ADDENDUM TO THE FINAL ENVIRONMENTAL IMPACT REPORT – TENTH AVENUE MARINE TERMINAL REDEVELOPMENT PLAN AND DEMOLITION AND INITIAL RAIL COMPONENT PROJECT
SCH No. 2015-031046

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JULY 2017

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1 INTRODUCTION

On December 13, 2016, the San Diego Unified Port District (Port District or District) (1) certified the Final Environmental Impact Report (Final EIR)[1] for the Tenth Avenue Marine Terminal (TAMT) Redevelopment Plan and Demolition and Initial Rail Component Project and adopted associated Findings, Statement of Overriding Considerations and the Mitigation Monitoring and Reporting Program (MMRP), (2) adopted Sustainable Terminal Capacity (STC) reduced project alternative and the Redevelopment Plan as amended to reflect the STC and (3) authorized issuance of a non-appealable Coastal Development Permit for the Demolition and Initial Rail Component Project (Project). The non-appealable Coastal Development Permit authorized construction of the Project, which involved demolishing Transit Sheds #1 and #2 and completing initial rail improvements and 5,282 square feet of onsite, above-grade improvements including increases in the total square footage of the support structure and the modular office building to 5,000 square feet, adding an additional 780-square foot support structure, as well as additional subsurface stormwater improvements and other technical and minor changes to the Project's utility improvements and grading.

As a result of final engineering design work that was completed for the first Phase of the Project in May 2017, the updated Demolition and Initial Rail Component (updated Project or updated Demolition and Initial Rail Component Project) results in an increase of onsite, above-grade improvements. In particular, the proposed updated Project includes approximately 7,630 square feet of above-ground improvements which is 2,348 square feet larger than the improvements proposed by the original Project. . The specific modifications that are being proposed to the updated Project are summarized below and shown on Figure 2 – Site Plan Showing Changes to the Demolition and Initial Rail Component on page 17.

1. **Modular Office Building:** The Final EIR analyzed the environmental impacts of a 3,600 square foot temporary modular office facility. As revised, the modular office would become permanent and would increase in size by 1,400 square feet, resulting in a 5,000-square-foot facility.

2. **Support Structure(s):** The Final EIR analyzed one 782-square-foot support structure that would be located where Transit Shed #1 is currently located (northern portion of terminal), which included an electrical gear room, restroom facility, and an information technology room (IT Room), as well as an attached 850-square-foot outdoor equipment storage area. As revised, the 850-square-foot outdoor storage area would be removed, and the support structure would be 1,800 square feet (.an approximate 750 square foot increase) of office area to accommodate existing Customs and Border Patrol (CBP)

[1] The Final EIR document can be viewed at the San Diego Unified Port District, Planning and Green Port Department, located at 3165 Pacific Highway, San Diego, CA 92101.

staff. In addition, the updated Project includes a new 780-square-foot support structure that would be located where Transit Shed #2 is currently located (southern portion of terminal), which would also include an electrical gear room, restroom facility, and an IT Room. Both facilities would include exterior electrical equipment, fire hydrants, and 90-foot tall light poles, as described in the Final EIR.

3. **Subsurface Improvements:** The Final EIR analyzed impacts associated with installing one of two potential stormwater drainage systems. As revised, the updated Project identifies the specific stormwater system improvements that would be constructed, as well as reconfiguring water and sewer connections to reflect the final design. The revised Project reconfigures existing water and sewer systems to eliminate connections to Transit Sheds #1 and #2, and it provides new connections to the two support structures and the new modular office building located near the terminal's entry gate. The new stormwater system includes BMP pass-through filtration systems that will be installed in two areas. The first system will be located between Transit Sheds #1 and #2 and treat 42-acres of runoff area in the main outfall pipe. The second system will be located near the new modular office and designed to treat an area approximately 10,000-square-feet. The BMP pass-through filtration systems would still include necessary features to capture the 85th percentile stormwater event, as analyzed in the Final EIR. Similarly, excavation for all subsurface improvements would continue to be 9,200 cubic yards or less, as discussed in the Final EIR.

4. **Conduit and Electrical Improvements:** The Final EIR analyzed installing up to 2,500 linear feet of conduit west of Warehouse B and C and east of existing Transit Shed #1 and Transit Shed #2 to provide for future electrification of the terminal. The precise design and location of the conduit and electric improvements is now available, which has been updated to include communication systems infrastructure and reconfigured to connect to (1) the new permanent office building, and (2) the two new separate support structures serving the northern and southern portions of the terminal. As analyzed in the Final EIR, trenching for up to 2,500 linear feet of conduit and other electrical improvements would occur prior to paving activities. The system would utilize the existing vault system and would use some existing conduit as well as some new conduit, as analyzed in the Final EIR.

5. **On-terminal Rail Facility Upgrades:** The Final EIR analyzed the installation of a rail lubricator and a compressed air system for testing train brakes on the existing tracks in three locations on the terminal. The first airbrake system would be located on the northern end of the terminal to serve tracks 3 and 4, the second airbrake system would be located near warehouse C to serve tracks 6 and 7, and the third airbrake system

would be sited along the terminal's northeastern boundary to serve tracks 14, 15, 16 and 17. As revised, the updated Project has eliminated the third airbrake system to serve tracks 14, 15, 16 and 17 because it was determined this improvement is no longer needed in this area. Additionally a 50-square-foot equipment enclosure has been added to house the rail track lubrication system, which would include a small tank and pumping system and consist of some underground piping. This structure will support the rail track lubrication system that would be located on the curved portion of the BNSF tracks at the southernmost area of the terminal (adjacent to the eastside of the molasses storage tanks).

6. **Soil Excavation:** The Final EIR assumed that the Project would result in excavating approximately 47,100 cubic yards of soil, which would be transported offsite utilizing 16-cubic-yard-capacity dump trucks over a period of 50 working days (25 days for Transit Shed #1 and 25 days for Transit Shed #2). As part of the Project's final engineering design for Phase I, the updated Project would result in having to excavate 86,700 cubic yards of soil, largely because the Project will need thicker asphalt to accommodate future loads. The updated Project would result in excavating to depths ranging between 24- to 32-inches on average, instead of the 12- to 15-inches that was analyzed in the Final EIR. However, the bid specifications for the updated Project require the contractor to use 20-cubic-yard-capacity dump trucks instead of 16-cubic-yard-capacity trucks that were assumed in the Final EIR. As analyzed in the Final EIR, the updated Project would require excavated soils to be either (1) disposed of at a legally permitted landfill, or (2) reused at the Chula Vista Bayfront Harbor District, depending on the suitability of the soil for beneficial reuse.

As a result of these changes, the District is recommending the Board adopt this addendum and then adopt a material amendment to the Project's Coastal Development Permit, in accordance with Section 14.d of the District's Coastal Development Permit Regulations (Material Coastal Development Permit Amendment). This addendum complies with the provisions of the California Environmental Quality Act (CEQA), the CEQA State Guidelines, including without limitation Section 15164 of the CEQA Guidelines, which governs the preparation of an addendum to an environmental impact report.

Purpose of the Addendum

A Material Coastal Development Permit Amendment to the Project's Coastal Development Permit (Amendment No. 1) is required to more accurately reflect final engineering design changes. As noted above, the final engineering design for the Project has resulted in a larger modular office facility (e.g., 3,600 square feet to 5,000 square feet), an additional support

structure approximately 780 square feet on the southern end of the terminal (which includes an electrical gear room, restroom facility, and information technology (IT) room), a larger support structure on the northern end of the terminal (which increased from 782 square feet to 1,800 square feet), and an updated the water, sewer, and electrical facility improvements. The final engineering design also involves excavating a total of 86,700 cubic yards of soil (instead of 47,100 cubic yards of soil) to ensure the concrete and pavement is of adequate thickness to handle future loads. Finally, the final engineering design includes placing the rail track lubrication system in a 50-square foot equipment enclosure and includes a small tank pumping system and some underground piping that were not originally contemplated in the Project.

While clarifications to identify which mitigation measures are triggered for each phase of the Project and the TAMT Redevelopment Plan, these clarifications do not meet the conditions specified in Section 15162 or 15163 calling for the preparation of a Subsequent EIR or Supplemental EIR, respectively, as there are no new mitigation measures required or being proposed. Additionally, they do not require any change to the adopted Mitigation Monitoring and Reporting Program. The proposed Project changes described in the preceding paragraph are not substantial changes requiring major revisions of the previous EIR, nor would they result in new significant environmental effects or substantially increase the severity of previously identified significant effects. The updated Project's impacts would not result in any new environmental impacts or increase the severity of impacts related biological resources, greenhouse gas emissions, hazards and hazardous materials, and utilities. These impacts would continue to be reduced to a level below significance with implementation of the previously identified mitigation measures. Furthermore, the proposed Project changes would not substantially increase the severity of temporary noise impacts associated with construction because the type, quantity and duration of construction activities would be the same as what was analyzed in the previously certified EIR. Similarly, the updated Project would not increase the severity of temporary impacts to the Norman Street Road / 32nd Street / Wabash intersection during construction because the number of construction workers (e.g., 50 workers on any given day) is consistent with what was analyzed in the Final EIR and project contract documents require trucks to take 28th Street to access Interstate 5, thereby avoiding any impacts to the Norman Street Road / 32nd Street / Wabash intersection.

In addition, original Project's Final EIR was certified in December 2016 (approximately 6-months ago), and there have been no substantial changes with respect to the circumstances under which the project is undertaken, nor is there any new information of substantial importance which was not known at the time the previous EIR was certified. Rather, the changes and additions are minor, technical clarifications in nature that would not result in substantial changes to the Project, result in new or more severe environmental effects or require new mitigation measures. Therefore, an addendum to the previously certified Final Environmental

Impact Report (FEIR) for the Tenth Avenue Marine Terminal Redevelopment Plan and Demolition and Initial Rail Component Project has been prepared in accordance with Section 15164 of the CEQA Guidelines.

Finally, this addendum provides the necessary documentation to demonstrate that the proposed Project modifications would not result in any new, or substantially more severe environmental impacts than those identified in the Project's Environmental Assessment/Finding of No Significant Impact (EA/FONSI). Due to the $10 million Transportation Infrastructure Generating Economic Recovery (TIGER) grant that was awarded to the District to help fund the TAMT Demolition and Initial Rail Component Project, the U.S. Maritime Administration (MARAD) approved an EA/FONSI on November 16, 2016, in accordance with the National Environmental Policy Act of 1969 (NEPA).

Regulatory Requirements

CEQA Guidelines, Section 15164: Addendum to an EIR

(A) The lead agency or a responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.

(B) An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.

(C) An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.

(D) The decision-making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.

(E) A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's required findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

This addendum complies with the provisions of CEQA Guidelines Section 15164, which governs the preparation of an addendum to an EIR. Section 15164 requires the preparation of an addendum to an EIR where some changes or additions to the EIR are necessary but none of the conditions calling for preparation of a subsequent EIR exist. No additional significant impacts or

increase in severity in existing significant impacts would occur as a result of changes to this Project. Therefore, the project-level analysis of the proposed changes to the Project is appropriately addressed in an addendum to the FPEIR.

CEQA Guidelines, Section 15162: Subsequent EIR

Under CEQA, a lead agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary to the EIR but none of the conditions described in State CEQA Guidelines section 15162 calling for preparation of a subsequent EIR have occurred (14 CCR 15164(a)).

CEQA Guidelines, Section 15162, provides that when an EIR has been certified for a project, a subsequent EIR shall be prepared for that project if the lead agency determines one or more of the following have occurred:

(1) Substantial changes are proposed in the project which will require major revisions of the previous EIR … due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR … due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete … shows any of the following:

    (a) The project will have one or more significant effects not discussed in the previous EIR;

    (b) Significant effects previously examined will be substantially more severe than shown in the previous EIR;

    (c) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

(d) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

As explained in Section 3, there is no substantial evidence in light of the whole record that the proposed revisions to the Project would result in any new significant environmental effects, or result in a substantial increase in the severity of previously identified significant effects, mitigation measures or alternatives. Nor are there any new mitigation measures or Project alternatives that are now considered feasible that could substantially reduce one or more significant impacts. The proposed clarification to the mitigation measures would not be considerably different than those analyzed in the Final EIR. Finally, there is no new information not previously known that shows new significant environmental effects or that result in an increase in the severity of previously identified significant effects. Therefore, preparation of an addendum is appropriate under these circumstances.

CEQA Guidelines, Section 15163: Supplement to an EIR

(A) The lead agency or a responsible agency shall prepare a supplement to an EIR rather than a Subsequent EIR if:

(1) Any of the conditions described in Section 15162 would require the preparation of a subsequent EIR, and

(2) Only minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed situation.

(B) The Supplement to the EIR need contain only the information necessary to make the previous EIR adequate for the project as revised.

(C) A Supplement to an EIR shall be given the same kind of notice and public review as is given to a draft EIR under Section 15807.

(D) A Supplement to an EIR may be circulated by itself without recirculating the previous draft or final EIR.

(E) When the agency decides to approve the project, the decision-making body shall consider the previous EIR as revised by the supplemental EIR. A finding under Section 15091 shall be made for each significant effect shown in the previous EIR as revised.

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2 PROJECT DESCRIPTION

This section of the addendum summarizes the Project's location and setting, which has not changed from what was identified in the previously certified EIR. It also describes the specific characteristics of the updated Project.

2.1 Location and Setting

The Project site is a 96-acre marine terminal facility located at 850 Water Street in San Diego, California, 92101 (Figure 1 page 15). The TAMT is located along San Diego Bay, south of downtown San Diego, east of the San Diego Convention Center and Hilton Bayfront Hotel, and west adjacent to the San Diego community of Barrio Logan. Harbor Drive runs northwesterly approximately 160 feet from the Project site boundary. Project site access from Harbor Drive is provided at two locations.

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

The District's Port Master Plan (PMP), which has been certified by the California Coastal Commission, identifies TAMT within Planning District 4. The land use designations for the Project site include a combination of Marine Terminal and Marine-Related Industrial. The PMP states that the intent of this planning district is to retain and continue marine-related, water-dependent industrial uses. It foresees the continuation and intensification of cargo operations at TAMT. The District's policy is to maintain established marine-oriented industrial areas that are devoted to transportation, commerce, industry, and manufacturing and encourage modernization and construction of necessary facilities within these established areas to minimize or eliminate the necessity for future dredging and filling in new areas. The updated Project would still be located in Planning District 4, and all of the physical improvements and proposed modifications continue to consistent with the land use designations identified in the District's certified Port Master Plan. The updated Project would serve to facilitate implementation of the Port Master Plan by enabling the TAMT to improve and enhance its existing operations as a marine terminal and is therefore, consistent with the Port Master Plan.

For a detailed discussion on the Project site's existing environmental conditions, please see pages 2-1 through 2-6 in Part 2 of the Final EIR for the Tenth Avenue Marine Terminal (TAMT) Redevelopment Plan and Demolition and Initial Rail Component Project (SCH No. 2015-031046)), which are hereby incorporated by reference.

2.2 Project Background

The Final Environmental Impact Report (Final EIR) for the Tenth Avenue Marine Terminal (TAMT) Redevelopment Plan and Demolition and Initial Rail Component Project (SCH No. 2015-031046) was certified by the Board of Port Commissioners on December 13, 2016, by Resolution No. 2016-199, Clerk Document No. 65901. The Final EIR included a program-level analysis of the TAMT Redevelopment Plan and a project-level analysis of the Demolition and Initial Rail Component.

TAMT Redevelopment Plan (Program-level Analysis)

In addition to the Maximum Practical Capacity Project, the Final EIR included a programmatic analysis of the Sustainable Terminal Capacity (STC) Alternative, which was a reduced project alternative that analyzed increasing cargo throughput from 1,044,446 metric tons in 2014 (e.g., existing baseline condition) to 4,675,567 metric tons in a 2035 build-out year. The Board adopted the STC Alternative. Consequently, the TAMT Redevelopment Plan was amended to include the STC Alternative, and likewise was approved by the Board of Port Commissioners on December 13, 2016 (Resolution No. 2016 No. 2016-200, Clerk Document No. 66093).

The Final EIR included a comprehensive assessment of the environmental impacts associated with the STC Alternative, and identified a number of feasible mitigation measures that would reduce impacts to a level below significance. With the prescribed mitigation measures, the STC Alternative was found to have a "less than significant" impact on air quality and health-risk (on-going operations), biological resources, cultural resources, greenhouse gas emissions (up to year 2020), hazards and hazardous materials, hydrology and water quality, and utilities and energy.

However, impacts to air quality (temporary construction), greenhouse gas emissions (post-2020), noise and transportation were found to be significant and unavoidable because project-level details and other regulatory information were unknown. As a result, the Final EIR requires mitigation measures that may result in less than significant impacts to these four resource areas, but because the long-term build-out scenario lacked project-specific details, the Final EIR concluded that impacts to these resources would be significant and unavoidable. Finally, because there was no feasible mitigation measures that could reduce the visual impacts associated with up to five new, 270-foot tall electric gantry cranes identified in the STC Alternative, the Final EIR concluded that there would be significant and unavoidable impacts to aesthetics.

