NOT CERTIFIED; HEARING PENDING

Final Subsequent Environmental Impact Report

Mitsubishi Cement Corporation at Warehouse C

Volume 1 of 2

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Acronyms

AB	Assembly Bill
APCD	Air Pollution Control District
Board	Board of Port Commissioners
CAP	Climate Action Plan
CARB	California Air Resources Board
CDP	Coastal Development Permit
CEQA	California Environmental Quality Act
CERP	Community Emissions Reduction Plan
District	San Diego Unified Port District
DWT	deadweight tonnage
EHC	Environmental Health Coalition
EIR	Draft Environmental Impact Report
GHG	greenhouse gas
I-	Interstate
IS	Initial Study
MCAS	Maritime Clean Air Strategy
Mitsubishi	Mitsubishi Cement Corporation
MMRP	Mitigation and Monitoring Reporting Program
MT/yr	metric tons per year
NOP	Notice of Preparation
Project or Proposed Project	Warehouse C: Bulk Cement Warehouse and Loading Facility Project
SDAPCD	San Diego Air Pollution Control District
SEIR	subsequent environmental impact report
SR	State Route
STC Alternative	Sustainable Terminal Capacity Alternative
TAMT	Tenth Avenue Marine Terminal
TAMT Plan	Tenth Avenue Marine Terminal Redevelopment Program

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1. Introduction

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

The District is the Lead Agency, as defined under California Environmental Quality Act (CEQA) Guidelines Section 15050, because it has principal responsibility for carrying out and approving the Proposed Project. As Lead Agency, the District also has primary responsibility for complying with CEQA.

The District has determined that the Proposed Project falls within the broader scope of the Tenth Avenue Marine Terminal Redevelopment Plan and the associated *Final Environmental Impact Report: Tenth Avenue Marine Terminal Redevelopment Plan and Demolition and Initial Rail Component* (TAMT Final PEIR) certified by the District in December 2016 (UPD #EIR-201539; State Clearinghouse #2015031046; Clerk Document Number 65901). When a program EIR (PEIR) has been prepared, CEQA encourages "tiering" from that EIR when the later project is separate but related (State CEQA Guidelines Section 15152[b]). *Tiering* refers to using the analysis of general matters contained in a broader EIR (e.g., the TAMT Final PEIR) with later EIRs on narrower projects, incorporating by reference the general discussions from the broader EIR, and concentrating the later EIR solely on the issues specific to the later project (State CEQA Guidelines Section 15152[a]). Because the Proposed Project falls within the broader scope of the TAMT Final PEIR, the District prepared a subsequent environmental impact report (SEIR) to evaluate environmental impacts associated with the implementation of the Proposed Project. In accordance with Section 15152 of the State CEQA Guidelines, this SEIR tiers from the TAMT Final PEIR, focusing on effects that were not examined in the TAMT Final PEIR; analyzes whether there are any new or more severe significant effects as compared to those identified in the TAMT Final PEIR; and identifies new mitigation measures or alternatives that could potentially lessen significant effects of the Proposed Project.

This introductory chapter provides (1) the Project overview, (2) the process for certification of the Final SEIR, and (3) the contents and organization of the Final SEIR.

1.1 Project Overview

1.1.1 TAMT Redevelopment Plan

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

On December 13, 2016, the Board of Port Commissioners (Board) certified the TAMT Final PEIR by Resolution No. 2016-199 and adopted the Sustainable Terminal Capacity Alternative (STC Alternative), a reduced project alternative for the terminal buildout and operations that was analyzed in the TAMT Final

PEIR) by Resolution No. 2016-200. Table 1-1 provides the throughput quantities for the STC Alternative that were analyzed and adopted in the TAMT Final PEIR.

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

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

MT/yr = metric tons per year

Since the certification of the TAMT Final PEIR, the Board has adopted two CEQA Addenda to the TAMT Final PEIR. In July 2017, the Board approved the1st Addendum to the TAMT Final PEIR by Resolution No. 2017-100 (SCH #2015031046; Clerk Document No. 67004), which addressed minor modifications based on the final engineering design of the Demolition and Initial Rail Component. The modifications included larger on-terminal office facilities, elimination of a potential third airbrake system from the project, and additional quantities of soil excavation, as well as the addition of project-specific details for stormwater and conduit/electrical improvements programmatically identified in the TAMT Final PEIR. In April 2018, the Board approved a 2nd Addendum to the TAMT Final PEIR by Resolution No. 2018-061 (SCH # 2015031046; Clerk Document No. 68288) to implement and install a renewable microgrid to satisfy a portion of TAMT Final PEIR Mitigation Measure MM-GHG-6.

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

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

1.1.2 Proposed Project

The Proposed Project would entail the construction and operation of a cement and cementitious material import, storage, and distribution facility within the TAMT. This facility would include the potential for two separate phases of improvements to Bays C-7 through C-10 of Warehouse C for the receipt, storage, and distribution of up to 600,000 metric tons per year (MT/yr) of cement and cementitious materials including, but not limited to, cement, slag, fly ash, and pozzolans. The cementitious material would be pneumatically[1] unloaded into Warehouse C from dry bulk cargo ships using mobile vacuum unloaders. There would be up to 24 vessel calls per year at Berths 10-7/10-8 during peak operation. The operational lifetime of the Proposed Project is anticipated to be 15 years following District approval of a lease or similarly binding agreement. The proposed term of that agreement would be 5 years with two 5-year options to extend, for a maximum total of 15 years. Approval of the Proposed Project would also require issuance of a non-appealable CDP by the District prior to development and operation. Chapter 3, *Project Description*, provides a detailed description of construction and operation of the Proposed Project.

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

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

The Proposed Project differs from the dry bulk project component analyzed in the TAMT Final PEIR in that it includes dry bulk operations for a maximum of 15 years at Warehouse C, which is proposed to be demolished to make way for a multipurpose general cargo area under the TAMT Final PEIR. The TAMT Final PEIR identified a consolidated dry bulk operating node that will be located on approximately 15 acres in the southeastern portion of the TAMT (known as the terminal "backlands"). However, like the Proposed Project, the TAMT Final PEIR assumed the dry bulk node would be served primarily by Berths 10-7/10-8. The TAMT Final PEIR analyzed dry bulk node improvements including construction of a consolidated multipurpose dry bulk facility with two cement terminals and a new semi-permanent storage facility (up to a 100,000-square-foot horizontal structure and/or an equivalent vertical storage facility) to store dry bulk products; the Proposed Project's upgrades to Warehouse C would serve this same purpose at a slightly different location, require less new infrastructure, and leave the possibility of demolishing Warehouse C to a later time after the lease's expiration or termination. Over the long-term, however, the dry bulk operating node is still planned to be located in a consolidated facility on "backlands" of the TAMT.

1.2 Certification of the Final SEIR

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

- The Final SEIR has been completed in compliance with CEQA;
- The Final SEIR was presented to the decision-making body of the Lead Agency, and the decision-making body reviewed and considered the information contained in the Final SEIR prior to approving the Project; and
- The Final SEIR reflects the Lead Agency's independent judgment and analysis.

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

1.3 Contents and Organization of the Final SEIR

The content and format of this Final SEIR are designed to meet the requirements of CEQA; the State CEQA Guidelines, Article 9, specifically State CEQA Guidelines Section 15132; and the District's Guidelines for Compliance with CEQA (Resolution 97-191). Table 1-2 summarizes the organization and content of the Final SEIR.

The Draft SEIR that was previously circulated for public review is an integral part of the Final SEIR, and both documents are intended to be used together. The Draft SEIR was not reprinted; however, a copy of the Draft SEIR and its appendices is available at the District Clerk office at 3165 Pacific Highway, San Diego, CA 92101, during regular business hours, which are Monday through Friday, 8 a.m. to 5 p.m. An electronic copy of the Draft SEIR and appendices is also available at the District's website: https://www.portofsandiego.org/public-records/port-updates/notices-disclosures/ceqa-documents.

Table 1-2. Document Organization and CEQA Requirements

Location	Contents
VOLUME 1	
Chapter 1 *Introduction*	Provides background on the Proposed Project, the requirements for a Final SEIR and other related documents, and the organization of the Final SEIR.
Chapter 2 *Executive Summary*	Briefly summarizes the Proposed Project; identifies each significant effect, with proposed mitigation measures and alternatives that would reduce or avoid that effect; identifies the areas of controversy known to the Lead Agency, including issues raised by agencies and the public; and summarizes the issues to be resolved, including the choice among alternatives and how to mitigate the significant effects (State CEQA Guidelines Section 15123).
Chapter 3 *Project Description*	Contains both a map of the precise location and boundaries of the Proposed Project and its location relative to the region; lists the Proposed Project's central objectives, underlying purpose, and benefits; and provides a detailed description of the Proposed Project's technical, economic, and environmental characteristics (State CEQA Guidelines Section 15124(a), (b), and (c)).
Chapter 4 *Errata and Revisions*	Includes the revisions to the Draft SEIR and its technical appendices (where appropriate), which were prepared in response to comments received during the public review period for the Draft SEIR (State CEQA Guidelines Section 15132).
Chapter 5 *Comments Received and District Responses*	Includes a list of agencies, organizations, and individuals that provided comments on the Draft SEIR during the public review period. Each comment is assigned a comment number, which corresponds to a response (State CEQA Guidelines Section 15132).
Attachment 1 *Mitigation Monitoring and Reporting Program*	The Mitigation Monitoring and Reporting Program (MMRP) for the Project is included as a chapter of the Final SEIR. The MMRP is presented in table format and identifies mitigation measures for the Proposed Project, the party responsible for implementing the mitigation measures, the timing of implementing the mitigation measures, and the monitoring and reporting procedures for each mitigation measure (State CEQA Guidelines Section 15097).
VOLUME 2	
Draft SEIR and Draft SEIR Technical Appendices	Volume 2 of the Final SEIR contains the Draft SEIR (Volume I of II of the Draft SEIR) and Appendices A through G of the Draft SEIR (Volume II of II of the Draft SEIR) that were previously circulated for public review. The Draft SEIR contains all the contents described within CEQA, the State CEQA Guidelines, Article 9, and the District's Guidelines for Compliance with CEQA. The technical appendices include additional background information and technical detail for several of the resource areas, as well as the Initial Study/Notice of Preparation and any comments received during the scoping process. The Draft SEIR and technical appendices to the Draft SEIR are included on the enclosed CD, as Volume 2 of the Final SEIR. A hard copy is available at the District Clerk's office.
Under Separate Cover	
Findings of Fact and Statement of Overriding Considerations	Provides findings on each significant impact and alternative, accompanied by a brief explanation of the rationale for each finding. The findings are supported by substantial evidence in the administrative record (State CEQA Guidelines Section 15091). The statement of overriding considerations provides a written statement related to balancing, as applicable, the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable environmental risks when determining whether to approve the project (State CEQA Guidelines Section 15093).

2. Executive Summary

2.1 Project Overview

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

The District has determined that the Proposed Project falls within the broader scope of the Tenth Avenue Marine Terminal Redevelopment Program (TAMT Plan) and the associated *Final Environmental Impact Report: Tenth Avenue Marine Terminal Redevelopment Plan and Demolition and Initial Rail Component* (TAMT Final PEIR; ICF 2016) certified by the Board of Port Commissioners (Board) in December 2016 (UPD #EIR-2015-39; State Clearinghouse # 2015031046; Clerk Document Number 65901). The Sustainable Terminal Capacity Alternative (STC Alternative), a reduced project alternative for the terminal buildout and operations that was analyzed in the TAMT Final PEIR, was selected as the preferred alternative and adopted by the Board by Resolution No. 2016-200. In accordance with State CEQA Guidelines Section 15152, this SEIR tiers from the TAMT Final PEIR, focusing on effects that were not examined in the TAMT Final PEIR; analyzes whether there are any new or more severe significant effects as compared to those identified in the TAMT Final PEIR; and identifies new mitigation measures or alternatives that could potentially lessen significant effects of the Proposed Project. Therefore, the District prepared this SEIR to evaluate environmental impacts associated with the implementation of the Proposed Project.

2.2 Project Location

The Proposed Project site is located at 645 Switzer Street within the District's TAMT. The TAMT is located along San Diego Bay, south of downtown San Diego, east of the San Diego Convention Center and the Hilton San Diego Bayfront Hotel, and adjacent to the San Diego community of Barrio Logan. Harbor Drive is located near the northern boundary of the TAMT. Site access from Harbor Drive is provided primarily from Cesar E. Chavez Parkway, which becomes Crosby Road as it approaches the TAMT. Major circulation facilities in the area include State Route (SR) 75, also known as the Coronado Bridge, approximately 0.25 mile to the south, and Interstate (I-) 5, approximately 0.5 mile to the north. Figure 2-1 provides a regional map of the Proposed Project's location. Figure 2-2 provides an aerial view of the Proposed Project site.

The Project site is within the TAMT and includes Bays C-7 through C-10, which are located on the western end of Warehouse C. Bays C-7 and C-9 are currently vacant, while Bays C-8 and C-10 are currently occupied by a District tenant and used for the storage of bauxite. The bauxite tenant will either vacate the premises or relocate elsewhere on the terminal at the time Mitsubishi takes control of Bays C-8 and C-10. The Project site also encompasses Berths 10-7/10-8. These two berths face south, have 650 feet of space, and have a depth of 36 to 42 feet. Figure 2-3 provides the existing site layout.

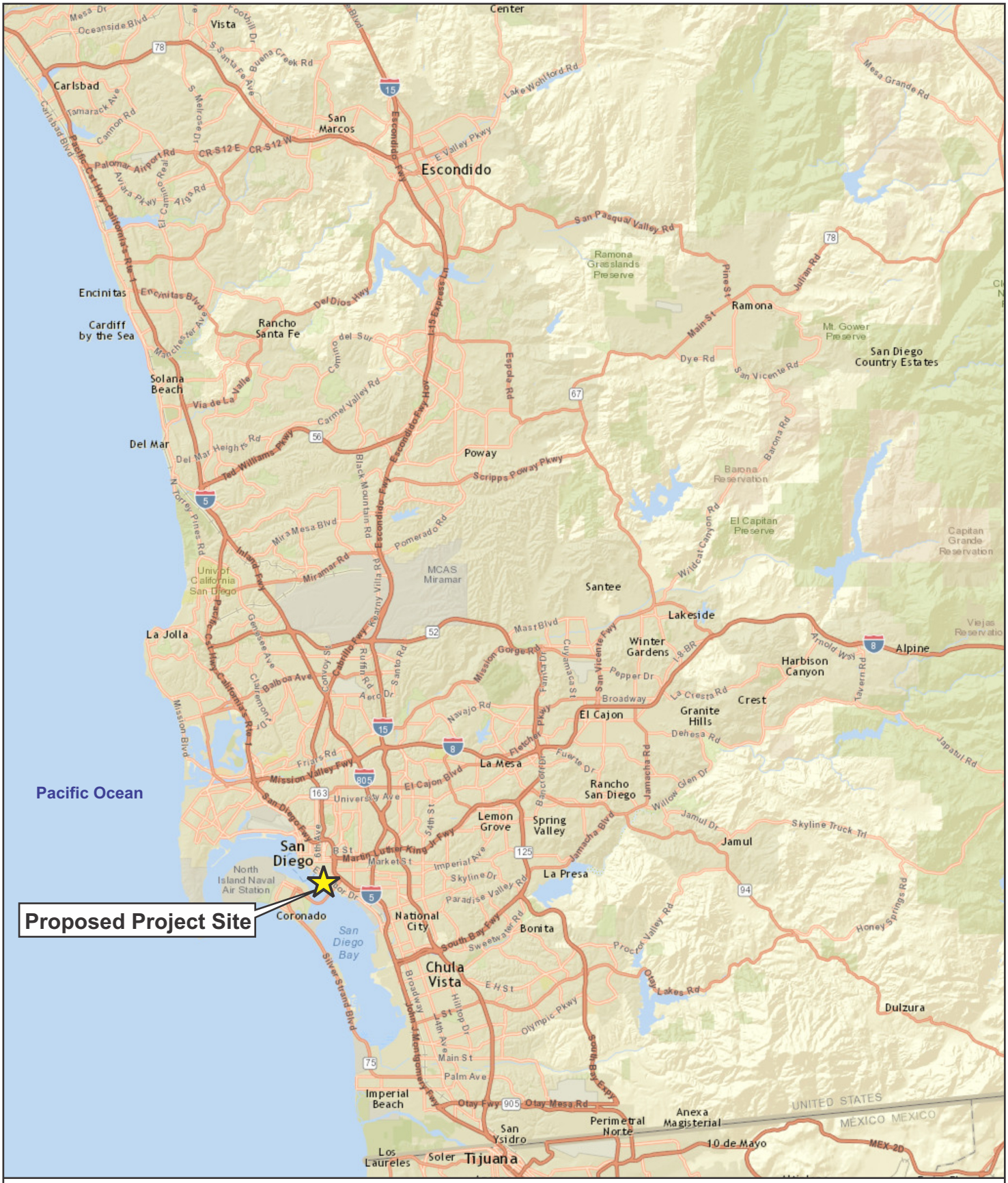
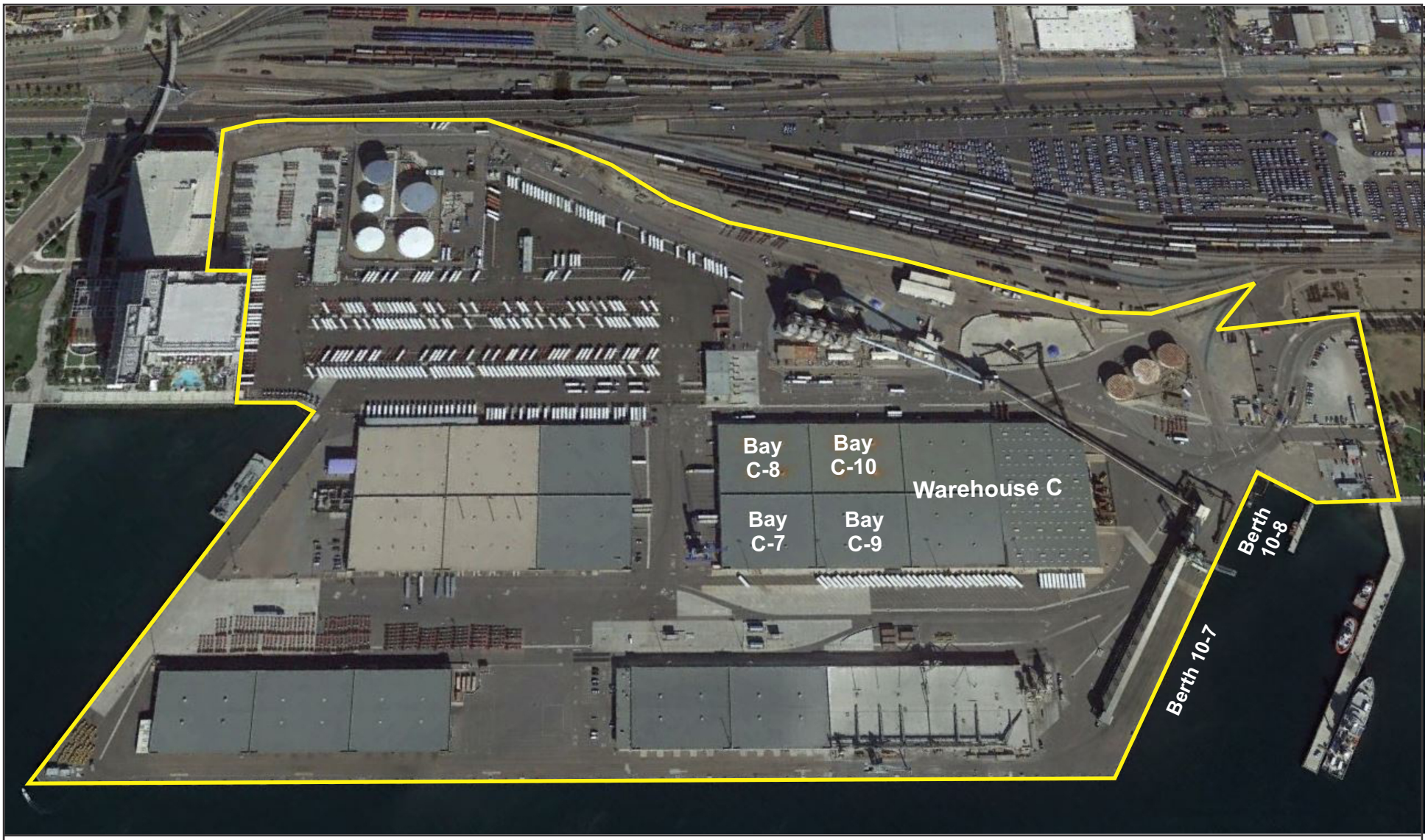


