diego and not the District. As such, the District cannot ensure that the improvement to the roadway segment would be made when needed. Therefore, while TAMT Final PEIR Mitigation Measure **MM-TRA-3** could reduce the roadway segment impact to a less-than-significant level, the impact would be significant and unavoidable because of the uncertainty regarding the timing and implementation of the recommended improvement to 28th Street between Boston Avenue and National Avenue (TAMT Final PEIR pg. 4.10-52).

Intersections

As identified in the TAMT Final PEIR, all study area intersections operate at LOS D or better under existing conditions, except for the Norman Scott Road/32nd Street/Wabash Boulevard intersection. The Norman Scott Road/32nd Street/Wabash Boulevard intersection was identified as operating at LOS F in the AM peak hour (with an average delay of 95.3 seconds) and LOS E in the PM peak hour (with an average delay of 66.2 seconds). With the addition of TAMT Plan traffic under the STC scenario, this intersection would continue to operate at LOS F in the AM peak hour and LOS E in the PM peak hour. However, the addition of TAMT Plan buildout traffic would increase existing delay by 17.7 seconds in the AM peak hour and 7.2 seconds in the PM peak hour, which would exceed the City of San Diego's Traffic Significance Thresholds. Therefore, the TAMT Final PEIR concluded that a significant intersection impact at the Norman Scott Road/32nd Street/Wabash Boulevard intersection is anticipated with the addition of TAMT Plan traffic under existing year plus STC scenario conditions.

To mitigate for the impact at the Norman Scott Road/32nd Street/Wabash Boulevard intersection, the TAMT Final PEIR identified the improvement of the intersection by adding a westbound right-turn

overlap phase.¹ Implementation of this improvement would improve the traffic operations at this affected intersection by reducing the delay associated with the TAMT Plan. With the improvement, the intersection would operate at LOS F in the AM peak hour (with an average delay of 93.6 seconds) and LOS D in the PM peak hour (with an average delay of 54.1 seconds), effectively reducing delay at this intersection to below current levels.

However, the Norman Scott Road/32nd Street/Wabash Boulevard intersection is a Caltrans controlled intersection with improvements programmed and constructed by Caltrans. The TAMT Final PEIR identifies that the District shall coordinate with Caltrans to determine the District's fair share contribution of the cost to add a westbound right-turn overlap phase to the Norman Scott Road/32nd Street/Wabash Boulevard intersection. The TAMT Final PEIR states that the intersection impact would occur when future projects contemplated under TAMT Plan generate 195 new daily truck trips. This is the point at which TAMT operations would contribute more than 1.0 second of delay in the AM peak hour at the Norman Scott Road/32nd Street/Wabash Boulevard intersection.

To ensure that the fair share contribution is triggered once TAMT operations reach a certain traffic volume, the TAMT Final PEIR identified Mitigation Measure **MM-TRA-4**, which outlines when the fair share contribution to the affected intersection is triggered, the mechanism for how the fair share contribution for the roadway improvement would be paid, a tracking program to monitor the number of trucks that enter and exit TAMT, and how the District may seek reimbursement from future projects that would contribute new daily trips to the intersection in proportion to their contribution.

Implementation of TAMT Final PEIR Mitigation Measure **MM-TRA-4** would reduce the TAMT Plan's impact at the Norman Scott Road/32nd Street/Wabash Boulevard intersection. However, the TAMT Final PEIR concludes that, because the timing and implementation of the necessary improvement are within the exclusive jurisdiction of Caltrans and not the District, the District cannot ensure that the improvement to the intersection would be made when needed. Therefore, while TAMT Final PEIR Mitigation Measure **MM-TRA-4** could reduce the intersection impact to a less-than-significant level, the impact would be significant and unavoidable because of the uncertainty regarding the timing and implementation of the recommended improvement to the Norman Scott Road/32nd Street/Wabash Boulevard intersection (TAMT Final PEIR pg. 4.10-52).

Freeway Ramp Intersection Capacity

As identified in the TAMT Final PEIR, consistent with Caltrans requirements, the signalized ramp intersection conditions of National Avenue/I-5 northbound off-ramp and Norman Scott Road/32nd Street/Wabash Boulevard were determined using ILV procedures as described in Topic 406 of the Caltrans *Highway Design Manual* (Caltrans 2015). As identified in Table 4.10-8 of the TAMT Final PEIR, the existing intersection lane volumes at these signalized ramp intersections are considered to be under capacity.

With the addition of TAMT Plan buildout traffic to existing traffic volumes, the anticipated intersection lane volumes at these signalized ramp intersections would be considered under capacity. As identified in the TAMT Final PEIR, impacts on signalized ramp intersections at the National Avenue/I-5 northbound off ramp and Norman Scott Road/32nd Street/Wabash Boulevard would be less than significant, and no mitigation is required (TAMT Final PEIR pg. 4.10-42).

¹ A typical use of an overlap phase is where there is a dedicated right-turn lane that is signalized with a right-turn arrow. The signal overlap allows the right-turn traffic to continue flowing when the adjacent thru traffic is going, and to continue when the signal stops the adjacent thru traffic to serve the side street left-turn traffic.

Freeway Mainline Segments

As identified in the TAMT Final PEIR, all study area freeway segments operate at LOS D or better under existing conditions, except for the following:

- I-5 northbound between 28th Street and SR-15 (LOS F and V/C of 1.10)
- I-5 northbound between SR-15 and Main Street (LOS E and V/C of 0.99)
- I-5 southbound between SR-15 and Main Street (LOS E and V/C of 0.99)

With the addition of TAMT Plan traffic to existing traffic volumes, these study area freeway segments are projected to operate as follows:

- I-5 northbound between 28th Street and SR-15 (LOS F and V/C of 1.10)
- I-5 northbound between SR-15 and Main Street (LOS E and V/C of 1.00)
- I-5 southbound between SR-15 and Main Street (LOS E and V/C of 1.00)

A significant impact for a freeway mainline segment operating at LOS E occurs when an increase in V/C is greater than 0.01, while a significant impact for a freeway mainline segment operating at LOS F occurs when an increase in V/C is greater than 0.005. Under the existing year plus STC scenario, no operational related increase in V/C on I-5 northbound between 28th Street and SR-15 would occur. The operational related increase in V/C of 0.010 on I-5 northbound between SR-15 and Main Street and I-5 southbound between SR-15 and Main Street is less than the identified significance threshold of 0.01. As a result, the TAMT Final PEIR concluded that, based on the City of San Diego significance thresholds, no significant freeway mainline segment impact would occur with the addition of TAMT Plan buildout traffic.

Project Impact Discussion

Construction

As identified in Chapter 3, *Project Description*, of this SEIR, construction of the Proposed Project would occur in two phases (Phase I and Phase II). Bays C-7 and C-9 are anticipated to be upgraded as part of Phase I, and Bays C-8 and C-10 would be upgraded as part of Phase II. Phase II improvements to Bays C-8 and C-10 are anticipated to begin 2 to 3 years after Phase I is operational. Improvements for each phase would take an estimated 7 to 10 months to complete. The improvements would be identical for each phase and would involve five principal construction activities: (1) concrete demolition and excavation, (2) foundation and concrete pouring, (3) roof demolition and repair, (4) installation of mechanical equipment, and, (5) electrical tie-ins.

The Proposed Project's construction traffic would be composed primarily of two types of vehicle trips: construction worker trips (arriving to the Proposed Project site during the morning and leaving during the afternoon); and truck trips (occurring throughout the 8-hour workday). A maximum of 50 construction workers would be needed during the most intensive phase of construction, and 21 trucks would access the site over the course of a typical workday. In addition, a modest amount of miscellaneous vehicle trips was added to the AM and PM peak hours to account for miscellaneous trips (e.g., late worker arrivals/departures, inspectors, etc.). As shown in Table 4.5-8, construction traffic generated by the Proposed Project would total 284 trips per day (PCE), with a total of 34 trips occurring during the AM peak hour and 4 trips occurring during the PM peak hour. This could last up to 10 months over two separate phases.

The TAMT Final PEIR identified that given the lack of construction and schedule details for future projects at the time the TAMT Final PEIR was prepared and the potential overlap of construction for

TAMT Plan projects, construction associated with the full TAMT Plan buildout could result in significant construction traffic impacts.

The total worker and truck traffic construction volumes associated with the Proposed Project were assigned to the street system using the same distribution assumptions used in the TAMT Final PEIR. Table 4.5-7 provides a comparison between 2019 study area intersection operations and 2019 study area intersection operations with Proposed Project construction traffic.

Table 4.5-7. Study Area Intersections 2019 Conditions and Project Construction Traffic

Intersection	Control Type	Peak Hour	2019 Conditions		2019 Conditions + Project Construction			Impact?
			Delay ¹	LOS ²	Delay	LOS	Δ^3	
Harbor Drive/Cesar E. Chavez Parkway	Signal	AM	22.8	C	23.1	C	0.3	No
		PM	23.0	C	23.1	C	0.1	No
Harbor Drive/Sampson Street	Signal	AM	37.5	D	38.1	D	0.6	No
		PM	34.1	C	34.2	C	0.1	No
Main Street/28 th Street	Signal	AM	18.1	B	18.1	B	0.0	No
		PM	26.8	C	26.8	C	0.0	No
National Avenue/28 th Street	Signal	AM	33.1	C	33.1	C	0.0	No
		PM	17.8	B	17.8	B	0.0	No
Harbor Drive/32 nd Street	Signal	AM	19.7	B	19.9	B	0.2	No
		PM	35.5	D	35.5	D	0.0	No
Norman Scott Road/32 nd Street/Wabash Boulevard	Signal	AM	57.3	E	57.3	E	0.0	No
		PM	63.2	E	63.2	E	0.0	No

Source: LLG 2018.

¹ Average delay expressed in seconds per vehicle

² Level of Service

³ Δ denotes an increase in delay due to the combined construction

As shown in Table 4.5-7, with the addition of Proposed Project construction traffic volumes, all Project study area intersections would continue to operate at LOS D or better except for the Norman Scott Road/32nd Street/Wabash Boulevard intersection during the AM and PM peak hours with or without Project construction traffic.

Construction traffic for the Proposed Project would contribute 0.0 second of delay at the Norman Scott Road/32nd Street/Wabash Boulevard intersection. Per the City of San Diego significance thresholds, a significant impact for an intersection operating at LOS E occurs when there is an increase in delay greater than 2.0 seconds. Based on the City of San Diego significance thresholds, no significant intersection impacts would occur with the addition of Project construction traffic.

Table 4.5-8 provides a comparison between 2019 study area roadway segment operations and 2019 study area roadway segment operations with Project construction traffic.

Table 4.5-8. Study Area Street Segments 2019 Conditions and Project Construction Traffic

Street Segment	2019 Conditions			2019 Conditions + Project Construction				Impact?
	ADT	V/C ¹	LOS ²	ADT	V/C	LOS	Δ ³	
Harbor Drive								
Beardsley Street to Cesar E. Chavez Parkway	16,800	0.420	B	16,884	0.422	B	0.002	No
Cesar E. Chavez Parkway to S. 28th Street	11,920	0.298	A	12,125	0.303	A	0.005	No
Sampson Street to Schley Street	13,900	0.348	A	14,105	0.353	A	0.005	No
Schley Street to 28 th Street	13,440	0.336	A	13,645	0.341	A	0.005	No
28th Street to Belt Street	20,360	0.509	B	20,468	0.512	B	0.003	No
Belt Street to 32 nd Street	19,950	0.499	B	20,058	0.501	B	0.002	No
28th Street								
Harbor Drive to Main Street	12,820	0.321	A	12,919	0.323	A	0.002	No
Main Street to Boston Avenue	16,400	0.547	C	16,475	0.549	C	0.002	No
Boston Avenue to National Avenue	16,170	0.719	D	16,216	0.721	D	0.002	No
32 ND Street								
Harbor Drive to Norman Scott Road	27,340	0.547	B	27,448	0.549	B	0.002	No

Source: LLG 2018.

¹ Volume to Capacity ratio

² Level of Service

³ Δ denotes an increase in volume to capacity ratio due to the combined construction

As shown in Table 4.5-8, with the addition of Proposed Project construction traffic volumes, all study area roadway segments would continue to operate at LOS D or better. Therefore, construction of the Proposed Project would not result in a significant direct impact on study area intersections or roadway segments and no new or more severe significant impact would occur compared to what was previously disclosed in the TAMT Final PEIR.

Operation

A Comparative TIA was prepared for the Proposed Project, which evaluated whether there have been any substantial changes in circumstances related to roadway segment and intersection operations since certification of the TAMT Final PEIR that could cause the Proposed Project to result in new or more severe transportation impacts during operations.

Roadway Segments and Intersections

As shown in Table 4.5-7 above, operation of the Proposed Project is anticipated to generate 176 daily truck trips per day at peak day with a corresponding peak increase of 48 daily dock workers. These truck and employee trips would total approximately 1,200 average daily trips (PCE), with 76 trips occurring during both the AM and PM peak hours.

Figure 4.5-3 provides total vehicle volumes associated with operation of the Proposed Project. The employee distribution scenario is consistent with truck and employee trip distributions used in the TAMT Final PEIR traffic analysis. As shown in Tables 4.5-4 and 4.5-5, roadway segment and intersection operations have generally improved compared to the traffic conditions described in the TAMT Final PEIR.

Mitsubishi Cement Corporation at Warehouse C
4.5 TRANSPORTATION, CIRCULATION AND PARKING



Source: LLG, 2019.

Figure 4.5-4
Total Project Traffic Volumes

The Proposed Project's traffic volumes were distributed onto the same roadways and intersections as those analyzed in the TAMT Final PEIR. As described in Section 7.5.5.10 of the TAMT Final PEIR, operation of the STC Alternative is anticipated to generate 296 truck trips each day. As such, the 176 peak daily truck trips generated by operation of the Proposed Project would be within the truck trip volumes analyzed in the TAMT Final PEIR. Therefore, because the Proposed Project's operational truck trip volumes are within the scope of what was previously analyzed for the STC Alternative, no new or more severe roadway segment or intersection impacts would occur with operation of the Proposed Project compared to what was disclosed in the TAMT Final PEIR.

Freeway Ramp Intersection Capacity

As identified in the TAMT Final PEIR, the addition of TAMT buildout traffic to the signalized ramp intersections at the National Avenue/I-5 northbound off ramp and Norman Scott Road/32nd Street/Wabash Boulevard would not result in the signalized ramp intersections operating at overcapacity conditions. The TAMT Final PEIR concluded that impacts on signalized ramp intersections at the National Avenue/I-5 northbound off ramp and Norman Scott Road/32nd Street/Wabash Boulevard would be less than significant, and no mitigation is required (TAMT Final PEIR, pg. 7-50).

Traffic associated with the operation of the Proposed Project would be within the traffic volumes contemplated in the TAMT Final PEIR (refer to TAMT Final PEIR, Table 7-45). Because the Proposed Project would not generate traffic volumes in excess of the traffic volumes contemplated in the TAMT Final PEIR, no new or more severe signalized ramp intersection impacts would occur with the operation of the Proposed Project compared to what was disclosed in the TAMT Final PEIR.

Freeway Mainline Segments

As identified in the TAMT Final PEIR, no significant freeway mainline segment impacts are anticipated with the addition of TAMT Plan buildout traffic to existing conditions. Traffic associated with the operation of the Proposed Project would be within the traffic volumes contemplated in the TAMT Final PEIR (refer to TAMT Final PEIR, Table 7-45). Because the Proposed Project would not generate traffic volumes in excess of the traffic volumes contemplated in the TAMT Final PEIR, no new or more severe freeway mainline segments impacts would occur with the operation of the Proposed Project compared to what was disclosed in the TAMT Final PEIR.

Level of Significance Prior to Mitigation

Construction

No new or more severe significant intersection or roadway segment impacts would occur with the addition of Project construction traffic compared to what was previously disclosed in the TAMT Final PEIR.

Operation

Roadway Segments

Operation of the Proposed Project would not result in any new or more severe significant impacts on study area roadway segments compared to what was previously disclosed in the TAMT Final PEIR. However, the Proposed Project would generate vehicle trips that would contribute to the overall significant impact from TAMT Plan buildout on the roadway segment of 28th Street between Boston Avenue and National Avenue identified in the TAMT Final PEIR. As identified in the TAMT Final PEIR, to

mitigate for significant impacts from buildout of the TAMT Plan (which includes future projects such as the Proposed Project) on the roadway segment of 28th Street between Boston Avenue and National Avenue, the segment would need to be expanded to its ultimate classification as a Four Lane Major Arterial. Implementation of this improvement would improve the traffic operations at this affected roadway segment to LOS C, reducing the impact to a less-than-significant level. TAMT Final PEIR mitigation measure **MM-TRA-3** identified a 2.8 percent fair share contribution by the District of the cost to widen the roadway to a Four Lane Major Arterial classification and that the roadway impact would occur when future projects contemplated under TAMT Plan generate 161 new daily truck trips.

The Proposed Project would generate up to 176 trucks per day during peak operation and would contribute to the exceedance of the V/C ratio on the segment of 28th Street between Boston Avenue and National Avenue. Therefore, TAMT Final PEIR mitigation measure **MM-TRA-3** would apply to the Proposed Project. As noted in TAMT Final PEIR mitigation measure **MM-TRA-3**, the District may seek reimbursement from future projects that would contribute new daily trips in proportion to their contribution.

Utilizing the same fair share contribution identified in the TAMT Final PEIR, the Proposed Project would be responsible for contributing 1.6 percent of the total cost to widen the segment of 28th Street between Boston Avenue and National Avenue.

$$\text{Fair Share Percent (\%)} = \frac{(\text{Project Volume: 353 ADT})}{(\text{Baseline Volume: 22,112}) + (\text{Project Volume: 353 ADT})}$$

The roadway segment widening improvement has been identified as part of the overall improvement to the 28th Street roadway segment between National Avenue and Main Street in the Barrio Logan Public Facilities Financing Plan. However, the Barrio Logan Public Facilities Financing Plan indicates that the design and construction of the improvement will be scheduled when funding becomes available. To ensure consistency with TAMT Final PEIR Mitigation Measure **MM-TRA-3**, the Proposed Project would contribute 1.6 percent of the total cost to widen the roadway segment, while the District (or other future projects) would contribute the remaining 1.2 percent of total cost to the City to ensure the entire 2.8 percent fair share contribution is provided to the City of San Diego. As such, TAMT Final PEIR mitigation measure **MM-TRA-3** has been modified to reflect the Proposed Project's fair share contribution to the roadway improvement as mitigation measure **MM-TRA-3R**.

Intersections

Operation of the Proposed Project would not result in any new or more severe significant impacts on study area intersections compared to what was previously disclosed in the TAMT Final PEIR. However, the Proposed Project would generate vehicle trips that would contribute to the overall significant impact from TAMT Plan buildout on the Norman Scott Road/32nd Street/Wabash Boulevard intersection identified in the TAMT Final PEIR. To mitigate for significant impacts from buildout of the TAMT Plan (which includes future projects such as the Proposed Project) on the Norman Scott Road/32nd Street/Wabash Boulevard intersection, the TAMT Final PEIR identified the improvement of the intersection by adding a westbound right-turn overlap phase. Implementation of this improvement would improve the traffic operations at this affected intersection by reducing the delay associated with the TAMT Plan. With the improvement, the intersection would operate at LOS F in the AM peak hour (with an average delay of 93.6 seconds) and LOS D in the PM peak hour (with an average delay of 54.1 seconds), effectively reducing delay at this intersection to below current levels. The TAMT Final PEIR

noted that the intersection impact would occur when future projects contemplated under TAMT Plan generate 195 new daily truck trips. This is the point at which TAMT operations would contribute more than 1.0 second of delay in the AM peak hour at the Norman Scott Road/32nd Street/Wabash Boulevard intersection.

The TAMT Final PEIR identified mitigation measure **MM-TRA-4** to ensure that the fair share contribution is triggered once TAMT operations generate approximately 150 new daily trips, which outlines when the fair share contribution to the affected intersection is triggered, the mechanism for how the fair share contribution for the roadway improvement would be paid, a tracking program to monitor the number of trucks that enter and exit TAMT, and how the District may seek reimbursement from future projects that would contribute new daily trips to the intersection in proportion to their contribution. The Proposed Project would generate up to 176 trucks per day during maximum operation. As such, TAMT Final PEIR Mitigation Measure **MM-TRA-4** has been modified to reflect the Proposed Project's contribution to the intersection improvement as Mitigation Measure **MM-TRA-4R**.

Freeway Ramp Intersection Capacity

Traffic associated with the operation of the Proposed Project would not result in new or more severe freeway ramp intersection capacity impacts compared to what was previously disclosed in the TAMT Final PEIR. Impacts would be less than significant.

Freeway Mainline Segments

Traffic associated with the operation of the Proposed Project would not generate traffic volumes that would result in new or more severe freeway mainline impacts compared to what was previously disclosed in the TAMT Final PEIR. Impacts would be less than significant.

Mitigation Measures

Table 4.5-9 provides a comparison summary of construction and operational traffic mitigation measures previously identified in the TAMT Final PEIR for the TAMT Plan and how those mitigation measures apply to the Proposed Project. In instances where modification of the TAMT Final PEIR mitigation measures is necessary or new Project mitigation measures are needed, an explanation is provided. For modifications to the TAMT Final PEIR mitigation measures, the changes are indicated in Table 4.5-9 with an "R."

Table 4.5-9. Comparison of Construction and Operational Traffic TAMT Final PEIR Mitigation Measures to Proposed Project Draft SEIR Mitigation Measures

<p>TAMT Final PEIR Mitigation Measure <i>The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMT Plan, adopted by the District in December 2016 as part of the Final Environmental Impact Report for the TAMT Plan.</i></p>	<p>Mitsubishi Cement Corporation Project SEIR Mitigation Measure <i>Project mitigation measures are a combination of applicable TAMT Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMT Final PEIR mitigation measures are provided with additions shown in <u>double underline</u> and deletions are indicated in strikeout format.</i></p>	<p>Project Applicability/Reason for Modification or New Project Mitigation Measure</p>
TRANSPORTATION AND CIRCULATION		
<p>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/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"> ▪ 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. <p>Coordinate with the City of San Diego (which may also include coordination with the local planning group) for additional ideas.</p>	<p>TAMT Final PEIR MM-TRA-1 is not applicable to the Proposed Project.</p>	<p>TAMT Final PEIR MM-TRA-1 is related to construction activities associated with the Demolition and Initial Rail Component Project. The Proposed Project is not associated with the Demolition and Initial Rail Component Project. Therefore, TAMT Final PEIR MM-TRA-1 does not apply to the Proposed Project.</p>
<p>MM-TRA-2: 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.</p> <p>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</p>	<p>The Project-level SEIR for the Proposed Project has satisfied and is consistent with TAMT Final PEIR MM-TRA-2.</p>	<p>As part of the Proposed Project's SEIR, a traffic study has been prepared to assess project-specific construction impacts. Based on the Project's traffic study (, the anticipated construction activity associated with the Proposed Project would not have a significant impact on study area roadways or intersections. Because no significant construction</p>

Table 4.5-9. Comparison of Construction and Operational Traffic TAMT Final PEIR Mitigation Measures to Proposed Project Draft SEIR Mitigation Measures

<p>TAMT Final PEIR Mitigation Measure <i>The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMT Plan, adopted by the District in December 2016 as part of the Final Environmental Impact Report for the TAMT Plan.</i></p>	<p>Mitsubishi Cement Corporation Project SEIR Mitigation Measure <i>Project mitigation measures are a combination of applicable TAMT Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMT Final PEIR mitigation measures are provided with additions shown in <u>double underline</u> and deletions are indicated in strikeout format.</i></p>	<p>Project Applicability/Reason for Modification or New Project Mitigation Measure</p>
<p>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.</p> <ul style="list-style-type: none"> ▪ 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. <p>Coordinate with the City of San Diego (which may also include coordination with the local planning group) for additional ideas.</p>		<p>traffic impacts would occur, a TDM plan is not required.</p>
<p>MM-TRA-3: Widen the Segment of 28th 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 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 28th 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.</p> <p>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 District shall initiate payment once approximately 150</p>	<p>MM-TRA-3R: Widen the Segment of 28th Street between Boston Avenue and National Avenue to a Four-Lane Major Arterial Classification Consistent with the <u>Barrio Logan Community Plan Barrio Logan Public Facilities Financing Plan</u>. 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 28th 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 <u>Barrio Logan Public Facilities Financing Plan</u>, and therefore would be paid to the City of San Diego in accordance with Section 142.0640 of the San Diego Municipal Code.</p> <p>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 District shall initiate payment once approximately 150 new daily truck trips are reached under the proposed project. The</p>	<p>MM-TRA-3 applies to the Proposed Project. Modifications to MM-TRA-3 are limited to identifying updates to the Barrio Logan Public Facilities Financing Plan and the Proposed Project's fair share contribution to the roadway improvements.</p>

Table 4.5-9. Comparison of Construction and Operational Traffic TAMT Final PEIR Mitigation Measures to Proposed Project Draft SEIR Mitigation Measures

<p>TAMT Final PEIR Mitigation Measure <i>The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMT Plan, adopted by the District in December 2016 as part of the Final Environmental Impact Report for the TAMT Plan.</i></p>	<p>Mitsubishi Cement Corporation Project SEIR Mitigation Measure <i>Project mitigation measures are a combination of applicable TAMT Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMT Final PEIR mitigation measures are provided with additions shown in <u>double underline</u> and deletions are indicated in strikeout format.</i></p>	<p>Project Applicability/Reason for Modification or New Project Mitigation Measure</p>
<p>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>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><u>Based on the Proposed Project's contribution of new daily trips, a fair share contribution of 1.6% of the total cost to widen the roadway segment shall be paid by the Mitsubishi Cement Corporation to the City prior to 150 new daily truck trips being generated.</u></p>	
<p>MM-TRA-4: Westbound Right-Turn Overlap Phase at Norman Scott Road/32nd 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/32nd 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</p>	<p>MM-TRA-4R: Westbound Right-Turn Overlap Phase at Norman Scott Road/32nd 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/32nd 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</p>	<p>MM-TRA-4 applies to the Proposed Project. Modifications to MM-TRA-4 are limited to identifying the Proposed Project's fair share contribution to the roadway improvements.</p>

Table 4.5-9. Comparison of Construction and Operational Traffic TAMT Final PEIR Mitigation Measures to Proposed Project Draft SEIR Mitigation Measures

<p>TAMT Final PEIR Mitigation Measure <i>The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMT Plan, adopted by the District in December 2016 as part of the Final Environmental Impact Report for the TAMT Plan.</i></p>	<p>Mitsubishi Cement Corporation Project SEIR Mitigation Measure <i>Project mitigation measures are a combination of applicable TAMT Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMT Final PEIR mitigation measures are provided with additions shown in <u>double underline</u> and deletions are indicated in strikeout format.</i></p>	<p>Project Applicability/Reason for Modification or New Project Mitigation Measure</p>
<p>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.</p>	<p>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.</p> <p><u>Based on the Proposed Project's contribution of new daily trips, a fair share contribution of 1.4% of the total cost to improve the intersection shall be paid by the Mitsubishi Cement Corporation to the District prior to 150 new daily trips being generated.</u></p>	

Level of Significance After Mitigation

Construction

TAMT Final PEIR mitigation measure **MM-TRA-2** requires a traffic study to analyze the potential transportation impacts associated with future specific construction projects and to consider any overlapping projects on TAMT. TAMT Final PEIR mitigation measure **MM-TRA-2** also requires that the traffic study consider if a Transportation Demand Management (TDM) plan is required if the proposed construction activity results in a significant traffic impact.