TAMT Demolition and Initial Rail Component Project (Project-level Analysis)

The Demolition and Initial Rail Component Project (Project) was deemed an important first step towards realizing the additional throughput that was contemplated in the TAMT Redevelopment

Plan. TAMT's two transit sheds were identified as a notable operational constraint, as well as a significant impediment to capturing any near- or long-term growth. As a result, the Final EIR included a project-level analysis of the Project, which analyzed demolishing Transit Sheds #1 and #2, as well as constructing some initial rail and other site specific improvements that would begin in 2017 and be completed in 2020. On December 13, 2017 the Board of Port Commissioner's authorized issuance of a Non-Appealable Coastal Development Permit that allowed for development of the Project (Resolution No. 2016-201, Clerk Document No. 66094). On January31, 2017, the District issued Coastal Development Permit No. 2016-09, which authorized development of the following improvements:

- Demolition of Transit Sheds #1 and #2. Transit Shed #1 is approximately 148,000 square feet in size, which includes a 2,400 square foot maintenance shed. Transit Shed #2 is approximately 194,000 square feet in size and includes 7,000 square foot head house, which is currently used as office space for terminal operations.

- Installation of conduit and other electric improvements to allow for future electrification of the Project site, which would include up to 2,500 linear feet of conduit and would utilize the existing vault system.

- Upgrades to the sites existing stormwater system, including excavating up to 9,200 cubic yards of soil and the installation of a stormwater system designed to capture the 85th percentile storm event.

- Replacement of existing lighting. The new lighting would continue to be mounted on 90-foot tall light poles, but would be capable of average 5-foot candles during cargo operations and 1-foot candles during non-cargo operations. The replacement lighting would use light-emitting diodes to improve energy efficiency at the site, and would be directed away from adjacent land uses and the open water of the bay.

- On-terminal rail upgrades that include a rail lubricator and compressed air system for air-brake testing. The compressed air system would include a compressed air generator and receiver, as well as subsurface piping (approximately 2 inches in diameter) that would lead to steel outlets approximately four feet in height. The generators would be housed in a 100 square-foot structure.

- Installation of a 3,600 square foot modular office for marine operations with offices, restroom facilities, a conference room, a work area and parking for up to 15 employees.

- Installation of an electrical gear room and information technology (IT) room approximately 782 square feet and an outdoor equipment storage area approximately 850 square feet to be located where the existing Transit Shed #1 is located

- Grading and repaving of the site.

The Final EIR assumed a maximum of 50 construction workers per day during construction of the Project. To ensure potential impacts would not be under estimated, the Final EIR assumed favorable market conditions based on the District's 5-year budget estimates and near-term industry trends at the time, which yielded up to 92 new daily workers once construction of the Project was complete. For the complete description of the Project, please see pages 3-13 to 3-17 in Part 2 of the Final EIR for the Tenth Avenue Marine Terminal (TAMT) Redevelopment Plan and Demolition and Initial Rail Component Project (SCH No. 2015-031046), which are hereby incorporated by reference.

This Final EIR's analysis of the Project was based on the best available information that was available in March 2015, when the Project's Notice of Preparation (NOP) was issued. However, final engineering design for Phase I of the Project was not finalized until May 2017, approximately 6-months after certification of the Project's Final EIR and 5-months after issuance of the Project's Non-Appealable Coastal Development Permit. Phase I of the Project's final engineering design focuses on demolishing Transit Shed #1, installing the necessary utilities and support structure in this area, as well as constructing the new stormwater BMP pass-through systems onsite and the new modular office facility near the front office gate, as well as constructing other onsite utility improvements such as water, sewer, and lighting. The final engineering design for these improvements has resulted in some changes from what was analyzed in the Final EIR. (See Figure 2 – Site Plan Showing Changes to the Demolition and Initial Rail Component).

The District's Engineering Department applied for an amendment to the Non-Appealable Coastal Development Permit in May 2017 that was reviewed by the Assistant Vice President of (A.V.P) Planning and Green Port, in accordance with Section 14.d of the District's Coastal Development Permit Regulations. The A.V.P. determined that the proposed amendment would be a material change, largely because the final design would (1) increase the size of the modular office facility from 3,600 square to 5,000 square feet, (2) increase the size of the support structure from 782 square feet to 1,800 square feet, (3) add an additional 780 square foot support structure on the southern end of the terminal, and (4) result in excavating up to 86,700 cubic yards of soil, instead of 47,100 cubic yards of soil.

Therefore, Planning and Green Port staff are processing a material amendment to the Project's Coastal Development Permit, which shall be referred to the Board of Port Commissioner's for consideration, as outlined in Section 14.d of the District's Coastal Development Permit regulations.

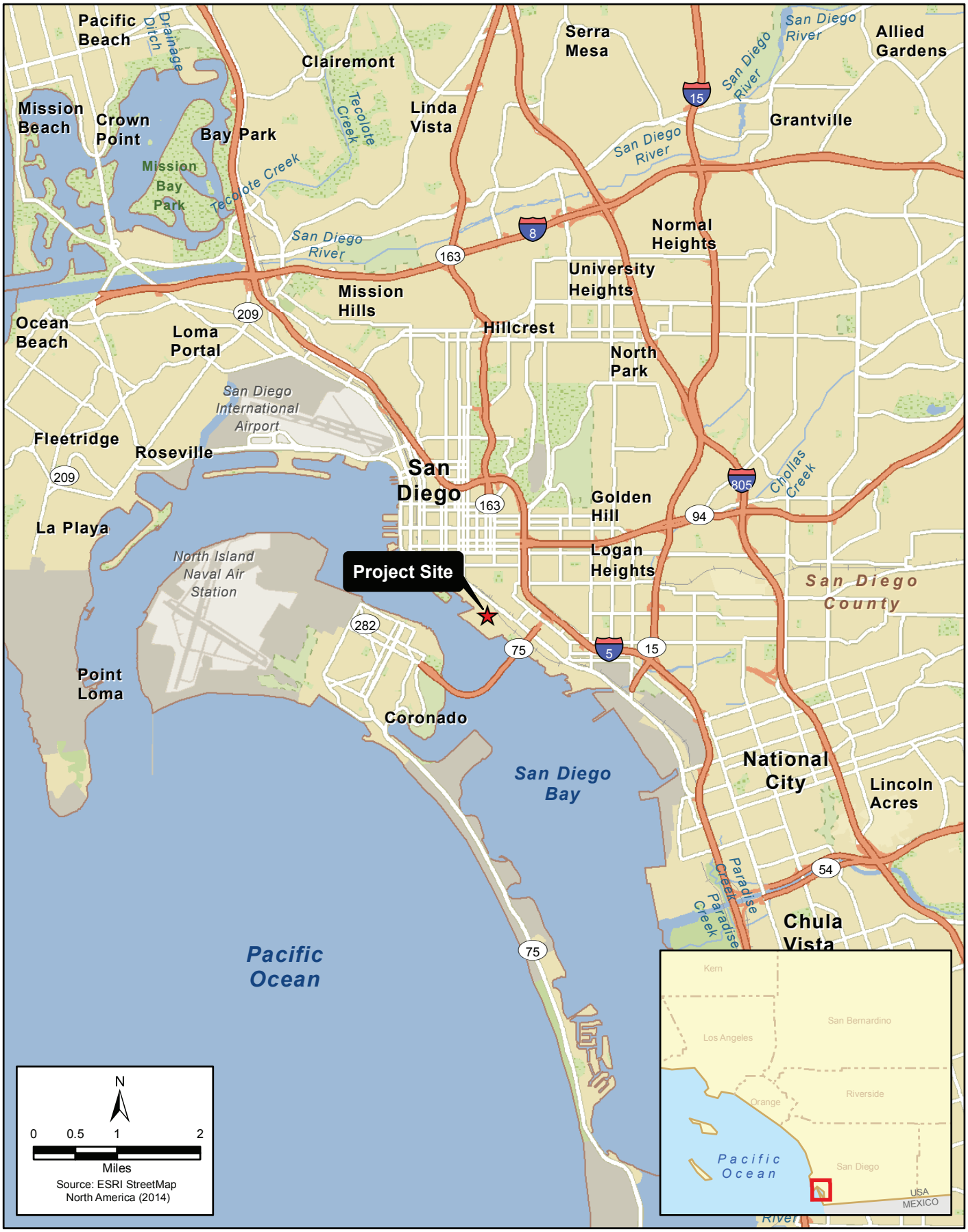

Figure 1: Project Vicinity Map

Tenth Avenue Marine Terminal Demolition and Initial Rail Component Project

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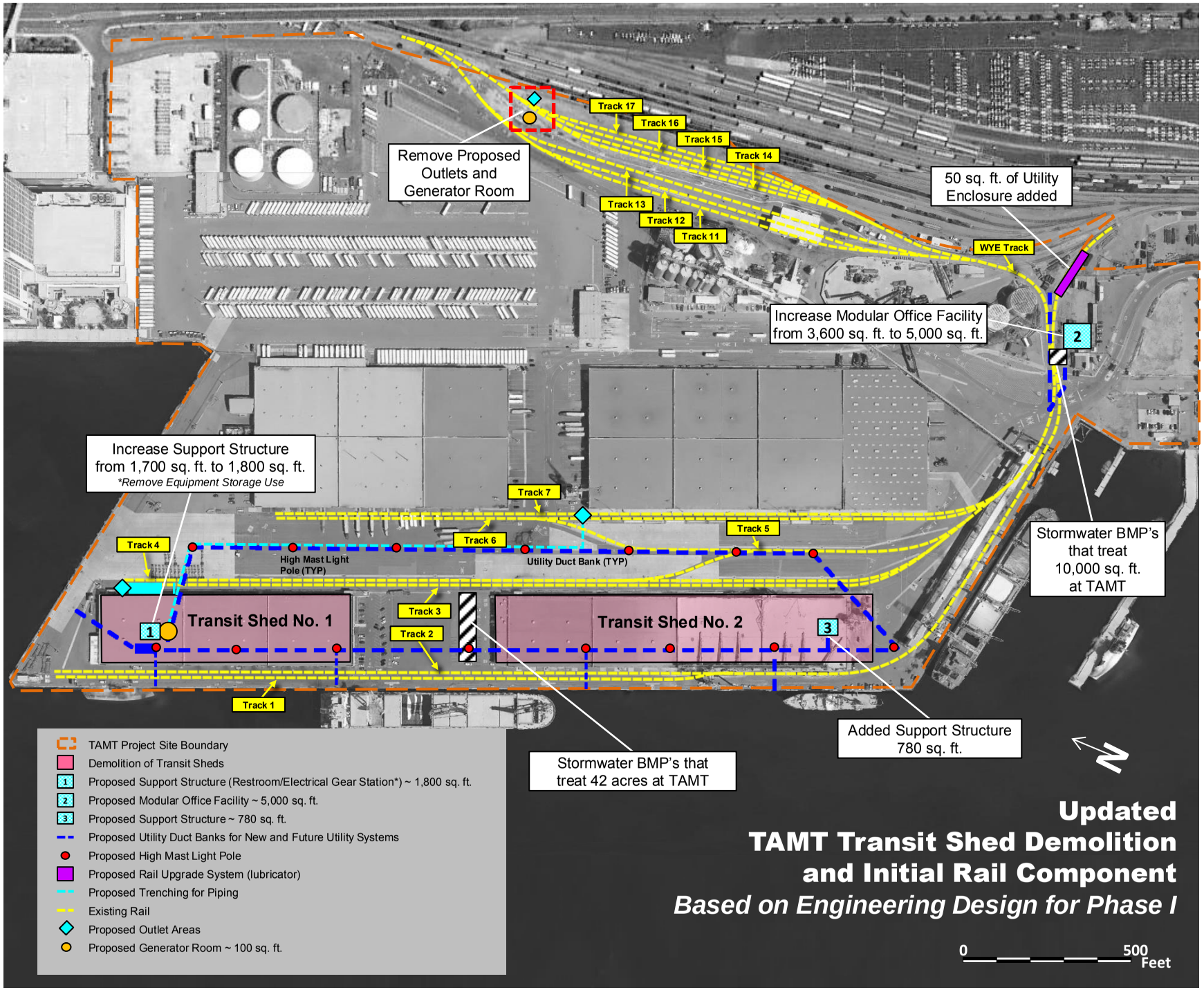

Figure 2: Site Plan showing changes to Demolition and Initial Rail Component Project

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2.3 Proposed Project Improvements

To reflect Phase I of the Demolition and Initial Rail Component Project's (referred to as the updated Project) final engineering design that was completed in May 2017, this addendum analyzes changes to the original Project. To help simplify the environmental analysis, the ~~cross-out~~ / underline updated Project description shown below identifies how the Project changed from March 2015, based on the best available information at that time, to May 2017 reflecting a final engineered design for Phase I of the Project.

Updated Demolition and Initial Rail Component Project Description to Reflect Final Engineering Design (May 2017)

The Project is an initial, project-level component that is necessary to implement the various program-level development scenarios identified in the TAMT Redevelopment Plan. The Project would include the following features and modifications discussed below.

- **Demolition of Transit Sheds #1 and #2.** The transit sheds consist of seven warehouse bays, restroom facilities, and office space. Transit Shed #1 includes approximately 148,000 square feet of warehouse space, comprising Bays A, B, and C, and Transit Shed #2 includes approximately 194,000 square feet of warehouse space, comprising Bays E, F, G, and H. Both transit sheds are approximately 32 feet tall and 200 feet wide. Transit Shed #1 is 740 feet long and Transit Shed #2 is 970 feet long. Transit Shed #1 includes an approximately 2,400-square-foot maintenance shed. Transit Shed #2 includes an approximately 7,000-square-foot head house, which is currently used as office space for terminal operations. Demolition would involve the proper removal of any asbestos, lead, polychlorinated biphenyls, or other potentially hazardous materials that may be present in the Transit Sheds, followed by removal of the existing fire alarm, fire protection systems, and electrical systems. In addition, demolition of Transit Shed #2 would include the removal and/or reuse of all off-loading equipment including the existing distribution and conveyor system.[2] Once this is completed, soil excavation and grading would occur and underground utilities including storm water systems, revisions to potable and fire water systems, sanitary sewer systems, replacement of existing lighting, electrical and communication systems, and conduit to facilitate future electrification of the area would be installed, followed by paving and leveling across the site.

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

- **Subsurface Stormwater Improvements.** Excavate up to 9,200 cubic yards of soil and install ~~one of two potential stormwater drainage systems.~~ two new stormwater quality BMP pass-through-filtration systems onsite in two areas. The first system will treat 42-acres of runoff area in the main outfall pipe located between Transit Sheds #1 and #2. The second system will treat approximately 10,000 square feet of the site in the area near the new Modular Office Building which would be located near the terminal's main entry gates - this system will drain into an existing 18" drain pipe system which ties into an outfall pipe located at Berth 8. Both systems ~~would include design features~~ are designed to capture the 85th percentile storm event. ~~The first option would involve concrete retention vaults that would capture the stormwater and allow water to infiltrate into the underlying soil by placing orifices in the bases of the vaults. The second option would involve collecting and routing overflows to an underground high-density polyethylene (HDPE) pipe retention system. The HDPE pipe retention would also rely on infiltration by placing holes in the bases of the pipes.~~ ~~Both options have been designed to~~ Both systems also comply with the San Diego Regional Municipal Separate Storm Sewer System Permit (R9-2015-0100) and allow for settling time and capture of aluminum, copper, iron, lead, and zinc.
- **Potable Water and Fire Supression Water Systems.** The existing systems will be reconfigured to eliminate the potable and fire water piping and connection devices to Transit Sheds #1 and #2 and provide new services to the new permanent office building and the two new separate buildings with office space, restrooms, electrical and Information Technology (IT) rooms. Additionally, fire hydrants and water will be provided at each of the high mast light pole locations.
- **Sanitary Sewer Systems.** The existing systems will be reconfigured to eliminate the sanitary sewer piping and connection devices to Transit Sheds #1 and #2 and provide new services to the new permanent office building and the two new separate buildings with office space, restrooms, electrical and Information Technology (IT) equipment rooms.
- **Replacement of Existing Lighting.** The existing 90-foot-tall light poles at the loading docks and around both Transit Shed perimeters would be replaced with 90-foot-tall lights capable of an average 5 foot-candles of light during cargo operations at fourteen locations in the general areas of Transit Sheds #1 and #2. During non-cargo operations, five-foot candles would be reduced to 1. The replacement lighting would use light-emitting diodes, improving energy efficiency at the Project site, and would be directed downward and away from adjacent land uses and the open water of the bay.
- **Conduit and Electrical Improvements.** Up to 2,500 linear feet of conduit would be installed west of Warehouse B and Warehouse C and east of the existing Transit Shed #1 and Transit Shed #2 to provide for electrical and communication systems to the new permanent office building and the two new separate buildings with office space,

restrooms, electrical and Information Technology (IT) equipment rooms and for future electrification of the Project site. Trenching for the conduit and electrical improvements would occur prior to paving activities. All electrical utilities would utilize new and existing conduits as well as the existing vault system.

- **On-Terminal Rail Facility Upgrades.** The proposed Project would include installation of a rail lubricator and a compressed air system for testing of train air brakes on the existing tracks. As shown on Figure 3-2, the rail lubricator (purple rectangle) would be installed in the southeastern portion of the Project site, where there is a sharp and inefficient curve that regularly impedes operations. Manual lubrication would be replaced with an automated lubrication system, thereby increasing both the safety and efficiency of the rail movement.