Figure 2-1

Regional Map



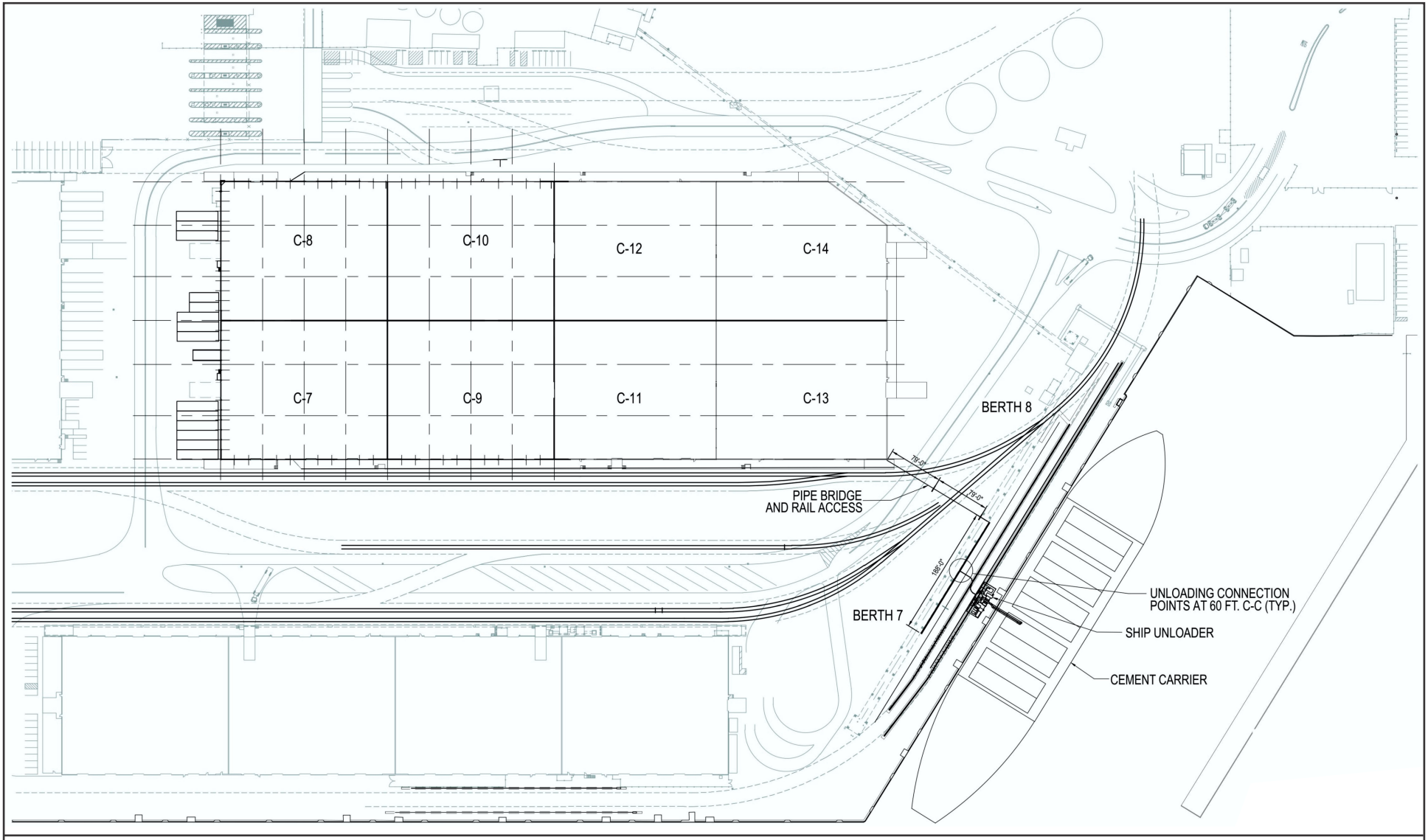
Source: GoogleEarth, 2017.

Tenth Avenue Marine Terminal Boundary

0 250 500 1,000 Feet

Figure 2-2

Aerial View of Project Site



Source: Environmental Audit, Inc. 2017

0 120 240 480 Feet

Figure 2-3

Existing Site Layout

2.3 Project Objectives

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

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

2.4 Project Components

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

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

The Proposed Project differs from the dry bulk project component analyzed in the TAMT Final PEIR in that it includes dry bulk operations for a maximum of 15 years at Warehouse C, which is proposed to be demolished to make way for a multipurpose general cargo area under the TAMT Final PEIR. The TAMT Final PEIR identified a consolidated dry bulk operating node that will be located on approximately 15 acres in the southeastern portion of the TAMT (known as the terminal "backlands"). However, like the Proposed Project, the TAMT Final PEIR assumed the dry bulk node would be served primarily by Berths 10-7/10-8.

The TAMT Final PEIR analyzed dry bulk node improvements including construction of a consolidated multipurpose dry bulk facility with two cement terminals and a new semi-permanent storage facility (up to a 100,000-square-foot horizontal structure and/or an equivalent vertical storage facility) to store dry bulk products; the Proposed Project's upgrades to Warehouse C would serve this same purpose at a slightly different location and would require less new infrastructure and leave the possibility of demolishing Warehouse C to a later time, possibly after the lease's expiration or termination. Over the long-term, however, the dry bulk operating node is still planned to be located in a consolidated facility on "backlands" of the TAMT.

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

2.5 Project Alternatives

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

2.5.1 Alternative 1 – No Project Alternative

Analysis of the No Project Alternative (Alternative 1) considers the potential impacts that would occur if the Proposed Project was not implemented. The No Project Alternative assumes that no Project-related development would occur and none of the Project's other components would be implemented. Under the No Project Alternative, the District would maintain existing conditions at the Project site, which is currently used for dry bulk handling and consists of dry bulk and equipment storage and two clerk shacks. Bays C-7 and C-9 of Warehouse C are currently vacant, while Bays C-8 and C-10 are currently occupied by a District tenant and used for the storage of bauxite. The existing Warehouse C facilities would be left intact under this alternative. No new development or upgrades to dry bulk cargo handling equipment would be implemented on this portion of the TAMT, and operations would continue under the existing physical conditions at the site. Similar to what was described for the No Project/No Build Alternative in the TAMT Final PEIR (TAMT Final PEIR page 7-7), growth at the project site would occur in an ad hoc manner, and due to the existing capacity constraints, the maximum annual dry bulk cargo throughput would only reach approximately 400,000 million metric tons, as identified in Table 7-2 of the TAMT Final PEIR. Because no physical modifications would occur at the terminal, the No Project Alternative would potentially reduce one or more significant impacts that were identified for the Proposed Project—impacts which are consistent with those disclosed in the certified TAMT Final PEIR.

2.5.2 Alternative 2 – Reduced Throughput Alternative

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

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

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

2.5.3 Environmentally Superior Alternative

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

2.6 Impact Summary

In accordance with CEQA, Table 2-1 summarizes all potential impacts associated with the Proposed Project, and the recommended mitigation measures to reduce significant impacts to a level of less than significant, where applicable.

Table 2-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
4.1 Air Quality and Health Risk				
Project Impacts				
Violate an Air Quality Standard	No New or More Severe Impacts than Previously Identified in the TAMT Final PEIR	PS	**MM-AQ-1R: Implement Best Management Practices During Construction of Future TAMT Plan Components.** The Mitsubishi Cement Corporation Project Proponent shall implement Best Management Practices (BMPs) to reduce air emissions from all construction activities implemented as part of the Proposed Project. The following measures are required to limit construction equipment exhaust from on-road trucks and heavy-duty equipment used during construction. ▪ Ensure that all off-road diesel-powered equipment used during construction between 2020 and 2025 is equipped with the U.S. Environmental Protection Agency (EPA) Tier 3 or cleaner engines, except for specialized construction equipment for which an EPA Tier 3 engine is not available. ▪ Ensure that all off-road diesel-powered equipment used during construction beyond 2025 is equipped with the EPA Tier 4 Final or cleaner engines, except for specialized construction equipment for which an EPA Tier 4 Final engine is not available. ▪ Maintain all construction vehicles and equipment according to manufacturers' specifications. ▪ Restrict idling of construction vehicles and equipment to a maximum of 3 minutes when not in use (see MM-AQ-2 for definition of "not in use"). In addition, the Mitsubishi Cement Corporation Project Proponent shall implement the relevant BMPs, consistent with the Project-specific industrial Storm Water Pollution Prevention Plan (SWPPP). In no case would any BMP be implemented if it conflicts with the SWPPP or other applicable water quality permit requirements. BMP dust control measures may include, but are not limited to, the following: ▪ Water the grading areas at least twice daily to minimize fugitive dust.	LS

Table 2-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			▪ Stabilize graded areas as quickly as possible to minimize fugitive dust. ▪ Apply chemical stabilizer or pave the last 100 feet of internal travel path within the construction site prior to public road entry. ▪ Install wheel washers adjacent to a paved apron prior to vehicle entry on public roads. ▪ Remove any visible track-out into traveled public streets within 30 minutes of occurrence. ▪ Wet wash the construction access point at the end of each workday if any vehicle travel on unpaved surfaces has occurred. ▪ Provide sufficient perimeter erosion control to prevent washout of silty material onto public roads. ▪ Cover haul trucks or maintain at least 12 inches of freeboard to reduce blow-off during hauling. ▪ Suspend all soil disturbance and travel on unpaved surfaces if winds exceed 25 mph. ▪ Cover/water onsite stockpiles of excavated material. ▪ Enforce a 15 mph speed limit on unpaved surfaces. ▪ On dry days, sweep up any dirt and debris spilled onto paved surfaces immediately to reduce re-suspension of particulate matter caused by vehicle movement. Clean approach routes to construction sites daily for construction-related dirt in dry weather. ▪ Develop as quickly as possible all disturbed areas as directed by the San Diego Unified Port District's Planning and Green Port Department and/or SDAPCD to reduce dust generation. ▪ Limit the daily grading volumes/area. Prior to the commencement of construction activities, the Mitsubishi Cement Corporation Project Proponent shall submit evidence to the San Diego Unified Port District's Planning and Green Port Department of compliance with the BMPs and that construction equipment is maintained and properly tuned in accordance with manufacturers' specifications, which shall be	

Table 2-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			subject to confirmation by the San Diego Unified Port District's Planning and Green Port Department during construction. **MM-AQ-2R: Implement Diesel Emission-Reduction Measures During Construction and Operations of Future TAMT Plan Components.** The Mitsubishi Cement Corporation Project Proponent shall implement the following measures during construction and project operations, subject to verification by the San Diego Unified Port District's Planning and Green Port Department. i. The Mitsubishi Cement Corporation Project Proponent shall limit all construction and operations equipment, drayage, and delivery truck idling times by shutting down equipment when not in use and reducing the maximum idling time to less than 3 minutes. Clear signage regarding the limitation on idling time at the delivery driveway and loading areas has been installed on terminal to provide actual notice of this requirement to all drivers. This measure shall be enforced by the terminal supervisors or by a Port designated functional-equivalent, who will submit quarterly reports of violators to San Diego Unified Port District's Planning and Green Port Department and repeat violators shall be subject to penalties pursuant to California airborne toxics control measure 13 California Code of Regulations Section 2485. The Project Proponent shall submit evidence of the use of diesel emission reduction measures to the San Diego Unified Port District's Planning and Green Port Department through annual reporting, with the first report due 1 year from the date of project completion and each report due exactly 1 year after, noting all violations with relevant identifying information of the vehicles and drivers in violation of these measures. ii. The Mitsubishi Cement Corporation Project Proponent shall verify that all construction and operations equipment is maintained and properly tuned in accordance with manufacturers' specifications. Prior to the commencement of construction and operations activities using diesel-powered vehicles or equipment, the Mitsubishi Cement Corporation Project Proponent shall verify that all vehicles and equipment have been checked by a mechanic experienced with such equipment and determined to be running in proper condition prior to admittance into any terminal leasehold. The Mitsubishi	

Table 2-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			Cement Corporation Project Proponent shall submit a report by the mechanic of the condition of the construction and operations vehicles and equipment to the San Diego Unified Port District's Engineering Department during the construction phase and the Planning and Green Port Department during the operation phase prior to commencement of their use. **MM-AQ-3R: Comply with San Diego Unified Port District Climate Action Plan Measures.** Prior to approval of all discretionary actions and/or Coastal Development Permits, the Mitsubishi Cement Corporation Project Proponent shall be required to implement the following measures to be consistent with the Climate Action Plan. ▪ Vessels shall comply with the San Diego Unified Port District's voluntary vessel speed reduction program, which targets 80 percent compliance. ▪ Vessels that are subject to CARB's at-berth regulation (dry bulk vessels are not subject to the at-berth regulation) shall comply with ARB's at berth regulation that requires shore power or alternative control technology regulation for certain vessel fleets for 80 percent of eligible calls by 2020, minus idle time to clear customs consistent with California Air Resources Board regulations. The TAMT Final PEIR assumed 1.5 hours of idle time for vessels to embark/disembark, which applies to all shore power and/or alternative control technologies employed at the terminal. This is a Project feature made into a mitigation measure to ensure compliance (see MM-AQ-9 for an explanation of the Proposed Project's shore power features). ▪ Designated truck haul routes shall be used, and the Project Proponent shall decrease onsite movements where practicable. ▪ No commercial drive-through shall be implemented. ▪ Compliance with Assembly Bill 939 and the City of San Diego's Recycling Ordinance shall be mandatory and shall include recycling at least 50 percent of solid waste; compliance with the City of San Diego's Construction and Demolition Debris Deposit Ordinance shall be mandatory and shall include recycling at least 65 percent of all	

Table 2-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			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 San Diego Unified Port District's Planning and Green Port Department by the Project Proponent on an annual basis through the end of the lease or 2035 (buildout of the TAMT Plan), whichever occurs first. **MM-AQ-4R: Implement Best Available Control Technologies for Conveyor System and Bulk Discharge Unloader for Future Dry Bulk Operations associated with the TAMT Plan.** As a condition of approval of any new or amended real estate agreement or Coastal Development Permit for the Mitsubishi Cement Corporation Project that would result in an increase in daily or annual throughput over baseline conditions identified in the TAMT Final PEIR, the San Diego Unified Port District shall require the Mitsubishi Cement Corporation Project Proponent to install and use the best available control technologies to achieve a minimum 95% control efficiency for particulate matter by bypassing the existing Conveyor System and Bulk Discharge Unloader and installing a new Conveyor System and Bulk Discharge Unloader that meets the minimum 95% control efficiency. Under no circumstance shall the Project Proponent seeking discretionary approval for dry bulk operations be allowed to increase daily or annual throughput of dry bulk operations without first completing the upgrade or replacement of the existing system, or installation of a new system required above. The recipient of a discretionary approval by the San Diego Unified Port District subject to this mitigation measure shall provide written evidence of implementation and compliance	

Table 2-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			with this mitigation measure to the San Diego Unified Port District on an annual basis through the end of the lease. **MM-AQ-5R: Implement Enhanced Vessel Speed Reduction Program Beyond Climate Action Plan Compliance for Future Operations Associated with the TAMT Plan.** The Mitsubishi Cement Corporation shall be required to comply with the Enhanced VSR Program. The Mitsubishi Cement Corporation shall, beginning with the first vessel call to the Port, comply with 80% of its OGVs reducing their speeds to 12 knots or less starting at 20 nautical miles from Point Loma. The Mitsubishi Cement Corporation shall comply with 90% of its OGVs calling to the Port, reduce their speeds to 12 knots starting at 40 nautical miles from Point Loma upon the occurrence of the earlier of either of the following two scenarios: ▪ Prior to the annual number of dry bulk vessel calls reach 91 calls annually (e.g., 76 new calls over the TAMT Final PEIR's baseline condition); or ▪ Beginning January 1, 2030, irrespective of the number of calls on an annual basis. To help the District implement the Beyond 2013 CAP VSR Program before reaching 91 dry bulk vessel calls annually, Mitsubishi Cement Corporation shall provide the District with a rolling estimate of anticipated vessels calls every 6 months. The San Diego Unified Port District will verify compliance through analysis of Automatic Identification System data or by requesting a vessel's Electronic Chart Display Identification System log from the captain. **MM-AQ-6: Electric Cargo Handling Equipment Upgrades.** This measure has multiple steps for compliance, as specified below. A. Prior to January 1, 2020, the San Diego Unified Port District shall ensure that at least three pieces of existing non-electric cargo handling equipment at the terminal are replaced by electric cargo handling equipment, none of which were previously operating at the terminal during the 2013/2014 baseline year of the EIR analysis. Possible ways	