In accordance with **MM-TRA-2**, a Traffic Impact Analysis was prepared for the Proposed Project and included analysis of construction-related traffic impacts. Based on the Proposed Project's Traffic Impact Analysis (which included analysis of potential impacts associated with overlapping construction projects within TAMT), the anticipated construction activity associated with the Proposed Project would not have a significant impact on adjacent roadways or intersections. Because construction of the Proposed Project would not have a significant traffic impact, no TDM plan is required. Therefore, the Proposed Project is consistent with TAMT Final PEIR mitigation measure **MM-TRA-2**, and no new or more severe significant impacts than what was previously disclosed in the TAMT Final PEIR would occur.

Operation

Roadway Segments

Implementation of **MM-TRA-3R** would reduce the Proposed Project's contribution to the overall significant impact from TAMT Plan buildout on the segment of 28th Street between Boston Avenue and National Avenue. However, similar to what was identified in the TAMT Final PEIR, the timing and implementation of the necessary improvement are within the exclusive jurisdiction of the City of San Diego and not the District. As such, the District cannot ensure that the improvement to the roadway segment would be made when needed. Therefore, while Mitigation Measure **MM-TRA-3R** would reduce the roadway segment impact to a less-than-significant level, the impact would be significant and unavoidable because of the uncertainty regarding the timing and implementation of the recommended improvement to 28th Street between Boston Avenue and National Avenue. As this finding is consistent with the finding in the TAMT Final PEIR, the Proposed Project would not result in new or more severe significant roadway segment impacts than what was disclosed in the TAMT Final PEIR.

Intersections

Implementation of **MM-TRA-4R** would reduce the Proposed Project's contribution to the overall significant impact from TAMT Plan buildout on the Norman Scott Road/32nd Street/Wabash Boulevard intersection. However, similar to what was described in the TAMT Final PEIR, the timing and implementation of the necessary improvement are within the exclusive jurisdiction of Caltrans and not the District. As such, the District cannot ensure that the improvement to the intersection would be made when needed. Therefore, while **MM-TRA-4R** would reduce the intersection impact to a less-than-significant level, the impact would be significant and unavoidable because of the uncertainty regarding the timing and implementation of the recommended improvement to the Norman Scott Road/32nd Street/Wabash Boulevard intersection. As this finding is consistent with the finding in the TAMT Final PEIR, the Proposed Project would not result in new or more severe intersection impacts than what was disclosed in the TAMT Final PEIR.

Freeway Ramp Intersection Capacity

Traffic associated with the operation of the Proposed Project would not result in new or more severe significant impacts on signalized ramp intersections compared to those identified in the TAMT Final PEIR. Impacts would be less than significant with no mitigation required.

Freeway Mainline Segments

Traffic associated with the operation of the Proposed Project would not generate traffic volumes that would result in new or more severe significant impacts on freeway mainline segments compared to those identified in the TAMT Final PEIR. Impacts would be less than significant with no mitigation required.

Threshold 2: Implementation of the Proposed Project *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.

TAMT Final PEIR Discussion

As identified in the TAMT Final PEIR, no directly applicable land use policies from SANDAG's Regional Plan were identified that pertain to the TAMT Plan as implementation of TAMT Plan would not change land use designations on TAMT. In addition, aside from potential improvements associated with mitigation measures, the TAMT Plan would not result in any changes to existing transportation infrastructure outside of TAMT and would not interfere with the policies or projects identified in the Regional Plan. The TAMT Final PEIR concluded that implementation of the TAMT Plan would not conflict with an applicable congestion management program, and impacts would be less than significant with no mitigation measures required.

Project Impact Discussion

Implementation of the Proposed Project would not change land use designations within TAMT. Similar to what was identified in the TAMT Final PEIR, the Proposed Project would not interfere with policies or projects identified in the Regional Plan. Aside from potential improvements associated with identified mitigation measures that were part of the TAMT Final PEIR, the Proposed Project would not result in any changes to existing transportation infrastructure outside of TAMT. Therefore, the Proposed Project would not conflict with an applicable congestion management program, and no new or more severe significant impacts than what was disclosed in the TAMT Final PEIR would occur.

Level of Significance Prior to Mitigation

Implementation of the Proposed Project would not conflict with an applicable congestion management program, and no new or more severe significant impacts than what was disclosed in the TAMT Final PEIR would occur.

Mitigation Measures

No mitigation measures are required.

Level of Significance After Mitigation

The Proposed Project would not result in new or more severe significant impacts compared to those identified in the TAMT Final PEIR.

Threshold 7: Implementation of the Proposed Project <i>would not</i> result in inadequate parking capacity.
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TAMT Final PEIR Discussion

The TAMT Final PEIR identified that TAMT has 599 available parking spaces for terminal workers under existing conditions. Upon completion of the Demolition and Initial Rail Component, approximately 360 workers would be on TAMT on any given day during the busiest 8-hour shift, resulting in a surplus of 239 parking spaces on TAMT on even the busiest days (TAMT Final PEIR pg. 4.10-59).

It is also noted that the long-term buildout of the TAMT Plan calls for the demolition of Warehouse C, which would eliminate 85 parking spaces located along the northeast side of Warehouse C, resulting in a reduced total of 514 parking spaces. However, even with the reduction of parking spaces along Warehouse C, parking could be accommodated in areas on TAMT that are not heavily traveled, such as along the north area around the dry bulk facility (TAMT Final PEIR pg. 4.10-60).

The TAMT Final PEIR identified that at TAMT Plan buildout, up to 839 total workers under the STC scenario could be present on TAMT in 2035. The TAMT Final PEIR concluded that 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 for the buildout conditions at TAMT. However, implementation of TAMT Final PEIR 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, and would reduce impacts to less than significant.

Project Impact Discussion

Based on preliminary information available for the Proposed Project, it is anticipated that a maximum of 50 construction workers would be on TAMT during the most intensive phase of construction. Given that there would be a surplus of approximately 239 parking spaces on TAMT upon completion of the Demolition and Initial Rail Component, which is scheduled to be finished prior to Project construction, it is anticipated that parking for these 50 construction workers would be available on TAMT, and no offsite parking would be required during construction of the Proposed Project.

Once operational, the Proposed Project would require one full-time supervisor and up to three maintenance staff workers at all times, for a total of four long-term onsite workers. Vessel unloading and truck loading operations are considered independent activities that may either occur at different times or simultaneously. During truck loading operations up to three additional workers would be required, for a total of seven onsite workers per shift. During ship unloading operations, up to 16 additional workers per shift would be required, for a total of 20 workers onsite. When vessel unloading and truck loading occur at the same time up to 20 additional workers would be required, for a total of 24 onsite workers per shift for two shifts per day.

It is anticipated that the workers associated with operational activities would have available parking within the Proposed Project's leasehold or adjacent to Warehouse C. As identified in the TAMT Final PEIR, dock workers responsible for loading and unloading shipments typically park closest to where they have been assigned for a particular shift, provided the parked cars do not obstruct terminal operations. Onsite workers associated with vessel unloading for the Proposed Project would park adjacent to Berths

7 and 8, consistent with assumptions made for dock worker parking in the TAMT Final PEIR. In addition, the Proposed Project would not result in the demolition of Warehouse C or the removal of any additional parking on TAMT that would result in a reduction of available parking on TAMT. Based on the information presented, adequate parking to accommodate all anticipated Project workers during Project operation is available on TAMT. The Proposed Project would not result in new or more severe parking impacts compared to those disclosed in the TAMT Final PEIR.

Level of Significance Prior to Mitigation

Although no new or more severe parking impacts would occur with implementation of the Proposed Project, the Proposed Project would still contribute to the overall significant parking impact from TAMT Plan buildout identified in the TAMT Final PEIR. Therefore, TAMT Final PEIR Mitigation Measure **MM-TRA-5** is still required to ensure consistency between the TAMT Final PEIR and this SEIR.

Mitigation Measures

Table 4.5-10 provides a comparison summary of parking mitigation measures previously identified in the TAMT Final PEIR for the TAMT Plan and how those mitigation measures apply to the Proposed Project. In instances where modification of the TAMT Final PEIR mitigation measures is necessary or new Project mitigation measures are needed, an explanation is provided in Table 4.5-10. For modifications to the TAMT Final PEIR mitigation measures, the changes are indicated in Table 4.5-10 with an “R.”

Level of Significance After Mitigation

Similar to what was identified in the TAMT Final PEIR, with implementation of TAMT Final PEIR Mitigation Measure **MM-TRA-5**, the District would ensure that all TAMT workers, employees, and contractors would park onsite. At no point would TAMT employees be permitted to park outside of authorized locations—on-terminal or off. Specifically, parking would always be provided on TAMT or authorized parking locations (such as nearby parking garages and surface parking lots), which would be identified and formalized through signed agreements with tenants. Impacts associated with this issue are less than significant. Therefore, the Proposed Project would not result in new or more severe significant impacts compared to those disclosed in the TAMT Final PEIR.

Table 4.5-10. Comparison of Parking TAMT Final PEIR Mitigation Measures to Proposed Project Draft SEIR Mitigation Measures

<p>TAMT Final PEIR Mitigation Measure</p> <p><i>The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMT Plan, adopted by the District in December 2016 as part of the Final Environmental Impact Report for the TAMT Plan.</i></p>	<p>Mitsubishi Cement Corporation Project SEIR Mitigation Measure</p> <p><i>Project mitigation measures are a combination of applicable TAMT Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMT Final PEIR mitigation measures are provided with additions shown in <u>double underline</u> and deletions are indicated in strikeout format.</i></p>	<p>Project Applicability/Reason for Modification or New Project Mitigation Measure</p>
PARKING		
<p>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.</p>	<p>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.</p>	<p>MM-TRA-5 applies to the Proposed Project. No modifications to MM-TRA-5 are proposed for the Project.</p>
<p>MM-TRA-6: District to Maintain a Parking Inventory of TAMT. 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"> i. The inventory shall include all existing tenants, including tenant-specific parking lots or parking spaces identified in their lease and all nonexclusive parking spaces available at the TAMT. ii. The inventory shall include any parking required by the District's existing operations. 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. 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. v. A determination of the surplus or deficit of parking on TAMT. 	<p>TAMT Final PEIR MM TRA-6 is not applicable to the Proposed Project.</p>	<p>MM-TRA-6 does not apply to the Proposed Project.</p> <p>The threshold for initiating the parking inventory on TAMT has not occurred. Implementation of the Proposed Project would not result in an average of 475 employees being present on TAMT during any single 8-hour shift.</p> <p>In addition, the Proposed Project would not remove any of the parking areas identified within the TAMT Final PEIR.</p>

Table 4.5-10. Comparison of Parking TAMT Final PEIR Mitigation Measures to Proposed Project Draft SEIR Mitigation Measures

<p>TAMT Final PEIR Mitigation Measure</p> <p><i>The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMT Plan, adopted by the District in December 2016 as part of the Final Environmental Impact Report for the TAMT Plan.</i></p>	<p>Mitsubishi Cement Corporation Project SEIR Mitigation Measure</p> <p><i>Project mitigation measures are a combination of applicable TAMT Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMT Final PEIR mitigation measures are provided with additions shown in <u>double underline</u> and deletions are indicated in strikeout format.</i></p>	<p>Project Applicability/Reason for Modification or New Project Mitigation Measure</p>
<p>MM-TRA-7: Proponents for Future Project Components, New Leases, or Lease Renewals Shall Prepare a Parking Management Plan. 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"> 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. ii. Reserved parking spaces outside the tenant's leasehold at the TAMT, as authorized by the District through formal agreement signed by the District's Director of Maritime or his/her designee. iii. Alternative transportation options to reduce parking demand such as subsidized transit passes, bicycle racks, employee vanpools, or other carpooling incentive programs. iv. Preferential parking for carpools/vanpools. v. Employee shuttles to/from the union hall at shift changes, as feasible. 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. vii. Employer Coordination with SANDAG's iCommute Program. <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>	<p>The Project-level SEIR for the Proposed Project has satisfied and is consistent with TAMT Final PEIR MM-TRA-7.</p>	<p>The Project SEIR and Traffic Impact Analysis contains information pertaining to the availability of parking on TAMT for the Proposed Project. Based on information obtained from the traffic impact analysis and maritime staff coordination, there is adequate parking available for the Proposed Project on TAMT.</p>

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5. Cumulative Impacts

This chapter considers the cumulative effects of past, present, and reasonably foreseeable future projects and the proposed project's contribution to these effects. Past projects are defined as those that were recently completed and are now operational. Present projects are defined as those that are under construction but not yet operational. Reasonably foreseeable future projects are defined as those for which a development application has been submitted or credible information is available to suggest that project development is a probable outcome at the time the Notice of Preparation (NOP) was issued (September 18, 2017). This chapter describes the process used to determine cumulative impacts, which includes the CEQA requirements related to cumulative impacts, the methodology used in the cumulative impact analysis, and the cumulative projects identified and applicable to the cumulative analysis.

5.1 Overview

Both CEQA and the State CEQA Guidelines require that an EIR analyze whether a proposed project will result in a cumulatively considerable contribution to a potential cumulative impact. As stated in Public Resources Code Section 21083(b), "a project may have a significant effect on the environment if" the "possible effects of a project are individually limited but cumulatively considerable." The discussion of cumulative impacts must reflect the severity of the impacts, as well as the likelihood of their occurrence; however, the discussion need not be as detailed as the discussion of environmental impacts attributable to the project alone. Further, the discussion is intended to be guided by the standards of practicality and reasonableness.

Preparation of a cumulative impact analysis is required under CEQA (State CEQA Guidelines Sections 15130 and 15355). According to Section 15355 of the State CEQA Guidelines:

"Cumulative impacts" refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.

- (a) The individual effects may be changes resulting from a single project or a number of separate projects.*
- (b) 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.*

Further, according to State CEQA Guidelines Section 15130 (a)(1):

As defined in Section 15355, a cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts. An EIR should not discuss impacts which do not result in part from the project evaluated in the EIR.

In addition, as stated in State CEQA Guidelines Section 15064(h)(4) it should be noted that:

The mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project's incremental effects are cumulatively considerable.

Therefore, the cumulative analysis in an EIR should focus on whether the impacts of a proposed project are cumulatively considerable when taking into consideration the impacts caused by other past, present,

or reasonably foreseeable future projects. The determination of whether an impact is cumulatively considerable takes into consideration the severity and likelihood of the impact as well as the magnitude of the project's contribution to the cumulative impact. In some circumstances, even a minor project effect (i.e., less than significant project-level impact) can result in a substantial contribution to a cumulative impact, meaning that as a cumulative impact becomes more acute, even a small individual contribution to that impact can be considered cumulatively considerable. Cumulative impact discussions for each issue area are provided in the respective sections.

5.2 Cumulative Methodology

According to Section 15130(b) of the State CEQA Guidelines, cumulative impact analysis may be conducted using one of two methods: the List Method, which includes "a list of past, present, and probable activities producing related or cumulative impacts"; or the Plan Method, which uses "a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area wide conditions contributing to the cumulative impact." The cumulative analysis of near-term conditions that follows for a majority of issue areas uses the List Method. However, the Transportation Impact Analysis prepared for the Proposed Project bases the 2035 future year conditions on the forecasted traffic volumes in the San Diego Association of Governments (SANDAG) Series 12 traffic model, which was supplemented by the traffic volumes generated by buildout of the TAMT Plan. As such, the cumulative analyses for long-term transportation impacts as well as traffic-related impacts on air quality, greenhouse gas emissions, and noise and vibration use the Plan Method.

The analysis of cumulative effects considers a number of variables including geographic (spatial) limits, time (temporal) limits, and the characteristics of the resource being evaluated. The geographic scope of each analysis generally considers the topography surrounding the Proposed Project and the natural boundaries of the resource affected, rather than jurisdictional boundaries. The geographic scope of cumulative effects will often extend beyond the scope of the direct effects, but not beyond the scope of the indirect effects of the Proposed Project. Generally, the geographic area affected by cumulative effects varies by resource or issue area. For example, air quality impacts tend to disperse over a large area, while traffic impacts are typically more localized. For this reason, the geographic scope for the analysis of cumulative impacts must be identified for each issue area. In addition, each cumulative project (see Table 5-1) has its own implementation schedule, which may or may not coincide or overlap with the Proposed Project's schedule. These factors are all taken into consideration in the cumulative impact analysis for each issue area.

The cumulative analysis evaluates the potential for the Proposed Project to contribute to a cumulative adverse impact on the environment. For each resource area, an introductory statement is made regarding what would amount to a significant cumulative impact in a particular resource area.

The analysis that follows considers two separate impacts: the significance of the cumulative effect from past, present, and reasonably foreseeable projects; and, in the event a cumulative effect is identified, the Proposed Project's incremental contribution to the identified cumulative effect. If it is determined that the Proposed Project's contribution to the cumulative effect is considerable, a cumulatively considerable impact is identified, and mitigation is imposed.

Based on the existing conditions present at the Project site and a review of the Proposed Project, it was determined in the NOP that implementation of the Proposed Project would only have the potential to result in impacts on air quality and health risk, greenhouse gas emissions and global climate change, hazards and hazardous materials, noise and vibration, and transportation, circulation and parking.

Therefore, the cumulative analysis that follows addresses the incremental contribution of the Proposed Project to cumulative impacts associated with these resource areas. For all other issue areas, it was determined in the NOP that the Proposed Project would not result in any impacts, and therefore would not have a potential to contribute to cumulative impacts related to these resources areas. As such, these resource areas are not discussed in the cumulative impact analysis below.

5.2.1 Cumulative Projects List

Table 5-1 provides a list of the cumulative projects relevant to the cumulative analysis for the Proposed Project. These projects were identified and compiled by District Staff in coordination with the City of San Diego. The projects listed in the proposed project's cumulative study area have had applications submitted or have been approved, are under construction, or have recently been completed. The cumulative projects identified in the study area are listed in Table 5-1 and the locations are shown in Figure 5-1 (project numbering corresponds to numbers shown on Figure 5-1). Other relevant previously prepared documents were also consulted to ensure completeness of the cumulative project list.

Table 5-1. Cumulative Projects				
Map Number	Name	Location	Description	Status
1	Dole Fresh Fruit Refrigerated Rack Project	850 Water Street, within the District's Tenth Avenue Marine Terminal	Involved the installation of 5 new refrigerated racks with an additional 94 electrical outlets, to increase outlets from 669 to 763. Improvements increased storage capacity within the existing footprint to accommodate up to three new larger ocean-going vessels.	Completed
2	San Diego Continuing Education – Cesar Chavez Campus	Intersection of National Avenue and Cesar E. Chavez Parkway	New Cesar E. Chavez Campus is a 67,924-square-foot school facility with 22 classrooms to serve 720 students. The facility includes a multi-purpose room and administrative offices.	Completed
3	BAE Systems-Pier 1 North Drydock, Associated Real Estate Agreements and Removal of Cooling Tunnels Project	2205 East Belt Street	Replacement of a wet berth with a new floating drydock and removal of subsurface cooling tunnels. Dredging activities were estimated to result in approximately 395,000 cubic yards of sediment.	Completed
4	Shipyard Sediment Remediation Project	San Diego Bay Between Sampson Street extension to the north and Schley Street to the south from the shoreline to the U.S. Pierhead Line to the west and a portion of British Aerospace Systems facility, San Diego, CA 92113	Consisted of the dredging of sediment adjacent to shipyards in the San Diego Bay; the dewatering, and solidification of the dredged material on-shore; treatment of decanted water; and the transport of the removed material to an appropriate landfill for disposal.	Completed

Table 5-1. Cumulative Projects				
Map Number	Name	Location	Description	Status
5	Naval Base Point Loma Fuel Pier (P151) Replacement and Dredging	Naval Station Point Loma and Alternative Bait Barge locations within State lands, San Diego, CA	Temporary Space and Naval Warfare Systems Center (SSC) marine mammal facilities at Naval Main and Anti-Submarine Warfare Command (NMAWC) and relocation of the program to NMAWC; demolished existing Naval Base Point Loma Fuel Pier in phases so as to leave pier operational throughout project; constructed 71,180-square-foot double-deck replacement pier and perform associated dredging; returned SSC marine mammal program to original location.	Completed
6	Pier 12 Replacement and Dredging at Naval Base San Diego	Pier 12 at Naval Base San Diego	Demolition of an inadequate existing pier (Pier 12), dredging in berthing and approach areas for a new pier, dredged material disposal at an approved ocean disposal site and permitted upland landfill, construction of a new pier and associated pier utilities, including upgrades to the electrical infrastructure at the adjacent Pier 13, and reuse of demolition concrete to create fish enhancement structures (artificial reefs). The purpose of the project was to address the current and impending shortfall at Naval Base San Diego of pier infrastructure necessary to support modern Navy ship classes with deep draft or power intensive requirements.	Completed
7	Shelter Island Boat Launch Facility Improvements Project	2210 Shelter Island Drive, San Diego, CA 92106	Repair, maintenance, and replacement of the boat launch ramp, jetties (including public walkways), gangways, and floating docks, as well as minor improvements to the kayak launching area, restrooms, and parking.	Completed
8	Cold Ironing Phase 2 at B Street and Broadway Pier	B Street Pier and Broadway Pier, 1140 and 1000 North Harbor Drive	Infrastructure components to provide shore power to existing terminal operations at the B Street and Broadway Piers (three berths) with the result of reducing air pollutant emissions and greenhouse gas emissions while cruise ships are berthed. Initially, shore power will be available to one ship at a time; in subsequent years, two ships will be able to use shore power at the same time.	Currently in design (2019) and slated for future construction
9	San Diego Bay and Imperial Beach Oceanfront Fireworks Display Events	Throughout District tidelands	Addition of an Ordinance to the Port District Code that established a program to regulate fireworks. Specifically, the program governs the existing and proposed new fireworks display events requiring a discretionary action by the District or operated by the District's tenants that occur within the San Diego Bay and Imperial Beach Oceanfront. Four new fireworks display events were anticipated to require a future discretionary action by the District, including three displays along the Chula Vista Bayfront and one display along the National City Bayfront.	EIR was certified and Ordinance was adopted on May 25, 2017.

Table 5-1. Cumulative Projects

Map Number	Name	Location	Description	Status
10	Pier 8 Replacement Naval Base San Diego	Pier 8 at Naval Base San Diego	Demolition of the inadequate existing Pier 8; construction of a replacement Pier 8; provision of associated pier utilities. The purpose of the proposed action is to address the current and impending shortfall at Naval Base San Diego of pier infrastructure necessary to support modern Navy ship classes with deep-draft and power-intensive requirements.	Under construction.
11	Construction Projects associated with the Tenth Avenue Marine Terminal Redevelopment Plan and Demolition and Initial Rail Component Project	686 Switzer Street	Program- and Project-level EIR analysis. The Program component looks at the Sustainable Terminal Capacity of three distinct cargo nodes (e.g., Refrigerated Container, Neo-bulk/Break Bulk, Dry Bulk) to the horizon year of 2035. Long-term infrastructure investments may include up to five gantry cranes, additional and consolidated dry bulk storage capacity, enhancements to the existing conveyor system, demolition of molasses tanks and Warehouse C, additional open storage space, and on-dock intermodal rail facilities. Project-level improvements would be completed by June 30, 2020, and involve demolition of the two transit sheds, installation of a small gear-shack with restrooms and outdoor storage space, and on-terminal rail upgrades. Project improvements do not involve any in-water work; all Program- and Project-level improvements would be landside.	Under construction.
12	Portside Pier Restaurant Redevelopment Project	1360 North Harbor Drive	Redevelopment of an existing waterfront restaurant with a new facility, including new pilings, piers, decking, and structure. Development involves demolition of an existing restaurant and supporting structure (including 66 piles) and redevelopment with a new, two-story restaurant and supporting structure (on 53 piles). The new facility would be approximately 33,577 square feet and include three distinct dining establishments, a coffee and gelato shop, an expanded dock and dine for short-term boat berthing, and a public viewing deck. The project would involve an approximately 8,722-square-foot increase in building floor area and a 4,480-square-foot net increase in water coverage. Restaurant seating would be increased by 464 seats. A new public viewing deck with approximately 108 seats is proposed and the replacement dock and dine boat dock would allow an increase in boat slips from 2 to 12; however, 4 would be constructed initially.	Under construction.