  The purpose of the train air brake tests is twofold: to ensure that the air brakes work on each car and that air propagation exists between the locomotive and the end of the train. The compressed air system would include a compressed air generator and receiver, as well as subsurface piping (approximately 2-inch diameter) that would lead to steel outlets approximately 4 feet in height. The generators would be housed in an approximately 100-square-foot ~~structure~~ equipment enclosure (an orange circle on Figure 3-2). The outlets (shown as blue diamonds on Figure 3-2) would be sited adjacent to tracks 3 and 4 (within the former footprint of Transit Shed #1) and adjacent to tracks 6 and 7 (near Warehouse C). ~~A separate compressed air generator system and outlets would be sited along the eastern boundary of the project site to service tracks 14, 15, 16, and 17 (near Searle's Valley Operations).~~ In all cases, the outlets would include calibrated air gauges to monitor the air pressure of the yard air system at the outlet, and would feed the train air system by connecting a long braided hose to the glad-hand on the rail cars. Additionally, a rail track lubrication system will be located on the curved portion of the BNSF tracks at the southernmost area of terminal (adjacent to the east side of the molasses storage tanks (See Exhibit 2). The rail track lubrication system will consist of underground piping, a small tank and pumping system in an approximately 50-square foot equipment enclosure. ~~This system~~ These systems would be in compliance with the Federal Railroad Administration requirements for air brake systems,[3] and train crews would be required to adhere to the Air Brake and Train Handling rules established by the BNSF railroad.[4]

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

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

- ~~**Temporary**~~ **Modular Office Building.** An approximately ~~3,600~~ 5,000 square-foot modular office building for maritime operations with offices, a conference room, a work area, a break room, and parking for up to 15 employees would be constructed in the vicinity of the centralized common gate area. Up to three restrooms would also be added. This modular office and restroom facility would replace the existing approximately 7,000-square-foot head-house after it is demolished with Transit Shed #2. Underground water, sewer, and electrical utilities would be installed to support the proposed modular structure.
- **Two Modular Buildings for Electrical Gear Room, Field Offices, Restroom Facilities, and Information Technology (IT) Rooms (one building approximately ~~782~~ 1,800 square feet and the other building approximately 780 square feet) ~~and outdoor Equipment Storage Area (850 square feet)~~.** The Project would include the construction of ~~a facility~~ two facilities totaling approximately ~~782~~ 2,580 square feet on the western portion of the Project site. The first facility, sized at 1,800 square feet, will be placed where the existing Transit Shed #1 is located in the northern end of the terminal. The second facility, sized at 780 square feet, will be placed where the existing Transit Shed #2 is located in the southern end of the terminal. The sites of both facilities will include adjacent exterior electrical system equipment, fire hydrants, and 90-foot tall light poles. ~~The restroom facilities would be approximately 16 feet by 23 feet, the switching gear room for charging stations would be approximately 12 feet by 23 feet, and the IT and back services area would be approximately 6 feet by 23 feet. In addition, there would be an outdoor storage area of approximately 34 feet by 25 feet, which would be surrounded by a chain-link fence that could be covered with a chain-link fence or tarp. The following types of equipment would be stored in this area.~~
  - ~~Cones and cone baskets~~
  - ~~Lashing rods~~
  - ~~Stokes baskets (e.g., rescue baskets)~~
  - ~~Up to three forklifts~~
  - ~~Electric plug-ins as needed~~
  - ~~Other miscellaneous equipment.~~
- **Soil Excavation:** The Project involves excavating to depths between 24- to 32-inches on average, which would result in having to transport up to 86,700 cubic yards of soil offsite. The bid specifications would require 20-cubic-yard-capacity dump trucks instead of trucks with a 16-cubic-yard-capacity.

Updated Construction for Demolition and Initial Rail Component Based on Phase I of the Final Engineering Design (May 2017)

Construction of the updated Project is expected to commence in 2017, and would be sequenced in order to allow for existing terminal operations to proceed as usual. The demolition of Transit Shed #1, associated improvements and modular office facility would begin in September 2017 and would take approximately 13 months to complete. The demolition of Transit Shed #2 would begin in October 2018, upon completion of Transit Shed #1 demolition. Construction activities for Transit Shed #2 are anticipated to take approximately 15-months, with the updated Project completed in approximately January 2020. To provide for a conservative analysis, it is assumed that construction activities for both sheds would partially overlap in order to analyze the worst-case construction impacts of the Project. Table 2-1 and the discussion below show the updated Project's revisions in cross-out / underline format to the original construction activities that were identified in Project description found in Chapter 3.4.2 of the Final EIR

Table 2-1. Summary of Construction Activities under the Demolition and Initial Rail Component

Existing Infrastructure	Proposed Action/Description
Transit Shed #1	Demolish, install underground utilities including stormwater systems, potable water for drinking and fire suppression, sanitary sewer systems, replacement lighting, electrical and communication systems, and conduit~~, grade and repave~~ prior to grading and repaving the site; construct an approximately ~~782~~ 1,800 square-foot electrical gear room, field office, IT room, and restroom facility ~~with 850 square feet for outdoor storage~~ in the existing northern location of Transit Shed #1 footprint area to serve onsite operations. Install compressed air system in one 100-square-foot square enclosure; install a new stormwater BMP pass-through filtration system to treat 42-acres of runoff at the terminal in between transit sheds #1 and #2.
Transit Shed #2	Demolish, install underground utilities including stormwater systems, potable water for drinking and fire suppression, sanitary sewer systems, replacement lighting, electrical and communication systems, and conduit~~, grade and repave~~ prior to grading and repaving the site; construct an approximately 780 square-foot electrical gear room, field office, IT room, and restroom facility in the existing northern location of Transit Shed #1 footprint area to serve onsite operations.
Lighting	Replace and add a 90-foot-tall pole-mount lighting system with more energy-efficient lighting at fourteen locations in the general areas of Transit Sheds #1 and #2.
On-Dock Rail	Install compressed air system and rail lubricator in 100-square-foot enclosure as well as an approximately 50-square foot equipment enclosure, underground piping and a small tank to support the rail lubrication system;
Exterior Storage Area	Install an approximately ~~3,600~~ 5,000-square-foot modular office~~/restroom~~ facility; trench and install water, sewer, and electrical lines; install subsurface stormwater ~~detention tank~~ BMP pass-through infiltration system to treat approximately 10,000 square feet of the site area near the terminal's main entry gates.

Total earthwork associated with the Demolition and Initial Rail Component would consist of excavating approximately ~~18,500~~ 44,000 cubic yards of soil at the site of Transit Shed #1, approximately ~~24,200~~ 57,000 cubic yards at the site of Transit Shed #2, and approximately ~~9,136~~ 6,600 cubic yards for the installation of ~~an underground detention storage tank~~ a new stormwater BMP pass-through filtration system for stormwater drainage, and 1,500 cubic yards for the modular office facility. Total excavation would be approximately ~~51,836~~ 109,100 cubic yards.

Approximately ~~47,036~~ 86,700 cubic yards of soil would be exported off site (~~16,400~~ 35,000 cubic yards from Transit Shed #1, ~~21,500~~ 45,000 cubic yards from Transit Shed #2, and ~~9,136~~ 5,600 cubic yards from the ~~underground storage tank installation~~ new stormwater BMP pass-through filtration systems, and 1,100 cubic yards from the modular office facility site). It is anticipated that ~~4,800~~ 22,400 cubic yards of fill materials would be balanced and re-compacted on site, and ~~an additional 3,915 cubic yards of soil would be imported for the installation of the underground detention storage tank~~ the balance of 86,600 cubic yards of excavated soil would be exported off-site.

If all or a portion of the excavated soils to be exported are found to be appropriate for reuse, they may be ~~exported to~~ placed at the Chula Vista Bayfront Harbor District area for use as fill material to raise surface elevations, provided the parcels are not classified as environmentally sensitive areas, including any sensitive habitat. Several Chula Vista Bayfront Harbor District parcels, which have been cleared through the environmental review process to be used as streets and surface parking and to support subsequent development, have been identified in Appendix D as appropriate locations to receive soils deemed suitable for reuse. Some parcels have been identified for temporary storage of the soil (e.g., stockpiling), whereas other parcels have been identified for final reuse of the soil (permanent fill). The soil may be placed on any of these parcels during grading (or immediately after grading) and/or once the District confirms placement would not result in any new biological impacts on the affected parcel(s).

However, in the event that the sites listed above are not able to receive all or a portion of the excavated soil amounts based on the Project's construction schedule, all or a portion of the exported soils material would be disposed of in a legally permitted landfill off of Port District Tidelands. This ~~Draft EIR~~ first addendum to the Final EIR includes an analysis of both scenarios, including (1) reusing all or a portion of the ~~47,100~~ 86,700 cubic yards of soil at the Chula Vista Bayfront Harbor District or (2) transporting and disposing ~~47,100~~ all or a portion of the exported 86,700 cubic yards of soil at a landfill. This Addendum considers the impacts associated with exporting an additional 39,600 cubic yards of soil (for a total of 86,700 cubic yards), based on the Project's Phase I final engineering design.

In addition, approximately 17,300 cubic yards of concrete and asphalt would be ~~exported~~ generated from the ~~project site~~ demolition of Transit Sheds #1 and #2. Of that 10,000 cubic yards will be crushed and re-used on-site as pavement base material. The balance of the ~~Concrete~~ concrete and asphalt demolition material, (7,300 cubic yards), if found appropriate for reuse may also be exported to the Chula Vista Bayfront or another project site within the Port of San Diego jurisdiction to use as fill material. If the 7,300 cubic yards of concrete and asphalt are found unsuitable to use as fill material, they would be disposed of at an appropriate local landfill. Furthermore, if portions of the soils, concrete, and asphalt are determined to contain hazardous

materials, the Project would comply with an approved hazardous materials management plan that may require disposal at an appropriate hazardous waste facility.

Sequencing of this component would include demolition, grading, and paving. Construction equipment would include excavators, loaders, forklifts and scissor lifts, water trucks, dump trucks, backhoes, dozers, saw cutting equipment, and air compressors. A full list of construction equipment, hours of operation, and days in operation is included in the Project's air quality appendix (Appendix F), in Part 3 of the Final EIR certified by the Board of Port Commissioners on December 13, 2016 by Resolution No. 2016-199, Clerk Document No. 65901, which is hereby incorporated by reference.

3 ENVIRONMENTAL ANALYSIS

The Final EIR for the TAMT Redevelopment Plan and the Demolition and Initial Rail Component analyzed the TAMT Redevelopment Plan at the program-level, and the Demolition and Initial Rail Component at the project-level. As mentioned earlier, this addendum analyzes project-level changes to the Demolition and Initial Rail Component Project (updated Project or updated Demolition and Initial Rail Component Project) based on final engineering design for Phase I of the Project that was completed in May 2017. No changes are proposed to the TAMT Redevelopment Plan and the STC Alternative adopted by the Board and reflected in the TAMT Redevelopment Plan. Therefore, this addendum only considers the project-level analysis for the updated Demolition and Initial Rail Component.

The Final EIR identified potentially significant impacts to biological resources, greenhouse gas emissions, hazards and hazardous materials, noise, transportation and traffic, and utilities as a result of the original Project. However, implementation of mitigation measures identified in the Final EIR would reduce project-level impacts to **a level below significance** for the following resource areas:

- Biological Resources;
- Greenhouse Gas Emissions;
- Hazards and Hazardous Materials; and
- Utilities.

The Final EIR also identified mitigation measures for the original Project to help reduce potentially significant impacts related to a temporary increase of ambient noise conditions due to demolition and construction activities, and transportation impacts at the Norman Street Road / 32nd Street / Wabash intersection, which currently operates at a failing level of service (LOS) in the morning and evening peak hours. The Final EIR requires the District to prepare and implement a Construction Noise Reduction Plan (MM-NOI-3) to reduce construction noise at the nearby noise-sensitive land uses identified as Embarcadero Park and Embarcadero Marina Park South. Although construction noise levels would be reduced with this measure, the exact level of noise reduction that would be obtained from this measure is uncertain and noise levels may remain significant. Similarly, the Final EIR requires the preparation and implementation of a Transportation Demand Management (TDM) Plan prior to the commencement of construction activities to reduce congestion at the Norman Street Road / 32nd Street / Wabash intersection. Although TDM strategies are likely to reduce congestion at the affected intersection, it cannot be determined with certainty that impacts would be reduced to a less than significant level.

Therefore, the Final EIR concluded that the Project would result in a **significant and unavoidable impact** to the following two resource areas:

- **Noise** (temporary-construction noise);
- **Transportation** (construction-related impact to the Norman Street Road / 32nd Street / Wabash intersection);

However, the final engineering design changes associated with Phase I of the Project can be incorporated into the Final EIR by way of an addendum because none of the criteria listed under Section 15162 and 15163 are present.

Specifically, as evidenced herein no new significant impacts or increase in severity of significant impacts would occur, and no new mitigation measures are required. Additionally, mitigation measures previously found infeasible are not now feasible. In particular:

- The clarifications and minor revisions proposed to Project would not create new significant impacts or increase the severity of impacts identified in the certified Final EIR;
- There has been no substantial changes in circumstances under which the Project would be undertaken that would require major revisions to the certified Final EIR to address new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- No new information of substantial importance is now known—which was not known and could not have been known with the exercise of reasonable diligence at the time the Final EIR was certified—that would result in new significant impacts, increase the severity of impacts, make previously infeasible mitigation feasible and would still not be adopted, or result in mitigation that is considerably different from those analyzed in the certified Final EIR and would still not be adopted;
- The applicable Mitigation Measures (MM) provided in the adopted Mitigation Monitoring and Reporting Program and the certified Final EIR for the updated Project are listed and will continue to be implemented as part of the Project;
- No new mitigation measures are necessary with implementation of the updated Project.

The analysis provided below addresses the potential environmental impacts that would occur from the updated Project. The existing conditions and significance criteria outlined in the Final

EIR are applicable to the updated Project. In accordance with CEQA Guidelines Section 15150, existing conditions and significance criteria are incorporated in this addendum by reference. The incorporated certified Final EIR (SCH No. 2015-031046), including addenda, is available for viewing at the Port District, Planning and Green Port Department, (3165 Pacific Highway, San Diego 92101). Note that the analysis only looks at the Project changes and whether they would result in new significant impacts, increase the severity of significant impacts already identified, require new mitigation measures or include mitigation measures that were infeasible but now are feasible. The analysis for the TAMT Redevelopment Plan in the Final EIR remains the same unless otherwise noted.

3.1 Aesthetics

According to Section 4.1, Aesthetics and Visual Resources, the Project would not substantially degrade the existing visual character or quality of the site and its surroundings, nor would it create a new source of substantial light or glare that would adversely affect day or nighttime views. The updated Project, which identifies siting 90-foot-tall pole-mounted lights at fourteen locations in the general areas of Transit Shed #1 and Transit Shed #2 (after they are removed), would not change the impact determinations because similar exterior lighting improvements were identified in the Final EIR. The Final EIR determined that new exterior lighting would have a less than significant impact, in part, because the new lighting would be designed so as to not spill over directly to other areas, consistent with Section 142.0740 of the San Diego Municipal Code. The Final EIR concluded the proposed conditions would be similar to existing conditions because nighttime activities already occur at the Project site and similar conditions are located farther south. The updated Project is consistent with what was analyzed in the Final EIR, which includes reducing 5-foot candles to 1-foot candles during non-cargo operations. The updated Project would use light-emitting diodes to improve energy efficiency at the Project site, and would be directed downward and away from adjacent land uses and the open water bay, as discussed in the Final ER. Additionally, the updated Project lighting would comply with Section 142.0740 of the San Diego Municipal Code.

Similarly, lighting associated with the updated Project's construction activities, would be subject to the same requirements identified in the Final EIR that acknowledges construction activities would typically cease by 7pm and when necessary to illuminate construction activities after sunset, lights would be focused downward to minimize light spillover. Therefore, implementation of the updated Project would not adversely affect nighttime views and not mitigation is required.

In addition, other updated Project components would not substantially degrade the existing visual character or quality of the site and its surroundings, or create a new source of substantial

light or glare that would adversely affect daytime or nighttime views in the area. Increasing the size of the modular office building from 3,600 square feet to 5,000 square feet, increasing the size of the support structure from 782 square feet to 1,800 square feet where Transit Shed #1 (currently 148,000 square feet) is currently located, and adding a new support structure 780 square feet where Transit Shed #2 (currently 194,000 square feet) is currently located would not degrade the visual character of the site or its surrounding area, nor would these changes create any additional sources of light or glare. These structures are smaller in scale than what is currently located on TAMT and would blend in with the existing urban nature of TAMT and its surrounding area. The addition of a 50-square-foot equipment enclosure to support the rail track lubrication system near the terminal's entrance gates would also not result in any additional impacts to area's existing visual character because of its small size relative to the existing railcars, silos and storage facilities, and other terminal equipment located in the immediate area. In addition, there is no lighting associated with the equipment shed and it would be constructed with non-reflective material, so this change would not result in additional night- or daytime light or glare impacts. Similarly, reconfiguring and upgrading the underground utility systems related to potable water, fire suppression, sewer, conduit placement, electrical systems, communication systems, and stormwater conveyance systems would not result in any impacts to aesthetics or visual resources because these improvements would be underground, consistent with what was analyzed in the Final EIR. Finally, adding fire hydrants and fire-suppression water outlets to the proposed light poles that were previously analyzed as part of the Project will not result in any new visual or aesthetic impacts because these components are consistent with infrastructure requirements that are needed at a functioning marine terminal.