Table 2-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			the electric cargo handling equipment may be obtained include, but are not limited to, the following: 1. Purchased, leased, or otherwise acquired, in whole or in part, through funding provided to a tenant by the San Diego Unified Port District; 2. Purchased, leased, or otherwise acquired, in whole or in part, through funding provided to a tenant by other sources; or 3. Purchased, leased, or otherwise acquired, in whole or in part, by the tenant in compliance with a condition of a discretionary approval issued by the San Diego Unified Port District. Written evidence of the acquisition of the electric cargo handling equipment and the equipment it will replace and remove from further operation at the terminal must be provided to the San Diego Unified Port District. The San Diego Unified Port District shall further ensure that the electric cargo handling equipment is in use at each of the three nodes throughout the expected operating life. This will be accomplished by requiring each tenant that employs electric cargo handling equipment pursuant to this measure to report the equipment's annual number of hours of operation to the San Diego Unified Port District and by requiring the San Diego Unified Port District to monitor use of the electric cargo handling equipment as part of the San Diego Unified Port District's TAMT equipment inventory. B. Prior to January 1, 2025, the San Diego Unified Port District also shall ensure that no fewer than 20 non-electric yard trucks in operation are replaced at the TAMT by 20 electric yard trucks. Possible ways the electric yard trucks may be obtained include, but are not limited to, the following: 1. Purchased, leased, or otherwise acquired, in whole or in part, through funding provided to a tenant by the San Diego Unified Port District; 2. Purchased, leased, or otherwise acquired, in whole or in part, through funding provided to a tenant by other sources; or	

Table 2-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			3. Purchased, leased, or otherwise acquired, in whole or in part, by the tenant in compliance with a condition of a discretionary approval issued by the San Diego Unified Port District. Written evidence of the acquisition of the electric yard trucks, and the non-electric yard trucks they will replace and remove from further operation at the terminal, must be provided to the San Diego Unified Port District. The San Diego Unified Port District shall further ensure that the electric yard trucks are in use at the TAMT throughout the expected operating life of the equipment. Each tenant that employs electric trucks pursuant to this measure shall report the equipment's annual number of hours of operation to the San Diego Unified Port District, and the San Diego Unified Port District shall monitor use of the electric trucks as part of the San Diego Unified Port District's TAMT equipment inventory. C. Prior to January 1, 2030, the San Diego Unified Port District also shall ensure that no fewer than three existing non-electric reach stackers and ten non-electric forklifts in operation are replaced at the TAMT by three fully electric reach stackers and ten fully electric forklifts. Possible ways the electric reach stackers and forklifts may be obtained include, but are not limited to: 1. Purchased, leased, or acquired, in whole or in part, through funding provided to the tenant by the San Diego Unified Port District; 2. Purchased, leased, or acquired, in whole or in part, through funding provided to the tenant by other sources; or 3. Purchased, leased, or otherwise acquired, in whole or in part, by the tenant in compliance with a condition of a discretionary approval issued by the San Diego Unified Port District. Written evidence of the acquisition of the three electric reach stackers and ten electric forklifts and the conventional equipment they will replace and remove from further operation at the terminal must be provided to the San Diego Unified Port District. The San Diego Unified Port	

Table 2-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			District shall further ensure that the electric reach stackers and forklifts are in use at the TAMT throughout the expected operating life of the equipment. Each tenant that employs electric reach stackers or electric forklifts pursuant to this measure shall report the equipment's annual number of hours of operation to the San Diego Unified Port District, and the San Diego Unified Port District shall monitor use of the electric reach stackers and forklifts as part of the San Diego Unified Port District's TAMT equipment inventory. D. The electric equipment employed pursuant to paragraphs A, B, and C of this mitigation measure may be replaced by other technologies or other types of cargo handling equipment as long as the replacement equipment achieves the same or greater criteria pollutant, toxic air contaminant, and greenhouse gas emission reductions as compared to the equipment required by paragraphs A, B, and C of this mitigation measure.	
			MM-AQ-7R: Annual Inventory Submittal and Periodic Technology Review. The Mitsubishi Cement Corporation shall comply with the District's Annual Inventory and Periodic Technology Review Program by (1) providing an inventory of all the mobile equipment associated with their TAMT site operations that generate criteria pollutants, toxic air contaminants, and greenhouse gases on an annual basis to be submitted by January 30 of each year of operations, and (2) working collaboratively with District staff and/or the local air pollution control district to identify new technologies or other practices that can be incorporated into their operations that help reduce emissions and improve air quality. The Mitsubishi Cement Corporation shall complete the District's equipment inventory spreadsheet annually, which requires tenants to identify the year, make, VIN/ID number, fuel type, and model of the equipment that was used in the previous year, including annual hours of operation for each piece of equipment, including but not limited to heavy-duty drayage and non-drayage trucks, yard equipment, assist and ocean-going tugs, ocean-going vessels, bulk material handling equipment, and any other type of cargo handling equipment. The purpose	

Table 2-1. Project Impacts and Mitigation Measures

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

Table 2-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			Air Resources Board's (CARB's) At-Berth Regulation, Title 17, CCR Section 93118.3, subsection (c)(14)], prevents Mitsubishi Cement Corporation from achieving the required annual average shore-to-ship power rate (equal to or greater than 50 percent), Mitsubishi Cement Corporation may demonstrate compliance over a 2-year period, so long as Mitsubishi Cement Corporation submits documentation to the San Diego Unified Port District's Planning and Green Port Department which describes the emergency event(s) and explains the basis for Mitsubishi Cement Corporation's inability to demonstrate compliance using an annual average. The San Diego Unified Port District's Planning and Green Port Department shall review the documentation submitted by the Mitsubishi Cement Corporation and, if the San Diego Unified Port District's Planning and Green Port Department determines that Mitsubishi Cement Corporation made sufficient effort to comply with the environmental control, it would notify Mitsubishi Cement Corporation in writing that use of the two-year average is acceptable. **Please note that Mitsubishi' Cement Corporation's annual dry bulk throughput will not be counted towards the 691,418 metric ton dry bulk trigger that requires use of an At-Berth Emission Capture and Control System because Mitsubishi will be relying on a shore-to-ship power system. However, the 691,418 metric ton dry bulk trigger would apply to other dry bulk tenants that do not have shore-power capabilities.* **MM-AQ-10: Modernization of Delivery Truck Fleet.** No less than 90 percent of the trucks loading cement or cementitious material at the Mitsubishi Cement Corporation facility shall be equipped with an engine that meets one of the following requirements: 1) Is no more than 5 years old, based on engine model year ("5-Year Engine") for each operational year; 2) Has been designed or retrofitted to comply with federal and state on-road heavy-duty engine emissions standards (e.g. EPA 2010 engine emission standards or successor rules or regulations for on-road heavy duty diesel engines) for a 5-Year Engine ("Emission equivalent Engine"); or	

Table 2-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			3) Uses alternative engine technology or fuels demonstrated to produce emissions no greater than a 5-Year Engine ("Alternative Equivalent Engine"), including zero emission vehicles powered by electric batteries or hydrogen fuel cells. The remaining 10 percent of the trucks shall comply with all applicable federal and state heavy-duty on-road truck regulations. In addition, all trucks loading cement or cementitious materials at the Mitsubishi Cement Corporation facility shall be registered and be in compliance with the CARB Truck and Bus Regulation. In order to confirm that Mitsubishi Cement Corporation's 90 percent requirement for a Modernized Truck Fleet shall be determined on a calendar year basis. Mitsubishi Cement Corporation shall submit documentation of compliance, showing the following information, to the San Diego Unified Port District's Planning and Green Port Department on an annual basis by January 31 following each year of operation: 1) Truck vehicle identification number (VIN), 2) Engine model year, 3) Annual truck trips, and 4) If nondiesel technology, manufacturer engine standards.	
Cumulatively Considerable Criteria Pollutant Contribution under an Ambient Air Quality Standard	No New or More Severe Impacts than Previously Identified in the TAMT Final PEIR	PS	Implement mitigation measures **MM-AQ-1R** through **MM-AQ-9R** and **MM-AQ-10**.	LS
Sensitive Receptors	No New or More Severe Impacts than Previously Identified in the TAMT Final PEIR	PS	Implement mitigation measures **MM-AQ-1R** through **MM-AQ-9R, MM-HAZ-1R,** and **MM-HAZ-2**.	LS

Table 2-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
4.2 Greenhouse Gas Emissions and Climate Change				
Project Impacts				
Directly or Indirectly Generate Greenhouse Gases	No New or More Severe Impacts than Previously Identified in the TAMT Final PEIR	PS	**MM-GHG-1R: Implement Best Management Practices During Construction of Future TAMT Redevelopment Plan Components.** The Mitsubishi Cement Corporation Project Proponent shall implement Best Management Practices (BMPs) to reduce air emissions from all construction activities implemented as part of the Proposed Project. The following measures are required to limit construction equipment exhaust from on-road trucks and heavy-duty equipment used during construction. ▪ Ensure that all off-road diesel-powered equipment used during construction between 2020 and 2025 is equipped with the U.S. Environmental Protection Agency (EPA) Tier 3 or cleaner engines, except for specialized construction equipment for which an EPA Tier 3 engine is not available. ▪ Ensure that all off-road diesel-powered equipment used during construction beyond 2025 is equipped with the EPA Tier 4 Final or cleaner engines, except for specialized construction equipment for which an EPA Tier 4 Final engine is not available. ▪ Maintain all construction vehicles and equipment according to manufacturers' specifications. ▪ Restrict idling of construction vehicles and equipment to a maximum of 3 minutes when not in use (see MM-GHG-2 for definition of "not in use"). In addition, the Mitsubishi Cement Corporation Project Proponent shall implement the relevant BMPs, consistent with the Project-specific industrial Storm Water Pollution Prevention Plan (SWPPP). In no case would any BMP be implemented if it conflicts with the SWPPP or other applicable water quality permit requirements. BMP dust control measures may include, but are not limited to, the following: ▪ Water the grading areas at least twice daily to minimize fugitive dust.	SU

Table 2-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			▪ Stabilize graded areas as quickly as possible to minimize fugitive dust. ▪ Apply chemical stabilizer or pave the last 100 feet of internal travel path within the construction site prior to public road entry. ▪ Install wheel washers adjacent to a paved apron prior to vehicle entry on public roads. ▪ Remove any visible track-out into traveled public streets within 30 minutes of occurrence. ▪ Wet wash the construction access point at the end of each workday if any vehicle travel on unpaved surfaces has occurred. ▪ Provide sufficient perimeter erosion control to prevent washout of silty material onto public roads. ▪ Cover haul trucks or maintain at least 12 inches of freeboard to reduce blow-off during hauling. ▪ Suspend all soil disturbance and travel on unpaved surfaces if winds exceed 25 mph. ▪ Cover/water onsite stockpiles of excavated material. ▪ Enforce a 15 mph speed limit on unpaved surfaces. ▪ On dry days, sweep up any dirt and debris spilled onto paved surfaces immediately to reduce re-suspension of particulate matter caused by vehicle movement. Clean approach routes to construction sites daily for construction-related dirt in dry weather. ▪ Develop as quickly as possible all disturbed areas as directed by the San Diego Unified Port District's Planning and Green Port Department and/or SDAPCD to reduce dust generation. ▪ Limit the daily grading volumes/area. Prior to the commencement of construction activities, the Mitsubishi Cement Corporation Project Proponent shall submit evidence to the San Diego Unified Port District's Planning and Green Port Department of the project proponent's compliance with the BMPs and that construction equipment is maintained and properly tuned in accordance with manufacturers'	

Table 2-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			specifications, which shall be subject to confirmation by the San Diego Unified Port District's Planning and Green Port Department during construction. **MM-GHG-2R: Comply with San Diego Unified Port District Climate Action Plan Measures.** Prior to approval of all discretionary actions and/or Coastal Development Permits, the Mitsubishi Cement Corporation Project Proponent shall be required to implement the following measures to be consistent with the Climate Action Plan. • Vessels shall comply with the San Diego Unified Port District's voluntary vessel speed reduction program, which targets 80 percent compliance. • Vessels that are subject to the ARB's at berth regulation (dry bulk vessels are not subject to the at-berth regulation) shall comply with ARB's at berth regulation that requires shore power or alternative control technology regulation for certain vessel fleets for 80 percent of eligible calls by 2020, minus idle time to clear customs consistent with California Air Resources Board regulations. The TAMT Final PEIR assumed 1.5 hours of idle time for vessels to embark/disembark, which applies to all shore power and/or alternative control technologies employed at the terminal. This is a Project feature made into a mitigation measure to ensure compliance (see MM-GHG-9 for an explanation of the Proposed Project's shore power features). • Designated truck haul routes shall be used, and the project proponent shall decrease onsite movements where practicable. • No commercial drive-through shall be implemented. • Compliance with Assembly Bill 939 and the City of San Diego's Recycling Ordinance shall be mandatory and shall include recycling at least 50 percent of solid waste; compliance with the City of San Diego's Construction and Demolition Debris Deposit Ordinance shall be mandatory and shall include recycling at least 65 percent of all construction debris. This measure shall be applied during construction and operation of the Proposed Project.	

Table 2-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			• Light fixtures shall be replaced with lower-energy bulbs such as fluorescent, Light-Emitting Diodes (LEDs), Compact Fluorescent Lights (CFLs), or the most energy-efficient lighting that meets required lighting standards and is commercially available. • Implementation of Climate Action Plan measures will be included as part of any discretionary actions and/or Coastal Development Permit(s) associated with this Project. Evidence of implementation and compliance with this mitigation measure shall be provided to the San Diego Unified Port District's Planning and Green Port Department by the Project Proponent on an annual basis through the end of the lease or 2035 (buildout of the TAMT Redevelopment Plan), whichever occurs first. **MM-GHG-3: Electric Cargo Handling Equipment Upgrades.** A. Prior to January 1, 2020, the San Diego Unified Port District shall ensure that at least three pieces of existing non-electric cargo handling equipment at the terminal are replaced by electric cargo handling equipment, none of which were previously operating at the terminal during the 2013/2014 baseline year of the EIR analysis. Possible ways the electric cargo handling equipment may be obtained include, but are not limited to, the following: 1. Purchased, leased, or otherwise acquired, in whole or in part, through funding provided to a tenant by the San Diego Unified Port District; 2. Purchased, leased, or otherwise acquired, in whole or in part, through funding provided to a tenant by other sources; or 3. Purchased, leased, or otherwise acquired, in whole or in part, by the tenant in compliance with a condition of a discretionary approval issued by the San Diego Unified Port District. Written evidence of the acquisition of the electric cargo handling equipment and the equipment it will replace and remove from further operation at the terminal must be provided to the San Diego Unified Port District. The San Diego Unified Port District shall further ensure that the electric cargo handling equipment is	

Table 2-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			in use at each of the three nodes throughout the expected operating life. This will be accomplished by requiring each tenant that employs electric cargo handling equipment pursuant to this measure to report the equipment's annual number of hours of operation to the San Diego Unified Port District and by requiring the San Diego Unified Port District to monitor use of the electric cargo handling equipment as part of the San Diego Unified Port District's TAMT equipment inventory. **MM-GHG-4: Electric Cargo Handling Equipment Upgrades.** This measure has multiple steps for compliance, as specified below. A. Prior to January 1, 2025, the San Diego Unified Port District also shall ensure that no fewer than 20 non-electric yard trucks in operation are replaced at the TAMT by 20 electric yard trucks. Possible ways the electric yard trucks may be obtained include, but are not limited to, the following: 1. Purchased, leased, or otherwise acquired, in whole or in part, through funding provided to a tenant by the San Diego Unified Port District; 2. Purchased, leased, or otherwise acquired, in whole or in part, through funding provided to a tenant by other sources; or 3. Purchased, leased, or otherwise acquired, in whole or in part, by the tenant in compliance with a condition of a discretionary approval issued by the San Diego Unified Port District. Written evidence of the acquisition of the electric yard trucks, and the non-electric yard trucks they will replace and remove from further operation at the terminal, must be provided to the San Diego Unified Port District. The San Diego Unified Port District shall further ensure that the electric yard trucks are in use at the TAMT throughout the expected operating life of the equipment. Each tenant that employs electric trucks pursuant to this measure shall report the equipment's annual number of hours of operation to the San Diego Unified Port District, and the San Diego Unified Port District shall monitor use of the electric trucks as part of the San Diego Unified Port District's TAMT equipment inventory.	

Table 2-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			B. Prior to January 1, 2030, the San Diego Unified Port District also shall ensure that no fewer than three existing non-electric reach stackers and ten non-electric forklifts in operation are replaced at the TAMT by three fully electric reach stackers and ten fully electric forklifts. Possible ways the electric reach stackers and forklifts may be obtained include, but are not limited to: 1. Purchased, leased, or acquired, in whole or in part, through funding provided to the tenant by the San Diego Unified Port District; 2. Purchased, leased, or acquired, in whole or in part, through funding provided to the tenant by other sources; or 3. Purchased, leased, or otherwise acquired, in whole or in part, by the tenant in compliance with a condition of a discretionary approval issued by the San Diego Unified Port District. Written evidence of the acquisition of the three electric reach stackers and ten electric forklifts and the conventional equipment they will replace and remove from further operation at the terminal must be provided to the San Diego Unified Port District. The San Diego Unified Port District shall further ensure that the electric reach stackers and forklifts are in use at the TAMT throughout the expected operating life of the equipment. Each tenant that employs electric reach stackers or electric forklifts pursuant to this measure shall report the equipment's annual number of hours of operation to the San Diego Unified Port District, and the San Diego Unified Port District shall monitor use of the electric reach stackers and forklifts as part of the San Diego Unified Port District's TAMT equipment inventory. D. The electric equipment employed pursuant to paragraphs A, B, and C of this mitigation measure may be replaced by other technologies or other types of cargo handling equipment as long as the replacement equipment achieves the same or greater criteria pollutant, toxic air contaminant, and greenhouse gas emission reductions as compared to the equipment required by paragraphs A, B, and C of this mitigation measure.	