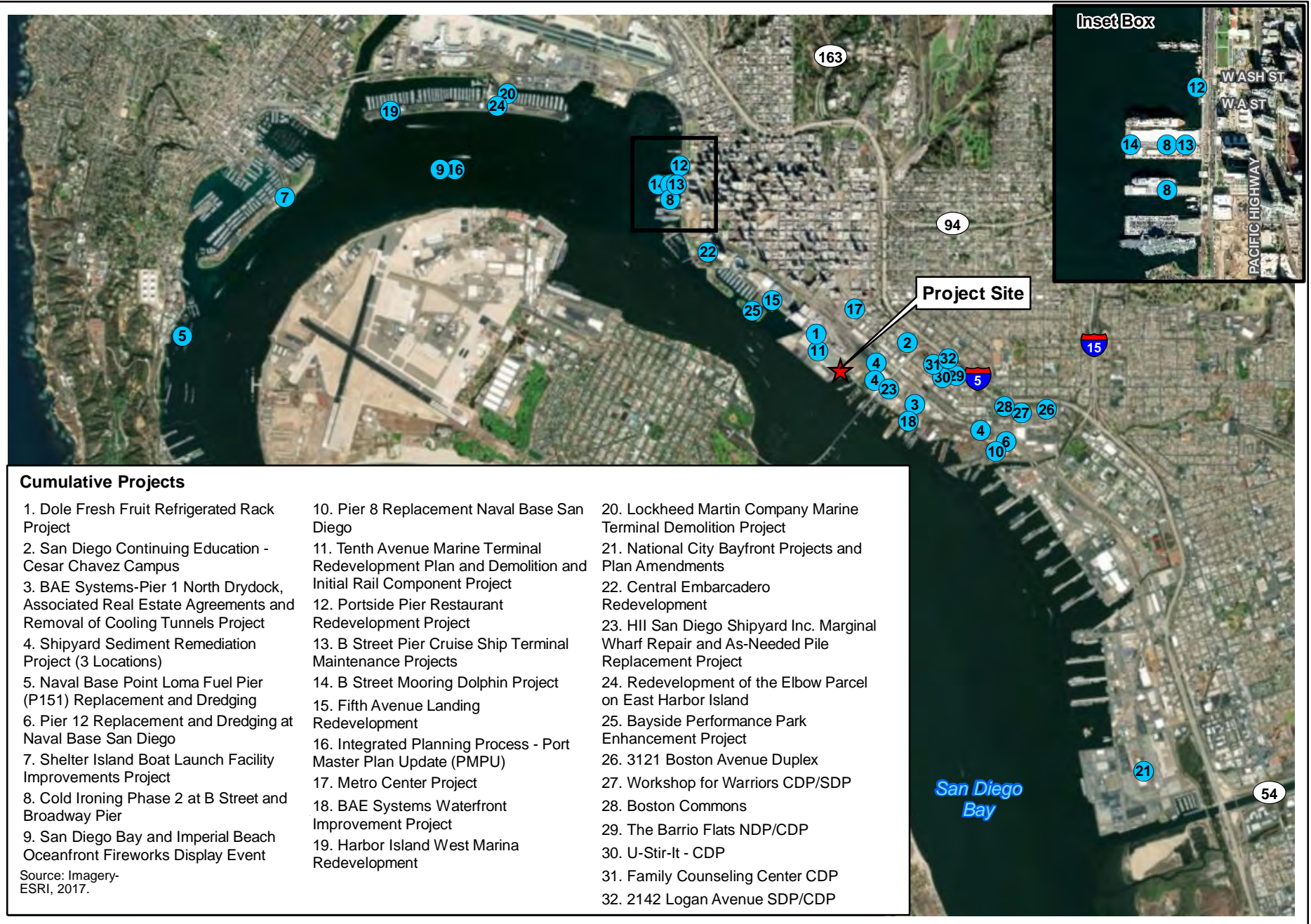
Table 5-1. Cumulative Projects

Map Number	Name	Location	Description	Status
13	B Street Pier Cruise Ship Terminal Maintenance Projects	B Street Pier, 1140 North Harbor Drive	Projects on B Street Pier required to address routine maintenance requirements to improve safety, security, integrity, aesthetics, and comfort of this facility. Roof replacement, roll-up and rolling gate doors installation, fire system upgrades, clean and paint ceilings and hangers, mobile gangway and platform painting, and a photovoltaic system.	Completed
14	B Street Mooring Dolphin Project	B Street Pier, 1140 North Harbor Drive	Proposal to install moorings off the end of B Street Pier to allow for larger cruise ship docking.	Draft EIR was circulated February 2013. The Final EIR has not yet been released. Project on hold
15	Fifth Avenue Landing Redevelopment	Southerly paper end of Fifth Avenue, between the back of the Convention Center and South Embarcadero Park, San Diego, CA 92101	Proposed development would include: two hotel structures, one 44-story, approximately 498-foot tall 850-room hotel tower, and one 5-story, approximately 82-foot tall 565-bed lower-cost visitor-serving hotel; a 263-space parking structure; retail; meeting space; ancillary guest amenities; an optional bridge connecting the hotel to the Convention Center; approximately 85,490 square feet of public access areas approximately 3,190 square feet at ground level and 82,300 square feet on a podium level; and expansion of the marina by an additional 57,696 square feet of dock space. The project would maintain the existing 35-foot-wide bayfront promenade.	Draft EIR released December 2017. The Final EIR has not yet been released
16	Integrated Planning Process – Port Master Plan Update (PMPU)	Throughout District tidelands	Comprehensive Update of the Port Master Plan that is anticipated to include new topical sections, or elements, to provide Baywide guidance related to Land and Water Use, Coastal Access and Recreation, Mobility, Natural Resources, Safety and Resiliency, and Economic Development.	Planning Phase – Program EIR under preparation
17	Metro Center Project	West side of National Avenue between Commercial and 16 th Streets	Consists of 160,600 square feet of regional shopping center uses, 163,300 square feet of retail space, and a 152,000-square-foot lumber store.	Foreseeable project, not entitled.
18	BAE Systems Waterfront Improvement Project	2205 E. Belt Street, San Diego, CA 92113	Involves construction and operation of 15 distinct project elements designed to improve efficiency and functionality of the existing BAE Systems Ship Repair Yard by replacing aging structures, improving existing infrastructure, increasing space utilization, and increasing efficiency of operations.	Foreseeable project, not entitled. Draft EIR currently in preparation.
19	Harbor Island West Marina Redevelopment	2040 Harbor Island Drive, San Diego, CA 92101	Involves demolition of 23,000 square feet of existing building and construction of 15,800 square feet of new office, deli, and retail, as well as reconfiguration of an existing marina. The project would expand the promenade from 8 to 12 feet and reduce boat slips from 620 to 603.	Foreseeable project, not entitled. Draft MND currently in preparation.

Table 5-1. Cumulative Projects

Map Number	Name	Location	Description	Status
20	Lockheed Martin Company Marine Terminal Demolition Project	1160 Harbor Island Drive, San Diego, CA 92101	Involves demolition of 5,500 square feet of building and removal of a pier and trolley rail.	Foreseeable project, not entitled. NOP release for Draft EIR anticipated in August 2019
21	National City Bayfront Projects and Plan Amendments	Generally north of Sweetwater Channel, south of Civic Center Drive, east of National City Marine Terminal, and west of Paradise Marsh and Interstate 5, National City, CA 91950	Includes several landside and waterside improvements, including a recreational vehicle park, modular cabins, dry boat storage, hotels, an expanded marina, a rail connector track and storage track, road closures, Segment 5 of the Bayshore Bikeway, restaurants, and retail development. The project also includes corresponding amendments to the District's Port Master Plan and the City of National City's General Plan, Local Coastal Program, Harbor District Specific Area Plan, Land Use Code, and Bicycle Master Plan.	Foreseeable project, not entitled. Draft EIR currently in preparation.
22	Central Embarcadero Redevelopment	Generally south of the USS Midway Museum and Harbor Drive, west of the Manchester Grand Hyatt and Kettner Boulevard, and north and east of San Diego Bay, San Diego, CA 92101	Includes redevelopment of approximately 40 acres of land and 30 acres of water. Project design is conceptual at this time, but currently includes an observation tower, boat slips, an aquarium, public park space, hotels, retail, office space, an educational center, and parking.	Foreseeable project, not entitled. Pending receipt of formal project application from applicant.
23	HII San Diego Shipyard Inc. Marginal Wharf Repair and As-Needed Pile Replacement Project	1995 Bay Front Street, San Diego, California	Involves two components consisting of demolition, reconstruction, and reconfiguration of piers and wharves. Component 1 is the replacement of 3 Wharves that have severely deteriorated. Component 2 includes the demolition of one pier and the as-needed pile replacement of the remaining 5 piers.	MND adopted on April 9, 2019. Construction anticipated mid-summer 2019.
24	Redevelopment of the Elbow Parcel on East Harbor Island	7-acre parcel of land north of the East Basin Industrial Subarea in the current PMP known as the Elbow Parcel	Involves an approximately 500-room hotel with other amenities including swimming pools, spas, gym, retail shops, open space event lawn, and a viewing deck.	Foreseeable project, not entitled.
25	Bayside Performance Park Enhancement Project	Embarcadero Marina Park South (EMPS)	Involves the replacement and enhancement of structures in EMPS and new facilities including the Bayside Performance Park, a new performance and event venue to hold up to 10,000 attendees and various other park improvements.	EIR adopted on January 9, 2018. Construction anticipated to commence 2019/2020.
26	Workshop for Warriors CDP/SDP – Project 528711	2984, 2970, 2960, 2948, 2940 Main Street	Coastal Development Permit for development of a 89,000 square foot warehouse/ trade school/ roof deck and parking. The 1.28-acre site is located within the non-appealable coastal zone at 2984,2970,2960, 2948, 2940 Main Street in the (BLPD-SUB-B) Barrio Logan Planned District/ Sub-District B zone of the Barrio Logan Community Plan Area.	Unknown

Table 5-1. Cumulative Projects				
Map Number	Name	Location	Description	Status
27	Boston Commons – Project 176117	2893 Boston Avenue	Site Development Permit & Coastal Development Permit to construct five affordable residential for rent units on a 0.24-acre site at 2893 Boston Avenue in Subdistrict C of Barrio Logan Planned District within the Barrio Logan Community Plan Area.	Unknown
28	The Barrio Flats NDP/CDP – Project 541700	2257-2275 Logan Avenue	Neighborhood Development Permit & Coastal Development Permit to demolish existing buildings and construct a new 38,375 sq. ft., 4-story mixed use building with 24 residential units, 10 hotel rooms & 5 retail spaces. The existing building at 2257-2259 Logan Avenue is to remain. The 0.41-acre site is located at 2257-2275 Logan Avenue in the BLPD-REDEVLP-SUBD zone of the Barrio Logan Planned District.	Unknown
29	U-Stor-It – CDP – Project 586276	2209 National Ave.	Coastal Development Permit for the demolition of an existing commercial building for the development of a new 3-story 68,878 sq ft self-storage building over 2 levels, 90,297 sq ft of underground basement at 2209 National Ave. The 0.807-acre site is in Subdistrict B of the Barrio Logan Planned District, Coastal Overlay zone (Non-Appealable) within the Barrio Logan Community Plan Area.	Unknown
30	Family Counseling Center CDP – Project 490726	2130, 2134 and 2142 National Avenue	Coastal Development Permit to demolish two single dwelling units and one commercial building located on three contiguous lots and construct a two-story family counseling center facility totaling 8,129 square-feet. The 0.34-acre site is located within the Coastal Overlay zone (Non-Appealable) at 2130, 2134 and 2142 National Avenue in the BLPD-SUBD-A zone(s) of the Barrio Logan Community Plan Area.	Unknown
31	2142 Logan Avenue SDP/CDP – Project 585277	2142 Logan Avenue	Coastal Development Permit and Site Development Permit to construct a mixed-use building to include 11 artist studios, retail sales, offices, and gallery spaces at 2142 Logan Avenue. The 0.10-acre site is in the Redevelopment Subdistrict of the Barrio Logan Planned District, Coastal Overlay zone (Non-Appealable) within the Barrio Logan Community Plan Area.	Unknown
32	3121 Boston Avenue Duplex – Project 409094	3121 Boston Ave.	Coastal Development Permit to construct a 2,535-sq-ft residential duplex on site with an existing 1,892-sq-ft residential duplex at 3121 Boston Ave. The 7,704-sq-ft site is located in Subdistrict C of the Barrio Logan Planned District, Coastal Overlay zone (Non-Appealable) and in the Barrio Logan Community Plan Area.	Unknown



0 0.5 1
Miles
1 in = 1 miles

Figure 5-1
Cumulative Project Locations
Mitsubishi Cement Corporation at Warehouse C:
Bulk Cement Warehouse and Loading Facility Project

5.3 Cumulative Project Analysis

5.3.1 Air Quality and Health Risk

Potential cumulative air quality impacts would result when cumulative projects' emissions would combine to degrade air quality conditions below attainment levels for the San Diego Air Basin (SDAB), delay attainment of air quality standards, affect sensitive receptors, or result in emissions (such as those leading to odors) that adversely affect people nearby.

Neither the District nor the San Diego Air Pollution Control District (SDAPCD) has established quantitative thresholds to determine whether a project's incremental contribution to emissions would be cumulatively considerable. However, Air Quality Impact Analysis (AQIA) Trigger Levels contained within SDAPCD Regulation II, Rules 20.2 and 20.3 outlines numerical trigger levels for new source review for non-major and major new or modified stationary sources, and the County of San Diego has established screening-level thresholds (SLTs) to assist lead agencies in determining the significance of both project-level and cumulative air quality impacts. These recommendations from the SDAPCD and County are used for the analysis of impacts related to emissions for Proposed Project construction and operations evaluated within the context of past, present, and reasonably foreseeable future projects. The substantial evidence for using the SDAPCD and County recommendations for the Proposed Project is contained within Section 4.1.2.2, *Thresholds of Significance*, of this Draft SEIR.

5.3.1.1 Geographic Scope

As defined in the TAMT Final PEIR, the geographic scope for cumulative air quality impacts is the SDAB, which covers 4,260 square miles, and cumulative sensitive receptor and odor impacts are assessed at a more localized level that includes the surrounding neighborhoods and areas close to the source of emissions, including odor emissions.

5.3.1.2 Cumulative Effects from Past, Present, and Future Projects

Past projects within the SDAB have involved the emissions of ozone precursors (reactive organic gases [ROG] and nitrogen oxides [NO_x]), particulate matter 10 microns or less in diameter (PM₁₀), and particulate matter 2.5 microns or less in diameter (PM_{2.5}), resulting in nonattainment status for 8-hour ozone under National Ambient Air Quality Standards (NAAQS) and nonattainment status for ozone, PM₁₀, and PM_{2.5} under California Ambient Air Quality Standards (CAAQS). Therefore, the emissions of concern within the SDAB are ozone precursors (ROG and NO_x), PM₁₀, PM_{2.5}, and PM precursors (ROG, NO_x and SO_x). The nonattainment status for the air basin is a consequence of past and present projects and is subject to continued nonattainment status by the cumulative contribution of reasonably foreseeable future projects within the air basin, such as those listed in Table 5-1.

There are several projects identified by the District in Table 5-1 that are located within vicinity of the Proposed Project site that could contribute cumulative impacts on localized air quality conditions; however, nearly all of these projects are already constructed and overlap would be limited to operations. Projects within and near the TAMT that would operate in proximity to the Proposed Project include the Dole Fresh Fruit Refrigerated Rack Project (cumulative project #1), the Shipyard Sediment Remediation Project (cumulative project #4), the Fifth Avenue Landing Redevelopment project (cumulative project #15), and the Bayside Performance Park Enhancement Project (cumulative project #25). Construction associated with cumulative project #15 could potentially overlap with the construction of the Proposed Project, which is scheduled to begin construction in 2020. Because past and present projects have resulted in the current nonattainment status for ozone, PM₁₀, and PM_{2.5}, and reasonably foreseeable future

projects would continue to contribute to the nonattainment status and potentially affect sensitive receptors, the effects from cumulative projects would be cumulatively significant.

5.3.1.3 Cumulative Contribution of the TAMT Plan

As detailed in Section 5.3.2 of the TAMT Final PEIR, construction-related emissions associated with the full TAMT plan buildout would result in a cumulatively considerable contribution to air quality after mitigation due to the unknowns regarding construction activities. With Mitigation Measure **MM-AQ-1**, construction-related impacts would remain significant and unavoidable. Operational emissions associated with buildout of the TAMT Plan would not be cumulatively considerable after mitigation (Mitigation Measures **MM-AQ-2** through **MM-AQ-9**) is incorporated. Further, the TAMT Plan'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, and the TAMT Plan's incremental contribution to cumulative health impacts would not be cumulative considerable after mitigation (**MM-AQ-2** through **MM-AQ-9**) under the STC Alternative.

5.3.1.4 Project Contribution

As discussed in Section 4.1, *Air Quality and Health Risk*, the Proposed Project would comply with all SDAPCD rules and regulations and does not propose any new land uses or emission sources that are inconsistent with the TAMT Plan. Consequently, the Proposed Project is deemed consistent with the most recent San Diego 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 growth and cumulative air emissions would not conflict with progress toward attainment of the air quality standards described in the RAQS and SIP.

Construction-related emissions associated with the proposed project would not exceed threshold levels for any pollutant. Although the effects from past, present, and reasonably foreseeable future projects are considered cumulatively significant, the Proposed Project's incremental contribution from construction emissions would not result in a cumulatively considerable net increase in nonattainment pollutants, as it would not exceed thresholds during project construction. Consequently, the Proposed Project's incremental contribution to this cumulative air quality impact during construction would not be cumulatively considerable.

Further, the Proposed Project would contribute emissions to the cumulative condition. Operations-related emissions associated with the Proposed Project would be below emissions associated with full buildout of the dry bulk cargo node in the TAMT Final PEIR. In addition, while construction of Phase II would overlap with operations, this maximum concurrent emission scenario would result in emissions below levels determined in the TAMT Final PEIR. Similarly, while the Proposed Project would result in emissions that can result in health risk in neighboring communities, the Proposed Project would not result in incremental risk above the levels determined in the TAMT Final PEIR. Mitigation Measures **MM-AQ-1R** through **MM-AQ-9R** and **MM-AQ-10** would apply to the Proposed Project to ensure compliance with the TAMT Final PEIR. As such, the Proposed Project would not result in any new or more severe health risk impacts at nearby sensitive receptor locations. Thus, 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 and pollutants that can cause health effects, the proposed project's

incremental contribution to cumulative air quality impacts during its operational stage would not be cumulatively considerable after mitigation is incorporated.

5.3.1.5 Level of Significance Prior to Mitigation

The Proposed Project would not result in new or more severe cumulatively considerable air quality and health risk impacts than what was disclosed in the TAMT Final PEIR. Consistent with the conclusions in the TAMT Final PEIR, the Proposed Project's incremental contribution to cumulative impacts associated with construction and operational air quality and health risk would be cumulatively considerable prior to mitigation.

5.3.1.6 Mitigation Measures

Implement mitigation measures **MM-AQ-1R** through **MM-AQ-9R** and **MM-AQ-10**, as described in SEIR Section 4.1.2.3 *Project Impacts and Mitigation Measures*.

5.3.1.7 Level of Significance after Mitigation

The Proposed Project's incremental contribution to cumulative air quality and health risk impacts would not be cumulatively considerable, and the Proposed Project would not result in new or more severe cumulatively considerable impacts than what was disclosed in the TAMT Final PEIR.

5.3.2 Greenhouse Gas Emissions and Global Climate Change

A cumulatively considerable greenhouse gas (GHG)-related impact if the project would be inconsistent with the District's Climate Action Plan (CAP) reduction targets; non-compliant with regulatory programs outlined in the Scoping Plan and adopted by the California Air Resources Board (CARB) or other California agencies ; inconsistent with the reduction targets set forth through California Executive Order (EO) S-03-05 and Senate Bill (SB) 32; or non-compliant with plans, policies, and regulations promulgated to reduce GHG emissions post-2020. There would be the potential for a cumulatively considerable climate change impact if the project would expose property and persons to the physical effects of climate change including, but not limited to, flooding, public health risk, wildfire risk, or other impacts resulting from climate change.

5.3.2.1 Geographic Scope

Climate change is a cumulative issue, and the geographic scope for cumulative GHG emission impacts is global. Because climate change is the result of cumulative global emissions, no single project, when taken in isolation, can cause climate change—a single project's emissions are insufficient to change the radiative balance of the atmosphere. Because climate change is the result of GHG emissions, and GHGs are emitted by innumerable sources worldwide, cumulative GHG emissions that contribute to global climate change will have a significant cumulative impact on the natural environment as well as on human development and activity. The global increase in GHG emissions that has occurred and will occur in the future is the result of the actions and choices of individuals, businesses, local governments, states, and nations. Furthermore, although climate change impacts will likely vary by geography and intensity, the impacts that will result from cumulative global emissions will be felt worldwide. The GHG and climate change analysis within Section 4.2, *Greenhouse Gas Emissions and Climate Change*, is inherently a cumulative analysis. However, a summary of the discussion is provided below.

5.3.2.2 Cumulative Effects from Past, Present, and Future Projects

Past, present, and reasonably foreseeable future projects throughout the region, state, nation, and world, including but not limited to those projects listed in Table 5-1, have contributed to and will continue to contribute to the cumulative impacts of global climate change. As with the Proposed Project, all the projects in Table 5-1, along with all other projects within the county, state, and region, would be required to comply with all applicable federal, state, and local policies and regulations regarding GHG emission reductions (e.g., Assembly Bill [AB] 32, Pavley 1, Advanced Clean Cars, Renewables Portfolio Standard, Senate Bill [SB] 350) and adapting to climate change (e.g., sea level rise). However, changes from past, present, and reasonably foreseeable future projects have contributed to and will continue to contribute to a cumulatively significant impact in the project vicinity.

5.3.2.3 Cumulative Contribution of the TAMT Plan

As detailed in Section 5.3.6 of the TAMT Final PEIR, the TAMT Plan buildout 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. With Mitigation Measures **MM-GHG-1** through **MM-GHG-9** and further implementation of State measures, TAMT Plan GHG emissions demonstrate a downward trajectory and would be generally consistent with known statewide strategies to date but remain cumulatively considerable given the lack of definitive state targets and framework to achieve those targets.

5.3.2.4 Project Contribution

The Proposed Project would contribute emissions to the cumulative condition. However, operations-related emissions associated with the Proposed Project would be below emissions associated with full buildout of the dry bulk cargo node in the TAMT Final PEIR. However, similar to the analysis in the TAMT Final PEIR, the Proposed Project would result in emissions that 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 CARB or other California agencies for post-2020 for the purpose of reducing the emissions of GHGs prior to mitigation. Implementation of mitigation measures **MM-GHG-1R** through **MM-GHG-9R** and **MM-GHG-10** ensure emissions remain below levels identified in the TAMT Final PEIR. Emissions would be on a downward trajectory through the life of the project, 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. However, this impact was already disclosed in the TAMT Final PEIR and no new or more severe significant impacts would occur.

5.3.2.5 Level of Significance Prior to Mitigation

Consistent with the conclusions in the TAMT Final PEIR, the Proposed Project's incremental contribution to cumulative impacts associated with construction and operational GHG and climate change would be cumulatively considerable. However, the Proposed Project would not result in new or more severe cumulatively considerable GHG and climate change impacts than what was disclosed in the TAMT Final PEIR.

5.3.2.6 Mitigation Measures

Implement mitigation measures **MM-GHG-1R** through **MM-GHG-9R** and **MM-GHG-10**, as described in Section 4.2.2.4, *Project Impacts and Mitigation Measures*.

5.3.2.7 Level of Significance after Mitigation

Consistent with the conclusions in the TAMT Final PEIR, the Proposed Project's incremental contribution to cumulative impacts associated with construction and operational GHG and climate change would be cumulatively considerable. However, the Proposed Project would not result in new or more severe cumulatively considerable GHG and climate change impacts than what was disclosed in the TAMT Final PEIR.

5.3.3 Hazards and Hazardous Materials

A significant cumulative impact on hazards and hazardous materials would occur if the Proposed Project were to result in a cumulatively considerable contribution to impacts related to the routine transport, use, or disposal of hazardous materials, the reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, or the impairment of, or physical interference with, an adopted emergency response plan or emergency evacuation plan when evaluated within the context of past, present, and reasonably foreseeable future projects.

5.3.3.1 Geographic Scope

The hazards and hazardous materials geographic scope consists of the areas that could be affected by Proposed Project activities as well as areas affected by other projects whose activities could directly or indirectly affect the proposed activities on the Proposed Project site. Consistent with the TAMT Final PEIR, the geographic scope of this analysis includes projects occurring within 0.25 mile of the Proposed Project site due to the localized nature of potential impacts associated with the release of hazardous materials into the environment.

5.3.3.2 Cumulative Effects from Past, Present, and Probable Future Projects

There are several areas within 0.25 mile of the Proposed Project site that involve the storage and/or use of hazardous materials. As addressed in Hazards Section 4.3.2, *Existing Conditions*), record searches of several federal, State, local and tribal databases were conducted for the Proposed Project site and its surroundings. Within the immediate vicinity of the Proposed Project site (less than 0.25 mile) six landside facilities of hazardous and hazardous materials concern have been identified, as well as TAMT Berths 10-1 and 10-2 (in-water), as summarized in Table 4.3-2. These facilities are all located within the boundaries of the TAMT. Additionally, testing, database searches and inspections of Warehouse C itself have also identified the presence of hazardous materials, including ACMs and lead.