Visual impacts associated with construction of the updated Project would remain less than significant because the updated Project does not propose any changes to the construction equipment or operations assumptions that were analyzed in the Project's Final EIR. Construction equipment would include excavators, loaders, forklifts and scissor lifts, water trucks, dump trucks, backhoes, dozers, saw cutting equipment, and air compressors. It was determined that the site is located in a highly urbanized part of San Diego where ambient lighting levels are considered to be high. As noted above, construction activities would typically cease by 7:00 pm, in accordance with the City of San Diego's Noise Abatement and Control Ordinance. When necessary to illuminate construction activities occurring after sunset, lighting sources during construction would consist of floodlights that would be focused downward on the work area to minimize light spillover

Based on the evaluation of the proposed Project change, the construction and operation of the updated Project would not create new significant environmental impacts or increase the severity of impacts identified in the previously certified Final EIR; would not have substantial changes occur with respect to the circumstances under which the Project is undertaken which will require

major revisions to the Final EIR; and does not contain new information of substantial importance that would result in new or more severe significant impacts or new mitigation measures or alternatives that are declined to be adopted by the District.

3.2 Agriculture and Forestry Resources

The Notice of Preparation (NOP) for the Project was issued in March 2016 and can be found in Appendix A, in Part 3 of the Final EIR for the TAMT Redevelopment Plan and Demolition and Initial Rail Component Project. The NOP determined that the Project site does not contain any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. It concluded that the Project site is not zoned for agricultural use and that there is not a Williamson Act contract for the site. It concluded that no forestland or timberland land exists on the Project site, nor has any land been zoned as forestland or timberland within the boundaries of the Project site. As a result, the Project would not result in the loss of forestland or timberland, nor would it result in the conversion of farmland to a nonagricultural use or the conversion of forestland to a non-forest use. None of these conditions change as the result of the updated Project. Therefore, the updated Project would have no impact on Agriculture and Forestry Resources.

3.3 Air Quality

Section 4.2 of the Final EIR for the original Project determined that the Project's construction and operational air quality impacts would be less than significant. For construction activities, the Final EIR estimated that demolition of Transit Shed #1 would take approximately 15 months to complete and demolition of Transit Shed #2 would take approximately 18 months to complete. To provide for a conservative analysis, construction activities for both phases were assumed to overlap for one day to in order to analyze the worst-case construction impacts of the Project. Emissions were estimated based on a construction phasing schedule and details regarding the types and numbers of construction equipment (including typical heavy-duty equipment, such as loaders, excavators, crushers, forklifts, etc.), as well as haul, delivery, employee vehicle trips, and material volumes, and can be found in Appendix F in Part 3 of the Final EIR, hereby incorporated by reference.

The construction schedule for the updated Project has been updated to reflect a 13-month overall construction period for demolition of Transit Shed #1 and construction of the modular office building, and a 15-month overall construction schedule for Demolition of Transit Shed #2. However, total construction activity assumed in Final EIR, (including the types and numbers of equipment that will be needed, the number the hours each piece of equipment would operate per day, and the total number of days each piece of equipment would operate per year), would not

increase as a result of the updated Project. The updated construction schedule is based on a more refined Project description that includes additional detail pertaining to the subsurface utility work (e.g., updated water, sewer, stormwater, and other electrical and communication systems) that results in a shorter overall construction period, but the intensity of construction activity for each phase of construction is consistent with what was assumed in the Project's Final EIR[5]. Specifically, the time of construction (7 a.m. to 7 p.m.) and the number of equipment used each day would not substantially change for the construction of a larger modular office (5,000 square feet instead of 3,600 square feet), larger support structure (1,800 square feet instead of 782 square feet), a new support structure of 780 square feet, and construction of an additional 50 square foot equipment enclosure. Accordingly, the update Project would not result in substantially more construction activity than what was assumed in the Final EIR.

However, the updated Project would involve excavating approximately 86,700 cubic yards of soil, (which is 39,600 more cubic yards of material than the 47,100 cubic yards that was estimated in the Final EIR). This modification is necessary to ensure the new asphalt and concrete is of sufficient thickness to accommodate future loads. The Final EIR assumed 47,100 cubic yards of material would be transported offsite utilizing dump trucks that had a 16 cubic-yard-capacity over two 25-working-day periods (25 days for Phase I and 25 days for Phase II)which resulted in 59 dump trucks per day during the two excavation periods. The updated Project involves transporting 86,700 cubic yards of material utilizing 20 cubic-yard-capacity trucks over the same period of time, which results in 87 daily trucks, or 28 more trucks per day for the 50-working-day period.

As shown in the Table 3.1 below, this increase in truck activity does not create any new significant environmental impacts or substantially increase the severity of the previously identified significant environmental impacts in the previously certified Final EIR. Taking into account a "worst-case" construction activity scenario, as identified in the Final EIR, the updated Project would still be far below the significance levels established for San Diego County. Table 3.1 below differentiates the maximum daily air quality impacts for each phase because Phase I - Demolition of Transit Shed #1, is scheduled to begin in September 2017, whereas Phase II - Demolition of Transit Shed #2 is scheduled to begin in October 2018, after demolition of Transit Shed #1 is complete. Therefore, the construction activities associated with the updated Project

[5] The District's Engineering Department in consultation with its engineering consultant (Harris and Associates), reviewed the construction activity assumptions found on .pdf page 347 in Appendix F of Part 3 of the Final EIR and determined that the updated project would involve the number of days and hours of operation for each piece of equipment that was identified. The District's Engineering Department also confirmed that the updated Demolition and Initial Rail Component Project would not result in more than 50 construction workers on any given day, which was the assumption analyzed on page 3-17 of Part 2 of the Final EIR.

would not violate or contribute substantially to an existing or proposed air quality violation, and impacts would continue to be less than significant.

TABLE 3.1. Estimate of Maximum Daily Construction Emissions associated with the updated Demolition and Initial Rail Component Project (pounds per day)

Construction Phase	VOC	NO_X	CO	SO_X	PM10	PM2.5
Transit Shed #1						
Demolition of Roofing and Steel Frame	4	44	36	<1	4	3
Demolition of Concrete Walls	6	59	48	<1	5	4
Demolition of Asphalt, Foundation, and Pile Caps	5	54	24	<1	6	3
Demolition and Removal of Asbestos/Lead/Hazardous Waste	1	7	7	<1	2	1
Earthwork & Grading	8	100	48	<1	5	4
Paving	3	19	10	<1	1	1
Utilities, Lighting, Misc.	2	21	17	<1	2	1
Final EIR Max Daily - Transit Shed #1	20	199	123	<1	14	10
Updated Project Emissions	*+0.2*	*+5.8*	*+0.6*	*+0.0*	*+0.4*	*+0.1*
Revised Total Transit Shed #1 with Updated Project	**20**	**205**	**124**	<1	**14**	**10**
San Diego County SLTs	75	250	550	150	100	55
Exceed Significant Threshold?	*No*	*No*	*No*	*No*	*No*	*No*
Transit Shed #2						
Demolition of Roofing and Steel Frame	4	40	38	<1	4	2
Demolition of Concrete Walls	6	56	51	<1	5	3
Demolition of Asphalt, Foundation, and Pile Caps	5	53	24	<1	6	3
Demolition and Removal of Asbestos/Lead/Hazardous Waste	0	4	6	<1	2	1
Earthwork & Grading	8	94	44	<1	5	4
Paving	3	18	10	<1	1	1
Utilities, Lighting, Misc.	2	19	17	<1	1	1
Rail Lubrication Install	<1	3	3	<1	<1	<1
Final EIR Max Daily - Transit Shed #2	21	203	126	<1	14	10
Updated Project Emissions	+0.2	+7.6	+0.8	+0.0	+0.6	+0.2
Revised Total Transit Shed #2 with Updated Project	**21**	**209**	**127**	<1	**15**	**10**
San Diego County SLTs	75	250	550	150	100	55
Exceed Significant Threshold?	*No*	*No*	*No*	*No*	*No*	*No*

Notes: Maximum daily emissions for Transit Sheds #1 and #2 assumes the maximum demolition phase for each shed overlaps with the remainder of construction of that shed. Maximum overall construction occurs if the maximum day for each shed overlaps with rail lubrication installation. It is assumed that demolition of each transit shed would occur independently and would not overlap with construction of the other shed. Totals may not add exactly due to rounding.
Source: Appendix F.

Table 4.2-14 in the Final EIR also determined that the total and annual emissions of all pollutants during construction would be below *de minimis* levels for the region. The updated Project, based

on the maximum daily criteria pollutant increases identified above, would not substantially increase total or annual emissions above what was considered in the Final EIR. Therefore, construction activities associated with the updated Project would not result in an adverse regional air quality effect.

The updated Project's operational-related emissions would also continue to result in a less than significant impact. Once construction was complete, the Final EIR estimated the Project could result in up to 92 additional daily employees, which included up to 10 new permanent Port employees and up to 82 additional dock workers. The additional 2,400 square feet that was added to the modular office building includes additional space for amenities such as a kitchenette, lunch room, and space for an onsite workout area, but it also includes space for two additional offices and desk space for up to four additional wharfingers. As a result, the total number of new permanent Port employees associated with the updated Project would increase to 16 employees, with no changes to the 82 projected dock workers. Increasing the total number of daily workers from 92 to 98 would not result in any measurable increase in vehicle emissions associated with six additional daily passenger vehicles (or approximately six additional average daily trips assuming no carpooling or public transportation). Therefore, operation of the updated Project would not violate or contribute to an existing or projected air quality standard, and impacts would continue to be less than significant, with no mitigation measures required.

Based on the evaluation of the proposed Project changes, the construction and operation of the updated Project would not create new significant environmental impacts or increase the severity of impacts identified in the previously certified Final EIR; would not have substantial changes occur with respect to the circumstances under which the Project is undertaken which will require major revisions to the Final EIR; and does not contain new information of substantial importance that would result in new or more severe significant impacts or new mitigation measures or alternatives that are declined to be adopted by the District.

3.4 Biological Resources

The Final EIR for the original Project determined that onsite demolition of structures, as well as noise from construction activities, could result in the destruction and loss of active bird nests that could be present within the Project area during nesting season (February 1st and August 31st). To avoid this potentially significant impact, the Final EIR requires the Project proponent in direct coordination with the general contractor to avoid performing construction or demolition activities during the nesting season, or conduct preconstruction focused nesting survey to determine the presence of active nests. If the survey identifies an active nest on any of the structures to be demolished, demolition of the structure shall not occur until after a qualified biologist determines that the nest is no longer active or that the young have fledged.

Similarly, the Final EIR for the original Project determined that demolition of onsite structures during construction could result in the loss of bat maternity roosts that could occur within the Project area during the April 15th to August 31st maternity season. To avoid this potentially significant impact, the Final EIR requires the District to avoid demolishing any structures during bat maternity season or to have a qualified biologist (with knowledge of the species), conduct a preconstruction survey to determine whether bats are present. If active bat maternity roosts are found, demolition of the structures shall be postponed and roosting structures shall be retained until a qualified biologist has determined that the maternity roost is no longer active and the young can take care of themselves.

The updated Project does not propose to demolish any additional structures that were not previously analyzed in the Final EIR. Furthermore, the total construction activity assumed in Final EIR, (including the types of equipment that will be needed, the total number of pieces of equipment that will be needed, the hours each piece of equipment would operate per day, and the total number of days each piece of equipment would operate per year), would not increase as a result of the updated Project. Specifically, the time of construction (7 a.m. to 7 p.m.) and the number of equipment used each day would not substantially change for the construction of a larger modular office (5,000 square feet instead of 3,600 square feet), larger support structure (1,800 square feet instead of 782 square feet), a new support structure of 780 square feet, and construction of an additional 50 square foot equipment enclosure. The updated Project would still be required to implement the Final EIR's two mitigation measures that are identified below. Therefore, with the required mitigation measures, the updated Project would result in a less than significant impact to biological resources.

Existing Final EIR Mitigation Measures (No Change)

MM-BIO-1: Avoid Nesting Season for Birds or Conduct Preconstruction Nesting Survey. To ensure compliance with the MBTA and similar provisions under the California Fish and Game Code, the project proponent in direct coordination with the general contractor shall conduct demolition of Transit Shed #1, Transit Shed #2, Warehouse C, the molasses tanks, and other existing structures during the non-breeding season (between September 1 and January 31) or shall implement the following.

- If demolition of a structure is scheduled to occur between February 1 and August 31, the project proponent shall retain a qualified biologist (with knowledge of the species to be surveyed) who shall conduct a focused nesting survey prior to demolition of any structures within 1 week of scheduled demolition. A qualified biologist is a person who, by reason of his or her knowledge of the natural sciences and the principles of wildlife biology, acquired by wildlife biology education and experience, performs services including, but not limited to, consultation investigation, surveying, evaluation, planning, or responsible supervision of

wildlife biology activities when those professional services require the application of biology principles and techniques.

- The survey to look for active nests shall be conducted and results reported in writing to the District for review and approval prior to the commencement of any demolition or construction activities on the project site. The survey shall occur between sunrise and 12:00 p.m., when birds are most active. If no active nests are detected during these survey, the biologist will prepare a letter report to the District documenting the results of the survey. If there is a delay of more than 7 days between when the nesting bird survey is performed and demolition begins, the qualified biologist shall confirm in writing to the District that he/she has resurveyed the structure proposed for demolition and that no new nests have been established.
- If the survey confirms an active nest on any of the structures to be demolished, demolition of the structure shall not occur until after a qualified biologist determines that the nest is no longer active or that the young have fledged

MM-BIO-2: Avoid Bat Maternity Roosts or Conduct Preconstruction Maternity Bat Roost Survey. If demolition of any structures is scheduled during the bat maternity season when reproductively active females and dependent young could be present (between April 15 and August 31), a qualified biologist (as defined under MM-BIO-1 and with knowledge of the species to be surveyed) shall conduct a preconstruction survey to determine whether bats are present. The survey shall examine potential suitable roost sites for evidence of bat presence (presence of bats, guano, or urine stains), and it shall be conducted no more than 7 days prior to demolition of the structures. If no active maternity roosts are detected during these survey, the biologist will prepare a letter report to the District documenting the results of the survey. The survey shall be submitted in writing to the District for review and approval prior to the commencement of any demolition activities on the project site. If the biologist determines that the area surveyed does not contain any active maternity roosts, demolition may commence. If active maternity roosts are found, demolition of the structure shall be postponed and roosting structures shall be retained until a qualified biologist has determined that the maternity roost is no longer active and the young can take care of themselves. The need for a construction buffer shall be determined through consultation among the qualified biologist, the District, and CDFW.

3.5 Cultural Resources

The Final EIR determined that the original Project would not cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the State CEQA Guidelines, nor would implementation of the Project cause a substantial adverse change in the significance of an archaeological resource as defined in Section 15064.5 of the State CEQA Guidelines. Section 4.4.4.1 of the Final EIR determined that no archaeological resources have

been identified or recorded in the areas subject to ground disturbing activities associated with the original Project.

As a result of a $10 million Transportation Investment Generating Economic Recovery (TIGER) grant that was awarded to the District to fund a portion of the Demolition and Initial Rail Component Project, the U.S. Maritime Administration (MARAD) prepared an Environmental Assessment/Finding of No Significant Impact (EA/FONSI) for the Demolition and Initial Rail Component Project, in accordance with the National Environmental Policy Act (NEPA), which was approved on November 16, 2016. The EA/FONSI determined that there was a potential for significant effects on buried archaeological resources and proposed mitigation to ensure adverse effects would not be significant.

The EA/FONSI and EIR both identified portions of a prehistoric scatter site (CA-SDI-5931) located approximately 125 to 180 feet east of the study area, and both reports determined that there were no known archaeological resources within the study area as the original Project was primarily located within an area that was previously bay waters and was filled during the first half of the twentieth century. The EIR, with the District as lead agency and using local and state guidance, determined that the original Project would not have the potential to result in an adverse change in the significance of an archeological resource because it was too far removed from CA-SDI-5931; no mitigation was required pursuant to CEQA. However, MARAD, as the federal lead agency and applying federal guidance, determined that the Project must conduct archaeological monitoring near the southeastern area as a requirement in the EA/FONSI (and as indicated in Figure 3.7-2 of that document) under NEPA. MARAD's requirement to implement monitoring for all ground-disturbing activities near the area of archaeological sensitivity does not change the Final EIR's cultural resources determination under CEQA. The Projects CDP-2016-09 requires archaeological monitoring as a special provision, and will continue do so under the proposed Coastal Development Permit Amendment for the updated Project. Therefore, the updated Project would continue to have a less-than-significant impact on cultural resources and the required mitigation associated with the EA/FONSI and the long-term buildout of the STC Alternative will be implemented.