Table 2-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			MM-GHG-5R: Implement Enhanced Vessel Speed Reduction Program Beyond Climate Action Plan Compliance for Future Operations Associated with the TAMT Plan. The Mitsubishi Cement Corporation shall be required to comply with the Enhanced VSR Program. Mitsubishi Cement Corporation shall, beginning with the first vessel call to the Port, comply with 80% of its OGVs reducing their speeds to 12 knots or less starting at 20 nautical miles from Point Loma. The Mitsubishi Cement Corporation shall comply with 90% of its OGVs calling to the Port reducing their speeds to 12 knots starting at 40 nautical miles from Point Loma upon the occurrence of the earlier of either of the following two scenarios: ▪ Prior to the annual number of dry bulk vessel calls reaching 91 calls annually (e.g., 76 new calls over the TAMT Final PEIR's baseline condition); or ▪ Beginning January 1, 2030, irrespective of the number of calls on an annual basis. To help the District implement the Beyond 2013 CAP VSR Program before reaching 91 dry bulk vessel calls annually, Mitsubishi Cement Corporation shall provide the District with a rolling estimate of anticipated vessels calls every 6 months. The San Diego Unified Port District will verify compliance through analysis of Automatic Identification System data or by requesting a vessel's Electronic Chart Display Identification System log from the captain. **MM-GHG-6R: Implement a Renewable Energy Project, or Other Verifiable Actions or Activities on Tidelands, or Purchase the Equivalent Greenhouse Gas Offsets from a California Air Resources Board Approved Registry or a Locally Approved Equivalent Program for Future Operations Associated with the TAMT Plan.** A. Options for Reducing GHG Emissions. The Mitsubishi Cement Corporation shall do one or more of the following to achieve the required reductions in 2025,	

Table 2-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			2030, and 2035 greenhouse gas (GHG) emissions specified below, in the following order of priority: 1. Incorporate a renewable energy project: ▪ within the Tenth Avenue Marine Terminal; ▪ within the San Diego Unified Port District's jurisdiction; or ▪ adjacent to the San Diego Unified Port District's jurisdiction; or 2. Undertake other verifiable actions or activities on Tidelands, approved by the District, such as electrification of equipment including vehicles and trucks, financial contribution to a future local or District GHG emission reduction program on Tidelands (locally approved equivalent program), or similar activities or actions that reduce operational GHG emissions; or 3. Purchase GHG emission offset credits which 1) are real, additional, permanent, quantifiable, verifiable, and enforceable as specified in California Health and Safety Code § 38562(d)(1) and (2) and as these terms are further defined in California Code of Regulations, Title 17, § 95802 (see below); 2) use a protocol consistent with or as stringent as California Air Resources Board (CARB) protocol requirements under California Code of Regulations, Title 17, § 95972(a); and 3) are issued by a CARB-approved offset registry. For offset credits from projects outside California, Mitsubishi Cement Corporation must demonstrate in writing to the satisfaction of the District that the offset project meets requirements equivalent to or stricter than California's laws and regulations for ensuring the validity of offset credits. For purposes of this section, the definitions are as follows: a. "Real" means, in the context of offset projects, that GHG reductions or GHG enhancements result from a demonstrable action or set of actions, and are quantified using appropriate, accurate, and	

Table 2-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			conservative methodologies that account for all GHG emissions sources, GHG sinks, and GHG reservoirs within the offset project boundary and account for uncertainty and the potential for activity-shifting leakage and market-shifting leakage. [17 CCR 95802] b. "Additional" means, in the context of offset credits, greenhouse gas emission reductions or removals that exceed any greenhouse gas reduction or removals otherwise required by law, regulation or legally binding mandate, and that exceed any greenhouse gas reductions or removals that would otherwise occur in a conservative business-as-usual scenario. [17 CCR 95802] c. "Permanent" means in the context of offset credits, either that GHG reductions and GHG removal enhancements are not reversible, or when GHG reductions and GHG removal enhancements may be reversible, that mechanisms are in place to replace any reversed GHG emission reductions and GHG removal enhancements to ensure that all credited reductions endure for at least 100 years. [17 CCR 95802] d. "Quantifiable" means in the context of offset credits, the ability to accurately measure and calculate GHG reductions or GHG removal enhancements relative to a project baseline in a reliable and replicable manner for all GHG emission sources, GHG sinks, or GHG reservoirs included within the offset project boundary, while accounting for uncertainty and activity-shifting leakage and market-shifting leakage [17 CCR 95802] e. "Verifiable" means that a non-California offset project is located in a state that has laws and regulations equivalent to or stricter as California's with respect to ensuring the validity of offsets and an Offset Project Data Report assertion is well documented and transparent such that it lends itself to an objective review by an accredited verification body. [17 CCR 95802]	

Table 2-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			f. "Enforceable" means the authority for the offset purchaser to hold the offset provider liable and to take appropriate action if any of the above requirements are not met. [adapted from definition in 17 CCR 95802 for use in this measure] "Enforceable" also means that the offset must be backed by a legal instrument or contract that defines exclusive ownership and the legal instrument can be enforced within the legal system of the State of California. B. Required Annual GHG Emissions Reductions: The option(s) implemented pursuant to paragraph A above shall achieve the following required GHG reductions for the activities of the Proposed Project for years 2025, 2030, and 2035: 1. 2025 reduction: 568 $MTCO_2e$ per year or 2,345 MWh/year. 2. 2030 reduction: 1,622 $MTCO_2e$ per year or 7,675 MWh/year. 3. 2035 reduction: 1,693 $MTCO_2e$ per year or 8,013 MWh/year. The required 2025, 2030, and 2035 GHG emissions reductions are based on the maximum throughput of 600,000 metric tons (MT) per year via 24 calls to port annually. The required reductions may be reduced at the discretion of the District, based on the actual amount of throughput and hours at berth in a given year and the other adjustment provisions specified below. C. Implementation of GHG Emissions Reduction Options. Prior to the first call of the first year of operation and annually thereafter, the District shall notify the Mitsubishi Cement Corporation of the option(s) available for achieving the annual maximum required GHG emissions reduction in the order of priority specified above, and the Mitsubishi Cement Corporation shall: 1. Develop a renewable energy project(s) or take other verifiable actions or activities identified by the District	

Table 2-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			to meet or partially meet the required amount of $MTCO_2e$ or MWh reductions specified above. a. If the Mitsubishi Cement Corporation develops a renewable energy project(s), or takes other verifiable actions or activities to reduce GHG emissions, the Mitsubishi Cement Corporation shall submit to the District's Energy Department/Team, for its review and approval, a report specifying the annual amount of $MTCO_2e$ or MWh reduction achieved by the project(s), actions, or activities; submit evidence that the renewable energy project, actions, or activities are not being used to offset GHG emissions for any other project or entity; and submit any other information requested by the District's Energy Department/Team to verify the amount of GHG emissions reduction achieved by the project, actions or activities (collectively, "GHG Emission Reduction Report"). b. If the GHG Emission Reduction Report is approved, a reduction to the required offsets shall be calculated by the District's Energy Department/Team, and the reduction of offsets shall be transmitted to the Mitsubishi Cement Corporation in writing and the amount of GHG reduction shall count towards the required GHG reduction for the Proposed Project ("GHG Reduction"). 2. Purchase GHG emission offsets in conformance with paragraph A(3) above in an amount sufficient to achieve the required reduction of $MTCO_2e$ or MWh specified above, which may be decreased by the amount of annual $MTCO_2e$ or MWh reduction that is achieved by any renewable energy project(s) or other verifiable action or activities if developed and/or implemented pursuant to paragraph (1) above. The purchase of offsets to achieve the required reduction in $MTCO_2e$ or MWh shall occur as follows: a. Purchase offsets for the first 2 years of operation;	

Table 2-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			b. Purchase offsets at least annually thereafter, prior to any calls to port for the corresponding timeframe, beginning with the third year of operation, for the life of the Proposed Project's operations or until termination of the lease agreement between the District and the Mitsubishi Cement Corporation. The Mitsubishi Cement Corporation may purchase more than 1 year of operational emissions offsets, consistent with the amount of MTCO2e or MWh reduction specified above for the corresponding timeframe of 2025, 2030, or 2035; and c. On or before the first ship call in the first year of operation of the proposed project and annually thereafter, Mitsubishi Cement Corporation shall submit certificates for offsets purchased to achieve the required GHG emission reductions, including written verification by a qualified consultant approved by the District that the offsets meet the requirements for GHG emission offset credits set forth in paragraph A(3) above, to the District's Energy Department/Team. D. Adjustments to Required GHG Emissions Reductions. If the Mitsubishi Cement Corporation complies with paragraphs A(1) or A(2) above, in an amount that meets the total amount of $MTCO_2e$ or MWh reductions specified above for 15 years of operation to meet the 2035 reduction target, or complies with paragraph A(3) above and purchases the requisite offsets for 15 years, or does a combination of paragraphs A(1), (2), and (3) to meet the 2035 reduction target, then nothing further shall be required under this mitigation measure. 1. Reduction of Emissions through Development of a Renewable Energy Project Requirement: Although none are identified at this time, the Mitsubishi Cement Corporation may be required by the District to develop a renewable energy project at any time during the life of the project (subject to future approvals and the priorities listed above) and may request a	

Table 2-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			reduction of required offsets. If any reduction in offsets is requested by the Mitsubishi Cement Corporation because of the development of a renewable energy project(s), the Mitsubishi Cement Corporation shall submit a GHG Emission Reduction Report for the District Energy Department's review pursuant to the process specified above in paragraph C(1) above and required offsets shall be determined by the District and reduced. 2. Reduction of Emissions through Verifiable Actions or Activities on Tidelands Requirement: Although none are identified at this time, the Mitsubishi Cement Corporation may be required by the District to take other verifiable actions or activities at any time during the life of the project (subject to future approvals and the priorities listed above) and may request a reduction of required offsets. If any reduction in offsets is requested by the Mitsubishi Cement Corporation because of the other verifiable actions or activities on tidelands, the Mitsubishi Cement Corporation shall submit a GHG Emission Reduction Report for the District Energy Department's review pursuant to the process specified above in paragraph C(1), and required offsets shall be determined by the District and reduced. 3. Reduction of Emissions through Purchase of Offsets: Subsequent to purchasing GHG emission offsets pursuant to paragraph C(2) above, the Mitsubishi Cement Corporation's future annual purchase of offsets to achieve the GHG emission reductions specified in paragraph B above may be adjusted if the preceding year's throughput is less than 600,000 metric tons (the maximum allowed annual throughput), and/or the annual calls to port are less than 24 (the maximum allowed number of calls; 24 calls at 168 hours per call, or 4,032 annual hours at berth). The District or a District-retained consultant (at the Mitsubishi Cement Corporation cost) shall calculate, using the best available science, the amount of unused GHG reduction offsets based on the actual	

Table 2-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			throughput and/or time at berth. Any unused offsets shall be used for the next year of operation of the Proposed Project and the Mitsubishi Cement Corporation shall purchase offsets in the necessary amounts (required amount less any unused offsets) for the subject year. This procedure shall be repeated on an annual basis. In the event that newly discovered information shows that an offset, previously certified as compliant pursuant to paragraph C(3)(c), does not comply with the requirements of paragraph A(3), Mitsubishi Cement Corporation shall purchase an equivalent amount of replacement offsets that comply with the requirements of paragraph A(3) within 30 days after receiving notice of the noncompliance. After verification of unused and available offsets, unused offsets may replace previously compliant offsets should those offsets subsequently be determined noncompliant with paragraph A(3). At the Mitsubishi Cement Corporation's written request to the District, Mitsubishi Cement Corporation may waive the annual adjustment described above and purchase the required $MTCO_2e$ or MWh offsets on at least an annual basis. **MM-GHG-7R: Annual Inventory Submittal and Periodic Technology Review.** A. The Mitsubishi Cement Corporation shall comply with the San Diego Unified Port District's Annual Inventory and Periodic Technology Review Program as follows: (1) Prior to January 30th of each year of operations, Mitsubishi Cement Corporation shall provide an inventory of all mobile equipment associated with its TAMT operations that generate criteria pollutants, toxic air contaminants and greenhouse gases. The annual inventory shall identify the year, make, VIN or other identification number, fuel type, and model of the equipment that was used in the previous year, as well as the number of hours of operation for each piece of equipment, including but not limited to heavy-duty drayage and non-drayage trucks, yard equipment, assist and ocean-going tugs, ocean-going	

Table 2-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			vessels, bulk material handling equipment, and any other type of cargo handling equipment. The purpose of the annual inventory is to track emissions and equipment at TAMT and to assist in the District's periodic technological reviews, pursuant to TAMT Redevelopment Plan MM-GHG-7.	
			(2) Within twelve (12) months of commencement of truck loadout activities, Mitsubishi Cement Corporation shall implement a zero emission truck demonstration project at TAMT ("Demonstration Project") which uses zero emission trucks for the transport of cement and cementitious material from its TAMT facility. The Demonstration Project shall operate for a period of not less than twelve (12) months and shall include one or more zero emission trucks. If market conditions require Mitsubishi Cement Corporation to temporarily cease truck loadout operations at TAMT, the 12 months shall be tolled until Mitsubishi Cement Corporation resumes regular truck loadout operations. The Demonstration Project will evaluate the capability of zero emission trucks to transport cement and cementitious materials from Mitsubishi Cement Corporation's TAMT facility, determine the operational logistics of the use of zero emission trucks with increasing deployment, and better inform the District's metrics for determining the feasibility of zero emission trucks.	
			(3) Within three (3) months after completion of the Demonstration Project, Mitsubishi Cement Corporation shall submit a written report to the District which sets forth the data collected during the Demonstration Project and identifies opportunities and barriers for larger deployment of zero emission trucks at Mitsubishi Cement Corporation's TAMT facility. The Demonstration Project is intended to assist the District in its Periodic Technology Review pursuant to TAMT MM-GHG-7 by providing information regarding the feasibility of using zero emission trucks to service Mitsubishi Cement Corporation's operations at TAMT.	

Table 2-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			(4) Within six (6) months after completion of the Demonstration Project, Mitsubishi Cement Corporation shall submit a zero emission truck infrastructure plan ("Infrastructure Plan") to the District. The Infrastructure Plan shall include, at a minimum, the location of needed charging stations and other equipment needs, power requirements for each charging station and any necessary upgrades and other improvements to support the use of zero emission trucks in Mitsubishi Cement Corporation's operations at TAMT. The Infrastructure Plan also shall identify ancillary infrastructure needs related to potential operational changes from incorporating zero emission trucks, including coordination with Mitsubishi Cement Corporation's customers at key locations to service San Diego County and necessary accommodations for drivers and other personnel. The Infrastructure Plan is intended to assist the District in its Periodic Technology Review pursuant to TAMT MM-GHG-7 by providing information regarding the feasibility of using zero emission trucks to service Mitsubishi Cement Corporation's operations at TAMT. B. Beginning a year after approval of the Project and continuing each year during the term of the Mitsubishi Cement Corporation's lease with the District, the District shall include in its Periodic Technology Review under TAMT MM-GHG-7 an evaluation of the feasibility of using zero emission trucks for the transport of cement and cementitious material from Mitsubishi Cement Corporation's facility at TAMT ("Annual ZE Truck Feasibility Study"). The District's evaluation of and conclusion regarding feasibility shall be based on the feasibility metrics set forth in Table 1, ZE Truck Feasibility Categories and Metrics, below and shall be made available to the public in an Annual ZE Truck Feasibility Study. The District shall review the feasibility metrics annually and update them as necessary to reflect current data.	

Table 2-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation

Table 1. ZE Truck Feasibility Categories and Metrics

Feasibility Category	Feasibility Metric
Technical	Range
	Torque
	Payload Capacity
	Refueling Time
	Service and maintenance support
	Ancillary energy requirements
Economic	Vehicle cost
	Total Cost of Ownership w/ incentives
	Total Cost of Ownership w/o incentives
	Charging infrastructure cost
Fleet Logistics	Scheduling
	Truck Assignments
	% of port trips that ZEVs can meet
Charging Infrastructure Availability	On-site/depot
	On-route/opportunity
	Public (as needed)
Demonstration Project	Information obtained from the demonstration project.
Availability of Zero-Emission Trucks	Procurement and delivery availability, including delivery of the trucks to the fleet. * Procurement availability for the full spectrum of potential MCC customers, regardless of size.

Table 2-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			Annual Throughput — Number of trucks to support annual operations *"fleet" means customers' trucks traveling to or from the Mitsubishi Cement Corporation's facility at TAMT. C. In the event the District's Periodic Technology Review pursuant to TAMT MM-GHG-7R identifies new technology or other practices that are feasible and are equally or more effective in reducing GHG emissions than the mitigation measures adopted by the District for the Mitsubishi Cement Corporation facility, the District may add, modify or substitute in place of an adopted mitigation measure such new technology or other practices as it becomes commercially available, unless the changes to an adopted measure would cause or contribute to an increase in any of the facility's significant environmental impacts. **MM-GHG-8R: Implement Exhaust Emissions Reduction Program at Tenth Avenue Marine Terminal.** The San Diego Unified Port District is tasked with developing an incentive program, based on an emission reduction schedule, that incentivizes tenants and/or terminal operators to reduce mobile source emissions above and beyond the requirements identified in the TAMT Final PEIR. San Diego Unified Port District staff is currently developing the Exhaust Emission Reduction Program as part of their Clean Air Plan update, per the direction of the Board of Port Commissioner's in June 2019. Following completion of the Clean Air Plan update, the Project Proponent will be eligible to participate in the updated plan's Exhaust Emission Reduction Program. **MM-GHG-9R: Use of At-Berth Emission Capture and/or Control System to Reduce Vessel Hoteling Emissions.** In lieu of the At-Berth Emission Capture and Control System, the Mitsubishi Cement Corporation shall use electric power through connection with the ship's dry-dock breaker system to reduce Vessel Hoteling Emissions. To attain emission reductions equivalent to or greater than the At-Berth Emission Capture and Control System specified in TAMT Redevelopment Plan MM-GHG-8, OGVs that call at the Mitsubishi Corporation Project facility shall use the shore-to-ship power system at least 50 percent of the time while at berth, not including the necessary	

Table 2-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			1.5 hours to embark and 1.5 hours to disembark to/from the system. Compliance with the 50 percent shore-to-ship power system requirement shall be calculated based on an annual average. Mitsubishi Cement Corporation shall submit annual reports for each year of Project operations to the San Diego Unified Port District's Planning and Green Port Department on or before January 31 of each year, demonstrating compliance with this environmental control measure for the previous calendar year. If an emergency event (as defined in CARB's At-Berth Regulation, Title 17, CCR Section 93118.3, subsection (c)(14)), prevents Mitsubishi Cement Corporation from achieving the required annual average shore-to-ship power rate (equal to or greater than 50 percent), Mitsubishi Cement Corporation may demonstrate compliance over a 2-year period, so long as Mitsubishi Cement Corporation submits documentation to the San Diego Unified Port District's Planning and Green Port Department which describes the emergency event(s) and explains the basis for Mitsubishi Cement Corporation's inability to demonstrate compliance using an annual average. The San Diego Unified Port District's Planning and Green Port Department shall review the documentation submitted by the Mitsubishi Cement Corporation and, if the San Diego Unified Port District's Planning and Green Port Department determines that Mitsubishi Cement Corporation made sufficient effort to comply with the environmental control, it will notify Mitsubishi Cement Corporation in writing that use of the 2-year average is acceptable. **Please note that Mitsubishi' Cement Corporation's annual dry bulk throughput will not be counted towards the 691,418 metric ton dry bulk trigger that requires use of an At-Berth Emission Capture and Control System because Mitsubishi will be relying on a shore-to-ship power system. However, the 691,418 metric ton dry bulk trigger would apply to other dry bulk tenants that do not have shore-power capabilities.* **MM-GHG-10: Modernization of Delivery Truck Fleet.** No less than 90 percent of the trucks loading cement or cementitious material at the Mitsubishi Cement Corporation	