Although the presence of sites (with a history of releases) within the cumulative study area is known, it does not inherently indicate that a cumulatively significant hazardous materials impact is present. Rather, evidence must suggest that the contamination has resulted in a cumulative condition to which other projects are contributing. Present and reasonably foreseeable future projects within the cumulative study area could disrupt or result in the exposure of hazardous materials during construction activities. However, any proposed development in or within close proximity to identified hazardous materials sites would be required to comply with all applicable federal, state and local laws, ordinances, regulations and standards related to hazardous materials, including the Resource Conservation and Recovery Act of 1976 (RCRA), the Department of Transportation Hazardous Materials Regulations, and the local Certified

Unified Program Agency (CUPA) regulations, prior to, during, and following construction-related activities. Further, all future development within the TAMT itself would be required to implement all applicable mitigation measures prescribed in the TAMT Final PEIR, as well as any other additional site/project-specific mitigation measures identified by the District as part of the subsequent environmental review process for that project. Therefore, cumulative effects related to hazardous materials from past, present, and reasonably foreseeable future projects would not be cumulatively considerable.

In addition, during both construction and operation of the cumulative projects listed in Table 5-1, each project would be required to comply with all applicable federal, state and local laws and regulations for worker safety, as well as all standards and protocols prescribed by the San Diego Fire-Rescue Department (SDFD), Harbor Police Department (HPD) (when located within the District's jurisdiction), and San Diego Police Department (SDPD) for emergency access and response. Furthermore, each project would be required to implement any site/project-specific mitigation measures that the District and City deem warranted as part of the environmental review process for that project. Therefore, cumulative effects associated with the impairment of, or physical interference with, an adopted emergency response plan or emergency evacuation plan would not be significant.

5.3.3.3 Cumulative Contribution of the TAMT Plan

As detailed in Section 5.3.7 of the TAMT Final PEIR, there is the known presence of asbestos-containing materials and lead-based paint in some of existing sheds and warehouses on the project. However, the TAMT Final PEIR determined that additional site assessment and cleanup would be required if any previously identified or unidentified contamination is discovered, pursuant to the existing laws summarized under Section 4.7.3, *Applicable Laws and Regulations*, of the TAMT Final PEIR. In addition, implementation TAMT Final PEIR mitigation measures **MM-HAZ-1** and **MM-HAZ-2** would ensure that project-level impacts would be reduced to less than significant.

Furthermore, typical construction-related hazardous materials would be used during construction of future projects associated with the overall TAMT Plan, including fuel, solvents, paints, oils, and grease. It is possible that any of these substances could be released during construction activities. However, compliance with federal, state, and local regulations described under Section 4.7.3 of the TAMT Final PEIR, in combination with construction BMPs, would minimize any impacts. Therefore, the TAMT Final PEIR concluded that future activities under the TAMT Plan, when combined with past, present, and reasonably foreseeable future projects' hazard and hazardous material impacts, would not be cumulatively considerable.

5.3.3.4 Project Contribution

As detailed throughout Section 4.3 of this SEIR, the Proposed Project would not result in any new or more severe significant hazardous materials impacts than what was disclosed in the TAMT Final PEIR. Similar to what was described in the TAMT Final PEIR, typical construction-related hazardous materials would be used during construction of the Proposed Project, including fuel, solvents, paints, oils, and grease. It is possible that any of these substances could be released during construction activities. However, compliance with federal, state, and local regulations described in Section 4.3.3 of this SEIR, in combination with construction BMPs, would minimize any impacts. Consequently, the Proposed Project would not create a significant hazard to the public or the environment through upset and accident conditions because no new acutely hazardous materials would be introduced at the Proposed Project site.

Although implementation of the Proposed Project may result in a minimal increase in the amounts of common types of hazardous materials used at the project site (such as fuel, lubricants and grease,

solvents, and cleaners), normal routine use of these products would not result in a significant hazard to students, residents, or workers in the vicinity of the project site. Such transport and use would comply with applicable regulations, such as the RCRA, Department of Transportation Hazardous Materials Regulations, and local CUPA regulations. Therefore, compliance with applicable laws and regulations would ensure that the Proposed Project would not result in hazardous emissions from handling hazardous or acutely hazardous materials, substances, or waste. This is currently the requirement for onsite use of common types of hazardous materials typical for the Project site, which would continue with the Proposed Project.

Implementation of the Proposed Project has the potential to encounter hazardous materials during excavation. In addition, ACMs and lead-containing materials associated with Warehouse C would require removal during construction. However, these findings are consistent with the TAMT Final PEIR, and as described in SEIR Hazards Section 4.3.2.3, *Project Impacts and Mitigation Measures*, potentially significant project-level impacts associated with the Proposed Project would be reduced to less than significant with compliance with all applicable federal, state and local regulations, and implementation of Mitigation Measure **MM-HAZ-1R** and TAMT Final PEIR Mitigation Measure **MM-HAZ-2**. Therefore, when combined with hazardous materials impacts of past, present, and reasonably foreseeable future projects, which would also be required to comply with all applicable regulations, the Proposed Project's incremental contribution would not be cumulatively considerable, consistent with the conclusions of the TAMT Final PEIR.

Additionally, construction and operation of the Proposed Project could potentially result in an upset condition requiring emergency access and response, or otherwise be located in close proximity to an emergency event. However, all phases of the Proposed Project's implementation would require adherence to, and full compliance with, established emergency-related standards and procedures specified by emergency responders (the SDFD, HPD and SDPD). Consequently, the Proposed Project's incremental contribution to cumulative impacts associated with the impairment of, or physical interference with, an adopted emergency response plan or emergency evacuation plan would not be cumulatively considerable, consistent with the conclusions of the TAMT Final PEIR. Therefore, the Proposed Project would not result in new or more severe cumulatively considerable hazard and hazardous materials impacts than what was disclosed in the TAMT Final PEIR.

5.3.3.5 Level of Significance Prior to Mitigation

The Proposed Project would not result in new or more severe cumulatively considerable hazard and hazardous materials impacts than what was disclosed in the TAMT Final PEIR. Consistent with the conclusions in the TAMT Final PEIR, the Proposed Project's incremental contribution to cumulative hazard and hazardous materials impacts would not be cumulatively considerable with implementation of mitigation measures **MM-HAZ-1R** and **MM-HAZ-2**.

5.3.3.6 Mitigation Measures

Implement mitigation measures **MM-HAZ-1R** and **MM-HAZ-2**, as described in SEIR Section 4.3.4.3.

5.3.3.7 Level of Significance after Mitigation

The Proposed Project's incremental contribution to cumulative hazards and hazardous materials impacts would not be cumulatively considerable, and the Proposed Project would not result in new or more severe cumulatively considerable impacts than what was disclosed in the TAMT Final PEIR.

5.3.4 Noise and Vibration

A significant cumulative impact on noise and vibration would result if the Proposed Project were to make a cumulatively considerable contribution to impacts related to exceedances of noise standards, groundborne vibration, or substantial increases in ambient noise levels when evaluated in the context of past, present, and reasonably foreseeable future project. Air traffic noise was determined to have no impact, and as such, cumulative impacts related to air traffic noise are not evaluated.

5.3.4.1 Geographic Scope

As defined in the TAMT Final PEIR, the study area for cumulative noise impacts is defined as areas within a 1,000-foot radius of the TAMT. Projects within and near the TAMT that could potentially occur concurrently with the Proposed Project include the Dole Fresh Fruit Refrigerated Rack Project (#1), the Shipyard Sediment Remediation Project (#4), the Fifth Avenue Landing Redevelopment project (#15), and the Bayside Performance Park Enhancement Project (#25).

Because the operational traffic noise analysis completed for the TAMT Final PEIR considered both near-term (opening year) and future conditions with and without redevelopment of the TAMT, cumulative noise impacts have already been considered along all the analyzed roadway segments that would serve Project-related traffic.

Ground vibrations dissipate more rapidly than noise levels, limiting the geographic scope of ground vibration cumulative impacts to the immediate vicinity of the vibration source.

5.3.4.2 Cumulative Effects from Past, Present, and Probable Future Projects

Noise and vibration from cumulative projects may increase future noise levels at the sensitive receptors nearest to the Proposed Project site. However, any effects would be limited to simultaneously occurring projects close to or within the Proposed Project site. Several of the cumulative projects listed in Table 5-1 are located within the TAMT and close to the Proposed Project site, and could be constructed and in operation simultaneously with the Proposed Project.

Construction

As discussed in the TAMT Final PEIR, there could be a cumulative increase in noise levels at the identified sensitive receptors as a result of construction if two or more projects within the TAMT or near the Proposed Project site are constructed concurrently. Each project would be subject to the same local ordinances governing construction noise and would be required to implement noise mitigation as necessary to abate excessive noise levels. As a result, it is unlikely that cumulative construction noise would result in noise at nearby receptors exceeding the 75 dBA construction noise threshold. However, significant cumulative impacts cannot be ruled out given the proximity of various related projects to the surrounding sensitive receptors and the occasional high noise levels associated with construction activities such as pile driving. Accordingly, construction noise from past, present, and reasonably foreseeable future projects would potentially be cumulatively significant.

Construction vibration effects are highly localized because groundborne vibration levels diminish rapidly with distance from the source. Cumulative projects identified in Table 5-1 would be more than 100 feet apart and would generally be more than 100 feet from sensitive receptors. Because vibration impacts are assessed based on instantaneous peak levels (PPV), worst-case groundborne vibration levels from construction are generally determined by whichever individual piece of equipment generates the highest vibration levels. As a result, the vibration from multiple construction sites, even if the sites are near each

other, does not generally combine to raise the maximum PPV, and the cumulative effect is no more severe than the effect from the largest individual contribution. Accordingly, vibration effects from past, present, and reasonably foreseeable future projects would not be cumulatively significant.

Operation

As discussed in the TAMT Final PEIR, cumulative operational traffic noise levels under near-term (Year 2021) conditions would increase noise levels by up to 2 decibels (dB) in the cumulative study area. The range would increase from between 67 to 72 dBA CNEL to 67 to 73 dBA CNEL. An increase of 2 dB to the existing CNEL would not be perceptible, and cumulatively the overall noise levels would remain under the City of San Diego's 75 dBA CNEL traffic noise threshold. For cumulative traffic noise levels under future year (2035) conditions, implementation of the buildout of the TAMT Plan would increase traffic noise levels by up to 2 dB, which would not be perceptible. Similar to noise levels identified for near-term conditions, overall noise levels in future year (2035) conditions would remain under the 75 dBA CNEL traffic noise threshold. The TAMT Final PEIR concluded that traffic noise from past, present, and reasonably foreseeable future projects is not cumulatively significant. None of the projects listed in Table 5-1 would substantially change the circumstances in the study area.

5.3.4.3 Cumulative Contribution of the TAMT Plan

As detailed in Section 5.3.9 of the TAMT Final PEIR, the TAMT would be a source of intermittent construction and increased operational activities over the next several decades as TAMT Plan projects are implemented. It was determined in the TAMT Final PEIR that buildout of the TAMT Plan would not result in a cumulatively considerable contribution to construction noise or vibration impacts. However, operational noise from TAMT plan buildout was predicted to result in noise that exceeds City standards at two parks. Despite the implementation of TAMT Final PEIR mitigation measures **MM-NOI-1** and **MM-NOI-2**, the incremental operational noise contribution from the TAMT Plan buildout combined with operational noise from cumulative projects would result in an exceedance of City standards. The TAMT Final PEIR concluded that full buildout of the TAMT plan would result in a cumulatively considerable contribution to operational noise impacts.

Additionally, as shown in Table 7-8 of the TAMT Final PEIR, full buildout of the TAMT Plan under the STC Alternative would increase traffic noise levels by up to 2 decibels (dB) under 2035 conditions. 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, the TAMT Final PEIR concluded that the TAMT Plan's incremental contribution to cumulative traffic noise would not be cumulatively considerable.

5.3.4.4 Project Contribution

Construction

As described in Noise Section 4.4.2.3, *Project Impacts and Mitigation Measures*, an acoustical analysis pursuant to **MM-NOI-1** was performed for the Proposed Project which determined that noise and vibration impacts during construction of the Proposed Project would be less than significant. Furthermore, the results of the analysis indicate that the project contribution to any cumulative impacts would be extremely small. Specifically, proposed project construction noise is predicted to be below existing ambient levels and would be at least 29 dB below the applicable threshold (i.e., construction noise levels would be up to 46 dBA at the nearby sensitive receptors versus the threshold of 75 dBA). Therefore, when combined with past, present, and reasonably foreseeable future projects' noise and vibration impacts,

the Proposed Project's incremental contribution during construction activities would not be cumulatively considerable.

Operation

As discussed above, the buildout of the TAMT Plan was predicted to exceed City of San Diego noise standards at two parks. As a result of the TAMT Final PEIR, the District is in the process of implementing TAMT Final PEIR Mitigation Measure **MM-NOI-2** to minimize nuisance noise to the surrounding community. This mitigation measure provides a complaint and response tracking program that would also cover activities associated with the Proposed Project. In assessing the Proposed Project's incremental contribution, predicted operational noise levels at the nearest sensitive receptors (which includes Cesar Chavez Park) were determined to be less than the established noise standards for the sensitive receptors (see SEIR Tables 4.4-12 through 4.4-15). In addition, the operational noise levels for the Proposed Project are all predicted to be less than, or with the range of, measured existing ambient noise levels at the surrounding noise-sensitive receptors. Consequently, the Proposed Project's incremental contribution to cumulative impacts associated with the noise levels at sensitive receptors would be less than cumulatively considerable.

5.3.4.5 Level of Significance Prior to Mitigation

The Proposed Project would not result in new or more severe cumulatively considerable noise and vibration impacts than what was disclosed in the TAMT Final PEIR. Consistent with the conclusions in the TAMT Final PEIR, the Proposed Project's incremental contribution to cumulative impacts associated with construction and operational noise and vibration would not be cumulatively considerable with implementation of mitigation measure **MM-NOI-2**. It should be noted that a project specific noise and vibration assessment (Appendix F) conducted as part of this SEIR satisfies the requirement of TAMT Final PEIR Mitigation Measure **MM-NOI-1**. Additionally, as demonstrated in the Proposed Project's noise and vibration assessment (Appendix F), the Proposed Project's construction noise levels would not result in a temporary increase of more than 5 dB at adjacent noise-sensitive uses. Therefore, TAMT Final PEIR Mitigation Measure **MM-NOI-3** is not required.

5.3.4.6 Mitigation Measures

As described above, the Proposed Project has satisfied and is consistent with TAMT Final PEIR Mitigation Measure **MM-NOI-1**. As noted in Table 4.4-16, the District is in the process of implementing TAMT Final PEIR Mitigation Measure **MM-NOI-2**. Consequently, implementation of Mitigation Measure **MM-NOI-2** would be conducted by the District and not the Proposed Project. As demonstrated in the Proposed Project's noise study (Appendix F), the Proposed Project's construction noise levels would not result in a temporary increase of more than 5 dB at adjacent noise-sensitive uses. Therefore, **MM-NOI-3** (Implement a Construction Noise Reduction Plan) is not required.

5.3.4.7 Level of Significance after Mitigation

The Proposed Project's incremental contribution to cumulative noise and vibration impacts would not be cumulatively considerable, and the Proposed Project would not result in new or more severe cumulatively considerable impacts than what was disclosed in the TAMT Final PEIR.

5.3.5 Transportation, Circulation and Parking

The TAMT Final PEIR evaluated both construction and operation cumulative transportation impacts associated with buildout of the TAMT Plan. For the operational analysis, traffic volumes generated by

buildout of the TAMT Plan were distributed onto study area roadway segments and intersections to determine program-level cumulative transportation impacts. Therefore, the operational impact analysis in this section focuses on whether the Proposed Project falls within the scope of the overall operation-related cumulative transportation impacts of the TAMT Plan buildout. The operational analysis for the Proposed Project also takes into consideration any substantial changes in circumstances that have occurred since certification of the TAMT Final PEIR that could cause the Proposed Project to result in new or more severe transportation impacts than previously disclosed.

For construction, the TAMT Final PEIR noted that, due the programmatic and market driven nature of the TAMT Plan, the timing, potential for overlap, and specific construction plans associated with future projects were unknown at the time of the analysis. As a result, a quantitative construction analysis of future TAMT Plan projects was not completed in the TAMT Final PEIR. Therefore, the cumulative construction impact analysis for the Proposed Project evaluates the Project's cumulative construction-related traffic impacts on study area roadways and intersections.

Consistent with the methodology described in Section 5.3.11 of the TAMT Final PEIR, a significant cumulative construction impact on roadway segment or intersection operations would occur if Proposed Project construction traffic, in combination with past, present, and reasonably foreseeable future projects, caused a segment or intersection to degrade to a level of service (LOS) E or LOS F, or if any of the criteria in Table 5-2 are exceeded.

Table 5-2. City of San Diego Traffic Impact Significance Thresholds

Level of Service with Proposed Project	Allowable Increase Due to Proposed Project Impacts ¹					
	Freeways		Roadway Segments		Intersections Delay (seconds)	Ramp Metering Delay (minutes)
	V/C	Speed (mph)	V/C	Speed (mph)		
E	0.010	1.0	0.02	1.0	2.0	2.0
F	0.005	0.5	0.01	0.5	1.0	1.0

¹ If a project's traffic causes the values shown in the table to be exceeded, the impacts are determined to be significant. The project applicant shall then identify feasible improvements (within the Traffic Impact Study) that will restore/and maintain the traffic facility at an acceptable LOS. If the LOS with the project becomes unacceptable, or if the project adds a significant amount of peak-hour trips to cause any traffic queues to exceed on- or off-ramp storage capacities, the project applicant shall be responsible for mitigating the project's direct significant and/or cumulatively considerable traffic impacts.

5.3.5.1 Geographic Scope

Consistent with the TAMT Final PEIR, the geographic scope of the cumulative analysis for transportation, circulation, and parking includes all intersections and roadway segments to which the Proposed Project would contribute 50 or more peak hour trips, as identified in SEIR Section 4.5, *Transportation, Circulation and Parking*. The TAMT Final PEIR traffic analysis identified fourteen cumulative projects (including the Proposed Project) that would be expected to generate traffic within the area of geographic scope. These cumulative projects were calculated to generate approximately 48,952 average daily trips (ADT). However, the list of cumulative projects has been updated to account for any changes in circumstances that have occurred since certification of the TAMT Final PEIR. The Comparative TIA prepared for the Proposed Project (Appendix G) included a review of the development status of each of the fourteen cumulative projects analyzed in the TAMT Final PEIR to determine which projects have been constructed and are now operational, and thus are accounted for in current traffic counts. Cumulative projects that have not yet been constructed were retained for analysis. The Comparative TIA also identified additional near-term cumulative projects from Table 5-1 that would add a substantial volume of new traffic since

approval of the TAMT Final PEIR. In total, ten cumulative projects were identified and evaluated in the near-term scenario, as identified in Table 5-3.

Table 5-3. Current Cumulative Project Trip Generation

ID	Project	ADT	AM Peak Hour		PM Peak Hour	
			In	Out	In	Out
1	Portside Pier Restaurant Redevelopment Project	356	14	14	17	11
2	Boston Commons Project	30	0	2	2	1
3	The Barrio Flats	272	6	13	14	11
4	U-Stor-It	138	4	4	6	6
5	2142 Logan Avenue	0	0	0	0	0
6	Ballpark Village D	7,200	259	173	346	230
7	Navy Broadway Complex	23,028	1,487	329	876	1,606
8	7 th and Island	1,296	47	31	62	42
9	7 th and Market	5,790	316	138	249	353
10	Modera	1,532	25	98	97	41
Total		39,642	2,158	802	1,669	2,301

Source: Appendix G

Based on the traffic volumes shown in Table 5-3, there is a reduction in the overall cumulative ADT from the TAMT Final PEIR by 9,310 ADT, or 19%. This demonstrates that there has not been a substantial change in circumstances related to cumulative projects that could result in new or more severe significant impacts if the Proposed Project is implemented.

5.3.5.2 Cumulative Effects from Past, Present, and Probable Future Projects

The following applicable cumulative traffic scenarios¹ were analyzed in the TAMT Final PEIR as it relates to baseline cumulative effects and are described below. To account for any changes in circumstances that have occurred since certification of the TAMT Final PEIR, the near-term and future year base condition traffic scenarios (2021 and 2035) have been updated as necessary, consistent with State CEQA Guidelines Section 15162.

- Near-Term Year (2021) Base Conditions
- Future Year (2035) Base Conditions

The Comparative TIA evaluated whether any substantial changes in circumstances related to roadway segment and intersection operations have occurred since certification of the TAMT Final PEIR that could result in new or more severe impacts if the Proposed Project is implemented. Updated traffic counts were taken in October 2019 at the same roadway segments and intersections analyzed in the TAMT Final PEIR. These updated counts, along with the addition of the updated cumulative projects in Table 5-3, were used to provide a comparison of the near-term base conditions for roadway segments and intersections from

¹ Other cumulative traffic scenarios were analyzed in the TAMT Final PEIR but are not applicable to the discussion of cumulative effects, including the Near-term Year (2021) Base Plus Demolition and Initial Rail Component Conditions, Near-term Year (2021) Base Plus Demolition and Initial Rail Component C- Alternative Gate Scenario Future Year (2035) Base Plus STC Alternative, Future Year (2035) Base Plus STC Alternative – Alternative Gate Scenario, and Future Year (2035) Base Plus Full TAMT Plan Buildout Conditions – MPC scenario.

the TAMT Final PEIR. The results of this comparison are discussed below and presented in Tables 5-4 and 5-5. In addition, the Comparative TIA determined that there would be no change in the Future Year 2035 base condition traffic volumes for roadways and intersections from the conditions disclosed in the TAMT Final PEIR.

Near-Term 2021 Base Conditions

As detailed in Section 5.3.11 of the TAMT Final PEIR, roadway and intersection geometrics under Near-Term Year 2021 conditions were assumed to be identical to existing conditions. The TAMT Final PEIR noted that all intersection signal timing plans were assumed to be optimized under Near-Term Year 2021 conditions, which could result in better signal operations at some intersections when compared to existing conditions.

Roadway Segments

A comparison of the roadway characteristics and near-term traffic conditions for each of the study area roadway segments are summarized in Table 5-4. Table 5-4 shows that all Proposed Project study area roadway segments would operate at acceptable LOS D or better under updated near-term base conditions. This represents a change from the conditions described in the TAMT Final PEIR, which identified the roadway segment of 28th Street between Boston Avenue to National Avenue as operating at an unacceptable LOS F.

Table 5-4. Comparison of Study Area Near-Term Roadway Conditions

TAMT Final PEIR Near-Term Base Conditions			Updated Near-Term Base Conditions		
Roadway	Capacity	ADT	LOS	ADT	LOS
Harbor Drive					
Beardsley Street to Cesar E. Chavez Parkway	40,000	24,460	C	19,695	B
Cesar E. Chavez Parkway to Sampson Street	40,000	15,744	B	13,433	A
Sampson Street to Schley Street	40,000	17,292	B	15,413	B
Schley Street to 28 th Street	40,000	16,868	B	14,830	A
28 th Street to Belt Street	40,000	22,496	C	21,281	C
Belt Street to 32 nd Street	40,000	21,048	C	20,871	B
28 th Street					
Harbor Drive to Main Street	40,000	17,184	B	13,289	A
Main Street to Boston Avenue	30,000	20,613	D	16,988	C
Boston Avenue to National Avenue	22,500	23,076	F	16,761	D
32 nd Street					
Harbor Drive to Norman Scott Road	50,000	24,610	B	27,800	B

Source: LLG 2019.

The comparison in Table 5-4 above demonstrates that there has not been a substantial change in circumstances related to the near-term roadway conditions described in the TAMT Final PEIR.

Intersections

Table 5-5 provides a comparison of the delay and corresponding LOS at each of the study area intersections during the weekday morning (7:00 a.m. to 9:00 a.m.) and afternoon (4:00 p.m. to 6:00 p.m.)

peak hours. Table 5-5 shows that all study area intersections along would operate at acceptable LOS D or better during the morning (AM) and afternoon (PM) peak hours under updated near-term base conditions, except the intersection of Norman Scott Road/32nd Street/Wabash Boulevard, which would operate at LOS E during the AM and PM peak hours. This represents a slight change from the near-term base conditions described in the TAMT Final PEIR, which identified this intersection as operating at LOS F during the AM peak hour.

Table 5-5. Comparison of Study Area Near-Term Intersection Conditions

Intersection	Control Type	Peak Hour	TAMT Final PEIR Near-Term Base Conditions		Updated Near-Term Base Conditions	
			Delay	LOS	Delay	LOS
Harbor Drive/Cesar E. Chavez Parkway	Signal	AM	41.0	D	30.1	C
		PM	38.0	D	26.1	C
Harbor Drive/Sampson Street	Signal	AM	43.8	D	40.7	D
		PM	44.9	D	36.9	D
Main Street/28 th Street	Signal	AM	22.2	C	18.3	B
		PM	38.8	D	27.1	C
National Avenue/28 th Street	Signal	AM	42.6	D	34.6	C
		PM	31.5	C	18.1	B
Harbor Drive/32 nd Street	Signal	AM	29.3	C	20.0	B
		PM	43.3	D	36.1	D
Norman Scott Road/32 nd Street/Wabash Boulevard	Signal	AM	103.2	F	57.2	E
		PM	69.6	E	63.5	E

Source: LLG 2019.

The comparison in Table 5-5 above demonstrates that there has not been a substantial change in circumstances related to the near-term intersection conditions described in the TAMT Final PEIR. Therefore, the cumulative effect on the National Avenue and 28th Street and Norman Scott Road/32nd Street/Wabash Boulevard intersections from past, present, and reasonably foreseeable future projects in 2035 were determined to be cumulatively significant; all other long-term cumulative impacts on study area intersections would not be cumulatively significant.