As for the changes associated with the updated Project, increasing the size of the modular office building from 3,600 square feet to 5,000 square feet, switching from a temporary modular facility to a permanent modular facility, and adding an additional 50-square-foot equipment enclosure to support the rail track lubrication system would not change the Final EIR determinations that found the Project would result in a less-than-significant impact to cultural resources. Similarly, adding an additional 780-square-foot support structure where Transit Shed #2 is located, removing the compressed air generator system and outlets proposed along the eastern boundary of the site, and updating the water, sewer and electrical facility improvements

to reflect the Project's final engineering design would not change the Final EIR's less-than-significant impact determination for cultural resources because all of these changes would occur within the confines of the TAMT project boundary and no archaeological resources have been identified or recorded within the Project site. Therefore, no additional impacts would occur from the proposed changes to the updated Project and mitigation measures proposed by the EA/FONSI and STC Alternative to address portions of CA-SDI-5931 that is located off-site will be implemented.

Based on the evaluation of the proposed Project change, the construction and operation of the updated Project would not create new significant environmental impacts or increase the severity of impacts identified in the previously certified Final EIR; would not have substantial changes occur with respect to the circumstances under which the Project is undertaken which will require major revisions to the Final EIR; and does not contain new information of substantial importance that would result in new or more severe significant impacts or new mitigation measures or alternatives that are declined to be adopted by the District.

Existing Final EIR Mitigation Measures (No Change)

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

- The Qualified Archaeologist shall participate in a preconstruction meeting to inform all personnel of the potential for historical archaeological materials to be encountered during ground-disturbing activities.
- If an isolated artifact or historic period deposit is discovered that requires salvaging, the Qualified Archaeologist shall have the authority to temporarily halt construction activities within 100 feet of the find and shall be given sufficient time to recover the item(s) and map its location with a global positioning system (GPS) device.
- If a potentially eligible Native American archaeological resource is discovered, the Qualified Archaeologist shall have the authority to temporarily halt construction activities within 100

feet of the find until a Qualified Archaeologist Principal Investigator (PI) makes a determination regarding the significance of the resource.

- The PI will notify the District to discuss the significance determination and shall also submit a letter indicating whether additional mitigation is required. If the resource is determined to be not significant, the PI shall submit a letter to the District indicating that artifacts will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that no further work is required.
- If the resource is determined to be significant, the PI shall submit an Archaeological Data Recovery Plan that has been reviewed by the Native American consultant/monitor, and obtain written approval from the Port to complete data recovery. Impacts on significant resources must be mitigated before ground-disturbing activities in the area of discovery will be allowed to resume.

- The Qualified Archaeologist shall treat recovered items in accordance with current professional standards by properly determining provenance, cleaning, analyzing, researching, reporting, and curating them in a collection facility meeting the Secretary of the Interior's Standards, as promulgated in 36 CFR 79, such as the San Diego Archaeological Center.
- Within 60 days after completion of the ground-disturbing activity, the Qualified Archaeologist shall prepare and submit a final report to the District for review and approval, which shall discuss the monitoring program and its results, and provide interpretations about the recovered materials, noting to the extent feasible each item's class, material, function, and origin.

3.6 Geology and Soils

The Final EIR determined that implementation of the original Project would not exacerbate the potential of (i) rupture of a known earthquake fault; (ii) strong seismic ground shaking; and (iii) seismic related ground failure, including liquefaction. It also determined that the Project would not cause a geological unit or soil to become unstable and exacerbate the potential of onsite or offsite lateral spreading, subsidence, or collapse.

The updated Project, which includes a larger modular office facility (e.g., 3,600 square feet to 5,000 square feet), an additional 50-square-foot equipment enclosure to support the rail track lubrication system, an additional 780-square-foot support structure on the southern end of the terminal, a larger support structure on the northern end of the terminal (which increased from 782 square feet to 1,800 square feet), and an updated water, sewer, and electrical facility improvements to support the final engineering design, would not exacerbate the potential for strong seismic ground shaking to occur or cause the ground shaking to be more powerful than that of the original Project. As discussed in Section 4.5 of the Final EIR, all structures, including the updated Project structure, would be sited at least 50 feet away from an active fault and the construction of a permanent modular office facility (not temporary), support structures, and 50-

sqaure foot equipment enclosure would continue to result in shallow grading and rely on shallow foundation depths and would not be capable of exacerbating the rupture of existing faults in the area.

For most of the improvements, the updated Project would involve an excavation depth that averages between 24- to 32-inches. The first stormwater BMP pass-through filtration system, however, would involve excavating to an eleven-foot depth to install a subsurface stormwater quality filtration capable of treating 42-acres by connecting to the existing, main outfall pipe located between Transit Sheds #1 and #2. The second BMP pass-through filtration system involves excavating to a nine-foot depth to treat approximately 10,000 square feet of the site located at the new Modular Office building located near the main entry gates. Neither of these improvements have the potential to exacerbate the rupture of existing faults in the area because they would not be installed on an existing fault, and the construction still involves relatively shallow grading and excavation. As noted in the Final EIR, influencing faults require deep and significant intrusion, such as the creation of reservoirs and the pumping of fluids in deep wells. Therefore, the updated Project would not have the potential to exacerbate an active fault, strong seismic ground shaking, or soil liquefaction. Nor would the updated Project cause a geologic unit or soil unstable and exacerbate the potential for lateral spreading, subsidence or collapse. As noted in Section 4.5.4.3 in the Final EIR, the updated Project would continue to have a less than significant impact to geology and soils and no mitigation measures are required.

3.7 Greenhouse Gas Emissions

Section 4.6.1 of the Final EIR for the original Project determined that the Project's combined construction and operational activities could result in GHG emissions that would be inconsistent with the District's Climate Action Plan reduction target of 33% for maritime-related activities by year 2020. To reduce this impact to a level of less than significant, the Final EIR requires the Project to implement diesel-reduction measures during construction of the Project (MM-GHG-1), it requires the Project to comply with all applicable GHG reduction strategies identified in the District's Climate Action Plan[6], and it requires the District to ensure at least three pieces of electric cargo handling equipment is in operation prior to January 1, 2020 (MM-GHG-3). With implementation of these three mitigation measures, the original Project was determined to have a less than significant impact to GHG emissions.

Changes associated with the updated Project, including the six additional passenger vehicles associated with the larger modular office facility (e.g., increased from 3,600 square feet to 5,000

[6] The District's 2013 Climate Action Plan is a qualified GHG reduction plan to year 2020, as specified in the CEQA Guidelines Section 15183.5 (b) (1) and (2).

square feet), would not significantly increase GHG emissions identified in the Final EIR, nor would they result in any changes to the Final EIR's previously identified mitigation measures. As mentioned earlier, the updated Project is based on a more refined Project description that includes additional detail pertaining to the subsurface utility work (e.g., updated water, sewer, stormwater, and other electrical and communication systems) that results in a shorter overall construction period, but the intensity of construction activity for each phase of construction is consistent with what was assumed in the Project's Final EIR[7]. Construction of a larger modular office (5,000 square feet instead of 3,600 square feet), larger support structure (1,800 square feet instead of 782 square feet), a new support structure of 780 square feet, and construction of an additional 50 square foot equipment enclosure, would not result in substantially more construction activity than what was assumed in the Final EIR.

However, the updated Project would involve excavating approximately 86,700 cubic yards of soil, (which is 39,600 more cubic yards of material than the 47,100 cubic yards that was estimated in the Final EIR). This modification is necessary to ensure the new asphalt and concrete is of sufficient thickness to accommodate future loads. The Final EIR assumed 47,100 cubic yards of material would be transported offsite utilizing dump trucks that had a 16 cubic-yard-capacity over a 50-working-day period (for both phases), which resulted in 59 dump trucks per day. The Final EIR determined that GHG emissions associated with the Project's construction activities would result in 794 metric tons of CO2e for the entire three-year construction period, which results in 40 metric tons annually when amortized over the 20-year life of the Project. The updated Project involves transporting 86,700 cubic yards of material utilizing 20 cubic-yard-capacity trucks, which would result in 28 more trucks per day over a 50-day period. As shown in Table 3.2 below, the additional trucks result in an additional 16 metric tons of CO2e during the earthwork and grading for Phase I, and an additional 26 metric tons of CO2e for Phase II. This increase in truck activity results in an additional 40 metric tons of CO2e emissions in total over the construction period, which results in an additional 2 metric tons of GHG emissions annually when amortized over the 20-year life of the Project.

[7] The District's Engineering Department in consultation with its engineering consultant (Harris and Associates), reviewed the construction activity assumptions found on .pdf page 347 in Appendix F of Part 3 of the Final EIR and determined that the updated project would involve the number of days and hours of operation for each piece of equipment that was identified. The District's Engineering Department also confirmed that the updated Demolition and Initial Rail Component Project would not result in more than 50 construction workers on any given day, which was the assumption analyzed on page 3-17 of Part 2 of the Final EIR.

TABLE 3.2. Estimate of Construction GHG Emissions (metric tons)

Construction Phase	Updated CO2e	Change in Addendum Compared to Final EIR
Transit Shed #1		
Demolition of Roofing and Steel Frame	62	0
Demolition of Concrete Walls	98	0
Demolition of Asphalt, Foundation, and Pile Caps	32	0
Demolition and Removal of Asbestos/ Lead / Hazardous Waste	11	0
Earthwork & Grading	109	16
Paving	13	0
Utilities, Lighting, Misc.	19	0
Total, TS#1	**345**	**16**
Transit Shed #2		
Demolition of Roofing and Steel Frame	77	0
Demolition of Concrete Walls	134	0
Demolition of Asphalt, Foundation, and Pile Caps	45	0
Demolition and Removal of Asbestos/ Lead / Hazardous Waste	11	0
Earthwork & Grading	140	26
Paving	16	0
Utilities, Lighting, Misc.	25	0
Total, TS#2	**447**	26
Rail Lubrication Install	**3**	**0**
Total GHGs	**794**	**41.7**
Amortized Total	*40*	*2*

Therefore, GHG emissions associated with construction of the updated Project would not create new significant environmental impacts or increase the severity of impacts identified in the previously certified Final EIR

In terms of ongoing operations, the updated Project involves increasing the modular office facility from 3,600 square feet to 5,000 square feet, placing the rail track lubrication system in a 50-square-foot equipment enclosure, constructing an additional 780-sqaure-foot support structure on the southern end of the terminal, and increasing the size of the support structure that would be located on the northern end of the terminal from 782-square-feet to 1,800-square-feet. The 5,000-square-foot modular office facility would be designed to accommodate an additional six employees (16 new permanent employees instead of 10), which would add up to six additional passenger vehicles daily and would not result in any measurable increase to the Project's estimated GHG emissions. Furthermore, all of the Final EIR's mitigation measures (MM-GHG 1 through MM-GHG-3) would remain in effect and would continue to reduce GHG-related emissions by 33%, as required by the District's Climate Action Plan. Therefore, for the years up to 2020, the updated Project would be (1) consistent with the District's CAP, including a 33

percent maritime specific GHG emissions reduction target and reduction measures specified therein, and (2) in compliance with plans, policies, and regulatory programs outlined in the Scoping Plan and adopted by ARB or other California agencies for the purpose of reducing GHG emissions.

The Project's post-2020 GHG impacts was considered in conjunction with the increased cargo throughput and infrastructure improvements that were contemplated as part of the long-term TAMT Redevelopment Plan's STC alternative, which identified a 2035 build-out year. For the same reasons mentioned above, the updated Project would not result in a substantial increase to the Project's GHG emissions for the post-2020 time period. The Final EIR concluded that with implementation of MM-GHG-1 through MM-GHG-3, as well as MM-GHG-4 through MM-GHG-9 that are required for the STC Alternative, GHG emissions would be reduced by 57% at plan build-out in year 2035. Although these nine mitigation measures demonstrate a downward trajectory in GHG emissions for the post-2020 period, the Final EIR concludes the impact would remain significant and unavoidable because there remains uncertainty if the 57% reduction target would contribute sufficiently to, (and not conflict with), California's long-term GHG reduction targets.

As required in the Final EIR, the updated Project would still need to implement MM-GHG-1 and MM-GHG-2, and the District would still be responsible for implementing MM-GHG-3, which includes having at least three pieces of electric cargo handling equipment in operation by January 1, 2020. Therefore, with the required mitigation measures listed below, the updated Project would result in a less than significant impact to GHG emissions for the 2020 target year.

Based on the evaluation of the proposed Project change, the construction and operation of the updated Project would not create new significant environmental impacts or increase the severity of impacts identified in the previously certified Final EIR; would not have substantial changes occur with respect to the circumstances under which the Project is undertaken which will require major revisions to the Final EIR; and does not contain new information of substantial importance that would result in new or more severe significant impacts or new mitigation measures or alternatives that are declined to be adopted by the District.

Existing Final EIR Mitigation Measures (No Change)

MM-GHG-1: Implement Diesel Emission Reduction Measures During Construction of the Demolition and Initial Rail Component and During Construction and Operations of Future TAMT Plan Components. The District shall implement the following measures during project construction and operations, subject to verification by the District.

i. All project proponents shall limit all equipment, drayage, and delivery truck idling times by shutting down equipment when not in use and reducing the maximum idling time to less than 3 minutes. The project proponent shall install clear signage regarding the limitation on idling

time at the delivery driveway and loading areas and shall submit quarterly reports of violators to the District. This measure shall be enforced by terminal supervisors, and repeat violators shall be subject to penalties pursuant to California airborne toxics control measure 13 California Code of Regulations Section 2485. The project proponent shall submit evidence of the use of diesel reduction measures to the District through annual reporting, with the first report due 1 year from the date of project completion and each report due exactly 1 year after, noting all violations with relevant identifying information of the vehicles and drivers in violation of these measures.

ii. The project proponent shall verify that all construction and operations equipment is maintained and properly tuned in accordance with manufacturers' specifications. Prior to the commencement of construction and operations activities using diesel-powered vehicles or equipment, the project proponent shall verify that all vehicles and equipment have been checked by a certified mechanic and determined to be running in proper condition prior to admittance into TAMT. The project proponent shall submit a report by the certified mechanic of the condition of the construction and operations vehicles and equipment to the District prior to commencement of their use.

MM-GHG-2: Comply with applicable measures in the San Diego Unified Port District Climate Action Plan. 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 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).

MM-GHG-3: Electric Cargo-handling Equipment Upgrades, which requires three pieces of electric cargo handling equipment to be in operation by 2020, regardless of whether the Demolition and Initial Rail Component or STC Alternative get implemented. Prior to January 1, 2020, the San Diego Unified Port District shall ensure that at least three pieces of existing non-electric cargo-handling equipment (CHE) at the terminal are replaced by electric CHE, none of which were previously operating at the terminal during the 2013/2014 baseline year of the EIR analysis. Possible ways the electric CHE may be obtained include, but are not limited to, the following:

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

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

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

3.8 Hazards and Hazardous Materials

Section 4.7 of the Final EIR for the original Project determined that construction and grading activities associated with the Project site could potentially result in a release of hazardous materials and create a potentially significant hazard to workers, the public and the environment. This determination was based on historical information compiled from previous site assessments and databases indicating that TPH, benzene, touline, PAHs, SVOCs, metals (copper, zinc and lead), and diesel may be encountered during construction. The Final EIR also determined that construction of the original Project could emit hazardous emissions, substances or waste within 1/4 of a mile of a school, and that the site was included on a list of hazardous sites pursuant to Government Code Section 65962.5, and has the potential to create a hazard to the public or environment.

Section 4.7.4.3 of the Final EIR, however, determined that these potentially significant impacts would be reduced to a level below significance by requiring compliance with Tenth Avenue Marine Terminal Soil Management Plan (MM-HAZ-1), and by requiring engineering controls and best management practices (MM-HAZ-2) during construction activities. The updated Project would not increase the severity of any of these impacts or result in the need to change or modify these two mitigation measures because all changes occur within the confines of the Project site's boundary, and the compliance with MM-HAZ-1 and MM-HAZ-2 would be required for all updated Project components that involve ground disturbance during construction activities. Increasing the size the modular office facility from 3,600 square feet to 5,000 square feet and increasing the size of the northern support structure from 782 square feet to 1,800 square feet would have minimal effect on the Project's potential to release hazardous substances into the environment. Similarly, increasing the depth of soil excavation from an average of 12- to 15-inches to 24- to 32-inches and installing the two new stormwater BMP pass-through filtration systems would not increase the potential to emit hazardous materials into the environment above what was identified in the Final EIR because MM-HAZ-1 and MM-HAZ-2 would be still be required to reduce the potential of emitting hazardous materials into the environment. Furthermore, all construction activities would be required to comply with all applicable federal, state and local hazardous materials laws and regulations as outlined in Section 4.7.3 of the Final EIR. Therefore, requiring compliance with the Tenth Avenue Marine Terminal Soil Management Plan (MM-HAZ-1), as well as implementing engineering controls and best management practices (MM-HAZ-2) during construction activities as outlined in the Final EIR would reduce the updated Projects impacts to a level below significance.

Based on the evaluation of the proposed Project change, the construction and operation of the updated Project would not create new significant environmental impacts or increase the severity of impacts identified in the previously certified Final EIR; would not have substantial changes occur with respect to the circumstances under which the Project is undertaken which will require major revisions to the Final EIR; and does not contain new information of substantial importance that would result in new or more severe significant impacts or new mitigation measures or alternatives that are declined to be adopted by the District.