Table 2-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			facility shall be equipped with an engine that meets one of the following requirements: 1) Is no more than 5 years old, based on engine model year ("5-Year Engine") for each operational year; 2) Has been designed or retrofitted to comply with Federal and State on-road heavy-duty engine emissions standards (e.g., EPA 2010 engine emission standards or successor rules or regulations for on-road heavy duty diesel engines) for a 5-Year Engine ("Emission equivalent Engine"); or 3) Uses alternative engine technology or fuels demonstrated to produce emissions no greater than a 5-Year Engine ("Alternative Equivalent Engine"), including zero emission vehicles powered by electric batteries or hydrogen fuel cells. The remaining 10 percent of the trucks shall comply with all applicable Federal and State heavy-duty on-road truck regulations. In addition, all trucks loading cement or cementitious materials at the Mitsubishi Cement Corporation facility shall be registered and be in compliance with the CARB Truck and Bus Regulation. Confirming that Mitsubishi Cement Corporation's 90 percent requirement for a Modernized Truck Fleet shall be determined on a calendar year basis. Mitsubishi Cement Corporation shall submit documentation of compliance, showing the following information, to the San Diego Unified Port District's Planning and Green Port Department on an annual basis by January 31 following each year of operation: 1) Truck vehicle identification number (VIN), 2) Engine model year, 3) Annual truck trips, and 4) If nondiesel technology, manufacturer engine standards.	
4.3 Hazards and Hazardous Materials				
Project Impacts				
Reasonably Foreseeable Upset and Accident Conditions Involving the Release of	No New or More Severe Impacts than Previously Identified in the TAMT Final PEIR	PS	**MM-HAZ-1R: Compliance with Burn Ash Soil Management Plan.** Prior to approval of the Project grading plans and the commencement of any construction activities that would disturb the soil, the Mitsubishi Cement Corporation Project Proponent and the contractor (collectively "Contractor") shall	LS

Table 2-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
Hazardous Materials			demonstrate compliance with the Burn Ash Management Plan – Tenth Avenue Marine Terminal, San Diego, California, prepared by Tetra Tech, Inc., June 30, 2017. Specifically, the Contractor shall demonstrate compliance with the following specific requirements of the Burn Ash Management Plan including, but not limited to, the following. ▪ *Conduct Soil Testing.* The Contractor shall comply with the excavated soil management techniques specified in the Burn Ash Management Plan. The Contractor shall follow the soil sampling protocol and soil sampling objectives, and shall comply with the soil characterization methodology identified within the Burn Ash Management Plan. ▪ *Prepare and Implement a Community Health and Safety Plan*. The Contractor shall develop and implement a Project specific Community Health and Safety Plan that addresses the chemical constituents of concern for the Project site. The guidelines of the Health and Safety Plan shall be in accordance with the County of San Diego's Department of Environmental Health's Site Assessment and Mitigation Manual (2017) and Environmental Protection Agency. The Health and Safety Plan shall include detailed plans on air monitoring and other appropriate construction means and methods to minimize the public's and site workers' exposure to the chemical constituents. The contractor shall utilize a Certified Industrial Hygienist with significant experience with chemicals of concern on the Project site to approve the Health and Safety Plan and actively monitor compliance with the Health and Safety Plan during construction activities. ▪ *Complete Soil Disposal.* Any soil disturbed by construction activities shall be profiled and disposed of in accordance with California Code of Regulations, Title 22, Division 4.5 requirements. If soils are determined to be appropriate for reuse, they may be exported or used as fill material. If soils are determined to be hazardous and not suitable for reuse, they shall be disposed of at a regulated Class I landfill. Soils shall be transported in accordance with the Burn Ash Management Plan. Soils to be loaded into trucks for offsite disposal at a Class I landfill shall be moistened with a water	

Table 2-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			spray or mist for dust control in accordance with Section 5.6, Dust Control, of the Burn Ash Management Plan. If dust is visible, positive means shall be applied immediately to prevent airborne dust. Care shall be used to minimize the amount of water applied to soils that may contain elevated concentrations of contaminants. 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: Implement Engineering Controls and Best Management Practices during Construction.** Prior to construction, a site-specific Health and Safety Plan shall be prepared by the contractor and approved by a licensed California Certified Industrial Hygienist. The Health and Safety Plan shall be prepared per the requirements of 29 Code of Federal Regulations 1910.120 and California Code of Regulations, Title 8, along with applicable federal, state, and local regulations and statutes. During construction, the contractor shall employ engineering controls and BMPs to minimize human exposure to potential contaminants, if encountered. Engineering controls and construction BMPs shall include but not be limited to the following. ▪ 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.	

Table 2-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			▪ 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.	
4.4 Noise and Vibration				
Project Impacts				
Expose Persons to or Generate Noise Levels in Excess of Established Standards	No New or More Severe Impacts than Previously Identified in the TAMT Final PEIR.	PS	**MM-NOI-2: Initiate and Maintain a Complaint and Response Tracking Program.** Prior to the commencement of operations of the TAMT plan, the District shall designate a noise disturbance coordinator. The coordinator will be responsible for responding to complaints regarding noise from project operations, will investigate the cause of the complaint, and will ensure that reasonable measures are implemented to correct the problem, where feasible. A contact telephone number for the noise disturbance coordinator will be conspicuously posted at the main entrance to the project site and in other reasonable locations, as appropriate, to ensure the contact information is easily obtained. This measure shall be implemented in combination with MM-NOI 1, which provides several examples of what type of noise attenuation measures may be feasible. The goal of this measure is to provide additional information regarding the sources of loud noises and to assist in the design and implementation of measures to reduce the noise to a level that would be at or below the applicable noise standards for the land use experiencing the excessive noise.	LS
4.5 Transportation, Circulation, and Parking				
Project Impacts				
Conflict with an Applicable Program, Plan, Ordinance, or Policy	No New or More Severe Impacts than Previously Identified in the TAMT Final PEIR**.**	PS	**MM-TRA-3R: Widen the Segment of 28th Street between Boston Avenue and National Avenue to a Four-Lane Major Arterial Classification Consistent with the Barrio Logan Public Facilities Financing Plan.** The District currently has an	SU

Table 2-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			established program to track the number of trucks that enter and exit the terminal each year associated with TAMT operations. Prior to generating an additional 161 new daily truck trips, the District shall pay a fair-share contribution (STC would be responsible for 2.8%) of the cost to widen the roadway segment of 28th Street between Boston Avenue and National Avenue to a Four-Lane Major Arterial classification. The improvement is identified within the Barrio Logan Public Facilities Financing Plan, and therefore would be paid to the City of San Diego in accordance with Section 142.0640 of the San Diego Municipal Code. Payment of the District's fair share shall be completed prior to reaching 161 new daily truck trips. In order to ensure the significant impact does not occur before the District has paid its fair share to the City, the District shall initiate payment once approximately 150 new daily truck trips are reached under the proposed project. The trigger will be determined by the District by examining the ADT over a 1 month timeframe and comparing the ADT to the baseline of 93 daily trucks generating 186 trips per day (33,349 trucks per year divided by 360 days multiplied by 2 trips for each truck) and 935 daily employee trips (315 existing employees multiplied by 3 trips per day). At the District's discretion, the District may seek reimbursement from tenants that would contribute new daily trips in proportion to their contribution. **MM-TRA-4: Westbound Right-Turn Overlap Phase at Norman Scott Road/32nd Street/Wabash Boulevard Intersection.** The San Diego Unified Port District currently has an established program to track the number of trucks that enter and exit the terminal each year associated with TAMT operations. Prior to generating an additional 195 new daily trips, the San Diego Unified Port District shall coordinate with the California Department of Transportation to determine the San Diego Unified Port District's fair share payment to fund the addition of a westbound right-turn overlap phase to the intersection of Norman Scott Road/32nd Street/Wabash Boulevard, a California Department of Transportation–controlled intersection, to improve the delay caused by the proposed project. This would reduce the delay associated with the project by 20.8 seconds during the AM peak hour and by 19.9 seconds during the PM	

Table 2-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			peak hour compared to unmitigated conditions, and would effectively reduce delay at this intersection to below current levels. (Note, for the STC Alternative, this mitigation measure would reduce the unmitigated delay associated with this alternative by 19.4 seconds during the AM peak hour and by 19.3 seconds during the PM peak hour.) In order to ensure the significant impact does not occur before the San Diego Unified Port District has paid its fair share to the California Department of Transportation, the San Diego Unified Port District shall initiate payment once approximately 150 new daily trips are reached under the proposed project. The trigger will be determined by the San Diego Unified Port District by examining the average daily trips over a 1 month timeframe and comparing the average daily trips to the baseline of 93 daily trucks generating 186 trips per day (33,349 trucks per year divided by 360 days multiplied by 2 trips for each truck) and 935 daily employee trips (315 existing employees multiplied by 3 trips per day). At the San Diego Unified Port District's discretion, the San Diego Unified Port District may seek reimbursement from tenants that would contribute new daily trips in proportion to their contribution.	
Result in Inadequate Parking Capacity	No New or More Severe Impacts than Previously Identified in the TAMT Final PEIR	PS	**MM-TRA-5: District Shall Inform All TAMT Workers to Park at the TAMT Facility or at an Authorized Offsite Parking Lot or Parking Garage.** All TAMT workers, employees, and contractors are prohibited from using on-street parking or from parking at the neighboring Cesar Chavez Park. If no parking is available on the project site, the District's marine terminal supervisors shall inform all dock workers that they shall park within a parking garage or surface parking lot.	LS
5.0 Cumulative				
Project Impacts				
Air Quality and Health Risk	No New or More Severe Impacts than Previously Identified in the TAMT Final PEIR	PS	Implement mitigation measures **MM-AQ-1R** through **MM-AQ-9R** and **MM-AQ-10**, as described above.	LS
Greenhouse Gas Emissions and Global Climate Change	No New or More Severe Impacts than Previously Identified in the TAMT Final PEIR	PS	Implement mitigation measures **MM-GHG-1R** through **MM-GHG-9R** and **MM-GHG-10**, as described above.	SU

Table 2-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
Hazards and Hazardous Materials	No New or More Severe Impacts than Previously Identified in the TAMT Final PEIR	PS	Implement mitigation measures **MM-HAZ-1R** and **MM-HAZ-2**, as described above.	LS
Noise and Vibration	No New or More Severe Impacts than Previously Identified in the TAMT Final PEIR	PS	Implement mitigation measure **MM-NOI-2** as described above.	LS
Transportation, Circulation and Parking	No New or More Severe Impacts than Previously Identified in the TAMT Final PEIR	PS	Implement mitigation measures **MM-TRA-3R** and **MM-TRA-4,** as described above. **MM-C-TRA-1R: Construct Managed Lanes on I-5 and SR-15.** SANDAG currently has plans to construct two managed lanes (one in each direction) on I-5 between SR-15 and Palomar Street by the year 2030 as well as two additional multi-purpose lanes and two managed lanes on SR-15 between I-5 and SR-94 by the year 2050. The District shall coordinate with SANDAG and Caltrans to determine the TAMT Plan's fair share contribution. Because this mitigation measure is far into the future, the exact amount will need to be determined at a future date and prior to the TAMT Plan's contribution to the affected freeway mainline sections reaching 0.005 change in V/C ratio. The following fair-share percentages under the STC Alternative scenario, per affected freeway facility, should serve as guidance to the amount the District should pay toward a program or plan for the aforementioned freeway facility improvements to be constructed. ▪ I-5 northbound between SR-94 & Imperial Avenue: 5 percent of the total cost for improvements to this segment. ▪ I-5 northbound between SR-15 & Main Street: 6 percent of the total cost for improvements at this segment. ▪ SR-15 southbound between Market Street & Ocean View Boulevard: 11 percent of the total cost for improvements to this segment. If a fair share funding program has been identified, the District shall determine if the Mitsubishi Cement Corporation Project Proponent shall provide a fair share contribution.	SU

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

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

Section 15123 of the State CEQA Guidelines requires the summary of an EIR to include areas of controversy known to the Lead Agency, including issues raised by agencies and the public. The District distributed an Initial Study (IS)/Notice of Preparation (NOP) to the State Clearinghouse, interested agencies, and groups on September 18, 2017, to solicit agency and public comments on the scope and content of the environmental analysis. Pursuant to State CEQA Guidelines Section 15082, recipients of the IS/NOP were requested to provide comments within 30 days after receipt of the IS/NOP. The 30-day IS/NOP public review period ended on October 18, 2017. A scoping meeting was held on September 27, 2017, at the District's Administration Building, Training Room, 3165 Pacific Highway, San Diego, CA 92101. A summary of all comments received is included in Table 1-2 of Chapter 1, *Introduction*, of the Draft SEIR, and all NOP comment letters are included in Appendix A of the Draft SEIR.

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

The Draft SEIR was made available for public review on December 19, 2019, for a period of 57 days. A total of 20 comment letters were received during the public review period. Comments received on the Draft SEIR included many similar concerns to those received during the NOP public review period. The primary issues raised in the comment letters were in regards to air quality and health risks; GHG emissions and climate change; hydrology and water quality; transportation, circulation, and parking; and the cumulative impact analysis. The comment letters and the District's responses are provided in Chapter 5, *Comments Received and District Responses*, of this Final SEIR.

In response to comments received on the Draft SEIR, changes were made to Section 4.1, *Air Quality and Health Risk;* Section 4.5, *Transportation, Circulation, and Parking,* and Chapter 5, *Cumulative Impacts*, to refine text and mitigation measures for clarity, and to include the potential changes in Navy activity within the Bay as a cumulative project, which was brought up in the public comment letters. There were no other changes to the Final SEIR in response to public comments.

The Board of Port Commissioners will determine whether to adopt a Statement of Overriding Considerations for approval of the Project, taking into consideration whether the benefits of the Project outweigh the significant and unavoidable impacts.

3. Project Description

3.1 Introduction

The Proposed Project would entail the construction and operation of a cement and cementitious material import, storage, and distribution facility within the TAMT. This facility would include the potential for two separate phases of improvements to Bays C-7 through C-10 of Warehouse C for the receipt, storage, and distribution of up to 600,000 metric tons per year (MT/yr) of cement and cementitious materials including, but not limited to, cement, slag, fly ash, and pozzolans. The cementitious material would be pneumatically[1] unloaded into Warehouse C from dry bulk cargo ships using mobile vacuum unloaders, and there would be up to 24 vessel calls per year at Berths 10-7/10-8 during peak operation. Aside from electrical upgrades for shore power, no changes to Berths 10-7/10-8 are proposed.

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

Bays C-7 and C-9 are currently vacant. Bays C-8 and C-10 are currently occupied by a District tenant and used for the storage of bauxite. It is anticipated that the other Warehouse C bays adjacent to the Proposed Project site would continue to be used for similar operations until such time that Warehouse C is demolished, as addressed in the Tenth Avenue Marine Terminal Redevelopment Program and the associated *Final Environmental Impact Report: Tenth Avenue Marine Terminal Redevelopment Plan and Demolition and Initial Rail Component* (TAMT Final PEIR). The timeframe for demolition is unknown, but would not likely occur within the next 15 years while Mitsubishi uses the bays for the Proposed Project.

The District has determined that the Proposed Project falls within the broader scope of the TAMT Final PEIR. The Sustainable Terminal Capacity Alternative (STC Alternative), a reduced project alternative for the terminal buildout and operations that was analyzed in the TAMT Final PEIR, was adopted by the Board of Port Commissioners (Board) by Resolution No. 2016-200.

3.2 Project Objectives

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

1. Establish a terminal facility in the San Diego region to receive delivery and provide for the storage and distribution of up to 600,000 MT/yr of cementitious materials to meet current and future cement demand in the greater San Diego region.
2. Eliminate or substantially reduce truck trips and distances from other more distant ports which presently deliver cementitious material necessary to serve the San Diego region.
3. Establish a facility with onsite storage capacity sufficient to provide for the efficient offloading of bulk ships delivering cementitious materials and loading of bulk cement trucks.

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

4. Establish an efficient, state-of-the-art facility that is sufficiently flexible to allow for unloading, separate storage, and distribution of a diverse range of cementitious products, including, but not limited to, cement, slag, fly ash, and pozzolans, which, in turn, facilitates the use of more environmentally sustainable concrete.
5. Establish a cementitious import operation facility at TAMT that is consistent with anticipated dry bulk throughput and operational capacities in the TAMT Redevelopment Plan under the Sustainable Terminal Capacity Alternative, adopted by the District while maintaining environmental sustainability.
6. Utilize existing berths and Port infrastructure and, in doing so, optimize the use of land and identify improvements and upgrade infrastructure necessary for the Proposed Project, consistent with the objectives of the TAMT Plan.