Freeway Ramp Intersection Capacity

As detailed in Section 5.3.11 of the TAMT Final PEIR, the key study signalized ramp intersections are projected to operate at “Under Capacity” during both the AM and PM peak hours under Near-Term Year 2021 Base conditions. Therefore, the cumulative effect on ramp intersections from past, present, and reasonably foreseeable future projects was determined not to be cumulatively significant. The Comparative TIA did not identify any changes to freeway ramp intersection operations since certification of the TAMT Final PEIR.

Future Year 2035 Base Conditions

As detailed in Section 5.3.11 of the TAMT Final PEIR, roadway and intersection geometrics under Future Year (2035) conditions were assumed to be identical to existing conditions. Because the TAMT Plan is a long-range redevelopment plan, the timing of its implementation will be based on ongoing market conditions and, therefore, the timing of its implementation and phasing is unknown. The TAMT Final PEIR notes that no mitigation measures identified under existing plus full TAMT Plan buildout conditions were carried forward into future year conditions because it is unknown when improvements will be implemented.

Roadway Segments

The Comparative TIA noted that there are no changes in Future Year 2035 traffic volumes because the SANDAG Series 12 Regional Traffic Model has not been modified since it was used for the TAMT Final PEIR traffic analysis. Therefore, the Comparative TIA did not identify any changes in the future year roadway segment conditions and the conditions are the same as those described in the TAMT Final PEIR. As detailed in Section 5.3.11 of the TAMT Final PEIR, all key study area roadway segments are projected to operate at LOS D or better under Future Year 2035 Base conditions, with the exception of 28th Street, between Boston Avenue and National Avenue (LOS F). Therefore, the cumulative effect on 28th Street between Boston Avenue and National Avenue from past, present, and reasonably foreseeable future projects in 2035 were determined to be cumulatively significant; all other long-term cumulative impacts on study area roadway segments would not be cumulatively significant.

Intersections

The Comparative TIA noted that there are no changes in Future Year 2035 traffic volumes because the SANDAG Series 12 Regional Traffic Model has not been modified since it was used for the TAMT Final PEIR traffic analysis. Therefore, the Comparative TIA did not identify any changes in the future year intersection conditions and the conditions are the same as those described in the TAMT Final PEIR. As detailed in Section 5.3.11 of the TAMT Final PEIR, all key study intersections are projected to operate at LOS D or better during both the peak hours under Future Year 2035 Base conditions, with the exception of the following two intersections.

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

Therefore, the cumulative effect on the National Avenue and 28th Street and Norman Scott Road/32nd Street/Wabash Boulevard intersections from past, present, and reasonably foreseeable future projects in 2035 were determined to be cumulatively significant; all other long-term cumulative impacts on study area intersections would not be cumulatively significant.

Freeway Ramp Intersection Capacity

As detailed in Section 5.3.11 of the TAMT Final PEIR, the key study signalized ramp intersections are projected to operate at “Under Capacity” during both the AM and PM peak hours under Near-Term Year 2021 Base conditions. Therefore, the cumulative effect on ramp intersections from past, present, and reasonably foreseeable future projects was determined not to be cumulatively significant. The Comparative TIA did not identify any changes to freeway ramp intersection operations since certification of the TAMT Final PEIR.

Freeway Segments

The Comparative TIA noted that there are no changes in Future Year 2035 traffic volumes because the SANDAG Series 12 Regional Traffic Model has not been modified since it was used for the TAMT Final PEIR traffic analysis. Since certification of the TAMT Final PEIR, however, the methodology for evaluating freeway segment operations transitioned from the freeway volume to capacity (V/C) ratio methodology to the Highway Capacity Manual (HCM) density methodology. The current HCM density methodology includes additional freeway segment geometric inputs, as well as a “density” output, both of which are different from the TAMT Final PEIR methodology. As a result, the Comparative TIA evaluated whether this change in methodology would substantially change the Future Year 2035 Base freeway conditions described in the TAMT Final PEIR. A comparison of the future year traffic conditions for each of the study area freeway mainline segments are summarized in Table 5-6.

Table 5-6. Comparison of Study Area Future Year Freeway Conditions

TAMT Final PEIR Near-Term Base Conditions				Updated Near-Term Base Conditions		
Freeway	Direction	V/C	LOS	V/C	Density	LOS
Interstate 5						
State Route 94 to Imperial Avenue	NB	1.07	F	1.087	--	F
	SB	0.94	E	0.956	40.7	E
Imperial Avenue to State Route 75	NB	0.96	E	0.975	42.5	E
	SB	0.90	D	0.909	36.9	E
State Route 75 to 28 th Street	NB	0.97	E	0.931	38.6	E
	SB	0.88	D	0.891	35.6	E
28 th Street to State Route 15	NB	1.17	F	1.289	--	F
	SB	0.94	E	1.031	--	F
State Route 15 to Main Street	NB	1.12	F	1.070	--	F
	SB	1.12	F	1.237	--	F
State Route 15						
State Route 94 to Market Street	NB	0.72	C	0.710	25.3	C
	SB	0.80	D	0.789	29.1	D
Market Street to Ocean View Boulevard	NB	0.95	E	1.035	--	F
	SB	1.02	F	1.112	--	F
Ocean View Boulevard to Interstate 5	NB	0.65	C	0.639	22.2	C
	SB	0.51	B	0.510	17.4	B
Interstate 5 to Norman Scott Road	NB	0.30	A	0.326	11.3	B
	SB	0.28	A	0.303	10.5	A

Source: Appendix G

As shown in Table 5-6, future year freeway conditions are generally the same as those described in the TAMT Final PEIR. However, there is a reduction in forecasted LOS from acceptable LOS D or better to unacceptable LOS E/F for the following two freeway segments compared to the TAMT Final PEIR.

- I-5 southbound between Imperial Avenue & SR-75 (LOS E)
- I-5 southbound between SR-75 & 28th Street (LOS E)

Although two additional freeway segments have been identified as operating at an unacceptable LOS, these segments would experience a minor increase in V/C (less than 1% increase) compared to the V/C described in the TAMT Final PEIR. Additionally, as noted above, there are no changes in Future Year 2035 traffic volumes from what was described in the TAMT Final PEIR. As such, it is anticipated that these changes in LOS are likely due to the change in methodology, rather than a change in forecasted traffic conditions.

5.3.5.3 Cumulative Contribution of the TAMT Plan

As detailed in Section 7.5.5.10 of the TAMT Final PEIR, full buildout of the TAMT Plan under the STC scenario (which was approved by the District as part of the TAMT Final PEIR certification in December 2016) would result in the generation of 296 additional truck trips each day and an additional 524 employees each day at TAMT. The additional truckloads of cargo and workers on TAMT under the STC scenario would result in the generation of 3,348 average daily trips. Of these 296 total trucks trips, 191 truck trips would be associated with dry bulk distribution (TAMT Final PEIR Appendix G-1).

Roadway Segments

As detailed in Section 7.5.5.10 of the TAMT Final PEIR, all study area roadway segments are projected to operate at LOS D or better under Future Year (2035) Plus STC Alternative conditions, except for the roadway segment of 28th Street between Boston Avenue and National Avenue. The segment of 28th Street between Boston Avenue and National Avenue is projected to operate at LOS F. With the addition of TAMT Plan traffic to Future Year (2035) traffic conditions under the STC scenario, this roadway segment would continue to operate at LOS F. However, the V/C ratio would increase by 0.029, which exceeds the City of San Diego's Traffic Significance Thresholds (Table 5-2) for allowable increases in V/C ratio for roadways operating at LOS F. As a result, the TAMT Final PEIR concluded that a cumulatively considerable roadway segment impact would occur with the addition of TAMT Plan traffic to future year conditions.

To mitigate for the impact to the roadway segment of 28th Street between Boston Avenue and National Avenue, the TAMT Final PEIR identifies the improvement of the roadway to its ultimate classification as a Four Lane Major Arterial. Implementation of this improvement would improve the traffic operations at this affected roadway segment to LOS C, reducing the cumulative impact to a less than significant level. The TAMT Final PEIR identifies that the TAMT Plan under the STC scenario would be responsible for a 2.8 percent fair share contribution of the cost to widen the roadway to a Four Lane Major Arterial classification. Similar to what was described in Section 4.5.3.3 of this SEIR, the TAMT Final PEIR also identifies that the roadway segment impact would occur when future projects contemplated under TAMT Plan generate 161 new daily truck trips. This is the point at which TAMT operations would add more than 0.01 V/C to the failing (LOS F) roadway segment.

Implementation of TAMT Final PEIR Mitigation Measure **MM-TRA-3** would reduce the TAMT Plan's impact on the 28th Street segment between Boston Avenue and National Avenue. However, the TAMT Final PEIR concludes that, while TAMT Final PEIR Mitigation Measure **MM-TRA-3** could reduce the roadway segment impact to a less than significant level, impacts would be cumulatively considerable and unavoidable due to the uncertainty regarding the timing and implementation of the recommended improvement, which is entirely within the City of San Diego's jurisdiction (TAMT Final PEIR page 4.10-52).

Intersections

As identified in Section 7.5.5.10 of the TAMT Final PEIR, all study area intersections segments are projected to operate at LOS D or better under Future Year (2035) Plus STC Alternative conditions, except for the National Avenue/28th Street intersection and the Norman Scott Road/32nd Street/Wabash

Boulevard intersection² (also known as the 32nd Street/Norman Scott Road/SR-15 intersection). With the addition of TAMT Plan traffic to Future Year (2035) traffic conditions under the STC scenario, the National Avenue/28th Street intersection would continue to operate at LOS F in the AM peak hour (with an average delay of 0.0 seconds) and LOS E in the PM peak hour (with an average delay of 0.7 seconds), which is below the City of San Diego's Traffic Significance Thresholds (Table 5-2) for intersections. However, the 32nd Street/Norman Scott Road/SR-15 intersection would worsen to LOS F in the AM peak hour (with an average delay of 97.6 seconds) and LOS F in the PM peak hour (with an average delay of 74.6 seconds).

The operational related increase in delay during the AM and PM peak hours at the 32nd Street/Norman Scott Road/SR-15 intersection under Future Year (2035) plus STC Alternative conditions is 16.1 seconds and 7.4 seconds, respectively, which exceeds the City of San Diego's thresholds. Therefore, the TAMT Final PEIR concluded that a cumulatively considerable intersection impact would occur at the 32nd Street/Norman Scott Road/SR-15 intersection with the addition of TAMT Plan traffic under future year conditions.

Similar to what was described in Section 4.5.3.3 of this SEIR, the TAMT Final PEIR states that the intersection impact would occur when future projects contemplated under TAMT Plan generate 195 new daily truck trips. This is the point at which TAMT operations would contribute more than 1.0 second of delay in the am peak hour at the 32nd Street/Norman Scott Road/SR-15 intersection. To mitigate for the cumulative impact to the 32nd Street/Norman Scott Road/SR-15 intersection, the TAMT Final PEIR identified the improvement of the intersection by adding a westbound right turn overlap phase. Implementation of this improvement would improve the traffic operations at this affected intersection by reducing the unmitigated delay associated with the TAMT Plan. With the improvement, the intersection would operate at LOS F in the am peak hour (with an average delay of 79.5 seconds) and LOS E in the pm peak hour (with an average delay of 57.2 seconds), effectively reducing delay at this intersection to below anticipated levels without the TAMT Plan.

Implementation of TAMT Final PEIR Mitigation Measure **MM-TRA-4** would reduce the TAMT Plan's impact at the 32nd Street/Norman Scott Road/SR-15 intersection. However, the TAMT Final PEIR concludes that, while TAMT Final PEIR Mitigation Measure **MM-TRA-4** could reduce the intersection impact to a less than significant level, impacts would be cumulatively considerable and unavoidable due to the uncertainty regarding the timing and implementation of the recommended improvement, which is entirely within Caltrans' jurisdiction (TAMT Final PEIR page 4.10-52).

Freeway Ramp Intersection Capacity

As detailed in the Section 5.3.11 of the TAMT Final PEIR, the anticipated intersection lane volumes at the signalized ramp intersections of National Avenue/I-5 northbound off-ramp and Norman Scott Road/32nd Street/Wabash Boulevard (also known as 32nd Street, Norman Scott Road/SR-15) would be considered under capacity and at capacity under Future Year (2035) Plus STC Alternative conditions. As identified in the TAMT Final PEIR, impacts on signalized ramp intersections at the National Avenue/I-5 northbound off ramp and Norman Scott Road/32nd Street/Wabash Boulevard would not be cumulatively considerable, and no mitigation is required (TAMT Final PEIR page 7-58).

² The TAMT Program FEIR uses Scott Road/32nd Street/Wabash Boulevard intersection while subsequent TAMT documents refer to this intersection as the 32nd Street/Norman Scott Road/SR-15 intersection.

Freeway Mainline Segments

As detailed in Section 5.3.11 of the TAMT Final PEIR, with the addition of TAMT Plan traffic to Future Year (2035) traffic volumes, the following study area freeway mainline segments are projected to operate at LOS E or LOS F:

- I-5 northbound between SR-94 and Imperial Avenue (LOS F and V/C of 1.08)
- I-5 southbound between SR-94 and Imperial Avenue (LOS E and V/C of 0.94)
- I-5 northbound between Imperial Avenue and SR-75 (LOS E and V/C of 0.97)
- I-5 northbound between SR-75 and 28th Street (LOS E and V/C of 0.97)
- I-5 northbound between 28th Street and SR-15 (LOS F and V/C of 1.17)
- I-5 southbound between 28th Street and SR-15 (LOS E and V/C of 0.94)
- I-5 northbound between SR-15 and Main Street (LOS F and V/C of 1.13)
- I-5 southbound between SR-15 and Main Street (LOS F and V/C of 1.12)
- SR-15 northbound between Market Street and Ocean View Boulevard (LOS E and V/C of 0.96)
- SR-15 southbound between Market Street and Ocean View Boulevard (LOS F and V/C of 1.04)

Based on the City of San Diego's thresholds provided in Table 5-2, buildout traffic associated with the TAMT Plan would cause a significant change in the V/C ratio to the following key study mainline freeway segments under Future Year (2035) plus STC Alternative scenario:

- I-5 northbound between SR-94 and Imperial Avenue (LOS F and V/C of 1.08)
- I-5 northbound between SR-15 and Main Street (LOS F and V/C of 1.13)
- SR-15 southbound between Market Street and Ocean View Boulevard (LOS F and V/C of 1.04)

Consequently, the TAMT Final PEIR concluded that impacts on freeway mainline segment would be cumulatively considerable with the addition of TAMT Plan buildout traffic to Future Year (2035) conditions under the STC Alternative scenario. As discussed in Section 5.3.11 of the TAMT Final PEIR, SANDAG 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. However, as noted in the TAMT Final PEIR, these plans are subject to budget availability and coordination with Caltrans. Through **MM-C-TRA-1**, the TAMT Final PEIR identified the following fair-share percentages, per facility, that the District should pay towards a program or plan for the affected freeway facility improvements to be constructed:

- I-5 northbound between SR-94 and Imperial Avenue – 5% of the total cost for improvements to this segment.
- I-5 northbound between SR-15 and Main Street – 6% of the total cost for improvements at this segment.
- SR-15 southbound between Market Street and Ocean View Boulevard – 11% of the total cost for improvements to this segment.

Although the TAMT Final PEIR identified these fair share improvements for these affected freeway facilities through **MM-C-TRA-1**, the TAMT Final PEIR also noted that there is no program in place, either by SANDAG or Caltrans, into which the District could pay its fair share toward the cost of such improvements.

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. For these reasons, the TAMT Final PEIR concluded that the freeway segment impacts along I-5 and SR-15 would be cumulatively considerable and unavoidable.

5.3.5.4 Project Contribution

Construction

As detailed in Section 5.3.11 of the TAMT Final PEIR, due to the programmatic and market-driven nature of the TAMT plan, the timing, potential for overlap, and specific construction plans associated with these future components are unknown at the time of the analysis was conducted. Consequently, the TAMT Final PEIR concluded that, 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.

The Proposed Project is one of the projects contemplated in the TAMT Plan, and project-level details are now available. As identified in Chapter 3, *Project Description*, of this SEIR, construction of the Proposed Project would occur in two phases (Phase I and Phase II). Improvements for each phase would take an estimated 7 to 10 months to complete. The Proposed Project's construction traffic would be composed primarily of two types of vehicle trips: worker trips (arriving to the Proposed Project site during the morning and leaving during the afternoon); and truck trips, which would occur throughout the 8-hour workday. A maximum of 50 construction workers would be needed during the peak of project construction, and 21 trucks would access the site over the course of a typical workday. As shown in Table 4.5-8 of this SEIR, construction of the Proposed Project would generate an estimated 284 trips per day (PCE), with a total of 34 trips occurring during the AM peak hour and 4 trips occurring during the PM peak hour.

Roadway Segments

The total worker and truck traffic construction volumes associated with the Proposed Project were assigned to the street system using the same distribution assumptions used in the TAMT Final PEIR. Table 5-7 provides a comparison between baseline study area roadway segment operations and baseline study area roadway segment operations with Proposed Project construction traffic.

Table 5-7. Study Area Street Segments Near-Term Base Conditions and Project Construction Traffic

Street Segment	Near-Term Base			Near-Term Base + Project Construction				Impact?
	ADT	V/C ¹	LOS ²	ADT	V/C	LOS	Δ ³	
Harbor Drive								
Beardsley Street to Cesar E. Chavez Parkway	19,695	0.492	B	19,779	0.494	B	0.002	No
Cesar E. Chavez Parkway to S. 28th Street	13,433	0.336	A	13,638	0.341	A	0.005	No
Sampson Street to Schley Street	15,413	0.385	B	15,618	0.390	B	0.005	No
Schley Street to 28 th Street	14,830	0.371	A	15,035	0.376	B	0.005	No
28th Street to Belt Street	21,281	0.532	C	21,389	0.535	C	0.003	No
Belt Street to 32 nd Street	20,871	0.522	B	20,979	0.524	B	0.002	No
28th Street								
Harbor Drive to Main Street	13,289	0.332	A	13,388	0.335	A	0.003	No
Main Street to Boston Avenue	16,992	0.566	C	17,067	0.569	C	0.003	No
Boston Avenue to National Avenue	16,761	0.745	D	16,807	0.747	D	0.002	No
32 ND Street								
Harbor Drive to Norman Scott Road	27,800	0.556	B	27,908	0.558	B	0.002	No

Source: Appendix G

¹ Volume to Capacity ratio

² Level of Service

³ Δ denotes an increase in volume to capacity ratio due to the combined construction

As shown in Table 5-7, with the addition of Proposed Project construction traffic volumes, all study area roadway segments would continue to operate at LOS D or better. Therefore, construction of the Proposed Project would not result in a cumulatively considerable impact on study area roadway segments and no new or more severe significant impacts would occur compared to what was previously disclosed in the TAMT Final PEIR.

Intersections

Table 5-8 provides a comparison between baseline study area intersection operations and baseline study area intersection operations with Proposed Project construction traffic.

Table 5-8. Study Area Intersections Near-Term Base Conditions and Project Construction Traffic

Intersection	Control Type	Peak Hour	Near-Term Base		Near-Term Base + Project Construction		Δ^3	Impact?
			Delay ¹	LOS ²	Delay	LOS		
Harbor Drive/Cesar E. Chavez Parkway	Signal	AM	30.1	C	30.6	C	0.5	No
		PM	26.1	C	26.2	C	0.1	No
Harbor Drive/Sampson Street	Signal	AM	40.7	D	41.6	D	0.9	No
		PM	36.9	D	36.9	D	0.0	No
Main Street/28 th Street	Signal	AM	18.3	B	18.3	B	0.0	No
		PM	27.1	C	27.1	C	0.0	No
National Avenue/28th Street	Signal	AM	34.6	C	34.7	C	0.1	No
		PM	18.1	B	18.1	B	0.0	No
Harbor Drive/32nd Street	Signal	AM	20.0	C	20.2	C	0.2	No
		PM	36.1	D	36.2	D	0.1	No
Norman Scott Road/32 nd Street/Wabash Boulevard	Signal	AM	57.2	E	57.2	E	0.0	No
		PM	66.5	E	66.5	E	0.0	No

Source: Appendix G

¹ Average delay expressed in seconds per vehicle

² Level of Service

³ Δ denotes an increase in delay due to the combined construction

As shown in Table 5-8, with the addition of Proposed Project construction traffic volumes, all Project study area intersections would continue to operate at LOS D or better except for the Norman Scott Road/32nd Street/Wabash Boulevard intersection during the AM and PM peak hours with or without Project construction traffic.

Construction traffic for the Proposed Project would contribute 0.0 seconds of delay at the Norman Scott Road/32nd Street/Wabash Boulevard intersection. Per the City of San Diego significance thresholds, a significant impact for an intersection operating at LOS E occurs when there is an increase in delay greater than 2.0 seconds. Based on the City of San Diego significance thresholds, construction of the Proposed Project would not result in a cumulatively considerable impact on study area intersections and no new or more severe significant impact would occur compared to what was previously disclosed in the TAMT Final PEIR.

Operation

Roadway Segments and Intersections

Operation of the Proposed Project is anticipated to generate 176 daily truck trips per day at peak day with a corresponding peak increase of 48 daily dock workers. These truck and employee trips would total approximately 1,200 average daily trips (PCE), with 76 trips occurring during both the AM and PM peak hours. As shown in Tables 5-4 and 5-5, near-term and future year roadway segment and intersection operations have generally improved compared to the traffic conditions described in the TAMT Final PEIR.

The Proposed Project's traffic volumes were distributed onto the same roadways and intersections as those analyzed in the TAMT Final PEIR. As described in Section 7.5.5.10 of the TAMT Final PEIR, operation of the STC Alternative is anticipated to generate 296 truck trips each day. As such, the 176 peak daily truck trips generated by operation of the Proposed Project would be within the truck trip volumes analyzed in the TAMT Final PEIR. Therefore, because the Proposed Project's operational truck trip volumes are within the scope of what was previously analyzed for the STC Alternative, no new or more severe cumulative roadway segment or intersection impacts would occur with operation of the Proposed Project compared to what was disclosed in the TAMT Final PEIR. However, the Proposed Project would generate vehicle trips that would contribute to the overall cumulatively considerable impact from TAMT Plan buildout on the roadway segment of 28th Street between Boston Avenue and National Avenue and the Norman Scott Road/32nd Street/Wabash Boulevard intersection identified in the TAMT Final PEIR.

Freeway Ramp Intersection Capacity

As identified in the TAMT Final PEIR, the addition of TAMT buildout traffic to the signalized ramp intersections at the National Avenue/I-5 northbound off ramp and Norman Scott Road/32nd Street/Wabash Boulevard would not result in the signalized ramp intersections operating at over capacity conditions. The TAMT Final PEIR concluded that impacts on signalized ramp intersections at the National Avenue/I-5 northbound off ramp and Norman Scott Road/32nd Street/Wabash Boulevard would be less than significant, and no mitigation is required (TAMT Final PEIR page 4.10-42).

Traffic associated with the operation of the Proposed Project would be within the traffic volumes contemplated in the TAMT Final PEIR (refer to TAMT Final PEIR, Table 7-45). Because the Proposed Project would not generate traffic volumes in excess of the traffic volumes contemplated in the TAMT Final PEIR, no

new or more severe cumulative signalized ramp intersection impacts would occur with the operation of the Proposed Project compared to what was disclosed in the TAMT Final PEIR.

Freeway Mainline Segments

As identified in the TAMT Final PEIR, significant freeway mainline segment impacts are anticipated with the addition of TAMT Plan buildout traffic to future year traffic conditions for the following three mainline freeway segments.

- I-5 northbound between SR-94 and Imperial Avenue
- I-5 northbound between SR-15 and Main Street
- SR-15 southbound between Market Street and Ocean View Boulevard

Future year traffic associated with the operation of the Proposed Project would be within the traffic volumes contemplated in the TAMT Final PEIR (refer to TAMT Final PEIR, Table 7-45) but would contribute to the same future year freeway mainline segment impacts. Because the Proposed Project would not generate traffic volumes in excess of the traffic volumes contemplated in the TAMT Final PEIR, no new or more severe cumulatively considerable freeway mainline segments impacts would occur with the operation of the Proposed Project compared to what was disclosed in the TAMT Final PEIR.

5.3.5.5 Level of Significance Prior to Mitigation

Construction

No new or more severe cumulatively considerable intersection or roadway segment impacts would occur with the addition of Project construction traffic compared to what was previously disclosed in the TAMT Final PEIR.

Operation

Roadway Segments

Operation of the Proposed Project would not result in any new or more severe cumulatively considerable impacts on study area roadway segments compared to what was previously disclosed in the TAMT Final PEIR. However, the Proposed Project would generate vehicle trips that would contribute to the overall cumulative impact from TAMT Plan buildout on the roadway segment of 28th Street between Boston Avenue and National Avenue identified in the TAMT Final PEIR.

Intersections

Operation of the Proposed Project would not result in any new or more severe cumulatively considerable impacts on study area intersections compared to what was previously disclosed in the TAMT Final PEIR. However, the Proposed Project would generate vehicle trips that would contribute to the overall significant impact from TAMT Plan buildout on the Norman Scott Road/32nd Street/Wabash Boulevard intersection identified in the TAMT Final PEIR.

Freeway Ramp Intersection Capacity

Traffic associated with operation of the Proposed Project would be within the traffic volumes contemplated in the TAMT Final PEIR (refer to TAMT Final PEIR, Table 7-45). As such, traffic associated with the operation of the Proposed Project would not result in new or more severe cumulatively considerable freeway ramp intersection capacity impacts compared to what was previously disclosed in the TAMT Final PEIR.