Existing Final EIR Mitigation Measures (No Change)

MM-HAZ-1: Compliance with Soil Management Plan. Prior to approval of the project grading plans and the commencement of any construction activities that would disturb the soil, the District or tenant, whichever is appropriate, and the contractor (collectively "Contractor") shall demonstrate compliance with the *10th Avenue Marine Terminal, San Diego, CA, Soil Management Plan, prepared by Tetra Tech EM, Inc., November 24, 2010* (Appendix J-1 of the Draft EIR) and consider the existing presence of the permitted underground storage tank on site

(shown on Figure 4.7-1). Specifically, the Contractor shall demonstrate compliance with the following specific requirements of the plan including, but not limited to, the following.

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

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

Complete Soil Disposal. 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.

If soils are determined to be hazardous and not suitable for reuse, they shall be disposed of at a regulated Class I landfill. Soils shall be transported in accordance with the Soil Management Plan. Soils to be loaded into trucks for offsite disposal at a Class I landfill shall be moistened with a water spray or mist for dust control in accordance with Section 4.7, Dust Control, of the Soil Management Plan. If dust is visible, positive means shall be applied immediately to prevent airborne dust. Care shall be used to minimize the amount of water applied to soils that may contain elevated concentrations of contaminants.

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.

MM-HAZ-2: Implementing Engineering 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.

- 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.

3.9 Hydrology and Water Quality

Section 4.8 of the Final EIR determined that the original Project would not violate any water quality standards or waste discharge requirements, substantially degrade water quality, or place structures within a 100-year flood hazard area that would impede or redirect flood flows. The updated Project which involves increasing the modular office facility from 3,600 square feet to 5,000 square feet, placing the rail track lubrication system in a 50-square-foot equipment enclosure, constructing an additional 780-sqaure-foot support structure on the southern end of the terminal, and increasing the size of the northern support structure from 782-square-feet to 1,800-square-feet would not change any of these determinations, nor would it require any mitigation measures because these changes would generally be located in the same locations analyzed in the Final EIR and the changes do not have the potential to substantially degrade water quality or impede or redirect flood flows.

More specifically, the updated Project would not violate water quality standards or substantially degrade water quality because it will be required to comply with the District's Jurisdictional Runoff Management Plan (JRMP), the District's Best Management Practices (BMP) Design

Manual, Construction and Industrial General Permits, and the San Diego Harbor Safety Plan. Furthermore, no mitigation is required for potential water quality impacts because MM-HAZ-1 and MM-HAZ-2 discussed above, would ensure soil contamination (if present), would be handled and treated in accordance with all applicable laws and regulations, reducing impacts to below a level of significance. Furthermore, the updated Project includes final engineering design for the stormwater drainage systems that was identified in the Final EIR. Like the original Project, the new stormwater BMP pass-through filtration systems include design features to capture the 85th percentile storm event to further ensure the updated Project would not violate any water quality standards.

The Final EIR acknowledges that pursuant to the recent Supreme Court Case decision in the CBIA vs. BAAQMD case, CEQA does not require an analysis of how the existing environmental conditions will affect a Project's resident's or users unless the Project will exacerbate those conditions. Therefore, the Final EIR determined that the original Project would not impede or redirect flood flows by placing structures in a 100-year flood hazard area. Similarly, the updated Project would not impede or redirect flood flows because the 50-square-foot equipment enclosure is not large enough substantially affect drainage patterns and the 5,000-square-foot modular office facility would be elevated approximately 2-feet above grade, as recommended in "Floodplain Study at TAMT" prepared by Harris and Associates (January 17, 2017). All of the other Project changes, including the two new support structures that would be sited where the Transit Shed #1 and #2 are currently located, would be located outside the 100-year flood zone. Therefore, the updated Project would not place any structures within a 100-year flood zone hazard area that would impede or redirect flood flows.

Based on the evaluation of the proposed Project change, the construction and operation of the updated Project would not create new significant environmental impacts or increase the severity of impacts identified in the previously certified Final EIR; would not have substantial changes occur with respect to the circumstances under which the Project is undertaken which will require major revisions to the Final EIR; and does not contain new information of substantial importance that would result in new or more severe significant impacts or new mitigation measures or alternatives that are declined to be adopted by the District.

Existing Final EIR Mitigation Measures (No Change)

MM-HAZ-1: Compliance with Soil Management Plan. Prior to approval of the project grading plans and the commencement of any construction activities that would disturb the soil, the District or tenant, whichever is appropriate, and the contractor (collectively "Contractor") shall demonstrate compliance with the *10th Avenue Marine Terminal, San Diego, CA, Soil Management Plan, prepared by Tetra Tech EM, Inc., November 24, 2010* (Appendix J-1 of the

Draft EIR) and consider the existing presence of the permitted underground storage tank on site (shown on Figure 4.7-1). Specifically, the Contractor shall demonstrate compliance with the following specific requirements of the plan including, but not limited to, the following.

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

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

Complete Soil Disposal. 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.

If soils are determined to be hazardous and not suitable for reuse, they shall be disposed of at a regulated Class I landfill. Soils shall be transported in accordance with the Soil Management Plan. Soils to be loaded into trucks for offsite disposal at a Class I landfill shall be moistened with a water spray or mist for dust control in accordance with Section 4.7, Dust Control, of the Soil Management Plan. If dust is visible, positive means shall be applied immediately to prevent airborne dust. Care shall be used to minimize the amount of water applied to soils that may contain elevated concentrations of contaminants.

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.

MM-HAZ-2: Implementing Engineering 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.

- 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.

3.10 Land Use

The NOP for the original Project determined that the Project would not physically divide an established community, conflict with any applicable land use plan, policy or regulation, or conflict with any applicable habitat conservation plan or natural community conservation plan. The updated Project, which primarily involves modifications to the Project's infrastructure improvements, would not change any of these determinations because all of the changes are contained within the Project site's original boundaries, and the updated Project does not propose any new uses or activities that were not previously contemplated in the Final EIR. Therefore, the updated Project would continue to result in no impact to land use and planning. More information can be found in the NOP that was issued in March 2016, which is currently located in Appendix A, in Part 3 of the Final EIR for the TAMT Redevelopment Plan and Demolition and Initial Rail Component Project.

3.11 Mineral Resources

The NOP for the original Project determined that the Project would not result in the loss of availability of a known mineral resource that would be of value to the region and residents of the

state because the Project site is underlain by artificial fill and does not contain any known mineral resources. The updated Project, which results in changes to the size and/or placement of several physical improvements within the original Project site's boundary would not change this determination. Similarly, the NOP concluded that the original Project would not result in the loss of availability of a locally important mineral resource recovery site delineated on a land use plan because the Project site is characterized by industrial marine-related activity, and the District's Port Master Plan does not identify any mineral resources in the area or designated plans for mineral extraction. The infrastructure changes and improvements identified as part of the updated Project would not change this determination. Therefore, the updated Project would continue to result in no impact to mineral resources. More information can be found in the NOP that was issued in March 2016, which is currently located in Appendix A, in Part 3 of the Final EIR for the TAMT Redevelopment Plan and Demolition and Initial Rail Component Project.

Based on the evaluation of the proposed Project as designed, the construction and operation of the updated Project would not create new significant environmental impacts or increase the severity of impacts identified in the previously certified FPEIR; would not have substantial changes occur with respect to the circumstances under which the Project is undertaken which will require major revisions to the FPEIR; and does not contain new information of substantial importance.

3.12 Noise

Section 4.9 of the Final EIR for the original Project determined that construction and demolition activities would result in a substantial temporary or periodic increase of 5 dB or more above existing noise levels at two parks and it requires the District to prepare a noise reduction plan and implement its recommendations (MM-NOI-3). However, because there was uncertainty as to whether the noise reduction plan would prevent and/or avoid a temporary increase of more than 5 dB in noise levels at these two locations, the Final EIR concluded that temporary construction-level noise impacts would be significant and unavoidable. The updated Project would not exacerbate any of the identified temporary noise impacts in the Final EIR because it would require the same type and quantities of construction equipment, as well as the same number of operational hours that was identified in the Final EIR. In addition, while final design indicates that construction of the updated Project can be begin in September 2017 (instead of June 2017), and will be completed in January 2020 (instead of March 2020), this will not increase the hours or intensity of construction activities previously assumed because the Final EIR intentionally identified the most impactful, worst case construction scenario. The additional specificity that came out of the Project's final design determined that construction of the updated Project could be completed in shorter time frame than previously estimated. Construction equipment for the

updated Project would continue to include excavators, loaders, forklifts and scissor lifts, water trucks, dump trucks, backhoes, dozers, saw cutting equipment, and air compressors, and construction activities would cease by 7:00 pm, in accordance with the City of San Diego's Noise Abatement and Control Ordinance.

The Final EIR determined that the Project would not (1) expose persons to or generate noise levels in excess of standards established in the City of San Diego Significance Determination Thresholds and/or the City's Noise Ordinance, (2) expose persons to or generate excessive ground-borne vibration or ground-borne noise levels, (3) result in a substantial permanent increase in ambient noise levels in the Project vicinity above existing levels without the Project. The updated Project, which includes a larger modular office facility (e.g., 3,600 square feet to 5,000 square feet), an additional 50-square-foot equipment enclosure to support the rail track lubrication system, an additional 780-square-foot support structure on the southern end of the terminal, a larger support structure on the northern end of the terminal (which increased from 782 square feet to 1,800 square feet), and an updated water, sewer, and electrical facility improvements to support the final engineering design, would not exacerbate any of these impacts because construction activities associated with the updated Project would not change. Specifically, the number and type of construction equipment, as well as the duration of construction activities, would be the same as what was analyzed in the Final EIR. Moreover, the placement of the structures would still be on TAMT in similar locations. The only change that could potentially result in greater noise impacts is the additional 39,600 cubic yards of soil, which would be transported offsite. However, this would result in no more than three additional trucks per hour (Monday - Friday 7am to 4pm), during the earthwork and grading phase. This nominal increase in truck activity would not result in a perceptible change in noise levels along the designated truck haul route (Harbor Drive to 28th Street). Similarly, once construction is complete, the updated Project may result in an additional six permanent employees, based on increasing the size of the modular office facility from 3,600 square feet to 5,000 square feet. Adding six additional passenger vehicles to the surrounding road network, however, would not result in a perceptible increase in noise levels associated with traffic.

Therefore, based on the evaluation of the updated Project, its construction and operation would not create new significant environmental impacts or increase the severity of impacts identified in the previously certified Final EIR; would not have substantial changes occur with respect to the circumstances under which the Project is undertaken which will require major revisions to the Final EIR; and does not contain new information of substantial importance. The updated Project would still be required to implement the following mitigation measure in an effort to reduce temporary increases in ambient noise levels at two parks, and impacts would continue to be significant and unavoidable.

Existing Final EIR Mitigation Measures (No Change)

MM-NOI-3 Implement a Construction Noise Reduction Plan. 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.

- 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.

3.13 Population and Housing

The NOP for the original Project determined that the Project would have a less than significant impact on population growth because the additional jobs associated with the Project are likely to filled by San Diego residents and/or any new workers from outside the city could be accommodated by the city's existing housing stock. The original Project description acknowledged that the Project could result in up to a total of 295 construction jobs, but that no more than 50 construction workers would be working onsite on any given day. The updated Project, which primarily involves modifications to the Project's infrastructure improvements, would not change any of these assumptions because the nature of the proposed changes would continue to require no more than 50 construction workers on any given day, and no more than a total of 295 construction-related jobs for the duration of construction activities. In addition, the Final EIR determined that once the Project was built, employment for ongoing terminal operations may result in an additional 92 daily workers. The updated Project, which includes increasing the size of the modular office facility from 3,600 square feet to 5,000 square feet, may result in an additional six employees above what was contemplated in the Final EIR. The six additional employees are likely to be hired from within the San Diego region, which would not result in the need for any new housing. If

these six new employees were hired from outside the San Diego region, there is sufficient housing stock within the San Diego region to house six additional employees and their families Therefore, the updated Project would not directly or indirectly induce substantial population growth through the creation of new homes or businesses in the San Diego region. Impacts would continue to be less than significant, as discussed in the Final EIR.

The NOP determined that no housing would be displaced as the result of the original Project, nor would it displace substantial numbers of people, necessitating the construction of replacement housing. The updated Project would not change any of these determinations because all of the changes are contained within the Project site's original boundaries and the updated Project would not affect housing or the displacement of people. Therefore, the updated Project would continue to have no impact to housing stock or displace substantial numbers of people, as discussed in the Final EIR. More information can be found in the NOP that was issued in March 2016, which is currently located in Appendix A, in Part 3 of the Final EIR for the TAMT Redevelopment Plan and Demolition and Initial Rail Component Project.

3.14 Public Services

The NOP for the original Project determined that the Project would have a less than significant impact on fire protection, police protection and parks, and would result in no impact to schools and other public facilities. The updated Project, which primarily involves modifications to the Project's infrastructure improvements, as well as the potential to accommodate six new permanent employees onsite, would not change any of these determinations, based on the analysis provided below. More information can be found in the NOP that was issued in March 2016, which is currently located in Appendix A, in Part 3 of the Final EIR for the TAMT Redevelopment Plan and Demolition and Initial Rail Component Project.

Fire Protection

The NOP for the original Project determined that four San Diego Fire District (SDFD) fire stations are located within the Project vicinity and could respond in the event of an emergency, and that there would be a less than significant impact because the Project would not result in a physical expansion of the terminal's boundaries. Similarly, there are three San Diego Harbor Police Department (HPD) offices that provides law enforcement and marine firefighting services in and around San Diego Bay. The NOP determined that the proposed activities and operations proposed as part of the original Project would be similar to existing operations in terms of the need for fire protection services, and would not increase the demand for new or physically altered fire

protection facilities. The updated Project, which primarily involves modifications to the Project's infrastructure improvements, a slightly larger modular office, a larger support structure to accommodate existing Customs and Border Patrol staff on the northern end of the terminal, and a new 780-square foot support structure on the southern end of the terminal, would continue to be located within the confines of the existing Project site boundaries, and activities and operations would continue to be similar to existing conditions. Therefore, the updated Project would continue to have a less than significant impact to fire protection services.

Police Protection

The NOP for original Project determined that the proposed Project would not result in increased demand that would require new or physically altered police protection facilities because TAMT is a monitored environment that has controlled access and active security and operations under the original Project would be similar to existing conditions in terms of the need for police protection services. The updated Project, which primarily involves modifications to the Project's infrastructure improvements, a slightly larger modular office, a larger support structure to accommodate existing Customs and Border Patrol staff on the northern end of the terminal, and a new 780-square foot support structure on the southern end of the terminal, would not change any of these determinations because the updated Project would continue to be sited within the existing Project site's boundaries that includes controlled access and active security and its activities and operations would continue to be similar to existing conditions in terms of the need for police protection. Therefore, the updated Project would continue to have a less than significant impact to police protection services.

Parks

The NOP for the original Project acknowledged that the Project site does not contain any parks and that the closest park is Cesar Chavez Park, located immediately adjacent to TAMT. It determined that the proposed Project would have a negligible impact on population growth, and it would be an insignificant increase and would not substantially degrade the existing facilities. The updated Project, which primarily involves modifications to the Project's infrastructure improvements, a slightly larger modular office, a larger support structure to accommodate existing Customs and Border Patrol staff on the northern end of the terminal, and a new 780-square foot support structure on the southern end of the terminal, would not result in any changes to the number of construction workers, and would result in an increase of only six additional employees at TAMT once the Project is complete. Therefore, the updated Project would continue to have a less than significant impact to Parks.

Schools

The NOP for the original Project determined that impacts on school facilities and services are usually associated with in-migration and population growth, which increase the demand for schools and result in the need for new or expanded facilities, and that the proposed Project would have no effect on population growth and school demand. The updated Project, which primarily involves modifications to the Project's infrastructure improvements, a slightly larger modular office, a larger support structure to accommodate existing Customs and Border Patrol staff on the northern end of the terminal, and a new 780-square foot support structure on the southern end of the terminal, would not result in additional in-migration or substantial population growth above what was considered in the Final EIR, and would continue to have no impact to schools.

Other Public Facilities

The NOP for the original Project determined that the proposed Project would not result in adverse impacts on other public facilities because physical impacts are usually associated with in-migration and population growth, and there are four San Diego Fire District (SDFD) fire stations that are located within the Project vicinity and could respond in the event of an emergency, and that there would be a less than significant impact because the Project would have no effect on population growth. The updated Project, which primarily involves modifications to the Project's infrastructure improvements, a slightly larger modular office, a larger support structure to accommodate existing Customs and Border Patrol staff on the northern end of the terminal, and a new 780-square foot support structure on the southern end of the terminal, would not result in additional in-migration or substantial population growth above what was considered in the Final EIR, and would continue to have no impact to on public facilities.

3.15 Recreation

The NOP for the original Project determined that the Project would have a less than significant impact on recreation because it would not result in an increase in the number of housing units or residents in the area and therefore, would not increase the use of existing parking and recreational facilities. Similarly, the original Project would not require construction or expansion of recreational facilities that may have an adverse physical effect on the environment because it does not include the development of any recreational facilities. The updated Project, which primarily involves modifications to the Project's infrastructure improvements, a slightly larger modular office, a larger support structure to accommodate existing Customs and Border Patrol staff on the northern end of the terminal, and a new 780-square foot support structure on the southern end of the terminal, would not change any of

these determinations because it does not increase the number of housing units or residents in the area, and it does not include the development of any recreational facilities. Therefore, the updated Project would continue to have a less than significant impact to recreational facilities. More information can be found in the NOP that was issued in March 2016, which is currently located in Appendix A, in Part 3 of the Final EIR for the TAMT Redevelopment Plan and Demolition and Initial Rail Component Project.