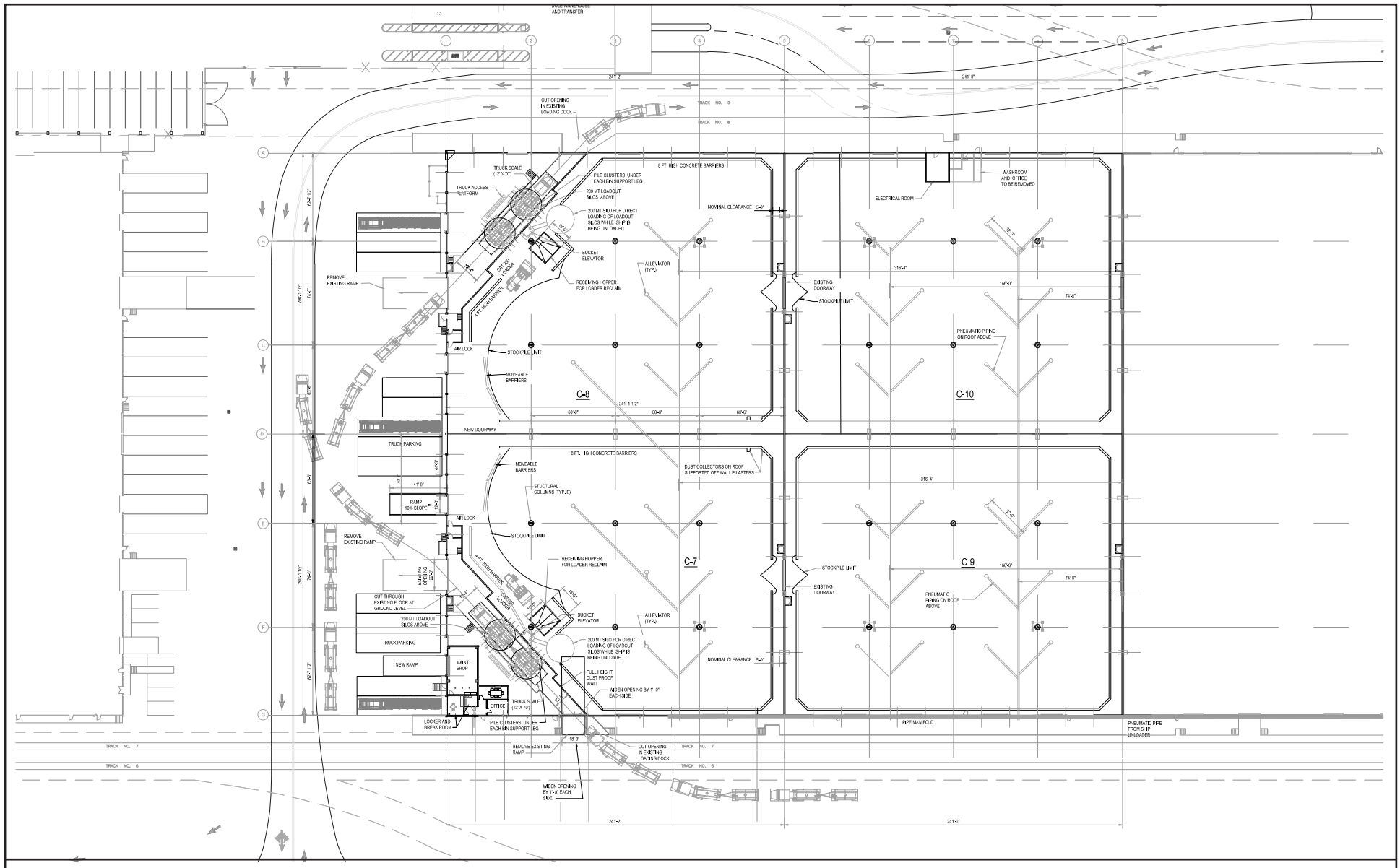
3.3 Proposed Project Description

The Proposed Project evaluated in this Final SEIR involves the construction and operation of a cement and cementitious material import, storage, and distribution facility within the TAMT to serve the needs of the San Diego area. The Proposed Project would be implemented in two phases. The facility would become operational following the completion of Phase I construction and have an estimated maximum loading, storage, and distribution capacity of 600,000 MT/yr. Based upon market demand, Phase II construction is expected to occur 2–3 years after Phase I becomes operational. At the conclusion of Phase II construction, the maximum annual throughput proposed by Mitsubishi would remain the same; however, the additional equipment and storage would allow more flexible operations and improved ability to respond to seasonal and other market fluctuations. There are also two loading options for the Proposed Project analyzed in this SEIR.

3.3.1 Project Construction

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

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



Source: Source: Environmental Audit, Inc. 2018

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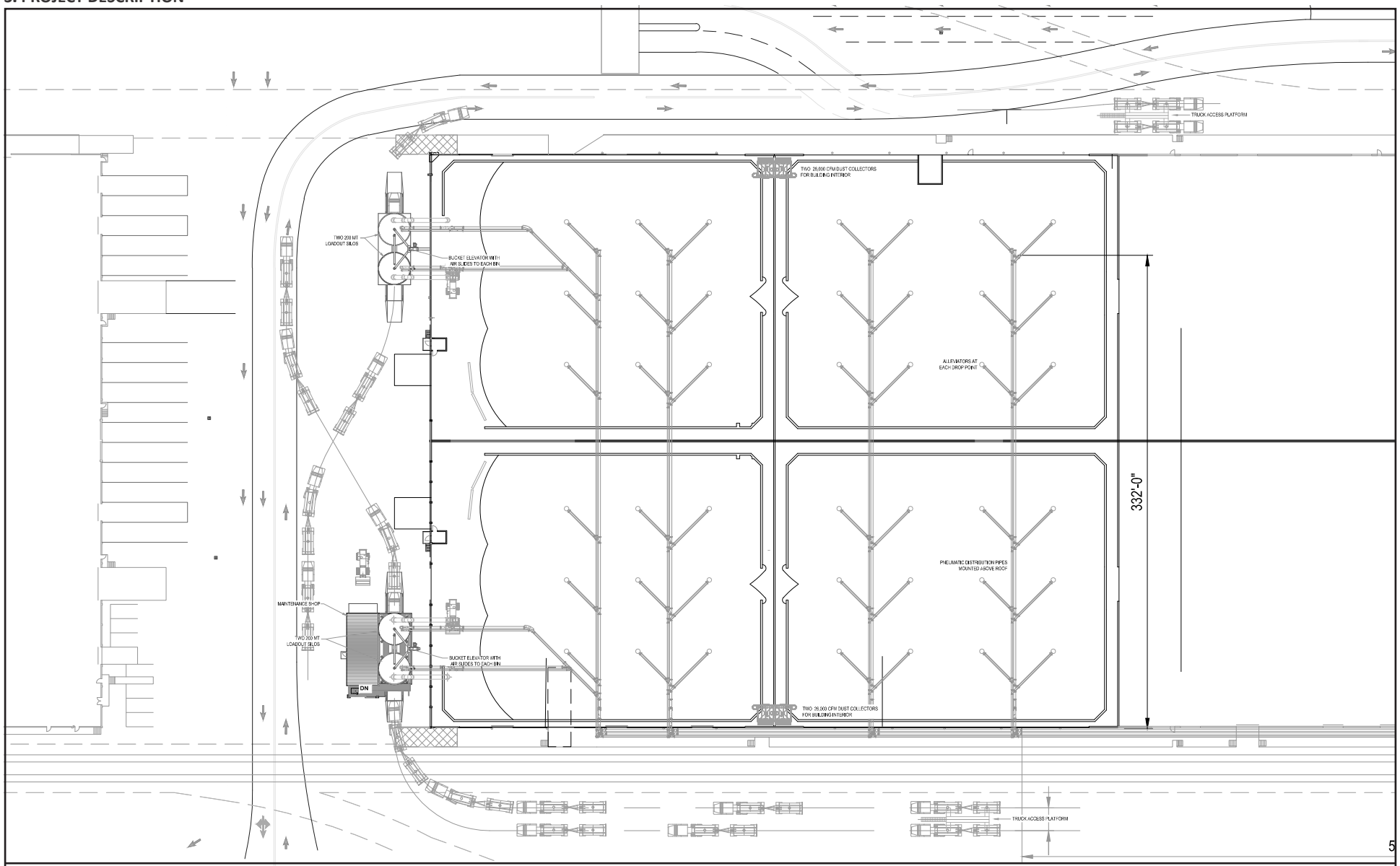
Figure 3-1

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



Source: Source: Environmental Audit, Inc. 2018

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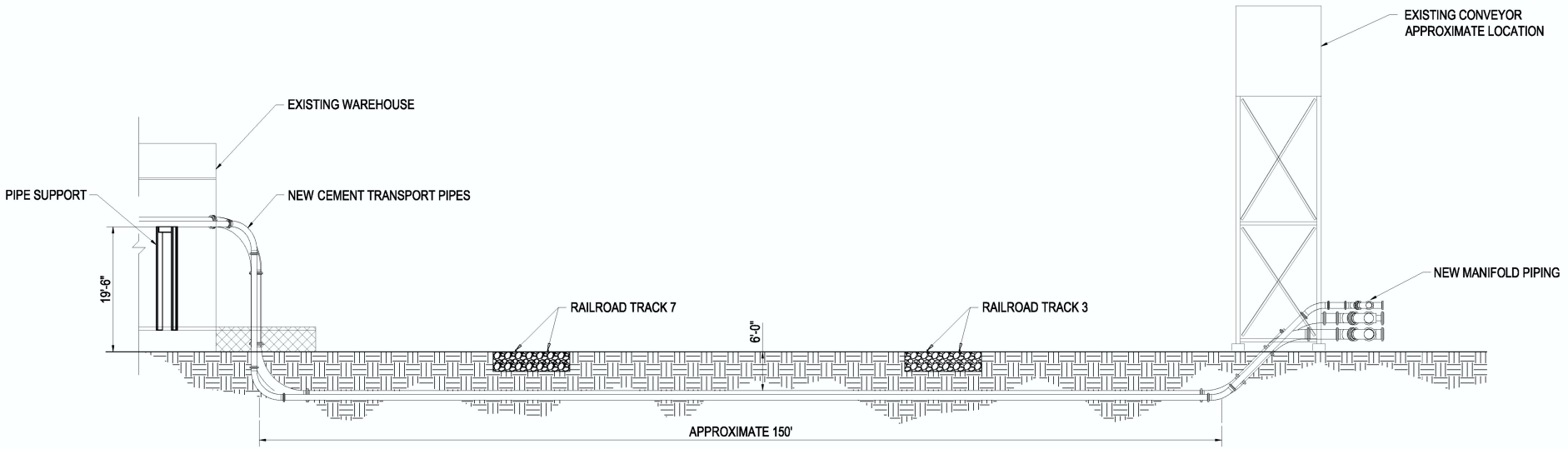
Figure 3-2

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

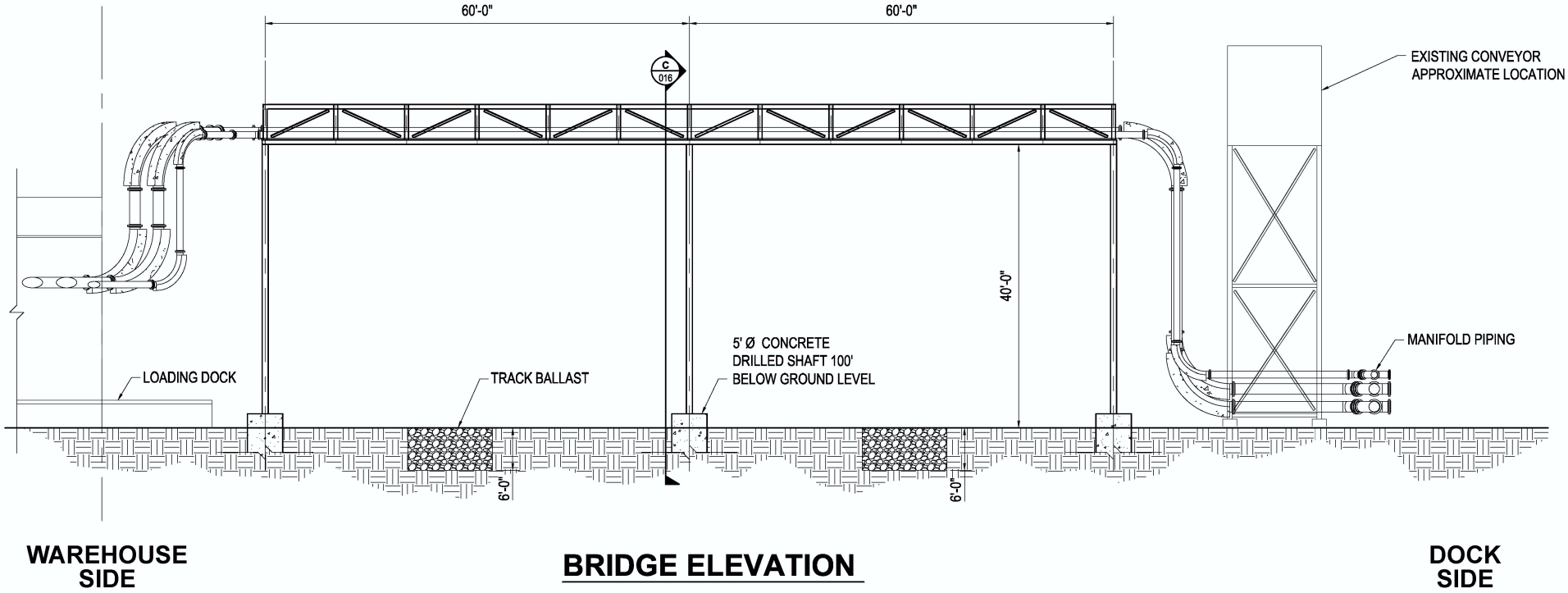


SUBTERRANEAN PIPELINE

Source: Environmental Audit, Inc. 2017

Figure 3-3

Sub-Option 1 (Subterranean Pipeline)



Source: Environmental Audit, Inc. 2017

Figure 3-4

Sub-Option 2 (Overhead Pipeline)

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

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

Phase I proposed improvements would include the following:

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

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

Phase II improvements to Bays C-8 and C-10 are anticipated to begin 2–3 years after Phase I is operational. These improvements (with the exception of the installation of underground piping, which only would occur during Phase I improvements) would be identical to those undertaken for Bays C-7 and C-9, and would require approximately 7–10 months to construct. Figure 3-8 presents a site plan for Bays C-8 and C-10 with interior truck loading (Loading Option A), while Figure 3-9 presents a site plan for Bays C-8 and

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

C-10 with exterior truck loading (Loading Option B). At the completion of Phase II improvements, the maximum annual throughput would remain the same; however, the additional equipment and storage would allow more flexible operations (e.g., store multiple cementitious materials concurrently within the warehouse bays) and improved ability to respond to seasonal and other market fluctuations.