Therefore, freeway ramp intersection impacts would not be cumulatively considerable, consistent with the conclusions in the TAMT Final PEIR.

Freeway Mainline Segments

Future traffic associated with the operation of the Proposed Project would be within the traffic volumes contemplated in the TAMT Final PEIR (refer to TAMT Final PEIR, Table 7-45). As such, traffic associated with the operation of the Proposed Project would not result in new or more severe cumulatively considerable freeway mainline impacts compared to what was previously disclosed in the TAMT Final PEIR. However, the Proposed Project would generate vehicle trips that would contribute to the overall cumulative impact from TAMT Plan buildout on the following three mainline freeway segments.

- I-5 northbound between SR-94 and Imperial Avenue (LOS F)
- I-5 northbound between SR-15 and Main Street (LOS F)
- SR-15 southbound between Market Street and Ocean View Boulevard (LOS F)

5.3.5.6 Mitigation Measures

Roadway Segments

To mitigate for cumulatively considerable impacts from buildout of the TAMT Plan (which includes future projects such as the Proposed Project) on the roadway segment of 28th Street between Boston Avenue and National Avenue, the segment would need to be expanded to its ultimate classification as a Four Lane Major Arterial. Implementation of this improvement would improve the traffic operations at this affected roadway segment to LOS C, reducing the impact to a less than significant level. TAMT Final PEIR mitigation measure **MM-TRA-3** identified a 2.8 percent fair share contribution by the District of the cost to widen the roadway to a Four Lane Major Arterial classification and that the roadway impact would occur when future projects contemplated under TAMT Plan generate 161 new daily truck trips.

The Proposed Project would generate up to 176 trucks per day during maximum operation and would contribute to the exceedance of the V/C ratio on the segment of 28th Street between Boston Avenue and National Avenue. Therefore, TAMT Final PEIR mitigation measure **MM-TRA-3** would apply to the Proposed Project. As noted in TAMT Final PEIR mitigation measure **MM-TRA-3**, the District may seek reimbursement from future projects that would contribute new daily trips in proportion to their contribution.

Utilizing the same fair share contribution identified in the TAMT Final PEIR, below, the Proposed Project would be responsible for contributing 1.6 percent of the total cost to widen the 28th Street segment between Boston Avenue and National Avenue.

$$\text{Fair Share Percent (\%)} = \frac{(\text{Project Volume: 353 ADT})}{(\text{Existing Volume: 22,112} + \text{Project Volume: 353 ADT})}$$

The roadway segment widening improvement has been identified as part of the overall improvement to the roadway segment of 28th Street between National Avenue to Main Street in the Barrio Logan Public Facilities Financing Plan. However, the Barrio Logan Public Facilities Financing Plan indicates that the design and construction of the improvement will be scheduled when funding becomes available. To ensure consistency with TAMT Final PEIR mitigation measure **MM-TRA-3**, the Proposed Project would contribute 1.6 percent of the total cost to widen the roadway segment, while the District would contribute the remaining 1.2 percent of total cost to the City of San Diego for the improvement of the 28th Street

segment between Boston Avenue and National Avenue to ensure the entire 2.8 percent fair share contribution is provided to the City. As such, TAMT Final PEIR mitigation measure **MM-TRA-3** has been modified to reflect the Proposed Project's contribution to the roadway improvement as Mitigation Measure **MM-TRA-3R**.

Intersections

To mitigate for cumulatively considerable impacts from buildout of the TAMT Plan (which includes future projects such as the Proposed Project) on the Norman Scott Road/32nd Street/Wabash Boulevard intersection, the TAMT Final PEIR identified the improvement of the intersection by adding a westbound right-turn overlap phase. Implementation of this improvement would improve the traffic operations at this affected intersection by reducing the delay associated with the TAMT Plan. With the improvement, the intersection would operate at LOS F in the AM peak hour (with an average delay of 93.6 seconds) and LOS D in the PM peak hour (with an average delay of 54.1 seconds), effectively reducing delay at this intersection to below current levels. The TAMT Final PEIR noted that the intersection impact would occur when future projects contemplated under TAMT Plan generate 195 new daily truck trips. This is the point at which TAMT operations would contribute more than 1.0 second of delay in the AM peak hour at the Norman Scott Road/32nd Street/Wabash Boulevard intersection.

The TAMT Final PEIR identified mitigation measure **MM-TRA-4** to ensure that the fair share contribution is triggered once TAMT operations generate approximately 150 new daily trips, which outlines when the fair share contribution to the affected intersection is triggered, the mechanism for how the fair share contribution for the roadway improvement would be paid, a tracking program to monitor the number of trucks that enter and exit TAMT, and how the District may seek reimbursement from future projects that would contribute new daily trips to the intersection in proportion to their contribution. The Proposed Project would generate up to 176 trucks per day during maximum operation. As such, TAMT Final PEIR mitigation measure **MM-TRA-4** has been modified to reflect the Proposed Project's contribution to the intersection improvement as Mitigation Measure **MM-TRA-4R**.

Freeway Ramp Intersection Capacity

As noted above, traffic associated with the operation of the Proposed Project would not result in new or more severe cumulatively considerable freeway ramp intersection capacity impacts compared to what was previously disclosed in the TAMT Final PEIR. Freeway ramp intersection impacts would not be cumulatively considerable, consistent with the conclusions in the TAMT Final PEIR. Therefore, no mitigation is required.

Freeway Mainline Segments

As noted in TAMT Final PEIR Mitigation Measure **MM-C-TRA-1**, the freeway mainline segment improvements have been identified as part of SANDAG's Regional Transportation Plan (RTP). However, the design and construction of the improvements is not currently known due to funding constraints. It is anticipated that the design and construction of the improvements will be scheduled when funding becomes available.

To ensure consistency with TAMT Final PEIR Mitigation Measure **MM-C-TRA-1**, the Proposed Project would contribute a fair share contribution of the total cost for these improvements when a funding mechanism becomes available to the District. As such, TAMT Final PEIR Mitigation Measure **MM-C-TRA-1** has been modified to reflect the Proposed Project's contribution to the improvement as Mitigation Measure **MM-C-TRA-1R**.

MM-C-TRA-1R Construct Managed Lanes on I-5 and SR-15. 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 TAMT Plan'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 TAMT Plan's contribution to the affected freeway mainline sections reaching 0.005 change in V/C ratio.

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.

If a fair share funding program has been identified, the District shall determine if the Mitsubishi Cement Corporation Project Proponent shall provide a fair share contribution.

5.3.5.7 Level of Significance after Mitigation

Roadway Segments

Implementation of **MM-TRA-3R** would reduce the Proposed Project's contribution to the overall significant impact from TAMT Plan buildout on the segment of 28th Street between Boston Avenue and National Avenue. However, similar to what was described in the TAMT Final PEIR, the timing and implementation of the necessary improvement are within the exclusive jurisdiction of the City of San Diego and not the District. As such, the District cannot ensure that the improvement to the roadway segment would be made when needed. Therefore, while Mitigation Measure **MM-TRA-3R** would reduce the cumulative roadway segment impact to a less-than-significant level, the impact would be significant and unavoidable because of the uncertainty regarding the timing and implementation of the recommended improvement to 28th Street between Boston Avenue and National Avenue. As this finding is consistent with the finding in the TAMT Final PEIR, the Proposed Project would not result in new or more severe significant roadway segment impacts than what was disclosed in the TAMT Final PEIR.

Intersections

Implementation of **MM-TRA-4R** would reduce the Proposed Project's contribution to the overall significant impact from TAMT Plan buildout on the Norman Scott Road/32nd Street/Wabash Boulevard intersection. However, similar to what was described in the TAMT Final PEIR, the timing and implementation of the necessary improvement are within the exclusive jurisdiction of Caltrans and not the District. As such, the District cannot ensure that the improvement to the intersection would be made when needed. Therefore, while Mitigation Measure **MM-TRA-4R** would reduce the cumulative intersection impact to a less than significant level, the impact would be significant and unavoidable because of the uncertainty regarding the timing and implementation of the recommended improvement

to the Norman Scott Road/32nd Street/Wabash Boulevard intersection. As this finding is consistent with the finding in the TAMT Final PEIR, the Proposed Project would not result in new or more severe intersection impacts than what was disclosed in the TAMT Final PEIR.

Freeway Ramp Intersection Capacity

As noted above, traffic associated with the operation of the Proposed Project would not result in new or more severe cumulatively considerable freeway ramp intersection capacity impacts compared to what was previously disclosed in the TAMT Final PEIR. Freeway ramp intersection impacts would not be cumulatively considerable, consistent with the conclusions in the TAMT Final PEIR.

Freeway Mainline Segments

Information released by SANDAG in 2016 indicated that funding to analyze and construct improvements identified for highways, carpool/managed lanes, and connectors along the I-5, I-8, SR-78, SR-67, SR-56, SR-52, and SR-94 could come from a proposed ballot measure (also known as Measure A or the San Diego County Road Repair, Transit, Traffic Relief, Safety and Water Quality Measure). However, Measure A was not approved by San Diego County voters in the November 2016 election. Given that Measure A was not approved, it is currently unknown when funding for the full construction of improvements for the identified managed lanes would be available and a funding mechanism for fair share contributions made available to agencies such as the District.

A review of Caltrans' System Plan for Managed Lanes on California State Highways indicates that managed lanes contemplated by Caltrans have been identified in SANDAG's 2016 Regional Plan. The District has also inquired about future improvements or phased improvements along I-5 and SR-15 with Caltrans. At the time of this SEIR's preparation, Caltrans did not have specific details or programming identified for the above mentioned mainline freeway segments.

As identified in Chapter 3, the operational lifetime of the Proposed Project is anticipated to be 15 years following District approval of a lease or similarly binding agreement. The proposed term of that agreement would be 5 years with two 5-year options to extend, for a maximum total of 15 years. Based on the information currently available, it is unknown if SANDAG or Caltrans will program the identified freeway mainline improvements or a funding mechanism for fair share contributions within the next 15 years or if the Proposed Project would operate during the entire 15-year timeframe. In addition, it is currently unknown if operations associated with the Proposed Project would continue on a different part of the TAMT (as part of the future consolidated bulk loader facility) after the 15 year lease expires. It is anticipated that separate environmental review would be conducted for the future consolidated bulk loader facility on TAMT and that a funding mechanism for fair share contributions for managed lane improvements would be available or analyzed in greater detail during that environmental review process.

Although the TAMT Final PEIR identified fair share improvements for these affected freeway facilities through **MM-C-TRA-1**, the TAMT Final PEIR also noted that there is no program in place, either by SANDAG or Caltrans, into which the District could pay its fair share contribution toward the cost of such improvements. The TAMT Final PEIR concluded that the cumulative impacts along I-5 and SR-15 would remain significant and unavoidable. Similarly, implementation of **MM-C-TRA-1R** for the Proposed Project would not guarantee that improvements to the freeway mainline segments would be made at the time potential impacts could occur. Therefore, the cumulative impacts along I-5 and SR-15 would remain significant and unavoidable until such time that improvements are constructed, consistent with the conclusions in the TAMT Final PEIR.

6. Additional Consequences of Project Implementation

6.1 Introduction

This chapter addresses the potential for additional environmental consequences related to implementation of the Proposed Project, pursuant to State CEQA Guidelines Sections 15126.2(c), (d), (e) and 15128. Specifically, this chapter: (1) addresses significant irreversible changes to the environment that would result from implementation of the Proposed Project; (2) discusses growth-inducing impacts of the Proposed Project, which pertain to ways in which the Proposed Project could promote either direct or indirect growth; and (3) identifies the environmental effects of the Proposed Project that have been determined to be significant and unavoidable, and (4) describes the effects found to be less than significant during the initial environmental analysis (e.g., the Proposed Project's Initial Study/Environmental Checklist analysis, which is included as Appendix A of this SEIR).

6.2 Significant Irreversible Environmental Changes

State CEQA Guidelines Section 15126.2(d) requires an EIR to consider significant irreversible environmental changes which would be caused by a proposed project. Irreversible impacts may include the use of nonrenewable resources during the initial and continued phases of a project and can also result from permanent loss of habitat, damage caused by environmental accidents associated with Project construction, or operational resource use.

The Proposed Project would consume nonrenewable resources during construction. This includes use of fossil fuels and construction materials that cannot be recycled at the end of the Project's useful lifetime. Energy would also be required for the production of Project materials and components. During Project operation, fossil fuels would be consumed by yard equipment, commute vehicles, trucks, and vessels. Energy would be required to operate the unloaders, truck loaders, and other equipment. Electrical power would be obtained from the grid and would likely be generated from a mix of renewable and nonrenewable sources. Therefore, an irreversible commitment of nonrenewable resources would occur as a result of long-term Project operation.

Construction and operation of the Proposed Project would require the use of a limited amount of hazardous materials such as fuel, lubricants, and cleaning solvents. Additionally, during Project construction and operation, there is a possibility that pre-existing soil contamination could be encountered. All hazardous materials used in construction and operation would be stored, handled, and used in accordance with applicable Federal, State, and local regulations. Mitsubishi would be required to comply with the TAMT Burn Ash Management Plan (BAMP) that was prepared under TAMT Final PEIR mitigation measure **MM-HAZ-1** (as revised in this SEIR as **MM-HAZ-1R**), including conducting soil testing, preparing and implementing a Community Health and Safety Program, and disposing of soil appropriately. In addition, mitigation measure **MM-HAZ-2** requires implementation of engineering controls and best management practices (BMPs) during construction. Compliance with existing regulations and appropriate implementation of BMPs, as well as mitigation measures recommended in SEIR Section 4.3, *Hazards and Hazardous Materials*, would reduce the potential for accidents associated environmental damage. Such incidents are not expected to cause irreversible damage.

Implementation of the Proposed Project would not result in any permanent loss of natural habitat, cultural resources, or agricultural lands that would represent a significant irreversible change.

Resources that would be consumed as a result of the Proposed Project's implementation include water, electricity, and fossil fuels during construction and operation; however, the amount and rate of consumption of these resources would not result in significant environmental impacts or the unnecessary, inefficient, or wasteful use of resources. Compliance with all applicable codes and regulations, as well as mitigation measures identified in this SEIR, would ensure that all natural resources are conserved to the greatest practical extent. Moreover, there is nothing proposed within this SEIR that would be considered a significant irreversible environmental change that was not previously analyzed and disclosed in the TAMT FINAL PEIR.

6.3 Growth-Inducing Impacts

State CEQA Guidelines Section 15126.2(e) requires that an EIR discuss the ways in which a proposed project could directly or indirectly foster economic development, population growth, or additional housing, either directly or indirectly, and how that growth would affect the surrounding environment. Direct growth inducement would result if a project, for example, involved construction of new housing. Indirect growth might occur if a project were to establish substantial new permanent employment opportunities that would stimulate the need for additional housing, utilities, and public services.

Similarly, a project would indirectly induce growth if it would remove an obstacle to additional development, such as removing a constraint on a required public service or utility. A project proposing to expand water supply capabilities in an area where limited water supply has historically restrained growth would be considered growth-inducing.

This section discusses the characteristics and consequences of the Proposed Project that may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. However, the following analysis does not assume that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment (State CEQA Guidelines Section 15126.2(e)). Rather, SEIR Chapters 4, *Environmental Analysis*, and 5, *Cumulative Analysis*, discuss the adverse impacts on resources, including any impacts that would be caused by cumulative conditions.

6.3.1 Economic Growth

One criterion by which growth inducement can be measured involves economic growth. Economic growth considerations include a demand for temporary and permanent employees, which the Proposed Project would foster through the creation of new jobs. In addition, the Project would result in indirect job growth and economic benefits through the throughput supply chain of additional truck drivers servicing final destinations of products stored at the Project site.

In the short term, construction of the Proposed Project would induce economic growth by introducing temporary employment opportunities associated with construction and operation of the Project. It is assumed that the Proposed Project would result in temporary employment opportunities for up to 50 construction workers during the near-term construction period and up to a total of 24 onsite workers per shift for two shifts per day during operations. In addition to the direct short-term employment, these workers would likely patronize businesses in the Project area and in the larger San Diego region, resulting in indirect economic benefits as well.

The Proposed Project's job creation and economic benefits are within the economic growth parameters assumed in the TAMT FINAL PEIR.

6.3.2 Population Growth

The Proposed Project would not involve the development of housing, which would increase the City of San Diego's permanent population. The Proposed Project would, however, result in the creation of both temporary and permanent employment opportunities to support the construction and operation of the Project. The small number of additional permanent jobs would have a positive impact on the economy. In addition, the additional permanent employment created by the Proposed Project would not increase the City's population because future employees (and their families) are anticipated to be drawn from existing residents of the City and surrounding area. Therefore, construction and operation of the Proposed Project would have little to no effect on population growth in the region, which is consistent with the analysis and corresponding determination provided in the TAMT FINAL PEIR.

6.3.3 Construction of Additional Housing

The Proposed Project does not call for the construction of housing, which is prohibited on District property under the Public Trust Doctrine, nor would the Proposed Project increase the City's population in a manner that would necessitate the construction of additional housing. Although the small number of new permanent jobs may allow current residents to upgrade their existing housing, this effect would be minor and well within the current housing market for the region. Therefore, the Proposed Project would not contribute directly or indirectly to the construction of additional housing, which is consistent with the analysis and corresponding determination provided in the TAMT FINAL PEIR.

6.3.4 Removal of Obstacles to Population Growth

The elimination of either physical or regulatory obstacles to population growth is considered a growth-inducing impact. A physical obstacle to population growth typically involves the lack of critical public service infrastructure. The extension of critical public service infrastructure, including roadways, water mains, and sewer lines, into areas that currently do not have these services generally supports new development that may lead to population growth in an area. The Proposed Project would not extend infrastructure such as roadways, water, gas, or electricity into previously undeveloped areas because the Project site is within the District's jurisdiction in an urban area that is identified in the Port Master Plan (PMP) for the development of marine-related industrial uses, which the Project site and TAMT currently supports. Existing roadways, water, and wastewater services already serve the Project site and surrounding area. Therefore, the Proposed Project would not remove a physical obstacle to population growth. The Project also does not involve changing any regulatory obstacle to population growth, such as a change in zoning or PMP amendment. The Project is consistent with the TAMT Redevelopment Plan and the analysis and corresponding determination provided in the TAMT FINAL PEIR.

6.3.5 Summary of Growth-Inducing Impacts

The Proposed Project is expected to foster economic growth via continuation of cargo operations at the Project site, consistent with the TAMT Redevelopment Plan. In addition, the Proposed Project would provide a small number of new jobs in the San Diego area. However, the Proposed Project would not directly or indirectly induce population growth or cause the construction of new housing in the region. Overall, the Project would not cause or contribute to a significant adverse effect on regional growth.

6.4 Significant Effects that Cannot be Avoided

State CEQA Guidelines Section 15126(c) requires that an EIR describe any significant impacts, including those that cannot be mitigated to a level of less than significant (e.g., a significant and unavoidable impact). Potential environmental effects of the Proposed Project and proposed mitigation measures are discussed in detail in the individual resources sections of SEIR Chapter 4, *Environmental Analysis*, as well as Chapter 5, *Cumulative Impacts*, and are summarized in this SEIR's Executive Summary in Table ES-2, *Project Impacts and Mitigation Measures*.

As discussed within Chapter 4 and Chapter 5 of this SEIR, the Proposed Project would not result in any new or more severe significant project-level or cumulative impacts than what was disclosed in the TAMT Final PEIR. Similar to what was described in the TAMT Final PEIR, however, the Proposed Project would result in significant irreversible environmental changes related to greenhouse gas (GHG) emissions and transportation. GHG emissions associated with the Proposed Project would contribute to the overall GHG emissions generated by full TAMT Plan buildout, which were determined in the TAMT Final PEIR to result in significant and unavoidable impacts related to post-2020 GHG emissions targets despite implementation of **MM-GHG-1** through **MM-GHG-9**. As such, the Proposed Project would contribute to this significant and unavoidable impact even with the implementation of TAMT Final PEIR mitigation measures **MM-GHG-1** through **MM-GHG-9** (as revised in this SEIR as **MM-GHG-1R** through **MM-GHG-9R**) and new mitigation measure **MM-GHG-10**. GHGs remain in the atmosphere long after they are emitted from a source; thus, even after mitigation, these impacts would be significant and unavoidable, consistent with the conclusions in the TAMT Final PEIR.

As discussed in Section 4.5, *Transportation, Circulation and Parking*, operation of the Proposed Project would generate vehicle trips that would contribute to the significant impacts on the roadway segment of 28th Street between Boston Avenue and National Avenue and the 32nd Street/Norman Scott Road/State Route (SR-) 15 intersection resulting from full TAMT Plan buildout. While implementation of TAMT Final PEIR mitigation measures **MM-TRA-3** and **MM-TRA-4** (as revised in this SEIR as **MM-TRA-3R** and **MM-TRA-4R**) would reduce the Proposed Project's contribution to these impacts to a less-than-significant level, the impacts would be significant and unavoidable because of the uncertainty regarding the timing and implementation of the recommended improvements. The permanent degradation of traffic operations on the roadway segment of 28th Street between Boston Avenue and National Avenue and the 32nd Street/Norman Scott Road/SR-15 intersection would be an irreversible condition, consistent with the conclusions in the TAMT Final PEIR.

6.5 Effects Not Found to be Significant

Analysis was performed as part of the Initial Study/Environmental Checklist (Appendix A) prior to the preparation of this SEIR to determine whether the Proposed Project is considered a later activity within the scope of the TAMT Final PEIR and would result in any new or more severe significant environmental effects not previously considered. In accordance with State CEQA Guidelines Section 15168, a brief explanation indicating why the effects on the following resources areas would not be more severe than the effects determined to not be significant in the TAMT Final PEIR is provided in Table 6-1. It should be noted that Appendix G of the State CEQA Guidelines was updated in December 2018. Therefore, the specific threshold questions used in the TAMT FINAL PEIR are not the same as those in the current Appendix G checklist. However, both versions of Appendix G generally address the same underlying issues, and an assessment using either version will generally result in the same significance determination for a project. The analysis in Table 6-1 below relies on the updated Appendix G checklist questions; however,

as demonstrated in Table 6-1, the use of the updated Appendix G questions does not alter the conclusions of the TAMT FINAL PEIR.

Table 6-1. Effects Not Found to Be Significant

Initial Study Checklist Questions	Conclusion
Aesthetics	
Except as provided in Public Resources Code Section 21099, would the project:	
Have a substantial adverse effect on a scenic vista?	Impacts on the surrounding vista areas as a result of development within the TAMT were fully analyzed in the TAMT FINAL PEIR, which concluded that none of the views from adjacent Planning Districts would be significantly affected by full buildout of the TAMT Redevelopment Plan. This conclusion is consistent with the findings of the TAMT FINAL PEIR.
Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?	The Proposed Project would be constructed entirely within the TAMT, which does not contain scenic resources such as trees, rock outcroppings, and historic buildings. This conclusion is consistent with the findings of the TAMT FINAL PEIR.
In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	The Proposed Project is located within an urbanized area developed with industrial and maritime uses. The Proposed Project would not conflict with any zoning or other regulations of the PMP that govern vista areas or scenic quality. The Proposed Project's improvements to Warehouse C, as well as the vessel unloading and truck loading activities, would be consistent with the site's existing industrial and shipping-related visual character. This conclusion is consistent with the findings of the TAMT FINAL PEIR.
Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	The potential for new structures within the TAMT to become a source of glare was fully analyzed in the TAMT FINAL PEIR, which concluded that new structures would not be designed with reflective surfaces and would not contribute to a substantial increase in glare. The TAMT FINAL PEIR concluded that additional vehicle activity associated with TAMT operations would not create a substantial new source of daytime glare that would adversely affect daytime views. Glare-related impacts from the Proposed Project would be less than significant. This conclusion is consistent with the findings of the TAMT FINAL PEIR.
Agriculture and Forestry Resources	
Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?	According to Important Farmland maps prepared by the California Department of Conservation, no designated Farmland is located within the Project site or within the surrounding vicinity. This conclusion is consistent with the findings of the TAMT FINAL PEIR.
Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?	The Proposed Project is not designated for agricultural use nor is there a Williamson Act contract for the Project Site. This conclusion is consistent with the findings of the TAMT FINAL PEIR.
Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	The Proposed Project site is located within the TAMT, which has a land use designation as Marine Terminal. Neither the Project site nor the surrounding vicinity is zoned for forest land or timberland. This conclusion is consistent with the findings of the TAMT FINAL PEIR.