3.16 Transportation

Section 4.10, Transportation, Circulation and Parking of the Final EIR for the original Project found that construction activities would worsen the existing delay at the Norman Scott Road / 32nd Street / Wabash Boulevard Intersection by 8.7 seconds in the AM peak hour and 4.2 seconds in the PM peak hour. To mitigate this impact, the Final EIR requires the implementation of a Transportation Demand Management (TDM) Plan, which shall include TDM strategies to limit the number of construction worker trips that travel through the affected intersection during peak hours. However, because it could not determine with certainty that the TDM Plan would reduce impacts to this intersection, the Final EIR determined that impacts to the Norman Scott Road / 32nd Street / Wabash Boulevard would be significant and unavoidable.

The updated Project would not result in a greater number of construction workers than what was analyzed in the Final EIR, but it does increase the amount of excavated soil that would be transported offsite. Assuming 20-cubic-yard-capacity dump trucks would transport 86,700 cubic yards of excavated material offsite over a period of 50 days (25 days for the 1st Phase that involves demolition of Transit Shed #1 and construction of the modular office facility, and 25 days for the 2nd Phase that involves demolition of Transit Shed #2), the updated Project would result in an additional 28 truck trips per day during these two 25-day periods, above what was identified in the Final EIR. However, the TDM Plan prepared by Linscott Law & Greenspan (LLG) Associates (June 2017) determined that *"with the more detailed project-level information that is now available, it is unlikely that construction-related traffic would result in significant impacts, requiring mitigation"*, because the trucks that would be transporting fill material would take 28th Street to access Interstate 5, thereby avoiding any impacts to the Norman Scott Road / 32nd Street / Wabash Boulevard intersection, which is located further south. The LLG TDM Plan further acknowledged that Project contract documents require truck traffic to/from Interstate 5 to use 28th Street. While the updated Project would continue to have up to 50 construction workers traveling to the site on any given day, the LLG TDM Plan also recommends that *"standards and specifications for all bidding documents shall specify that typical construction activities will begin no later than 7:00 AM, and terminate no later than 3:30 PM, to allow for workers to arrive and depart before the AM and PM commuter peak periods"*, which have been incorporated into the updated Project's bid documents. Therefore, based on the LLG TDM Plan

and TDM strategies, the updated Project would not worsen or exacerbate impacts to Norman Scott Road / 32nd Street / Wabash Boulevard intersection.

The Final EIR determined that the original Project would not conflict with an applicable congestion management program, substantially increase hazards due to a design feature, or conflict with adopted policies plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance of safety or other such facilities. The updated Project would not change any of these determinations because number of construction workers and construction activities are consistent with what was analyzed in the Final EIR, and the increased number of dump trucks associated with transporting fill offsite would not result in any changes to the existing transportation infrastructure outside the terminal, nor does it interfere with the policies or projects identified in SANDAG's Regional Plan.

In terms of operations, the updated Project results in an additional 2,400 square feet that was added to the modular office building, which would allow for an additional six workers totaling up to 16 permanent Port employees. The six additional employee daily trips are more likely to take 28th Street to access the TAMT because this is the more direct route to the terminal. Furthermore, six additional passenger vehicles would not result in any noticeable increase in traffic delays to the Norman Scott Road / 32nd Street / Wabash Boulevard intersection during the am or pm peak hour, if future employees decided to take this route. Therefore, the addition of up to six permanent employees would not result in any new impacts, or substantially increase the severity of a previously identified environmental effect.

Similarly, the Final EIR determined that the construction of the original Project would not result in an inadequate parking supply, either onsite or offsite, because there would be no more than 50 construction workers present during the construction period, and the terminal could support a total of 360 workers during its busiest 8-hour shift when the Demolition and Initial Rail Component Project was complete. The updated Project would not change these determinations because there would continue to be no more than 50 construction workers present on any given day, and the six additional permanent employees once the project is built, which would result in a total of 366 workers during the busiest 8-hour shift, could be accommodated by the 599 parking spaces identified in the Final EIR.

To offset the parking need for the headhouse (e.g., existing Port employee offices that are attached to the northern end of Transit Shed #2), the Final EIR noted that an additional 15 parking spaces would be provided at the new modular office building. The updated Project identifies 13 striped parking spaces within the confines of TAMT, and a total of 35 unsecured guest parking spaces east of the security fence adjacent to the proposed modular office building. . These 48 parking spaces address the 15 spaces that were contemplated in the Final EIR, the six

additional permanent employees contemplated as part of the larger modular office, as well as parking for up to 27 guests who may be visiting the terminal. Therefore, there would be adequate on-site parking provided for Port employees, as well as guests visiting the terminal.

Increasing the size of the support facility where northern support facility (e.g., containing an electrical gear room, field offices, restroom facilities and an IT Room) from 782 square feet to 1,600 square feet and adding an additional support facility in the southern area of the terminal would not result in any changes to number of employees identified in the Final EIR. Rather, the size of northern support facility was increased by 800 square feet to accommodate existing Custom and Border Patrol employees. Similarly, adding an additional 780 square foot support facility in southern portion of the terminal was necessary to provide an electrical gear room, field office, an IT room and restroom facilities for the dockworkers doing work at berths 10-5 through 10-8. The Final EIR assumed up to 82 dockworkers daily, which would not change as the result of these two support structures. The Final EIR determined that the 599 parking spaces identified on TAMT were adequate to accommodate these additional 82 dockworkers. As a result, the updated Project would not result in an inadequate parking supply, either on site or off site. Therefore, the updated Project would continue to result in a less than significant impact to construction-related traffic and parking, and the updated Project would continue to be required to implement a TDM Plan during the Project's construction period.

Based on the evaluation of the proposed Project change, the construction and operation of the updated Project would not create new significant environmental impacts or increase the severity of impacts identified in the previously certified Final EIR; would not have substantial changes occur with respect to the circumstances under which the Project is undertaken which will require major revisions to the Final EIR; and does not contain new information of substantial importance that would result in new or more severe significant impacts or new mitigation measures or alternatives that are declined to be adopted by the District.

Existing Final EIR Mitigation Measures (No Change)

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.

- Implementation of a ride-sharing program to encourage carpooling among workers.

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

3.17 Utilities and Service Systems

According to Section 4.11, Utilities and Energy in the Final EIR, the original Project would result in less than significant impacts to water supplies and treatment facilities, new or upgraded storm water drainage facilities, a landfill with sufficient permitted capacity to accommodate the Project's waste disposal needs, and wasteful, inefficient or unnecessary usage of direct and indirect energy. The updated Project, which primarily involves modifications to the Project's infrastructure improvements, would not exceed wastewater treatment requirements of the San Diego Regional Water Quality Control Board (RWQCB), would not result in a determination by the San Diego Public Utilities District that there is inadequate wastewater treatment capacity to the updated Project's demand, and not require the construction of a new wastewater treatment facility or expansion of existing facilities because the number of construction workers and full-time employees at Project completion would be similar to what was analyzed in the Final EIR. Similarly, the updated Project would not result in insufficient water supplies, new water treatment facilities, or result in the wasteful, inefficient or unnecessary use of energy or require the expansion of existing infrastructure which could cause significant environmental effects because the number of construction workers and number of full-time employees would be similar to what was analyzed in the Final EIR.

The Final EIR also determined that the original Project would not cause a significant environmental effect due to the construction of new or expanded storm water drainage facilities because the Project included a comprehensive update to the existing storm water system that identified new stormwater drainage systems that included design features to capture the 85th percentile storm event. The updated Project's final engineering design includes placing the first system between Transit Sheds #1 and #2 to treat 42-acres of runoff area in the main outfall pipe. The second system would be located near the new modular office and designed to treat an area approximately 10,000-square-feet. Like the original Project, both systems would be designed to capture the 85^{th} percentile storm water event, as analyzed in the Final EIR. Furthermore, these two subsurface storm water tanks would provide complete capture and detention of all runoff in these areas of the Project site, and would treat the storm water before releasing it into the bay or before discharging it into the sanitary sewer system, in accordance with the RWQCB discharge requirements. Therefore, the updated Project would not

cause a significant environmental effect from constructing or expanding storm water drainage facilities on site.

The Final EIR determined that the original Project would be served by a landfill with sufficient permitted capacity to accommodate the Project's solid waste disposal needs. The Final EIR assumed that a majority of the construction and demolition debris would be recycled onsite or at a local recycling facility in accordance with the City's Construction and Demolition Debris Deposit Ordinance, and that approximately 47,000 cubic yards of soil and 17,300 cubic yards of remaining concrete and miscellaneous demolition debris would be exported to the Chula Vista Bayfront site or another project site within the Port of San Diego to use as fill material. If the concrete and asphalt are found to be unsuitable to use as fill material, they would be recycled at one of several certified C&D Recycling Facilities, or to the Miramar Landfill if they cannot be recycled. While the updated Project would continue to recycle, reuse and dispose of the soil and concrete / construction debris in the same manner as discussed above, the updated Project estimates that a total of 22,400 cubic yards of fill material would be balanced and re-compacted on site, and 86,600 cubic yards of excavated soil would be needed to be exported offsite. If soils are determined to be hazardous and not suitable for reuse, they would be disposed of at a regulated Class I landfill as required in the Final EIR. Despite an increase in excavated soil amounts, the updated Project would continue to have its disposal needs met through a combination of recycling, reuse and/or offsite disposal with a landfill that has sufficient permitted capacity, and have a less than significant impact because there is both the need and capacity to receive 86,600 cubic yards at the Chula Vista Bayfront site, if soils are found to be suitable for reuse. If soils are not suitable for reuse, there would be sufficient capacity at a regulated Class I landfill.

Finally, the Final EIR determined that the original Project would exceed an annual generation of 60 tons of solid waste, which would exceed the City’s cumulative solid waste threshold. The Final EIR requires preparation of a waste management plan to address the demolition, construction, and operation phases of the proposed Project, and it requires the Project proponent to submit this plan to the City of San Diego’s Environmental Services Department for approval. The contents of the plan would include the tons of waste that would be generated, the type of waste that would be generated, a description of how the proposed Project would reduce the generation of construction and demolition debris and/or how these materials could be reused on site, as well as other recycling efforts. By complying with the contents of the City of San Diego’s waste management plan, cumulative impacts associated with the Demolition and Initial Rail component would be below significance. The updated Project would still be required to submit a waste management plan to the City for review and approval, and therefore, cumulative impacts would be less than significant.

Based on the evaluation of the proposed Project change, the construction and operation of the updated Project would not create new significant environmental impacts or increase the severity of impacts identified in the previously certified Final EIR; would not have substantial changes occur with respect to the circumstances under which the Project is undertaken which will require major revisions to the Final EIR; and does not contain new information of substantial importance that would result in new or more severe significant impacts or new mitigation measures or alternatives that are declined to be adopted by the District.

Existing Final EIR Mitigation Measures (No Change)

MM-C-UTIL-1 Prepare a Waste Management Plan. Prior to issuance of the construction permits, a waste management plan shall be prepared by the Applicant and submitted to the City's Environmental Services Department for approval. The plan shall address the demolition, construction, and operation phases of the proposed project as applicable, and shall include the following.

1. A timeline for each of the main phases of the proposed plan and near-term improvements (construction and operation).
2. Tons of waste anticipated to be generated (construction and operation).
3. Type of waste to be generated (construction and operation).
4. Description of how the proposed project will reduce the generation of construction and demolition (C&D) debris.
5. Description of how C&D material will be reused on site.
6. The name and location of recycling, reuse, and landfill facilities where recyclables and waste will be taken if not reused on site.
7. Description of how the C&D waste will be separated if a mixed C&D facility is not used for recycling.
8. Description of how the waste reduction and recycling goals will be communicated to subcontractors.
9. Description of how a "buy recycled" program for green construction products will be incorporated into the proposed project.
10. Description of any ISO or other certification, if any.

4 DETERMINATION

CEQA Guidelines Sections 15162 through 15164 set forth the criteria for determining the appropriate environmental documentation, if any, to be completed when there is a pre-existing certified EIR covering the Project. The Port District makes the following findings, and the Rationale of Findings is presented in Section 3.0 of this addendum.

CEQA Guidelines Section 15162(a) states: When an EIR has been certified for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in light of the whole record, one or more of the following:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

   Discussion: As discussed in Section 3 of this addendum, no substantial changes are proposed to the Project which would result in new significant effects or an increase in the severity of previously identified significant effects. As such, major revisions to the previous EIR are not required to reflect the proposed Project change.

2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR due to the involvement of new significant effects or a substantial increase in the severity of previously identified significant effects.

   Discussion: While final design has now occurred since certification of the Final EIR resulting in minor revisions to the original Project, as identified in Section 3 of this addendum, this change in circumstance does not involve any new significant effects or a substantial increase in the severity of previously identified significant effects.

3. New information of substantial importance, which was not known and could not have been know with the exercise of reasonable diligence at the time the previous EIR was certified as complete shows any of the following:

   A) The project will have one or more significant effects not discussed in the previous EIR; or

   Discussion: While final design has now occurred since certification of the Final EIR resulting in minor revisions to the original Project, as discussed in Section 3 of this document, no new significant effects would be associated with the proposed Project changes.

B) Significant effects previously examined will be substantially more severe than shown in the previous EIR; or

Discussion: While final design has now occurred since certification of the Final EIR resulting in minor revisions to the original Project, as discussed in Section 3 of this addendum, no significant impacts would be substantially more severe than previously analyzed and disclosed in the Final EIR.

C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

Discussion: While final design has now occurred since certification of the Final EIR resulting in minor revisions to the original Project, as discussed in Section 3 of this addendum, no previously identified mitigation measures or alternatives have been determined to be infeasible that are no feasible.

D) Mitigation measures or alternatives which are considered different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Discussion: While final design has now occurred since certification of the Final EIR resulting in minor revisions to the original Project, as discussed in Section 3 of this addendum, all the mitigation measures identified in the Final EIR would be the same and no new mitigation measures or alternatives have been identified that would substantially reduce one or more significant effects on the environment.

CEQA Guidelines Section 15164(a) states that "The lead agency or a responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred."

Discussion: This addendum clarifies details and changes related to the Project that was previously analyzed in the Final EIR for the Tenth Avenue Marine Terminal (TAMT) Redevelopment Plan and Demolition and Initial Rail Component Project. The purpose of the updated Project is to reflect changes to the Demolition and Initial Rail Component based on the final engineering design plans for Phase I. The updated Project has resulted in a larger modular office facility (e.g., 3,600 square feet to 5,000 square feet), an additional support structure approximately 780 square feet in the southern end of the

terminal, a larger support structure in the northern end of the terminal (which increased from 782 square feet to 1,800 square feet), and an updated the water, sewer, and electrical facility improvements. The final engineering design also includes placing the rail track lubrication system in a 50-square foot equipment enclosure and includes a small tank pumping system and some underground piping that were not originally contemplated. No additional impacts are anticipated as a result of changes to this Project. Therefore, this project-level analysis of the proposed changes to the Project is appropriately addressed in this addendum to the Final EIR.

5 CONCLUSION

None of the conditions requiring the preparation of a subsequent EIR pursuant to CEQA Guidelines Section 15162(a) have occurred. As such, pursuant to CEQA Guidelines Section 15164, and based on the rationale presented in Section 3 of this document, the project-level analysis for the updated Demolition and Initial Rail Component Project are appropriately addressed in this addendum to the Final EIR.

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6 REFERENCES

City of San Diego. 2011. *California Environmental Quality Act: Significance Determination Thresholds.* City of San Diego, Development Services Department. January 2011.

Harris and Associated. 2017. *Floodplain Study at the Tenth Avenue Marine Terminal.* San Diego, California, January 17, 2017.

Linscott, Law & Greenspan. 2017. Tenth Avenue Marine Terminal Redevelopment Plan: Transportation Demand Management Plan. San Diego, California, June 2017.

San Diego Unified Port District. 2016. *Final Program Environmental Impact Report for the Tenth Avenue Marine Terminal Redevelopment Plan and Demolition and Initial Rail Component Project.* SCH No. 2015-031046. Prepared by ICF. San Diego, California, December 2016.

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APPENDIX A

Tenth Avenue Marine Terminal Redevelopment Plan: Transportation Demand Management Plan. Linscott, Law & Greenspan. San Diego, CA, June 2017

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June 8, 2017

Mr. Mahmoud Akhavain, P.E.
Harris & Associates
600 B Street, Suite 2000
San Diego, CA 92101

LLG Reference: 3-17-2742

Subject: **Tenth Avenue Marine Terminal Redevelopment Plan: Transportation Demand Management Plan**
San Diego Unified Port District

Dear Mahmoud:

Linscott, Law & Greenspan, Engineers (LLG) is pleased to provide this letter to respond to the requirement to provide a Transportation Demand Management (TDM) plan to address short-term construction impacts identified in the Tenth Avenue Marine Terminal (TAMT) Redevelopment Plan Environmental Impact Report (EIR).

Background
The traffic impact analysis (TIA) prepared for the EIR identified short-term construction related impacts during the AM and PM commuter peak hours at the signalized Norman Scott Road/ 32nd Street/ Wabash Boulevard intersection, located south of the site. Trips affecting this intersection would be primarily oriented to/from Interstate 15, which terminates just to the north of this location. The impact was caused by a combination of construction truck traffic and construction worker traffic. The corresponding mitigation to address this construction-related project impact was to prepare a TDM plan to minimize or avoid some or all construction-related traffic to this location.