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

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

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

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

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

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

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

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

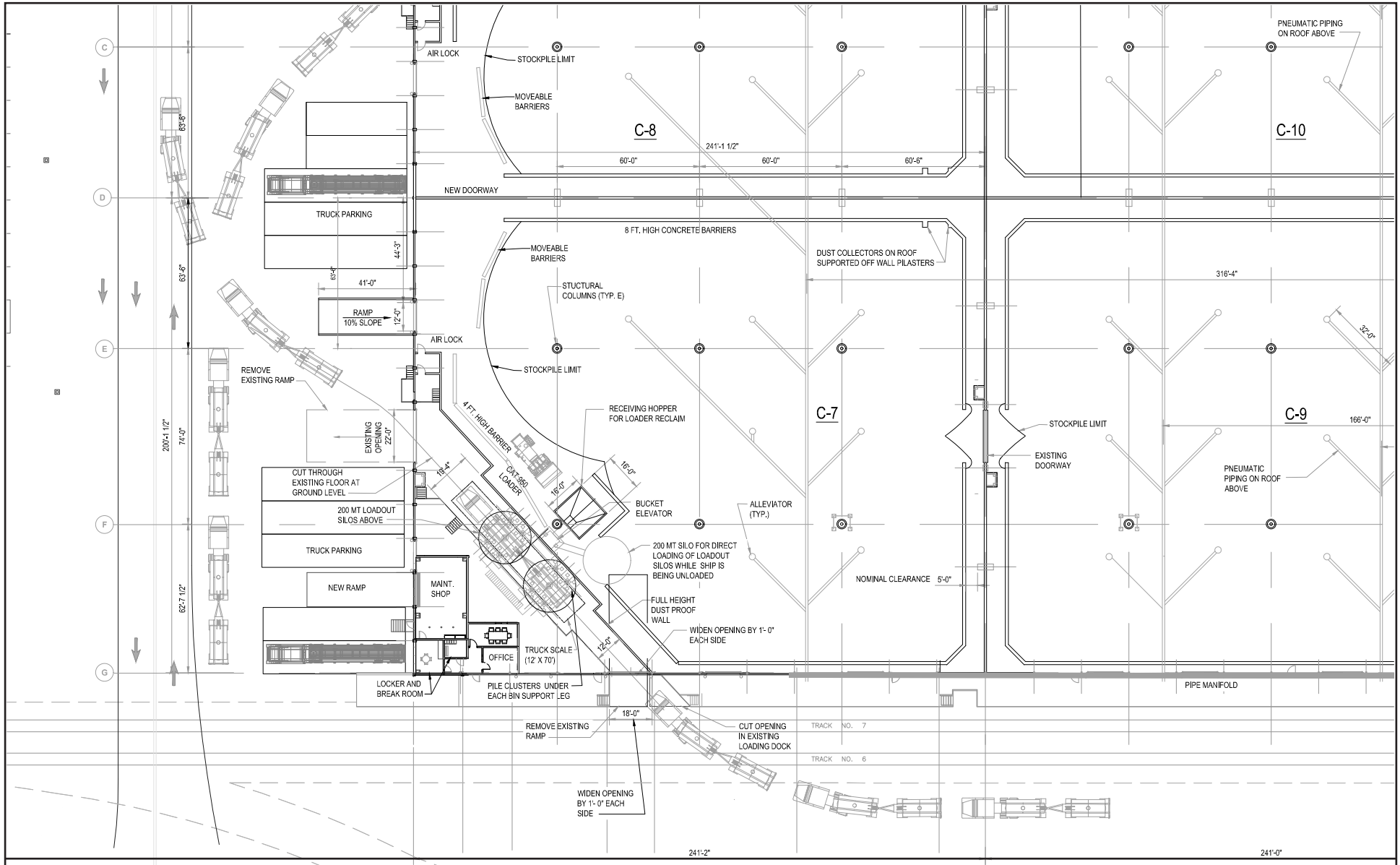


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Figure 3-5

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

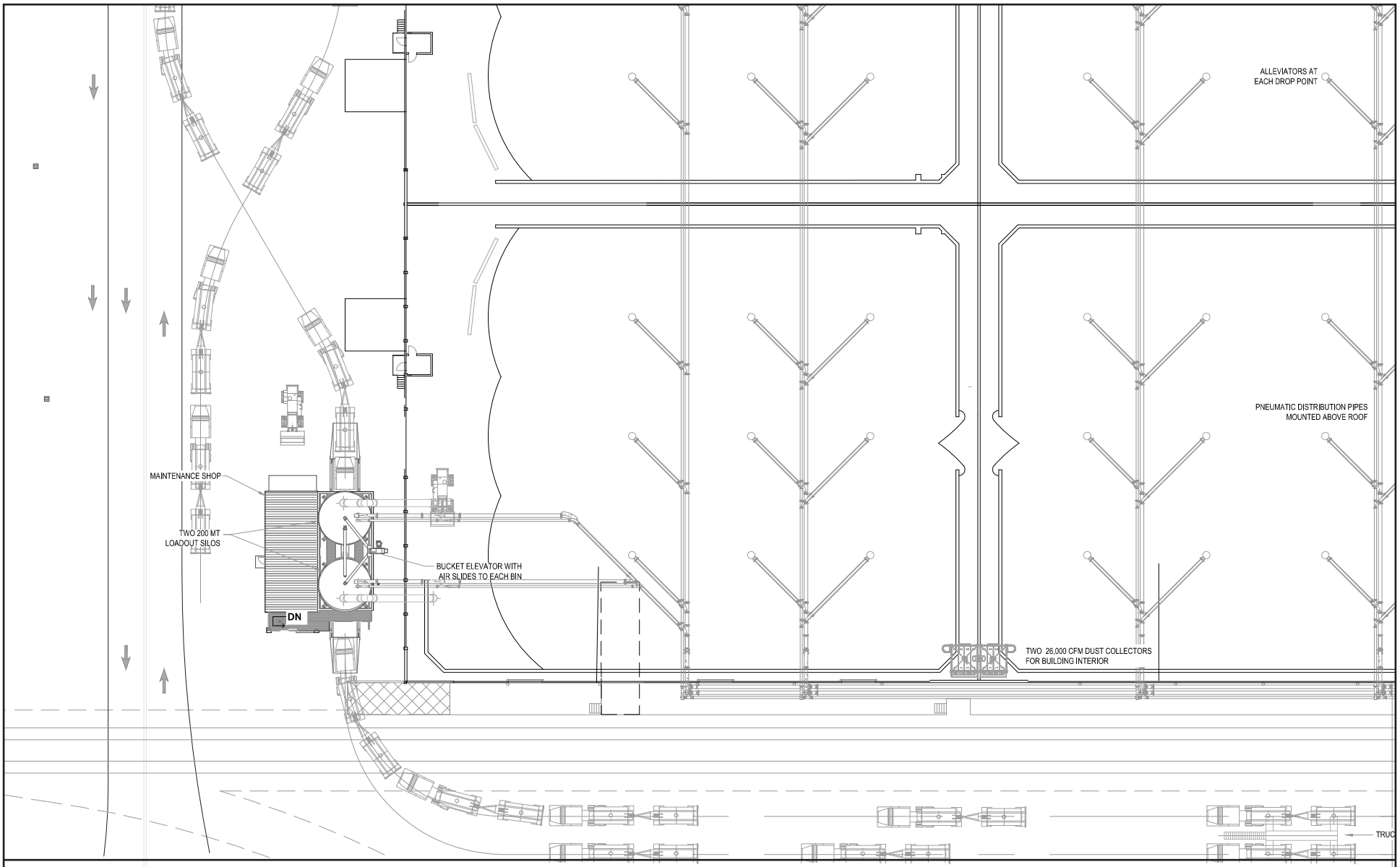

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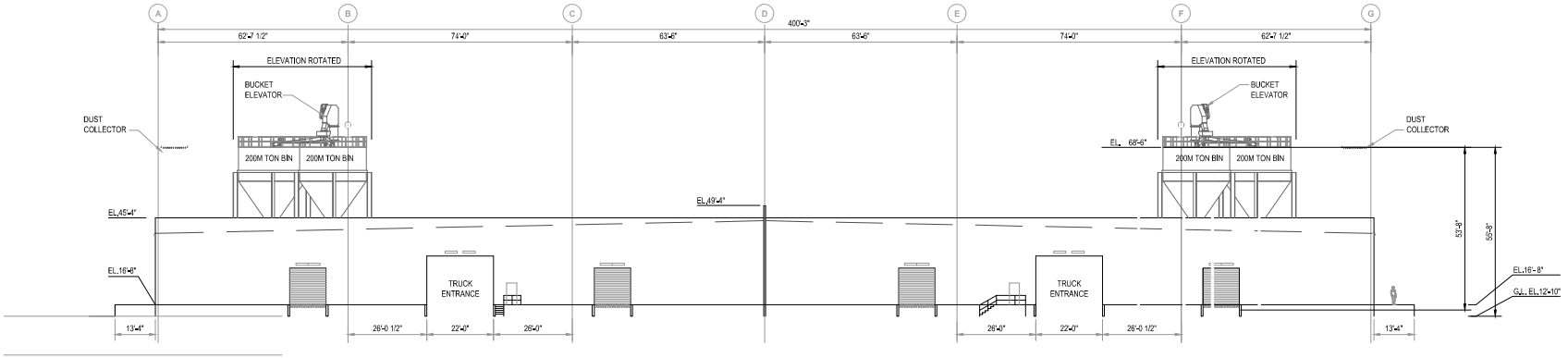
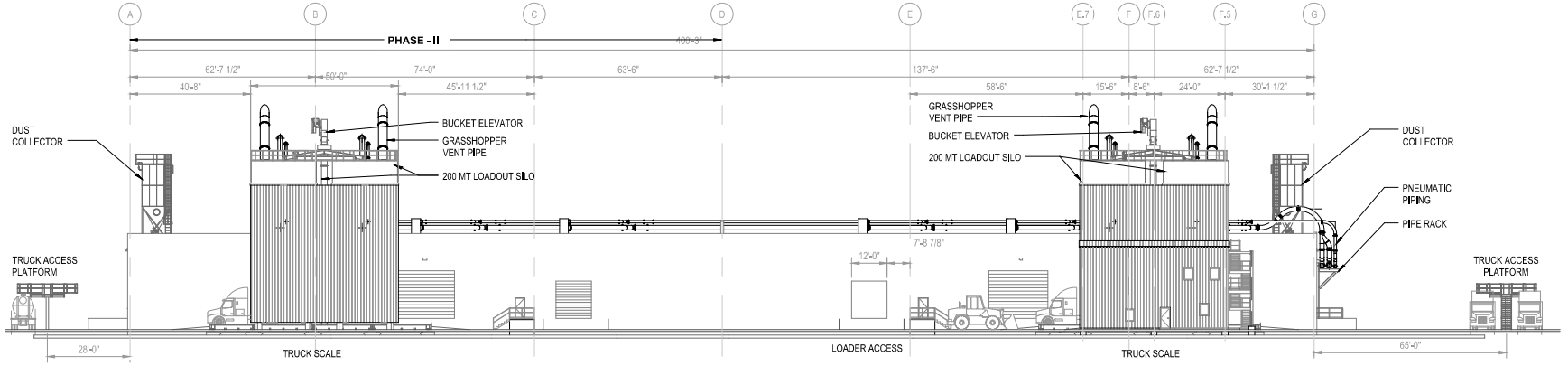
Figure 3-6

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



OPTION A



OPTION B

Source: Source: Environmental Audit, Inc. 2018

Figure 3-7

West Elevation View, Options A and B

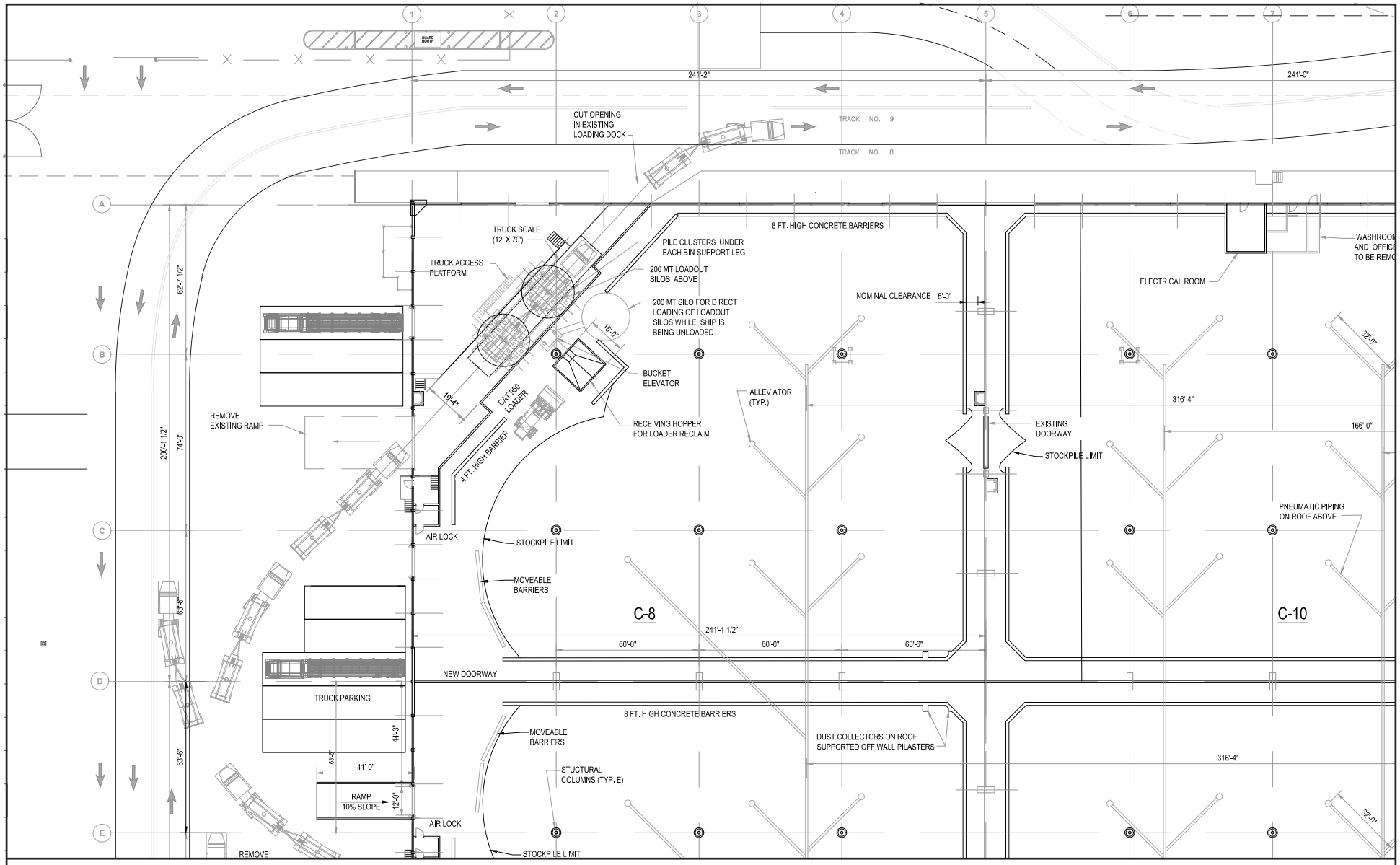


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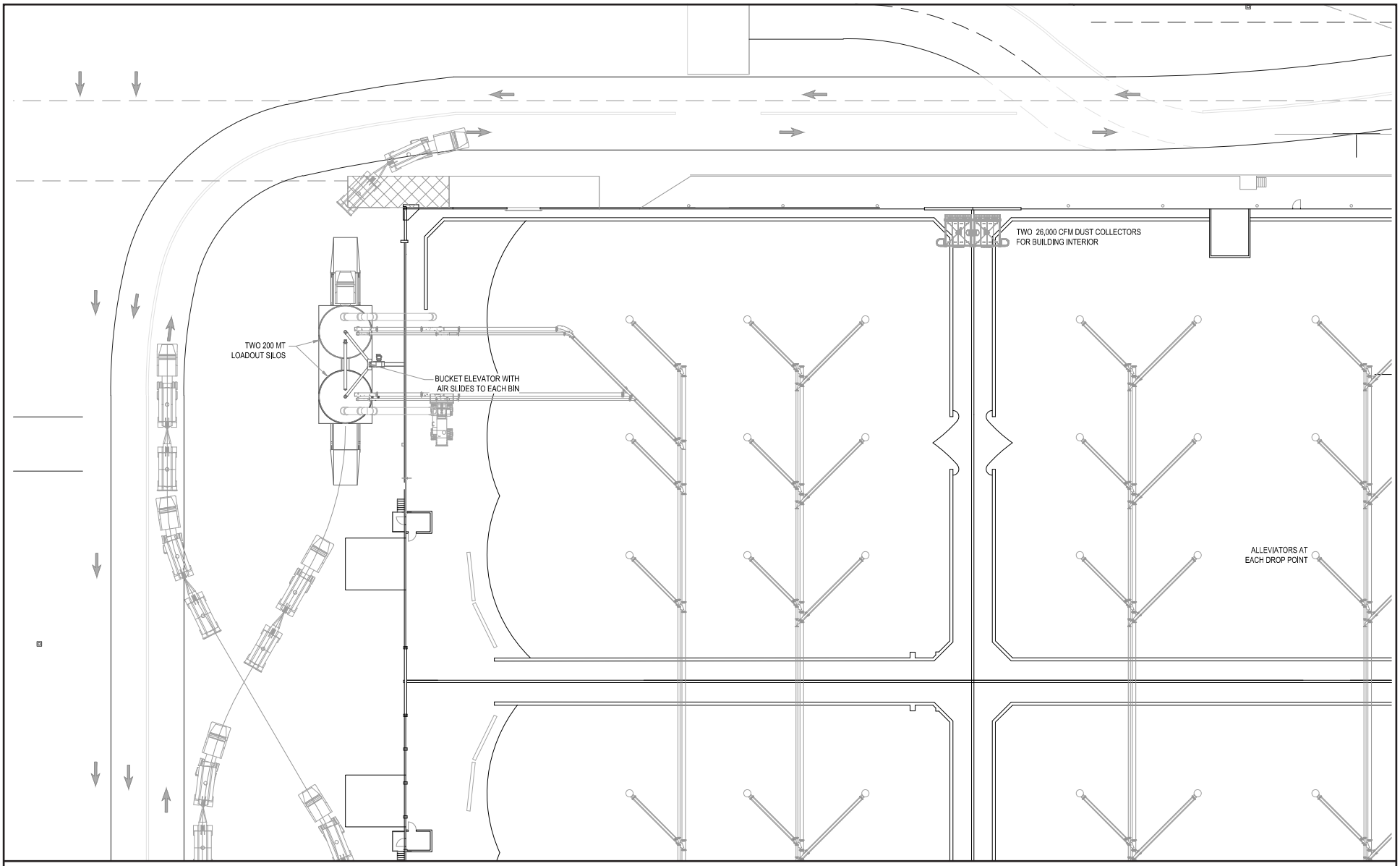
Figure 3-8

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



Source: Source: Environmental Audit, Inc. 2018

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Figure 3-9

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

3.3.2 Project Operations

As noted in Section 3.3.1, *Project Construction*, the Proposed Project would be implemented in two phases. The facility would become operational following the completion of Phase I construction and have an estimated maximum loading, storage, and distribution capacity of 600,000 MT/yr. Based upon market demand, Phase II construction is expected to occur 2–3 years after Phase I becomes operational. At the conclusion of Phase II construction, the maximum annual throughput proposed by Mitsubishi would remain the same; however, the additional equipment and storage would allow more flexible operations and improved ability to respond to seasonal and other market fluctuations. The Proposed Project's 600,000 MT annual throughput would be considered new throughput, over and above the dry bulk throughput of 289,864 MT/yr identified in the TAMT Final PEIR as part of existing baseline conditions. However, the Proposed Project's projected throughput would still be below the total estimated future dry bulk throughput of 1,987,500 MT/yr at buildout of the approved STC Alternative, as analyzed in the certified TAMT Final PEIR.

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

The Proposed Project would add up to 24 vessel calls per year at Berths 10-7/10-8. Depending on market availability, the origins of the vessels are anticipated to include Asia, South America, Mexico, or elsewhere. The vessels would be dry-bulk ocean-going vessels with a minimum holding of 20,000 MT to a maximum holding capacity of 40,000 MT of deadweight tonnage (DWT). At maximum operation, it is anticipated that each vessel would be at berth for 168 hours (7 days), and that two 400 MT unloaders would be used. The vessels would hotel at the berths continuously; however, actual unloading activities would occur for up to 20 hours per day in two work shifts. Table 3-1 provides a summary of at-berth vessel operations.

Table 3-1. Summary of At-Berth Vessel Operations (annual)

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

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

The Proposed Project would require one full-time supervisor and up to three maintenance staff workers at all times, for a total of four onsite workers. Vessel unloading and truck loading operations are

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

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

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

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

As identified in the Proposed Project's Initial Study/Environmental Checklist (Appendix A of Volume 3), the Proposed Project would not require the installation of new outdoor lighting on the TAMT that could affect nighttime views. Lighting proposed by the Proposed Project would be consistent with the lighting proposed in the TAMT Final PEIR. The Proposed Project would include lighting on proposed equipment as necessary to provide adequate illumination to safely access the equipment and facilities and provide security during Project operations, which include the off-loading of vessels. Lighting on the exterior of the warehouse would be limited to lighting required to provide safe working areas compliant with the Federal and State Occupational Safety and Health Administrations' lighting requirements. The lighting would use LED bulbs and be mounted 10 feet above finished floors to structural steel or on stanchions. These fixtures would be industrial type with 90 degree cut wherever possible. As stated in the TAMT Final PEIR, lighting proposed would be consistent with Section 142.0740 of the City of San Diego Municipal Code, which incorporates the California Energy Code (California Code of Regulations, Title 24, Part 6) and Green Building Regulations (Chapter 14, Article 10), as well as light shielding standards (TAMT Final PEIR pg. 4.1-21).

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

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

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

3.4 Project Review and Approvals

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

3.4.1 San Diego Unified Port District

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

3.4.2 City of San Diego

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

3.4.3 San Diego Air Pollution Control District

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

3.4.4 California Department of Transportation

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

4. Errata and Revisions

4.1 Introduction

This chapter reflects the modifications to the Draft SEIR that may have resulted from comments received during the 57-day public review for the Draft SEIR or that were required for purposes of clarification. These modifications do not alter the conclusions of the environmental analysis such that new significant environmental impacts have been identified, nor do they constitute significant new information under State CEQA Guidelines Section 15088.5. The modifications are provided by chapter and indicated with the page number from the Draft SEIR. This chapter is intended to be used in conjunction with the analysis contained within the Draft SEIR.

Additional text is shown as underlined and deleted text is shown in ~~strikethrough~~. For changes to Tables 4.1-10 and 4.5-9 of the Draft SEIR, deleted text is shown in double ~~strikethrough~~.