Table 6-1. Effects Not Found to Be Significant

Initial Study Checklist Questions	Conclusion
Would the project result in the loss of forest land or conversion of forest land to non-forest use?	No forest land is located within the Proposed Project site or the vicinity of the TAMT. The Proposed Project would not result in the loss of forest land or convert forest land to non-forest use. This conclusion is consistent with the findings of the TAMT FINAL PEIR.
Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	The Proposed Project would be located entirely within the TAMT. The area surrounding the District is characterized by urban development that does not include existing agriculture or forest land. No impacts on Farmland or forest land would occur. This conclusion is consistent with the findings of the TAMT FINAL PEIR.
Biological Resources	
Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	Although no natural habitat exists in the Project area, some urban-adapted birds and bats could nest and roost within Warehouse C and other structures on the TAMT. To ensure that TAMT demolition activities do not impact nesting birds and roosting bats, TAMT FINAL PEIR mitigation measures MM-BIO-1 (Avoid Nesting Season for Birds or Conduct Preconstruction Nesting Survey) and MM-BIO-2 (Avoid Bat Maternity Roosts or Conduct Preconstruction Maternity Bat Roost Survey) were identified to minimize impacts. TAMT FINAL PEIR mitigation measure MM-BIO-1 requires a preconstruction nesting survey prior to any demolition activities of structures that would occur during the bird breeding season (February 1 through August 31) and avoidance of structures supporting active nests until a qualified biologist determines that the nest is no longer active or the young have fledged. This applicable measure would ensure impacts on nesting birds would remain less than significant. Similarly, implementation of TAMT FINAL PEIR mitigation measure MM-BIO-2 would avoid impacts on roosting bats during demolition activities. The Proposed Project would be required to implement these TAMT FINAL PEIR mitigation measures, and impacts on biological resources would be less than significant. This conclusion is consistent with the findings of the TAMT FINAL PEIR.
Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	The Proposed Project site consists entirely of developed land; there are no sensitive vegetation communities or areas of riparian habitat on site. Eelgrass beds are not known to occur in the area of the berths that the Proposed Project would access, and the depth of the Bay at the Project site limits the potential for growth. As such, no riparian or other sensitive natural community would be affected by Project activities. This conclusion is consistent with the findings of the TAMT FINAL PEIR.
Would the project have a substantial adverse effect on state or Federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	The Proposed Project site consists entirely of developed land. No State or federally protected wetlands are located within or immediately adjacent to the Project site. Project construction and operations at the TAMT would adhere to Stormwater Pollution Prevention Plans (SWPPPs) and Urban Stormwater Management Programs, as required, and no dredging, fill, or other waterside construction would occur. As such, no federally protected wetlands would be affected by Project activities. This conclusion is consistent with the findings of the TAMT FINAL PEIR.
Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	The Project site consists entirely of developed land. Native species present on site are limited to those that commonly occur in heavily developed areas. Such species would not be substantially affected by the Proposed Project. Additionally, the industrial character of the Proposed Project site is not a wildlife corridor or nursery site. This conclusion is consistent with the findings of the TAMT FINAL PEIR.

Table 6-1. Effects Not Found to Be Significant

Initial Study Checklist Questions	Conclusion
Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	The Proposed Project site is within the jurisdiction of the District, and is located in PMP Planning District 4. The PMP's conservation policies focus on protecting and restoring functional areas of high ecological value, none of which occur within or near the Project site. Therefore, the Proposed Project would not conflict with any local policies or ordinances to protect biological resources. This conclusion is consistent with the findings of the TAMT FINAL PEIR.
Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?	The Proposed Project is not subject to the City of San Diego Multiple Species Conservation Program and is not inside the jurisdiction of any other adopted Habitat Conservation Plan or Natural Community Conservation Plan. As such, no conflict would occur. This conclusion is consistent with the findings of the TAMT FINAL PEIR.
Cultural Resources	
Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	A known prehistoric resource, CA-SDI-5931, is located within 125 to 180 feet of the Proposed Project site. Because the exact boundaries of the site are not known, it is possible that it could be subject to direct and indirect impacts associated with Project implementation. Implementation of TAMT FINAL PEIR mitigation measure MM-CUL-1 (Archeological Monitoring in Areas of Sensitivity) would ensure impacts on CA-SDI-5931, any previously unknown archeological resources, or any prehistoric human remains that may be present are less than significant. This conclusion is consistent with the findings of the TAMT FINAL PEIR.
Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	No known unique archeological resources are present in the Proposed Project area; however, it is possible that a previously unknown resource could be discovered, and damaged or destroyed during ground-disturbing work. Implementation of TAMT FINAL PEIR mitigation measure MM-CUL-1 would ensure impacts on CA-SDI-5931, any previously unknown archeological resources, or any prehistoric human remains that may be present are less than significant. This conclusion is consistent with the findings of the TAMT FINAL PEIR.
Would the project disturb any human remains, including those interred outside of dedicated cemeteries?	No human remains are known to be located within the Proposed Project area. However, the eastern portion of the study area for cultural resources is potentially sensitive for archaeological deposits and prehistoric human remains because of its proximity to CA-SDI-5931. Any ground-disturbing activities that would occur within this area would be monitored by a qualified archaeologist and a Native American monitor pursuant to TAMT FINAL PEIR mitigation measure MM-CUL-1 . Outside of this area of sensitivity, there is a very low potential for human remains as the majority of TAMT was filled using nonnative soils. Implementation of TAMT FINAL PEIR mitigation measure MM-CUL-1 and adherence to California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98 would ensure potential impacts associated with this issue remain less than significant. This conclusion is consistent with the findings of the TAMT FINAL PEIR.
Energy	

Table 6-1. Effects Not Found to Be Significant

Initial Study Checklist Questions	Conclusion
Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	The Proposed Project would upgrade the Project site to include additional electrification and shore power to help offset running auxiliary engines while vessels are at berth. The Proposed Project would include the installation of shore power facilities, which would draw from the San Diego Gas & Electric (SDG&E) grid. In 2016, 43% of SDG&E's electricity delivered was sourced from renewable resources. The implementation of the Proposed Project would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources. Impacts would be less than significant. Therefore, the Proposed Project would be consistent with the findings of the TAMT FINAL PEIR.
Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	The Proposed Project would include installation of shore power infrastructure, which would reduce the use of diesel engines while vessels are at berth, and would draw from the grid. California's Renewables Portfolio Standard (RPS) requires utilities to increase procurement from renewable resources to 33% of total procurement by 2020. In 2016, SDG&E sourced 43% of the total electricity delivered to its customers from renewable resources. Therefore, the Proposed Project would not conflict or obstruct SDG&E from reaching the goals set by the California RPS.
Geology and Soils	
Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	As identified in the Initial Study (SEIR Appendix A), the Silver Strand segment of the Rose Canyon Fault Zone is mapped as crossing Warehouse C. Therefore, there is a potential for ground rupture associated with onsite faulting. Implementation of the Proposed Project includes incorporation of all of the Project features contained in the Project's Geotechnical Investigation (see SEIR Appendix B), which is anticipated to reduce impacts to less than significant. This conclusion is consistent with the findings of the TAMT FINAL PEIR.
Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic groundshaking?	The Geotechnical Investigation prepared for the Proposed Project (see SEIR Appendix B) contains design features and recommendations for Project construction. With implementation of these Project features impacts would be less than significant, and no further analysis of seismic groundshaking within the context of this SEIR is warranted. This conclusion is consistent with the findings of the TAMT FINAL PEIR.
Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?	As identified in the Initial Study (SEIR Appendix A), the Project site is in an area with a high potential for liquefaction. Implementation of the Proposed Project includes the design features and recommendations contained in the Geotechnical Investigation, including supporting piles within those areas of Warehouse C that are proposed for renovation to prevent or lessen impacts (see SEIR Appendix B). As such, potentially adverse impacts associated with liquefaction would be less than significant. This conclusion is consistent with the findings of the TAMT FINAL PEIR.
Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?	The Proposed Project site is within an area mapped as being least susceptible to landslides. Additionally, based on the relatively flat topography of the Proposed Project site, landslides would not be anticipated to occur. Therefore, no impacts associated with this issue are anticipated to occur with implementation of the Proposed Project. This conclusion is consistent with the findings of the TAMT FINAL PEIR.

Table 6-1. Effects Not Found to Be Significant

Initial Study Checklist Questions	Conclusion
Would the project result in substantial soil erosion or the loss of topsoil?	The Proposed Project site is fully paved and does not contain any naturally occurring soils, including topsoils. Therefore, the Proposed Project would not affect or increase the potential for either soil erosion or the loss of topsoil, and no impacts associated with this issue are anticipated to occur with implementation of the Proposed Project. This conclusion is consistent with the findings of the TAMT FINAL PEIR.
Would the project be located on geologic units or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	The Proposed Project's Geotechnical Investigation (SEIR Appendix B) provides design features to lessen the effects of compressible soils and potential distress to the structural integrity of Warehouse C; these Project features would be implemented during final design and construction. Therefore, impacts associated with geologic soil stability would be less than significant. This conclusion is consistent with the findings of the TAMT FINAL PEIR.
Would the project be located on expansive soil, as defined in Section 1803.5.3 of the California Building Code (2010), creating substantial direct or indirect risks to life or property?	Project features, as identified in the Geotechnical Report (see SEIR Appendix B) would minimize the expansive soil heave. Specifically, the Proposed Project would place 2 feet of imported low expansion sand and aggregate base directly below the interior truck loading lane option (Option A). Therefore, impacts associated with expansive soils would be less than significant. This conclusion is consistent with the findings of the TAMT FINAL PEIR.
Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	The Proposed Project does not include the construction and operation of septic tanks or alternative wastewater disposal systems. No impacts would occur. This conclusion is consistent with the findings of the TAMT FINAL PEIR.
Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	The Proposed Project would not involve digging or trenching to depths sufficient to result in an impact on a unique paleontological or unique geologic feature. Excavation could occur with the subterranean pipeline option; however, the Project area consists of nonnative fill soil. This conclusion is consistent with the findings of the TAMT FINAL PEIR.
Hazards and Hazardous Materials	
Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Although the Proposed Project would result in increases in the amounts of common types of hazardous materials typical for the terminal (e.g., fuel, cleaning products and solvents, paints, oils, and grease associated with equipment operation and maintenance), such transport, use, and disposal would be required to comply with applicable local, State, and Federal regulations. As a consequence, the TAMT FINAL PEIR concludes that impacts associated with the Proposed Project's construction and operation would be less than significant. This conclusion is consistent with the findings of the TAMT FINAL PEIR. However, based on comments received on the Proposed Project's NOP (SEIR Appendix A), hazards and hazardous materials topic areas were carried forward in the SEIR (see Section 4.3).
Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	No existing or proposed schools are located within 0.25 mile of the Project site boundaries (Warehouse C and Berths 10-7/10-8). The closest school to the Proposed Project's boundaries is the Perkins Elementary School, which is an estimated 1,700 feet, or 0.32 mile, northeast of the Proposed Project site; therefore, Proposed Project activities would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or wastes within 0.25 mile of an existing or proposed school. This conclusion is consistent with the findings of the TAMT FINAL PEIR.

Table 6-1. Effects Not Found to Be Significant

Initial Study Checklist Questions	Conclusion
Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	No areas of Warehouse C itself, or the areas associated with the Proposed Project's outside truck loading racks (Option B) or subterranean pipelines (Sub-Option 1) are on a list of hazardous materials sites compiled pursuant to Cortese List Data resources (Governmental Code 65962.5). Therefore, no impacts would occur. This conclusion is consistent with the findings of the TAMT FINAL PEIR.
For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	The highest point of the Proposed Project would not conflict with the Federal Aviation Administration's (FAA's) height threshold requiring submittal of a Notice of Proposed Construction or Alteration, and no impacts are anticipated to occur. The San Diego International Airport has confirmed that the Proposed Project would not conflict with its airspace or require additional review for compatibility (Redman 2018). In addition, the Proposed Project site is not located within the Forecast Noise Exposure areas in the San Diego International Airport's Airport Land Use Compatibility Plan, and is not located within the vicinity of a private airstrip. Therefore, the Proposed Project would not expose people residing or working in the Project area to safety hazards or excessive airport noise. This conclusion is consistent with the findings of the TAMT FINAL PEIR.
Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	The Proposed Project would be required to comply with applicable requirements set forth by the County of San Diego Office of Emergency Services (OES) Operational Area Emergency Plan, the City of San Diego Police Department, and the City of San Diego Fire Department. Impacts were identified as less than significant, and this conclusion is consistent with the findings of the TAMT FINAL PEIR. However, based on comments received on the Proposed Project's NOP (SEIR Appendix A), hazards and hazardous materials were carried forward in the SEIR (see Section 4.3).
Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	There are no wildlands or heavily vegetated areas in the vicinity of the Proposed Project site, and implementation of the Project would not expose people or structures either directly or indirectly to a significant risk of loss, injury, or death involving wildland fires. As such, no impacts would occur. This conclusion is consistent with the findings of the TAMT FINAL PEIR.
Hydrology and Water Quality	
Would the project violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	Implementation of the Proposed Project would require compliance with the source control, site design, and pollutant control BMPs specified by the Project's SWPPP, and the Project would also be required to comply with a District-approved Stormwater Quality Management Plan (SWQMP). Additionally, the Project would be required to comply with the BMPs identified in the San Diego Harbor Safety Plan to avoid or mitigate unsafe vessel conditions. Therefore, the Proposed Project would not violate Regional Water Quality Control Board water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. Impacts would be less than significant. This conclusion is consistent with the findings of the TAMT FINAL PEIR.

Table 6-1. Effects Not Found to Be Significant

Initial Study Checklist Questions	Conclusion
Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management?	The Proposed Project would not result in any change to the amount of impervious surface area associated with the TAMT. Dewatering is not expected to be necessary. Groundwater at the Project site is saline from saltwater intrusion, and, therefore, it is not used as a potable water source. Impacts related to decreasing groundwater supplies and interfering with groundwater recharge would be less than significant. This conclusion is consistent with the findings of the TAMT FINAL PEIR.
Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: (i) result in substantial erosion or siltation on- or off-site;	The Proposed Project would not require any modifications to the existing storm drain system on the TAMT. In addition, the Proposed Project site does not contain any naturally occurring watercourses and is completely surfaced with asphalt and concrete. Consequently, no impacts related to changes in existing drainage patterns, including erosion and/or siltation, would occur. This conclusion is consistent with the findings of the TAMT FINAL PEIR.
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	The Proposed Project would not result in any substantial change to the amount of impervious surface area at the Project site. As a result, no substantial changes in drainage patterns would occur, and the Proposed Project would not increase surface runoff that would result in flooding on- or off site. No impacts would occur. This conclusion is consistent with the findings of the TAMT FINAL PEIR.
(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	The Proposed Project does not involve any modifications to the TAMT's existing stormwater drainage system, and would not increase the existing site's surface water runoff. Therefore, the Proposed Project would not exceed the capacity of the TAMT's existing stormwater drainage system and would not create an additional source of polluted runoff. No impacts would occur. This conclusion is consistent with the findings of the TAMT FINAL PEIR.
(iv) impede or redirect flood flows?	The Proposed Project site is not located within a Federal Emergency Management Agency (FEMA)-designated 100-year flood hazard area. No impacts related to structures placed within a 100-year flood hazard area would occur, and there would be no impacts related to the impediment or redirection of flood flow. This conclusion is consistent with the findings of the TAMT FINAL PEIR.
Would the project be located in flood hazard, tsunami, or seiche zones, risking release of pollutants due to project inundation?	As identified in the Initial Study (Appendix A), the TAMT, which includes the Proposed Project site, is not within a FEMA-designated 100-year flood hazard area, but is within a designated high-risk zone for tsunami events. However, considering the Project site's distance from the ocean, the buffering from it provided by landmass, and its height above sea level, the potential for hazards associated with seiche or tsunami events is low. The site is flat, and the potential for large-scale slope instability leading to mudflow is low. This conclusion is consistent with the findings of the TAMT FINAL PEIR.

Table 6-1. Effects Not Found to Be Significant

Initial Study Checklist Questions	Conclusion
Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	The Proposed Project would be required to comply with the Municipal Stormwater Permit, Industrial General Permit, District Code, Article 10 (Stormwater Management and Discharge Control Ordinance), and the District's Jurisdictional Runoff Management Plan (JRMP). The Proposed Project would comply with the source control, site design, and pollutant control BMPs specified by the Project's SWPPP, and the Project would also be required to comply with a District-approved SWQMP. Additionally, the Project would be required to comply with the BMPs identified in the San Diego Harbor Safety Plan to ensure a significant water quality impact from marine vessels does not occur. Therefore, the Proposed Project would not violate water quality standards and, thus, would not conflict with the requirements, or obstruct implementation, of a water quality control plan.
Land Use and Planning	
Would the project physically divide an established community?	The Proposed Project would not expand the physical boundaries of the TAMT or develop areas outside of its current boundaries. Neither construction nor operation of the Proposed Project would physically divide an established community. No impacts would occur. This conclusion is consistent with the findings of the TAMT FINAL PEIR.
Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	No conflicts or inconsistencies with applicable land use plans, policies, or regulations would occur from construction or operation of the Proposed Project. Therefore, no significant environmental impacts would occur. This conclusion is consistent with the findings of the TAMT FINAL PEIR.
Mineral Resources	
Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	The Proposed Project would not result in any loss of known mineral resources that would be of value regionally or to the State. The primary purpose and need of the Project is to import cement and cementitious materials that are in short supply at the local and regional level. No impact would occur. This conclusion is consistent with the findings of the TAMT FINAL PEIR.
Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	The Proposed Project site does not contain any known aggregate or other mineral resources, no mining or mineral excavation occurs either within or in proximity to it, and the site does not contain locally important mineral resources. Therefore, no impacts on locally important mineral resource recovery would occur. This conclusion is consistent with the findings of the TAMT FINAL PEIR.
Noise	
For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	The Proposed Project would not construct any habitable structures and would not attract large numbers of people to the Project area. In addition, the Proposed Project site is not located within the Forecast Noise Exposure areas in the San Diego International Airport's Airport Land Use Compatibility Plan, and is not located within the vicinity of a private airstrip. Therefore, the Proposed Project would not expose people residing or working in the Project area to excessive airport noise. No impacts would occur. This conclusion is consistent with the findings of the TAMT FINAL PEIR.

Table 6-1. Effects Not Found to Be Significant

Initial Study Checklist Questions	Conclusion
Population and Housing	
Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	The Proposed Project would not directly or indirectly cause additional development or unplanned population growth locally or regionally. Therefore, no impacts would occur, and no further analysis within the context of this SEIR is warranted. This conclusion is consistent with the findings of the TAMT FINAL PEIR.
Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	Construction of the Project would not directly or indirectly cause the displacement of housing or people. The properties surrounding the Proposed Project would remain fully operational during construction and operation; no businesses would be temporarily or permanently displaced by the Project. As such, no impacts would occur. This conclusion is consistent with the findings of the TAMT FINAL PEIR.
Public Services	
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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 fire protection?	Truck trips associated with the TAMT Redevelopment Plan and overall traffic volume growth within the San Diego Region have likely already been factored into local emergency fire response services. Consequently, direct Project-related impacts on fire protection services would be anticipated to be less than significant and would not require the provision of new or altered fire stations. This conclusion is consistent with the findings of the TAMT FINAL PEIR.
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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 police protection?	Truck trips associated with the TAMT Redevelopment Plan and overall traffic volume growth within the San Diego Region have likely already been factored into local emergency police response services. Consequently, direct Project-related impacts on police protection services are anticipated to be less than significant. This conclusion is consistent with the findings of the TAMT FINAL PEIR.
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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 schools?	The Proposed Project would not increase population. Jobs generated during construction and operation of the Proposed Project would be drawn from the local workforce already served under existing school capacities. Therefore, the Proposed Project would not increase demand for new schools. Less-than-significant or no impacts would occur. This conclusion is consistent with the findings of the TAMT FINAL PEIR.
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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 parks?	The Proposed Project would not increase population. Jobs generated during construction and operation of the Proposed Project would be drawn from the local workforce already served by existing park facilities. Therefore, the Proposed Project would not increase demand for new parks. Less-than-significant or no impacts would occur. This conclusion is consistent with the findings of the TAMT FINAL PEIR.
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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 other public facilities?	The Proposed Project would not increase population. Jobs generated during construction and operation of the Proposed Project would be drawn from the local workforce already served by existing public facilities. Therefore, the Proposed Project would not increase demand for new public facilities of this type. Less-than-significant or no impacts would occur. This conclusion is consistent with the findings of the TAMT FINAL PEIR.

Table 6-1. Effects Not Found to Be Significant

Initial Study Checklist Questions	Conclusion
Recreation	
Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	The Proposed Project would not result in an increase in local housing as the workforce is anticipated to be drawn from the local region. As the Proposed Project would not contribute to an increase in local housing or residences, no impacts on existing parks or recreational facilities would occur. This conclusion is consistent with the findings of the TAMT FINAL PEIR.
Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	None of the Project's proposed activities would involve the development of a recreational facility. All proposed construction and operational activities would occur within the TAMT. The Proposed Project would not require the construction or expansion of recreational facilities, and no impact associated with recreational facilities would occur. This conclusion is consistent with the findings of the TAMT FINAL PEIR.
Transportation	
Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Existing onsite parking design and capacity is sufficient to accommodate construction and operation of the Proposed Project without the need for any modifications. Therefore, the Proposed Project does not have the potential to increase traffic hazards to motorists from geometric design features or create an incompatible traffic-related use. No impacts would occur. This conclusion is consistent with the findings of the TAMT FINAL PEIR.
Would the project result in inadequate emergency access?	Construction and operation of the Proposed Project would not require any temporary closures of public roadways or driveways that could impede emergency access either within the TAMT or along streets under the jurisdiction of the City of San Diego. No impacts on emergency access would occur. This conclusion is consistent with the findings of the TAMT FINAL PEIR.
Tribal Cultural Resources	
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?	Although there is a low probability of encountering Tribal Cultural Resources (TCRs) within the Project site, the Proposed Project would still be required to adhere to TAMT FINAL PEIR mitigation measure MM-CUL-1 (Archaeological Monitoring in Areas of Sensitivity), which requires a qualified archaeologist and a Native American monitor to monitor all ground-disturbing activities within identified sensitive areas. With implementation of TAMT FINAL PEIR mitigation measure MM-CUL-1 , a less-than-significant impact would occur. This conclusion is consistent with the findings of the TAMT FINAL PEIR.

Table 6-1. Effects Not Found to Be Significant

Initial Study Checklist Questions	Conclusion
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	Although there is a low probability of encountering Tribal Cultural Resources (TCRs) within the Project site, the Proposed Project would still be required to adhere to TAMT FINAL PEIR mitigation measure MM-CUL-1 , which requires a qualified archaeologist and a Native American monitor to monitor all ground-disturbing activities within identified sensitive areas. With implementation of TAMT FINAL PEIR mitigation measure MM-CUL-1 , a less than significant impact would occur. This conclusion is consistent with the findings of the TAMT FINAL PEIR.
Utilities and Service Systems	
Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	The Proposed Project would generate minimal wastewater from construction and operation. The Proposed Project would not require any modifications to the existing storm drain system, or increase the TAMT's impervious surface area. Therefore, the Proposed Project would not substantially increase the amount of wastewater requiring treatment, and would not require the need for relocated, new, or improved wastewater treatment, or stormwater drainage facilities. Implementation of the Proposed Project would include installation of shore power infrastructure, which would entail trenching and laying conduit from the shore to the berthing space. However, trenching would be minimal, and it is anticipated that existing conduit would be used for new shore power infrastructure. Impacts related to the construction of the shore power facilities would be temporary and less than significant, and no operational impacts would occur. No additional, or relocated, natural gas or telecommunications facilities would be required for implementation of the Proposed Project. Therefore, less-than-significant impacts on wastewater, stormwater drainage, electric, natural gas, or telecommunication facilities would occur. This conclusion is consistent with the findings of the TAMT FINAL PEIR.
Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	All necessary potable water would be provided through existing water supplies serving Bays C-7 through C-10 of Warehouse C. Project-related water demand would be accommodated within existing infrastructure and entitlements. Water service is provided by the City's Public Utilities Department, which estimated future demand would be met by the supply in 5-year increments through 2035, including normal, dry, and multiple dry years. Therefore, less-than-significant impacts on water supplies would occur. This conclusion is consistent with the findings of the TAMT FINAL PEIR.
Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	The Project would not generate a significant amount of new wastewater from construction or operational personnel and activities. Therefore, the Proposed Project would not substantially increase the amount of wastewater requiring treatment and would not require the need for new or improved wastewater treatment facilities. Less-than-significant impacts on wastewater providers would occur. This conclusion is consistent with the findings of the TAMT FINAL PEIR.

Table 6-1. Effects Not Found to Be Significant

Initial Study Checklist Questions	Conclusion
Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of the solid waste reduction goals?	Construction of the Proposed Project would generate minimal amounts of waste requiring disposal at a landfill. Once operational, the Proposed Project would generate minimal waste (primarily from workers and maintenance activities). Solid waste generation is considered well within the permitted capacities of landfills providing solid waste disposal needs. Therefore, the Proposed Project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of the solid waste reduction goals. Less-than-significant impacts would occur. This conclusion is consistent with the findings of the TAMT FINAL PEIR.
Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	The Proposed Project would generate minimal waste during construction and operation, with any solid waste generation considered well within the permitted capacities of all landfills providing solid waste disposal needs. Less-than-significant impacts related to solid waste disposal would occur. This conclusion is consistent with the findings of the TAMT FINAL PEIR.
Wildfire	
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	
Substantially impair an adopted emergency response plan or emergency evacuation plan?	The Proposed Project would be required to comply with applicable requirements set forth by the County of San Diego Office of Emergency Services (OES) Operational Area Emergency Plan, the City of San Diego Police Department, and the City of San Diego Fire Department. Impacts would be less than significant.
Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	The Proposed Project is not located within a Very High Fire Hazard Severity Zone (VHFHSZ) as established by California Department of Forestry and Fire Protection (CALFIRE 2009). There are no wildlands, heavily vegetated areas, slopes, or other factors present on the Project site that would exacerbate wildfire risk. Therefore, implementation of the Proposed Project would not expose project occupants (workers) to pollutant concentrations from the uncontrolled spread of wildfire. There would be no impacts.
Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	Because the Proposed Project is not located within a VHFHSZ, no infrastructure associated with fire protection, such as fuel breaks or water sources, that could result in environmental impacts would be required as part of the Proposed Project. In addition, the Proposed Project would not include any new infrastructure that would exacerbate existing wildfire risk, because there are no wildlands or areas designated as a VHFHSZ on or adjacent to the Project site. Impacts would be less than significant.
Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	The Project site is flat and is not located downslope or downstream of any areas that could result in flooding or landslides due to runoff, post-fire slope instability, or drainage changes. Additionally, the Project site is not within or adjacent to the VHFHSZs established by CAL FIRE. Therefore, the Proposed Project would not exacerbate the risk to people or structures from runoff, post-fire slope instability, or drainage changes resulting from wildland fire. Impacts would be less than significant.