Figure A shows the Project location and the impacted intersection under discussion.

Project Impact Review
The TIA concluded that the construction activity would result in significant impacts to both the AM and PM commuter peak hours at the subject intersection based on the trip generation shown in ***Table A.*** This table shows that the analysis assumed 50 inbound and 50 outbound worker trips during the AM and PM peak hours, respectively. These reflect an assumption of one trip per worker (no carpooling), and that all trips would occur in the peak periods between 7:00-9:00 a.m. and 4:00-6:00 p.m.

These worker trips reflect slightly less than half (44%) of the site's total construction peak hour trips, and are considered to be more manageable from a TDM perspective than the truck trips, which are more constrained by hour of day and by prescribed truck routes in the study area. It should also be noted that Project Contract Documents require that truck traffic to/from Interstate 5 use 28th Street. Therefore, the 47% of truck trips to the subject intersection are oriented to/from Interstate 15 (see ***Attachment A*** at the end of this report). Regardless of the route, construction is expected to take 400 days to complete and trucks are expected on only about 20% of these days.

TABLE A
CONSTRUCTION TRIP GENERATION

Use	Units	Daily Trip Ends (ADTs)			AM Peak Hour			PM Peak Hour		
		Vehicle Conversion Rate	Rate	ADT	Volume			Volume		
					Total	In	Out	Total	In	Out
Worker Traffic	50	1	3/Worker	150	50	50	0	50	0	50
Truck Traffic	79	3	2/Truck	474	63	32	31	63	31	32
			Total:	**624**	**113**	**82**	**31**	**113**	**31**	**82**

Source: Chen Ryan, 2016

TIA's are often conducted using broad assumptions that are further refined as a project description becomes more developed. In the case of the construction traffic analysis, worker trips were assumed to occur during the commuter peak hours of 7:00-9:00 a.m. and 4:00-6:00 p.m. The latest project-specific information that LLG has received from the San Diego Unified Port District (SDUPD) relating to construction operations indicates that "*regular construction activities are from 7:00 a.m. to 3:30 p.m.*" (March 2017). While it is acknowledged that construction activities may vary on a phase-by-phase basis, this 8-hour shift (plus 30 minute lunch) is typical of most construction sites. Based on this more refined description, it appears that construction worker traffic would not substantively affect the subject intersection during the commuter peak hours much, if at all. Certainly some workers could arrive or leave late, but the typical shift would avoid the peak hours, indicating construction workers would most likely not contribute to peak hour intersection delays.

Workers would arrive and be ready for work on-site *prior* to the start of the AM peak hour (7:00 a.m.), and would be completed with work and departed from the site *prior* to the start of the PM peak hour (4:00 p.m.). Commercially-available GPS mapping software shows the typical weekday travel time at 3:30 p.m. from the site to the subject intersection as between 9 and 16 minutes, see ***Figure B***. Thus, it is a reasonable assumption that the majority (if not all) of workers would be off-site and clear of the subject intersection in the off-peak half hour between end of shift (3:30 p.m.) and the start of the commuter peak period (4 p.m.). The GPS mapping also routes all freeway-oriented trips to/from the site via the Cesar E. Chavez corridor, given its proximity to the site and prevailing congestion conditions in the vicinity. However, the TIA prepared for the EIR assumed that only 35% of employees would use the Cesar E. Chavez corridor, whereas 30% would use the 32nd Street corridor, and 20% would use the 28th Street corridor. Again, this is a conservative assumption that overstates Project impacts to the subject intersection.

LLG concludes that the analysis: a) likely calculates more total construction worker trips than will occur; b) distributes a larger percentage of construction worker trips to the 32nd Street corridor than may be expected; c) implies that truck trips occur every day during construction and; d) determines impacts based on the addition of overstated employee and truck trips to the peak hour analyses, resulting in the conclusion of construction impacts for which a TDM plan is necessary to mitigate. It is LLG's opinion that with more detailed project-level information that is now available, it is unlikely that construction-related traffic would result in significant impacts requiring mitigation. However, the following recommendations will address the concern 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 the morning and evening peak hours, per mitigation measure TRA-1 that is identified in the Final EIR for the TAMT Redevelopment Plan and Demolition and Initial Rail Component Project.

TDM Recommendations

If the SDUPD concludes that TDM measures are still required or desired, TDM measures should be applied to construction worker trips only, as these trip routes are discretionary and can be readily amended as compared to the construction truck trips, which are constrained by truck route restrictions. LLG offers the following recommendations:

- Standards and specifications for all bidding documents related to the TAMT Demolition and Initial Rail Component Project shall specify that typical construction activities should begin no later than 7:00 AM, and terminate no later than 3:30 PM to allow for workers to arrive and depart before the AM and PM commuter peak periods, respectively. The construction company or companies shall be made aware of this TDM measure, and encouraged to comply accordingly.

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- Upon their orientation at the project site, all employees shall be asked to avoid using the 32nd Street corridor for trips to/from the site. Instead, employees should be encouraged to use Cesar E. Chavez Parkway or 28th Street to access the regional freeway system.

- Upon orientation at the project site, all employees shall be encouraged to consider carpooling to work. Management shall consider providing preferential parking, such as paved parking, shaded parking or proximate parking (such as it may exist) to carpool vehicles to encourage carpool activity.

Please don't hesitate to call me at 858-300-8800 with any questions.

Sincerely,

Linscott, Law & Greenspan, Engineers

Chris Mendiara
Associate Principal

cc: File
Attachments: Figure A, Project Study Area
Figure B, PM Travel Time
Attachment A: "Project Trip Distribution – Trucks" (Chen Ryan TIA)

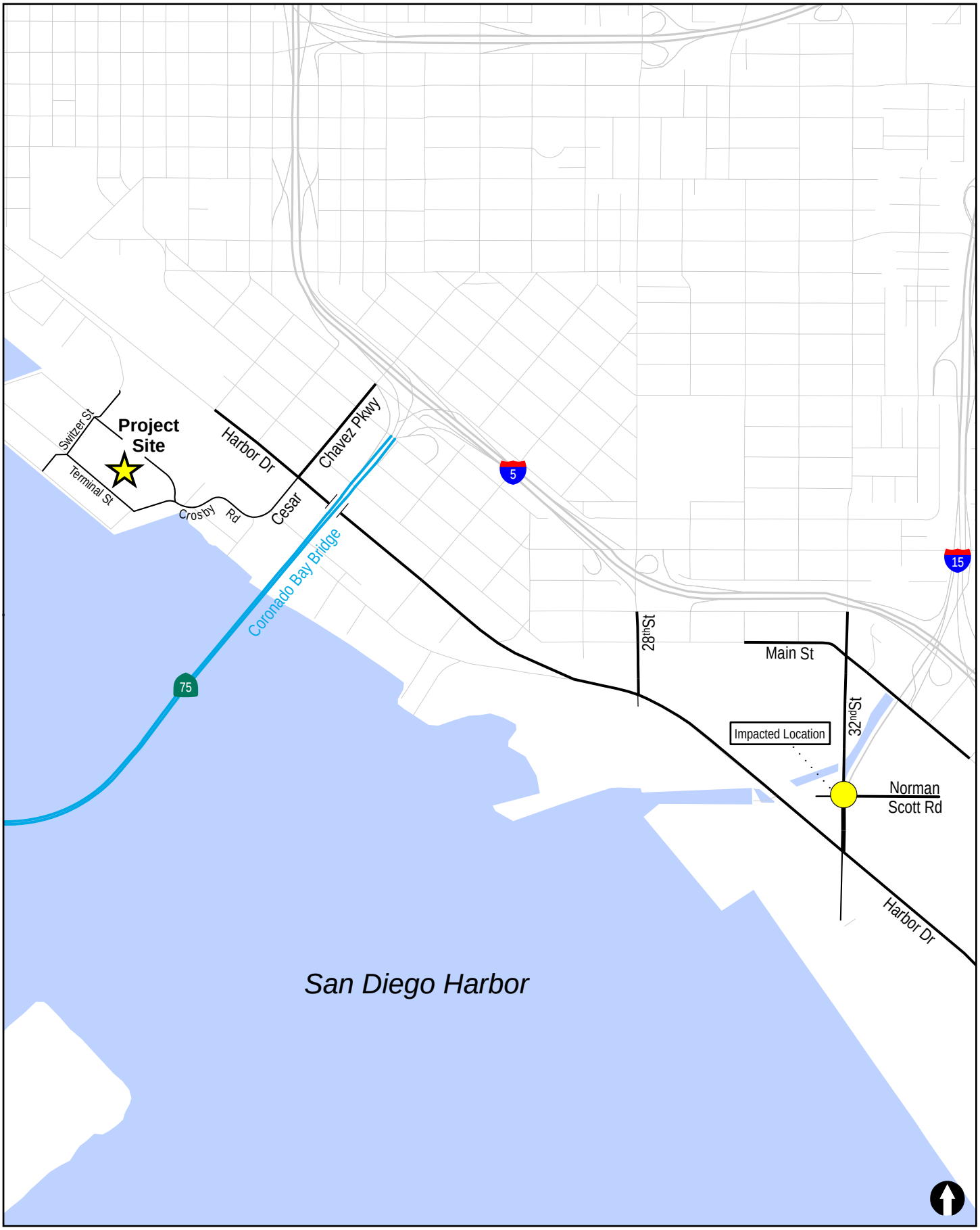

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Figure A

Project Study Area

TAMT Redevelopment Plan

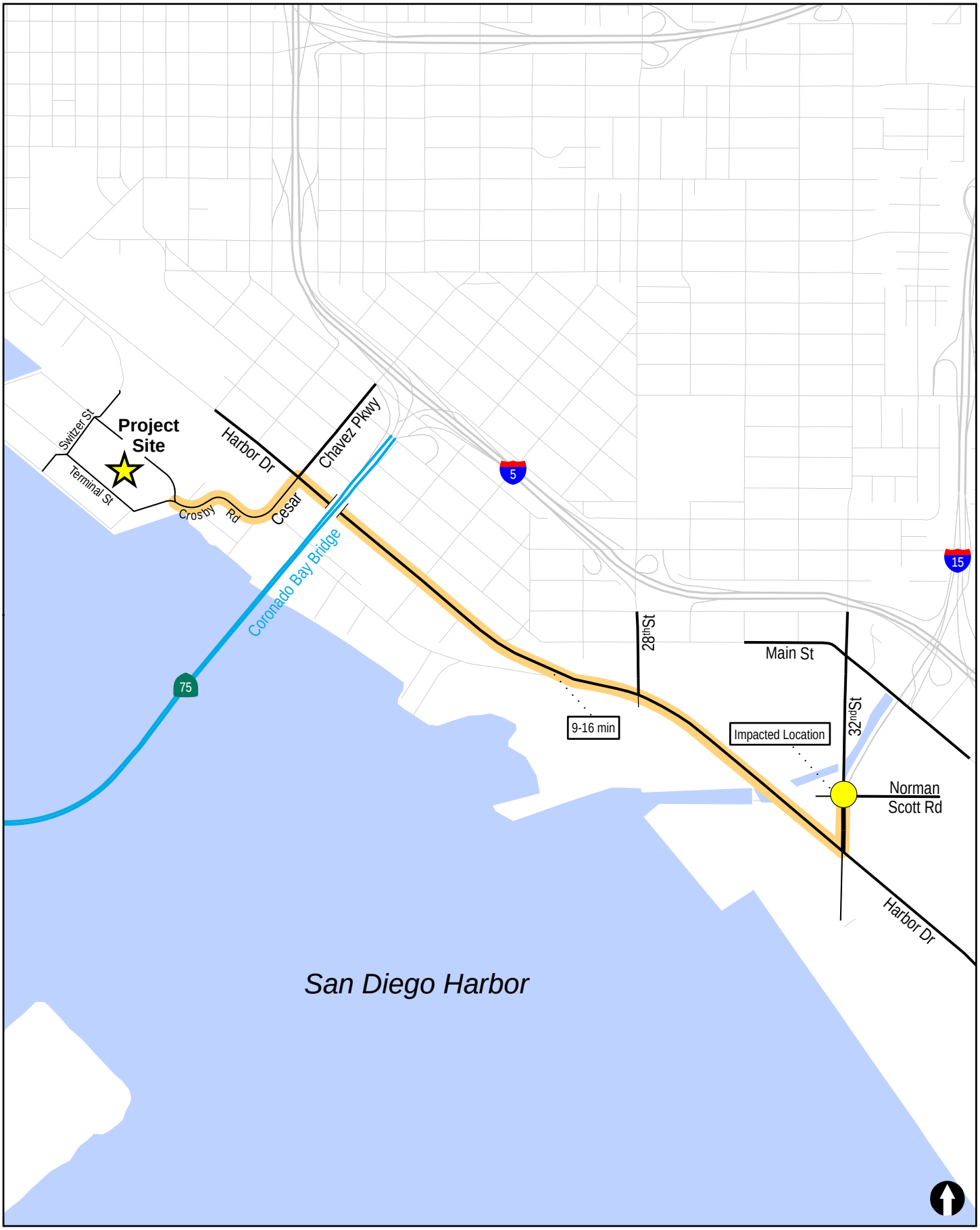

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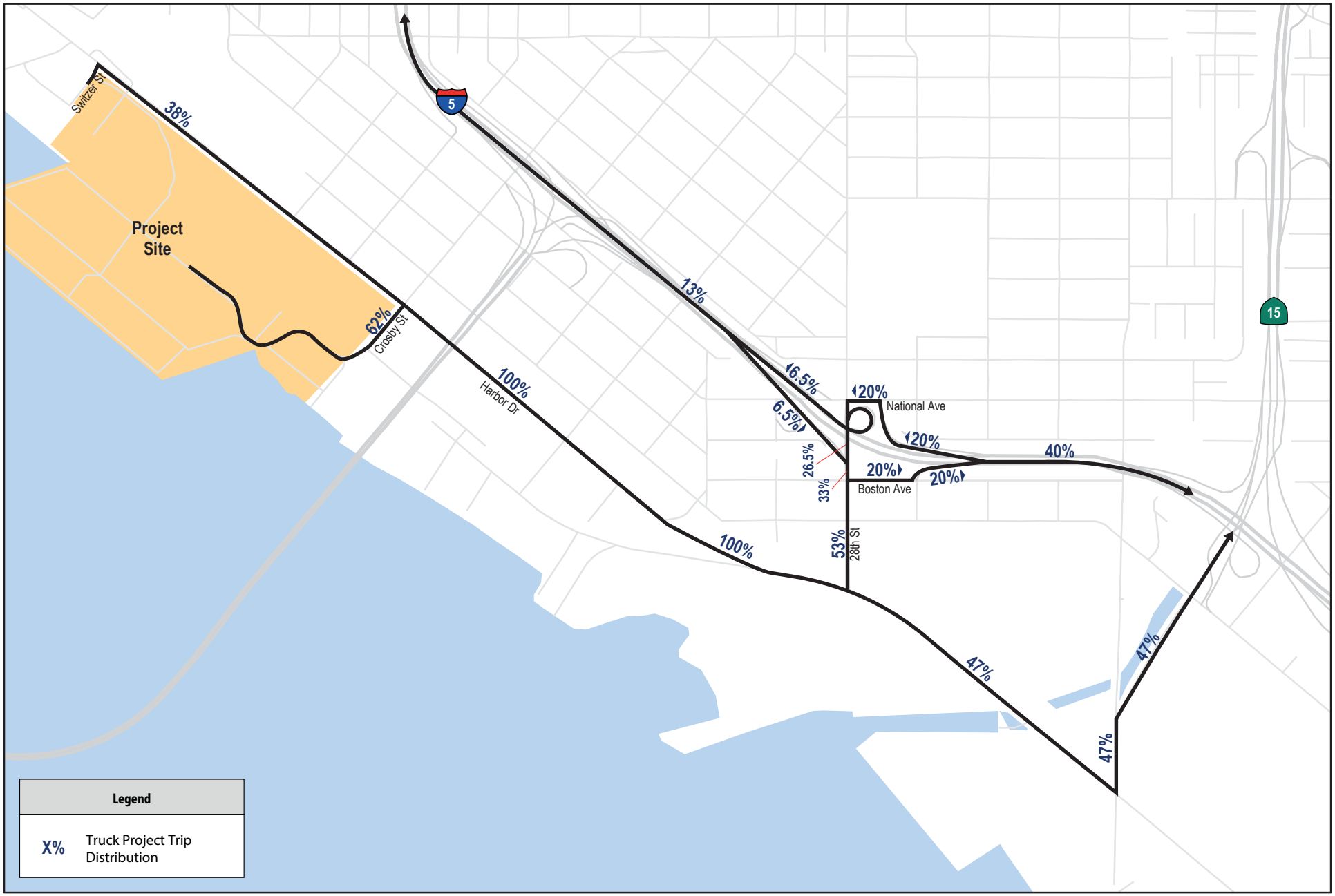
Figure B

PM Travel Time

TAMT Redevelopment Plan



Tenth Avenue Marine Terminal Redevelopment Plan

CHEN RYAN

Figure 3-2B

Project Trip Distribution - Trucks