7. Alternatives to the Proposed Project

7.1 Overview

The Proposed Project falls within the scope of the Sustainable Terminal Capacity (STC) Alternative identified in the certified TAMD Final PEIR. The STC Alternative was created, based on comments received from public agencies and the general public, to reduce the intensity and significant environmental impacts of the Maximum Practical Capacity (MPC) scenario originally proposed by the TAMD Plan and analyzed in the TAMD Final PEIR. The Board of Port Commissioners approved the STC Alternative, as described within the TAMD Plan, and certified the TAMD Final PEIR in December 2016.

As discussed in Chapters 4, *Environmental Analysis*, and 5, *Cumulative Impacts*, of this SEIR, the Proposed Project would not result in any new or more severe significant impacts than what was disclosed in the approved TAMD Final PEIR. Therefore, because the Proposed Project would be within the scope of the approved TAMD Plan (STC Alternative) and would not result in any new or more severe significant impacts, there are no new or more severe significant impacts that can be reduced by an alternative. Consequently, while four alternatives were considered, two were ultimately rejected from further analysis and only the No Project Alternative and the Reduced Throughput Alternative are carried forward in this chapter.

7.2 Requirements for Alternatives Analysis

The State CEQA Guidelines require that an EIR present a range of reasonable alternatives to a project, or to the location of a project, that could feasibly attain a majority of the basic project objectives, but that would avoid or substantially lessen one or more significant environmental impacts of the project. The range of alternatives required in an EIR is governed by a “rule of reason” that requires an EIR to set forth only those alternatives necessary to permit a reasoned choice. An EIR need not consider every conceivable alternative to a project. Alternatives may be eliminated from detailed consideration in the EIR if they fail to meet most of the basic project objectives, are not feasible, or do not avoid or substantially lessen any significant environmental effects (State CEQA Guidelines Section 15126.6(c)).

In addition to the requirements described above, CEQA requires the evaluation of a No Project Alternative, which analyzes the environmental effects that would occur if the project were not to proceed (State CEQA Guidelines Section 15126.6(e)). Moreover, the EIR is required to identify the environmentally superior alternative. The environmentally superior alternative cannot be the No Project Alternative.

7.3 Selection of Alternatives

In developing alternatives that meet the requirements of CEQA, the starting point is the Proposed Project’s objectives. The Proposed Project includes the following objectives.

1. Establish a terminal facility in the San Diego region to receive delivery and provide for the storage and distribution of up to 600,000 MT/yr of cementitious materials to meet current and future cement demand in the greater San Diego region.
2. Eliminate or substantially reduce truck trips and distances from other more distant ports which presently deliver cementitious material necessary to serve the San Diego region.
3. Establish a facility with onsite storage capacity sufficient to provide for the efficient offloading of bulk ships delivering cementitious materials and loading of bulk cement trucks.
4. Establish an efficient, state-of-the-art facility that is sufficiently flexible to allow for unloading, separate storage, and distribution of a diverse range of cementitious products, including, but not

limited to, cement, slag, fly ash, and pozzolans, which, in turn, facilitates the use of more environmentally sustainable concrete.

5. Establish a cementitious import operation facility at TAMT that is consistent with anticipated dry bulk throughput and operational capacities in the TAMT Redevelopment Plan under the Sustainable Terminal Capacity Alternative, adopted by the District while maintaining environmental sustainability.
6. Utilize existing berths and Port infrastructure and, in doing so, optimize the use of land and identify improvements and upgrade infrastructure necessary for the Proposed Project, consistent with the objectives of the TAMT Plan.

CEQA also requires that alternatives be feasible. *Feasible* is defined in CEQA as “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors” (Public Resources Code Section 21061.1). The State CEQA Guidelines elaborate that factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, other plans or regulatory limitations, and jurisdictional boundaries and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site (State CEQA Guidelines Section 15126.6).

Finally, the alternatives considered should also avoid or substantially lessen one or more significant environmental impacts that would occur under the Proposed Project. Notably, as analyzed and discussed in Chapters 4 and 5 of this SEIR, the Proposed Project would not result in any new or more severe significant impacts than what were disclosed in the certified TAMT Final PEIR.

7.4 Alternatives Considered

Four alternatives were initially considered for evaluation. Based on the criteria described in Section 7.3, the No Project Alternative and Reduced Throughput Alternative were carried forward. Two other alternatives that were considered, but rejected, included an alternate location alternative and an alternative that would build out the TAMT Plan.

7.4.1 Alternatives Considered but Rejected from Analysis

7.4.1.1 Alternate Location Alternative

State CEQA Guidelines Section 15126.6(f)(2) suggests that an EIR’s alternatives analysis identify alternative locations for the project, and that only locations that would avoid or substantially lessen any of the significant effects of the project need to be considered. For purposes of this alternatives analysis, the District has examined its inventory of land within its jurisdiction and identified nine District parcels, as discussed in Table 7-1, which could theoretically accommodate the Proposed Project. The District determined that none of these sites are feasible alternate sites because they either (a) already have a project proposal pending; (b) already have a tenant currently occupying the site under a lease agreement; or (c) are not a feasible site due to size, physical constraints, and/or location, as indicated in the table.

Table 7-1. Potential Alternate District Parcel Locations

District Parcel Number(s)	Existing Tenant and/or Occupant	Reason Site Is Infeasible ¹
Planning District 4: Tenth Avenue Marine Terminal		
020-91	San Diego Refrigerated Services, Inc.	B
020-131 through 020-133	District (Transit Shed No. 1)	A
020-151	District (Transit Shed No. 2)	A
020-037	Cemex Pacific Coast Cement Corporation (Transit Shed No. 2)	A, B
020-183	Dole Fresh Fruit Company	B
020-031	Searles Valley Minerals, Inc.	B
Planning District 5: National City Bayfront		
027-003	Pasha Automotive Services	B
026-038	Marine Group Boat Works	B
025-002	District (General Services)	C

1 - Reasons for determining the Proposed Project to be infeasible in the alternative location:

A = Site has a pending project proposal.

B = Site has a tenant currently occupying the site.

C = Site is not feasible due to size, physical constraints, and/or location.

The alternate location alternative was rejected as infeasible due to the lack of other feasible locations for the Proposed Project. Given the lack of other ports or other waterfront areas in the San Diego region that have cargo handling capabilities, no alternate locations outside of the District's jurisdiction were considered. The Proposed Project requires access to the ocean, as cargo is brought in by marine vessel. Therefore, any alternative sites would have to be situated at the waterfront, with appropriate breakwater, water depth, and landside infrastructure to load and off-load vessels.

The TAMT is one of two working terminals within the Port of San Diego. The other, the National City Marine Terminal, is approximately 3.5 miles south of the Project site. The Proposed Project is well-suited to the project site in that it was contemplated in the TAMT Plan, has already supported dry bulk cargo operations, and would rely on the use of existing dry bulk facilities at the terminal. This type of project was not contemplated for National City Marine Terminal or elsewhere within the District's boundaries and could not be readily accommodated.

Finally, relocating the Proposed Project would merely move the Project's impacts, which have already been disclosed and mitigated to the extent feasible in the certified TAMT Final PEIR, to one of these alternate locations, and in some cases those impacts would not have been disclosed and mitigated to the extent feasible in a certified EIR. Because no alternate locations have been identified that would avoid or substantially lessen impacts associated with the Proposed Project site, as required of a CEQA alternative, an alternative location alternative has been rejected from further consideration.

7.4.1.2 TAMT Plan Dry Bulk Infrastructure Buildout Alternative

The TAMT Plan Dry Bulk Infrastructure Buildout Alternative would buildout all of the dry bulk-related infrastructure, including demolishing Warehouse C and moving Dry Bulk operations to the backlands, as described in the TAMT Plan and in the certified TAMT Final PEIR. Under this alternative, Warehouse C would be demolished to open up access to up to 20 acres of open storage space. The former Warehouse C site would be graded and repaved, and a new multipurpose dry bulk structure consisting of any combination of domes, silos, or buildings would be constructed to provide cover for ground-stored dry bulk products. All other improvements identified in the TAMT Plan would be implemented under this alternative.

The TAMT Plan Dry Bulk Infrastructure Buildout Alternative would be consistent with the overall program goals and objectives of the TAMT Plan; however, it would not reduce any significant impacts compared to the Proposed Project, and would require more physical changes to the Project site than the Proposed Project would require before becoming operational. Therefore, this alternative was rejected from further consideration because it does not meet the requirements of a CEQA alternative, namely to reduce or avoid a significant impact associated with the Proposed Project.

7.4.2 Alternatives Selected for Analysis

The Proposed Project would not result in any new or more severe significant impacts than what has already been disclosed and analyzed in the certified TAMT Final PEIR. Therefore, no alternatives were identified that meet the requirements of CEQA because there would be no new or more severe significant impacts that an alternative to the Proposed Project could reduce. However, for informational purposes, a comparative analysis of the CEQA-required No Project Alternative and Reduced Project Alternative is provided below.

7.4.2.1 Alternative 1 – No Project

Analysis of the No Project Alternative (Alternative 1) assumes that no Project-related development would occur and none of the Project's other components would be implemented. Under the No Project Alternative, the District would maintain existing conditions at the Project site, which is currently used for dry bulk handling and consists of dry bulk and equipment storage and two clerk shacks. Bays C-7 and C-9 of Warehouse C are currently vacant, while Bays C-8 and C-10 are currently occupied by a District tenant and used for the storage of bauxite. The existing Warehouse C facilities would be left intact under this alternative. No new development or upgrades to dry bulk cargo handling equipment would be implemented on this portion of TAMT, and operations would continue under the existing physical conditions at the site. Similar to what was described for the No Project/No Build Alternative in the TAMT Final PEIR (TAMT Final PEIR page 7-7), growth at the project site would occur in an ad hoc manner, and due to the existing capacity constraints, the maximum annual dry bulk cargo throughput would only reach approximately 400,000 MT/yr, as identified in Table 7-2 of the TAMT Final PEIR. Because no physical modifications would occur at the terminal, the No Project Alternative would potentially reduce one or more significant impacts that were identified for the Proposed Project—impacts which are consistent with those disclosed in the certified TAMT Final PEIR.

7.4.2.2 Alternative 2 – Reduced Throughput Alternative

The Reduced Throughput Alternative (Alternative 2) was selected to reduce the operational impacts of the Proposed Project, which are predominantly tied to throughput. Under the Reduced Throughput Alternative, the footprint and improvements to Warehouse C would be identical to the Proposed Project, but the scale of operation would be smaller. The Reduced Throughput Alternative would reduce the total amount of cementitious materials that would be imported and distributed under the Proposed Project to an amount less than 600,000 MT, resulting in a corresponding decrease in vessel calls, cargo handling activities, and truck trips that would depend on the overall reduction of throughput proposed.

Construction activities under the Reduced Throughput Alternative would be identical to the Proposed Project, including implementation of either Option A (Interior Truck Loading) or Option B (Exterior Truck Loading), as well as either Sub-Option 1 (Subterranean Pipeline) or Sub-Option 2 (Overhead Pipeline), as described in Chapter 3, *Project Description*, Section 3.3, *Project Construction*. Construction of this alternative would be completed in two phases (Phase I and Phase II), and the construction workforce, the schedule, and earth disturbing activities for each phase would be identical to the Proposed Project.

It should be noted that the Board of Port Commissioners adopted the STC Alternative of the TAMT Plan, a reduced project alternative for the TAMT's buildout and future operations, when it certified the TAMT Final PEIR in December 2016. Because the Proposed Project falls within the scope of the STC Alternative by proposing new dry bulk throughput of up to 600,000 MT/yr from a total STC Alternative—allotted amount for the dry bulk cargo node of 1,987,500 MT/yr, the throughput associated with Project operations has already been analyzed in the certified TAMT Final PEIR. As such, a Reduced Throughput Alternative would simply offset throughput at the Project site with more throughput from other dry bulk tenants at TAMT.

7.5 Environmental Effects of the Project Alternatives

7.5.1 Alternative 1 – No Project Alternative

The following presents the impact analysis by resource area for Alternative 1, the No Project Alternative.

7.5.1.1 Air Quality and Health Risk

Under the No Project Alternative, there would be no Project construction or operational activities that would cause criteria air pollutant or air toxics emissions. Under the No Project Alternative, dry bulk handling operations at TAMT would continue under the existing physical conditions at the site. Consistent with the No Project/No Build Alternative described in the TAMT Final PEIR, the No Project Alternative would increase air pollutants emissions as associated with vessel, equipment, and truck traffic associated with handling approximately 400,000 MT/yr of dry bulk cargo, which is an increase of approximately 38 percent (110,136 MT/yr) over existing dry bulk cargo throughput of 289,864 MT/yr. While the throughput would be lower than the Proposed Project, which proposes an annual throughput of up to 600,000 MT of dry bulk cargo, the No Project Alternative would not include any specific air pollutant reduction measures and may not incorporate emission reduction technologies such as the installation of a new conveyor system and bulk discharge unloader and use of a shore-to-ship power (i.e., cold-iron) system that would otherwise be implemented under the Proposed Project. Moreover, the Proposed Project would bypass the existing conveyor system and transport dry bulk material through a fully enclosed vacuum system that would substantially improve air quality compared to the existing conveyor system. Therefore, impacts on air quality would likely be worse under Alternative 1 compared to the Proposed Project.

7.5.1.2 Greenhouse Gas Emissions and Climate Change

The No Project Alternative would not include any construction that would result in greenhouse gas (GHG) emissions. Consistent with the No Project/No Build Alternative described in the TAMT Final PEIR, the No Project Alternative would increase GHG emissions due to the increase in vessel and equipment activity and truck traffic associated with handling approximately 400,000 MT/yr of dry bulk cargo, which is an increase of approximately 38 percent (110,136 MT/yr) over the existing dry bulk cargo throughput of 289,864 MT/yr. While the throughput would be much lower than the Proposed Project, the No Project Alternative would also not include any specific GHG reduction measures and may not incorporate emission reduction technologies such as the installation of a new conveyor system and bulk discharge unloader and use of a shore-to-ship power (i.e., cold-iron) system that would otherwise be implemented under the Proposed Project. Therefore, GHG emissions under the No Project Alternative would be similar or even greater compared to the Proposed Project because it would incorporate fewer clean technology improvements and would not implement mitigation measures to reduce GHG emissions at the project site and during project operations.

7.5.1.3 Hazards and Hazardous Materials

Under the No Project Alternative, there would be no ground-disturbing activities, and therefore no potential to encounter possible soil contamination present at the Proposed Project site. Impacts on hazards and hazardous materials would be less than significant under both the Proposed Project and Alternative 1. However, while the Proposed Project would mitigate all potential impacts from encountering hazardous materials during construction and operation to less than significant, Alternative 1 would have no potential to either create a hazardous material condition or exacerbate an existing hazardous materials condition because there would be no earth disturbing activities or improvements/modifications to Warehouse C. Therefore, the No Project Alternative would result in slightly reduced hazards and hazardous materials impacts compared to the Proposed Project, but neither would result in significant and unavoidable hazards and hazardous materials impacts.

7.5.1.4 Noise and Vibration

Under the No Project Alternative, Warehouse C facilities would be left intact and no other improvements would be implemented. As such, no construction-related impacts would occur, and construction noise would be significantly reduced compared to the Proposed Project. Similarly, operational noise impacts would be reduced under the No Project Alternative because operations would continue under the existing physical conditions at the site, and there would be less activity that could generate noise or vibration compared to the Proposed Project. However, while there would be construction noise and operational noise, impacts from Project-related noise would still be less than significant. As such, while the No Project Alternative would not result in any significant construction noise and vibration impacts, neither would the Proposed Project. Therefore, the No Project Alternative would result in slightly reduced overall noise and vibration impacts when compared with the Proposed Project, but neither would result in significant and unavoidable noise or vibration impacts.

7.5.1.5 Transportation, Circulation, and Parking

Alternative 1 would not include any construction that would result in direct or indirect impacts associated with temporary (construction) vehicle trip generation. Consistent with the No Project/No Build Alternative described in the TAMT Final PEIR, Alternative 1 would increase the operational vehicle trips generated at the terminal compared to existing conditions. This increase in vehicle trips is associated with transportation of approximately 400,000 MT/yr of dry bulk cargo, which is an increase of approximately 38 percent of the existing dry bulk cargo throughput of 289,864 MT/yr. When compared to the Proposed Project, however, the smaller dry bulk cargo throughput under Alternative 1 would result in a fewer average daily trips at study area street segments and intersections under operational conditions. While the Proposed Project requires mitigation to reduce transportation-related impacts, the implementation of the improvements are outside the jurisdiction of the District. As a result, the certainty of their implementation is unknown. Therefore, even with the mitigation measures that the Proposed Project would be required to contribute to as described in the TAMT Final PEIR Mitigation and Monitoring Reporting Program (MMRP), overall traffic impacts under Alternative 1 would be less than under the Proposed Project because the implementation of the transportation system improvements are not within the control of the District and are therefore not certain.

7.5.1.6 Other Impacts

This alternative would not result in any new or greater impacts than the Proposed Project. Like the Proposed Project, impacts related to aesthetics, biological resources, cultural resources, geology/soils,

hydrology and water quality, land use and planning, population/housing, public services, recreation, and utilities would be less than significant and would not require mitigation.

7.5.1.7 Relationship to Project Objectives

The No Project Alternative would not meet any of the Proposed Project's objectives because it would not establish a facility capable of the receipt, storage, and distribution of cementitious materials; would not eliminate or substantially reduce truck trips and distances from other more distant ports; would not establish a project that is consistent with the overall program goals and objectives of the TAMT Plan; and it would not optimize the use of existing berths and land by identifying and upgrading infrastructure consistent with the objectives of the TAMT Plan.

7.5.2 Alternative 2 – Reduced Throughput Alternative

The following presents the impact analysis by resource area for Alternative 2, the Reduced Throughput Alternative.

7.5.2.1 Air Quality and Health Risk

The Reduced Throughput Alternative would result in a decrease in long-term criteria air pollutant and air toxics emissions (a reduction similar in magnitude to the reduction in annual dry bulk commodity throughput). However, while reducing throughput may reduce activity on an annual basis (e.g., the number of vessel calls), daily activity is likely to be the same as the Proposed Project because the peak day for activity is assumed to be the same for each vessel call, and the peak day is based on a single vessel call. Moreover, construction activities under the Reduced Throughput Alternative would be identical to the Proposed Project; therefore, construction-related emissions would be the same as the Proposed Project. The same mitigation measures required for the Proposed Project would be applicable to the Reduced Throughput Alternative. Compared to the Proposed Project, the Reduced Throughput Alternative would slightly reduce long-term toxic air contaminant (TAC) emissions, and therefore would slightly reduce the contribution towards cumulative health risk impacts compared to the Proposed Project. However, similar to the Proposed Project, the Reduced Throughput Alternative would fall within the scope of the total STC Alternative—allotted dry bulk cargo throughput, the air quality impacts of which were analyzed programmatically in the TAMT Final PEIR. As such, as part of the overall TAMT Plan, a Reduced Throughput Alternative would not reduce or avoid the overall programmatic air quality impacts identified in the TAMT Final PEIR because future TAMT dry bulk projects would still be able to draw down capacity permitted under the STC Alternative. Therefore, while the Reduced Throughput Alternative would result in slightly reduced air quality impacts compared to the Proposed Project, it would not avoid or reduce the overall air quality impacts associated with the TAMT Plan.

7.5.2.2 Greenhouse Gas Emissions and Climate Change

The Reduced Throughput Alternative would involve the same construction activities as the Proposed Project; therefore, construction-related GHG emissions would be similar. In addition, the Reduced Throughput Alternative would result in a slight decrease in GHG emissions during operation due to the decrease in throughput and associated activities. The slight reduction in operational emissions under Alternative 2 would not change the relative GHG emissions efficiency per unit of dry bulk throughput, or change the need to implement mitigation measures **MM-GHG-1R** through **MM-GHG-9R** and **MM-GHG-10**, although the GHG emissions reductions required under **MM-GHG-6** would be reduced compared to the Proposed Project. Like the Proposed Project, the Reduced Throughput Alternative would also not cause any conflicts with any GHG emissions reduction policies, plans, or measures; impacts would be less

than significant. No substantial impact changes would occur under the Reduced Throughput Alternative in comparison to the Proposed Project and impacts would be similar to one another.

7.5.2.3 Hazards and Hazardous Materials

The Reduced Throughput Alternative would result in the exact same level of earth-disturbing/excavation activities as the Proposed Project, including implementation of either Loading Option A (Interior Truck Loading) or Loading Option B (Exterior Truck Loading), and Unloading Option 1 (Underground Pipeline) or Unloading Option 2 (Overhead Pipeline). Similarly, Alternative 2 would result in the exact same modifications/improvements to Warehouse C. Therefore, in comparison to the Proposed Project, the Reduced Project Alternative would have a similar potential to cause soil contamination exposure, as well as exposure to hazardous materials due to the demolition and removal of building materials associated with Bays 7 through 10. Similar to the Proposed Project, these impacts would be reduced to less than significant with implementation of mitigation measures. Therefore, the Reduced Throughput Alternative would result in similar hazard and hazardous materials impacts as the Proposed Project, but neither would result in significant and unavoidable hazard and hazardous materials impacts.

7.5.2.4 Noise and Vibration

Construction of the Reduced Throughput Alternative would be identical to the Proposed Project; therefore, construction-related noise and vibration impacts would be similar to the Proposed Project and would be less than significant. Under the Reduced Throughput Alternative, the scale of operations would be reduced compared to the Proposed Project, as cargo handling activities and the number of vessel calls per year would be reduced. However, the intensity of operations would be the same as each vessel is unloaded, such that operational noise levels would be identical to the Proposed Project, but the unloading would not occur as frequently. As such, the Reduced Throughput Alternative would result in slightly reduced overall noise and vibration impacts when compared with the Proposed Project, but neither would result in significant and unavoidable noise or vibration impacts.

7.5.2.5 Transportation, Circulation, and Parking

Under the Reduced Throughput Alternative, the scale of construction would be identical to the Proposed Project. Therefore, the construction-related peak trip generation volumes would be the same as the Proposed Project and, like the Proposed Project, would result in less-than-significant impacts from construction-related traffic.

Under the Reduced Throughput Alternative, the scale of operations would be reduced compared to the Proposed Project as cargo handling activities and the number of vessel calls per year would be reduced. However, operational peak trip generation volumes would be similar when compared to the Proposed Project because a similar number of trips would occur for each vessel being off loaded. A reduction would occur with the frequency of such events, however. Therefore, Alternative 2 would result in slightly reduced operational impacts on study area roadways, intersections, and freeways compared to the Proposed Project. Both the Proposed Project and Alternative 2 would require mitigation to reduce transportation-related impacts identified from the buildout of the TAMT Plan in the TAMT Final PEIR and its associated MMRP. However, even after mitigation, transportation, circulation, and parking impacts would be significant and unavoidable because the implementation of the improvements associated with the mitigation measures are outside the jurisdiction of the District. As a result, the certainty of their implementation is unknown.

Importantly, similar to the Proposed Project, the Reduced Throughput Alternative, which would involve less than 600,000 MT, would fall within the scope of the total STC Alternative—allotted dry bulk cargo throughput of 1,987,500 MT analyzed in the TAMT Final PEIR. Therefore, although a Reduced Throughput Alternative would reduce the operations associated with the Proposed Project, other future dry bulk cargo projects, consistent with the TAMT Plan and the analysis provided in the TAMT Final PEIR, would simply offset the throughput reduction that would occur under the Reduced Throughput Alternative to an amount not to exceed 1,987,500 MT. Therefore, although a Reduced Throughput Alternative would have fewer truck and commute trips associated with it than would the Proposed Project, it would do nothing to reduce the overall dry bulk–related trips expected with buildout of the TAMT Plan.

7.5.2.6 Other Impacts

This alternative would not result in any new or greater impacts than the Proposed Project. Like the Proposed Project, impacts related to aesthetics, biological resources, cultural resources, geology and soils, hydrology and water quality, land use and planning, population and housing, public services, recreation, and utilities would be less than significant and would not require mitigation.

7.5.2.7 Relationship to Project Objectives

The Reduced Throughput Alternative would be inconsistent with Project Objectives #1 and #5 and at least partially inconsistent with Project Objectives #2, #3, and #6. In addition, this alternative would not be entirely consistent with the STC Alternative as described in the TAMT Final PEIR because it would seek to reduce throughput counter to the objectives of the approved STC Alternative.

7.6 Environmentally Superior Alternative

The Proposed Project would implement a project consistent with the approved STC Alternative identified in the TAMT Plan, the environmental effects of which were analyzed and approved in the TAMT Final PEIR. As discussed and analyzed in Chapters 4, *Environmental Analysis*, and 5, *Cumulative Impacts*, of this SEIR, the Proposed Project would not result in any new or more severe significant environmental effects than what has been analyzed in the TAMT Final PEIR. Additionally, no new or more severe significant impacts were identified as a result of a substantial change in circumstances or as a result of new information that was not known at the time of the TAMT Final PEIR’s certification (December 2016) and which could not have been known at that time. Moreover, there are no mitigation measures or alternatives identified in the TAMT Final PEIR that were determined to be infeasible that are now feasible that have been declined to be adopted. However, the Reduced Throughput Alternative was carried forward for full analysis in addition to the No Project/No TAMT Plan Alternative to provide a comparison of impacts to the Proposed Project. Based on the analysis in Section 7.5.1, the No Project Alternative would be the environmentally superior alternative. However, because the No Project Alternative cannot be the environmentally superior alternative, the closest such alternative would be the Reduced Throughput Alternative because it may temporarily reduce throughput by limiting the amount allowed by the Proposed Project, but this would be offset by other projects that propose dry bulk cargo throughput up to an amount allowed by the STC Alternative. As such, any reduction of impacts associated with the Reduced Throughput Alternative would be temporary.

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9.13 Chapter 8, List of Preparers and Agencies Consulted

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