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

4.2 Draft SEIR Chapters/Section Changes

4.2.1 Changes to the *Executive Summary*

Pages ES-17 through ES-28; ES-45 through ES-47

Table ES-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
4.1 Air Quality and Health Risk				
Project Impacts				
Violate an Air Quality Standard	No New or More Severe Impacts than Previously Identified in the TAMT Final PEIR	PS	**MM-AQ-1R: Implement Best Management Practices During Construction of Future TAMT Plan Components.** The Mitsubishi Cement Corporation Project Proponent shall implement Best Management Practices (BMPs) to reduce air emissions from all construction activities implemented as part of the Proposed Project. The following measures are required to limit construction equipment exhaust from on-road trucks and heavy-duty equipment used during construction. ▪ Ensure that all off-road diesel-powered equipment used during construction between 2020 and 2025 is equipped with the U.S. Environmental Protection Agency (EPA) Tier 3 or cleaner engines, except for specialized construction equipment for which an EPA Tier 3 engine is not available. ▪ Ensure that all off-road diesel-powered equipment used during construction beyond 2025 is equipped with the EPA Tier 4 Final or cleaner engines, except for specialized construction equipment for which an EPA Tier 4 Final engine is not available. ▪ Maintain all construction vehicles and equipment according to manufacturers' specifications. ▪ Restrict idling of construction vehicles and equipment to a maximum of 3 minutes when not in use (see MM-AQ-2 for definition of "not in use"). In addition, the Mitsubishi Cement Corporation Project Proponent shall implement the relevant BMPs, consistent with the Project-specific industrial Storm Water Pollution Prevention Plan (SWPPP). In no case would any BMP be implemented if it conflicts with the SWPPP or other applicable water quality permit requirements. BMP dust control measures may include, but are not limited to, the following: ▪ Water the grading areas at least twice daily to minimize fugitive dust.	LS

Table ES-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			▪ Stabilize graded areas as quickly as possible to minimize fugitive dust. ▪ Apply chemical stabilizer or pave the last 100 feet of internal travel path within the construction site prior to public road entry. ▪ Install wheel washers adjacent to a paved apron prior to vehicle entry on public roads. ▪ Remove any visible track-out into traveled public streets within 30 minutes of occurrence. ▪ Wet wash the construction access point at the end of each workday if any vehicle travel on unpaved surfaces has occurred. ▪ Provide sufficient perimeter erosion control to prevent washout of silty material onto public roads. ▪ Cover haul trucks or maintain at least 12 inches of freeboard to reduce blow-off during hauling. ▪ Suspend all soil disturbance and travel on unpaved surfaces if winds exceed 25 mph. ▪ Cover/water onsite stockpiles of excavated material. ▪ Enforce a 15 mph speed limit on unpaved surfaces. ▪ On dry days, sweep up any dirt and debris spilled onto paved surfaces immediately to reduce re-suspension of particulate matter caused by vehicle movement. Clean approach routes to construction sites daily for construction-related dirt in dry weather. ▪ Develop as quickly as possible all disturbed areas as directed by the San Diego Unified Port District's Planning and Green Port Department and/or SDAPCD to reduce dust generation. ▪ Limit the daily grading volumes/area. Prior to the commencement of construction activities, the Mitsubishi Cement Corporation Project Proponent shall submit evidence to the San Diego Unified Port District's Planning and Green Port Department of compliance with the BMPs and that construction equipment is maintained and properly tuned in accordance with manufacturers' specifications, which shall be	

Table ES-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			subject to confirmation by the San Diego Unified Port District's Planning and Green Port Department during construction. **MM-AQ-2R: Implement Diesel Emission-Reduction Measures During Construction and Operations of Future TAMT Plan Components.** The Mitsubishi Cement Corporation Project Proponent shall implement the following measures during construction and project operations, subject to verification by the San Diego Unified Port District's Planning and Green Port Department. i. The Mitsubishi Cement Corporation Project Proponent shall limit all construction and operations equipment, drayage, and delivery truck idling times by shutting down equipment when not in use and reducing the maximum idling time to less than 3 minutes. Clear signage regarding the limitation on idling time at the delivery driveway and loading areas has been installed on terminal to provide actual notice of this requirement to all drivers. This measure shall be enforced by the terminal supervisors or by a Port designated functional-equivalent, who will submit quarterly reports of violators to San Diego Unified Port District's Planning and Green Port Department and repeat violators shall be subject to penalties pursuant to California airborne toxics control measure 13 California Code of Regulations Section 2485. The Project Proponent shall submit evidence of the use of diesel emission reduction measures to the San Diego Unified Port District's Planning and Green Port Department through annual reporting, with the first report due 1 year from the date of project completion and each report due exactly 1 year after, noting all violations with relevant identifying information of the vehicles and drivers in violation of these measures. ii. The Mitsubishi Cement Corporation Project Proponent shall verify that all construction and operations equipment is maintained and properly tuned in accordance with manufacturers' specifications. Prior to the commencement of construction and operations activities using diesel-powered vehicles or equipment, the Mitsubishi Cement Corporation Project Proponent shall verify that all vehicles and equipment have been checked by a ~~certified~~ mechanic experienced with such equipment and determined to be running in proper condition prior to admittance into any terminal leasehold. The	

Table ES-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			Mitsubishi Cement Corporation Project Proponent shall submit a report by the ~~certified~~ mechanic of the condition of the construction and operations vehicles and equipment to the San Diego Unified Port District's Engineering Department during the construction phase and the Planning and Green Port Department during the operation phase prior to commencement of their use. **MM-AQ-3R: Comply with San Diego Unified Port District Climate Action Plan Measures.** Prior to approval of all discretionary actions and/or Coastal Development Permits, the Mitsubishi Cement Corporation Project Proponent shall be required to implement the following measures to be consistent with the Climate Action Plan. ▪ Vessels shall comply with the San Diego Unified Port District's voluntary vessel speed reduction program, which targets 80 percent compliance. ▪ Vessels that are subject to CARB's at-berth regulation (dry bulk vessels are not subject to the at-berth regulation) shall comply with ARB's at berth regulation that requires shore power or alternative control technology regulation for certain vessel fleets for 80 percent of eligible calls by 2020, minus idle time to clear customs consistent with California Air Resources Board regulations. The TAMT Final PEIR assumed 1.5 hours of idle time for vessels to embark/disembark, which applies to all shore power and/or alternative control technologies employed at the terminal. This is a Project feature made into a mitigation measure to ensure compliance (see MM-AQ-9 for an explanation of the Proposed Project's shore power features). ▪ Designated truck haul routes shall be used, and the Project Proponent shall decrease onsite movements where practicable. ▪ No commercial drive-through shall be implemented. ▪ Compliance with Assembly Bill 939 and the City of San Diego's Recycling Ordinance shall be mandatory and shall include recycling at least 50 percent of solid waste; compliance with the City of San Diego's Construction and Demolition Debris Deposit Ordinance shall be mandatory	

Table ES-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			and shall include recycling at least 65 percent of all construction debris. This measure shall be applied during construction and operation of the Proposed Project. ▪ Light fixtures shall be replaced with lower-energy bulbs such as fluorescent, Light-Emitting Diodes (LEDs), Compact Fluorescent Lights (CFLs), or the most energy-efficient lighting that meets required lighting standards and is commercially available. ▪ Implementation of Climate Action Plan measures will be included as part of any discretionary actions and/or Coastal Development Permit(s) associated with this project. Evidence of implementation and compliance with this mitigation measure shall be provided to the San Diego Unified Port District's Planning and Green Port Department by the Project Proponent on an annual basis through the end of the lease or 2035 (buildout of the TAMT Plan), whichever occurs first. **MM-AQ-4R: Implement Best Available Control Technologies for Conveyor System and Bulk Discharge Unloader for Future Dry Bulk Operations associated with the TAMT Plan.** As a condition of approval of any new or amended real estate agreement or Coastal Development Permit for the Mitsubishi Cement Corporation Project that would result in an increase in daily or annual throughput over baseline conditions identified in the TAMT Final PEIR, the San Diego Unified Port District shall require the Mitsubishi Cement Corporation Project Proponent to install and use the best available control technologies to achieve a minimum 95% control efficiency for particulate matter by bypassing the existing Conveyor System and Bulk Discharge Unloader and installing a new Conveyor System and Bulk Discharge Unloader that meets the minimum 95% control efficiency. Under no circumstance shall the Project Proponent seeking discretionary approval for dry bulk operations be allowed to increase daily or annual throughput of dry bulk operations without first completing the upgrade or replacement of the existing system, or installation of a new system required above. The recipient of a discretionary approval by the San Diego Unified Port District subject to this mitigation measure shall	

Table ES-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			provide written evidence of implementation and compliance with this mitigation measure to the San Diego Unified Port District on an annual basis through the end of the lease. **MM-AQ-5R: Implement Enhanced Vessel Speed Reduction Program Beyond Climate Action Plan Compliance for Future Operations Associated with the TAMT Plan.** The Mitsubishi Cement Corporation shall be required to comply with the Enhanced VSR Program. The Mitsubishi Cement Corporation shall, beginning with the first vessel call to the Port, comply with 80% of its OGVs reducing their speeds to 12 knots or less starting at 20 nautical miles from Point Loma. The Mitsubishi Cement Corporation shall comply with 90% of its OGVs calling to the Port, reduce their speeds to 12 knots starting at 40 nautical miles from Point Loma upon the occurrence of the earlier of either of the following two scenarios: ▪ Prior to the annual number of dry bulk vessel calls reach 91 calls annually (e.g., 76 new calls over the TAMT Final PEIR's baseline condition); or ▪ Beginning January 1, 2030, irrespective of the number of calls on an annual basis. To help the District implement the Beyond 2013 CAP VSR Program before reaching 91 dry bulk vessel calls annually, Mitsubishi Cement Corporation shall provide the District with a rolling estimate of anticipated vessels calls every 6 months. The San Diego Unified Port District will verify compliance through analysis of Automatic Identification System data or by requesting a vessel's Electronic Chart Display Identification System log from the captain. **MM-AQ-6: Electric Cargo Handling Equipment Upgrades.** This measure has multiple steps for compliance, as specified below. A. Prior to January 1, 2020, the San Diego Unified Port District shall ensure that at least three pieces of existing non-electric cargo handling equipment at the terminal are replaced by electric cargo handling equipment, none of which were previously operating at the terminal during the 2013/2014 baseline year of the EIR analysis. Possible ways	

Table ES-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			the electric cargo handling equipment may be obtained include, but are not limited to, the following: 1. Purchased, leased, or otherwise acquired, in whole or in part, through funding provided to a tenant by the San Diego Unified Port District; 2. Purchased, leased, or otherwise acquired, in whole or in part, through funding provided to a tenant by other sources; or 3. Purchased, leased, or otherwise acquired, in whole or in part, by the tenant in compliance with a condition of a discretionary approval issued by the San Diego Unified Port District. Written evidence of the acquisition of the electric cargo handling equipment and the equipment it will replace and remove from further operation at the terminal must be provided to the San Diego Unified Port District. The San Diego Unified Port District shall further ensure that the electric cargo handling equipment is in use at each of the three nodes throughout the expected operating life. This will be accomplished by requiring each tenant that employs electric cargo handling equipment pursuant to this measure to report the equipment's annual number of hours of operation to the San Diego Unified Port District and by requiring the San Diego Unified Port District to monitor use of the electric cargo handling equipment as part of the San Diego Unified Port District's TAMT equipment inventory. B. Prior to January 1, 2025, the San Diego Unified Port District also shall ensure that no fewer than 20 non-electric yard trucks in operation are replaced at the TAMT by 20 electric yard trucks. Possible ways the electric yard trucks may be obtained include, but are not limited to, the following: 1. Purchased, leased, or otherwise acquired, in whole or in part, through funding provided to a tenant by the San Diego Unified Port District; 2. Purchased, leased, or otherwise acquired, in whole or in part, through funding provided to a tenant by other sources; or	

Table ES-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			3. Purchased, leased, or otherwise acquired, in whole or in part, by the tenant in compliance with a condition of a discretionary approval issued by the San Diego Unified Port District. Written evidence of the acquisition of the electric yard trucks, and the non-electric yard trucks they will replace and remove from further operation at the terminal, must be provided to the San Diego Unified Port District. The San Diego Unified Port District shall further ensure that the electric yard trucks are in use at the TAMT throughout the expected operating life of the equipment. Each tenant that employs electric trucks pursuant to this measure shall report the equipment's annual number of hours of operation to the San Diego Unified Port District, and the San Diego Unified Port District shall monitor use of the electric trucks as part of the San Diego Unified Port District's TAMT equipment inventory. C. Prior to January 1, 2030, the San Diego Unified Port District also shall ensure that no fewer than three existing non-electric reach stackers and ten non-electric forklifts in operation are replaced at the TAMT by three fully electric reach stackers and ten fully electric forklifts. Possible ways the electric reach stackers and forklifts may be obtained include, but are not limited to: 1. Purchased, leased, or acquired, in whole or in part, through funding provided to the tenant by the San Diego Unified Port District; 2. Purchased, leased, or acquired, in whole or in part, through funding provided to the tenant by other sources; or 3. Purchased, leased, or otherwise acquired, in whole or in part, by the tenant in compliance with a condition of a discretionary approval issued by the San Diego Unified Port District. Written evidence of the acquisition of the three electric reach stackers and ten electric forklifts and the conventional equipment they will replace and remove from further operation at the terminal must be provided to the San Diego Unified Port District. The San Diego Unified Port	

Table ES-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			District shall further ensure that the electric reach stackers and forklifts are in use at the TAMT throughout the expected operating life of the equipment. Each tenant that employs electric reach stackers or electric forklifts pursuant to this measure shall report the equipment's annual number of hours of operation to the San Diego Unified Port District, and the San Diego Unified Port District shall monitor use of the electric reach stackers and forklifts as part of the San Diego Unified Port District's TAMT equipment inventory. D. The electric equipment employed pursuant to paragraphs A, B, and C of this mitigation measure may be replaced by other technologies or other types of cargo handling equipment as long as the replacement equipment achieves the same or greater criteria pollutant, toxic air contaminant, and greenhouse gas emission reductions as compared to the equipment required by paragraphs A, B, and C of this mitigation measure.	
			MM-AQ-7R: Annual Inventory Submittal and Periodic Technology Review. The Mitsubishi Cement Corporation shall comply with the District's Annual Inventory and Periodic Technology Review Program by (1) providing an inventory of all the mobile equipment associated with their TAMT site operations that generate criteria pollutants, toxic air contaminants, and greenhouse gases on an annual basis to be submitted by January 30 of each year of operations, and (2) working collaboratively with District staff and/or the local air pollution control district to identify new technologies or other practices that can be incorporated into their operations that help reduce emissions and improve air quality. The Mitsubishi Cement Corporation shall complete the District's equipment inventory spreadsheet annually, which requires tenants to identify the year, make, VIN/ID number, fuel type, and model of the equipment that was used in the previous year, including annual hours of operation for each piece of equipment, including but not limited to heavy-duty drayage and non-drayage trucks, yard equipment, assist and ocean-going tugs, ocean-going vessels, bulk material handling equipment, and any other type of cargo handling equipment. The purpose	

Table ES-1. Project Impacts and Mitigation Measures

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

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Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			Air Resources Board's (CARB's) At-Berth Regulation, Title 17, CCR Section 93118.3, subsection (c)(14)], prevents Mitsubishi Cement Corporation from achieving the required annual average shore-to-ship power rate (equal to or greater than 50 percent), Mitsubishi Cement Corporation may demonstrate compliance over a 2-year period, so long as Mitsubishi Cement Corporation submits documentation to the San Diego Unified Port District's Planning and Green Port Department which describes the emergency event(s) and explains the basis for Mitsubishi Cement Corporation's inability to demonstrate compliance using an annual average. The San Diego Unified Port District's Planning and Green Port Department shall review the documentation submitted by the Mitsubishi Cement Corporation and, if the San Diego Unified Port District's Planning and Green Port Department determines that Mitsubishi Cement Corporation made sufficient effort to comply with the environmental control, it would notify Mitsubishi Cement Corporation in writing that use of the two-year average is acceptable. **Please note that Mitsubishi' Cement Corporation's annual dry bulk throughput will not be counted towards the 691,418 metric ton dry bulk trigger that requires use of an At-Berth Emission Capture and Control System because Mitsubishi will be relying on a shore-to-ship power system. However, the 691,418 metric ton dry bulk trigger would apply to other dry bulk tenants that do not have shore-power capabilities.* **MM-AQ-10: Modernization of Delivery Truck Fleet.** No less than 90 percent of the trucks loading cement or cementitious material at the Mitsubishi Cement Corporation facility shall be equipped with an engine that meets one of the following requirements: 1) Is no more than 5 years old, based on engine model year ("5-Year Engine") for each operational year; 2) Has been designed or retrofitted to comply with federal and state on-road heavy-duty engine emissions standards (e.g. EPA 2010 engine emission standards or successor rules or regulations for on-road heavy duty diesel engines) for a 5-Year Engine ("Emission equivalent Engine"); or	

Table ES-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			3) Uses alternative engine technology or fuels demonstrated to produce emissions no greater than a 5-Year Engine ("Alternative Equivalent Engine"), including zero emission vehicles powered by electric batteries or hydrogen fuel cells. The remaining 10 percent of the trucks shall comply with all applicable federal and state heavy-duty on-road truck regulations. In addition, all trucks loading cement or cementitious materials at the Mitsubishi Cement Corporation facility shall be registered and be in compliance with the CARB Truck and Bus Regulation. In order to confirm that Mitsubishi Cement Corporation's 90 percent requirement for a Modernized Truck Fleet shall be determined on a calendar year basis. Mitsubishi Cement Corporation shall submit documentation of compliance, showing the following information, to the San Diego Unified Port District's Planning and Green Port Department on an annual basis by January 31 following each year of operation: 1) Truck vehicle identification number (VIN), 2) Engine model year, 3) Annual truck trips, and 4) If nondiesel technology, manufacturer engine standards.	
Sensitive Receptors	No New or More Severe Impacts than Previously Identified in the TAMT Final PEIR	PS	Implement mitigation measures **MM-AQ-1R** through **MM-AQ-9R, MM-HAZ-1R,** and **MM-HAZ-2**.	LS
4.2 Greenhouse Gas Emissions and Climate Change				
Project Impacts				
Directly or Indirectly Generate Greenhouse Gases	No New or More Severe Impacts than Previously Identified in the TAMT Final PEIR	PS	**MM-GHG-1R: Implement Best Management Practices During Construction of Future TAMT Redevelopment Plan Components.** The Mitsubishi Cement Corporation Project Proponent shall implement Best Management Practices (BMPs) to reduce air emissions from all construction activities implemented as part of the Proposed Project. The following measures are required to	SU

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			limit construction equipment exhaust from on-road trucks and heavy-duty equipment used during construction. ▪ Ensure that all off-road diesel-powered equipment used during construction between 2020 and 2025 is equipped with the U.S. Environmental Protection Agency (EPA) Tier 3 or cleaner engines, except for specialized construction equipment for which an EPA Tier 3 engine is not available. ▪ Ensure that all off-road diesel-powered equipment used during construction beyond 2025 is equipped with the EPA Tier 4 Final or cleaner engines, except for specialized construction equipment for which an EPA Tier 4 Final engine is not available. ▪ Maintain all construction vehicles and equipment according to manufacturers' specifications. ▪ Restrict idling of construction vehicles and equipment to a maximum of 3 minutes when not in use (see MM-GHG-2 for definition of "not in use"). In addition, the Mitsubishi Cement Corporation Project Proponent shall implement the relevant BMPs, consistent with the Project-specific industrial Storm Water Pollution Prevention Plan (SWPPP). In no case would any BMP be implemented if it conflicts with the SWPPP or other applicable water quality permit requirements. BMP dust control measures may include, but are not limited to, the following: ▪ Water the grading areas at least twice daily to minimize fugitive dust. ▪ Stabilize graded areas as quickly as possible to minimize fugitive dust. ▪ Apply chemical stabilizer or pave the last 100 feet of internal travel path within the construction site prior to public road entry. ▪ Install wheel washers adjacent to a paved apron prior to vehicle entry on public roads. ▪ Remove any visible track-out into traveled public streets within 30 minutes of occurrence.	

Table ES-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			▪ Wet wash the construction access point at the end of each workday if any vehicle travel on unpaved surfaces has occurred. ▪ Provide sufficient perimeter erosion control to prevent washout of silty material onto public roads. ▪ Cover haul trucks or maintain at least 12 inches of freeboard to reduce blow-off during hauling. ▪ Suspend all soil disturbance and travel on unpaved surfaces if winds exceed 25 mph. ▪ Cover/water onsite stockpiles of excavated material. ▪ Enforce a 15 mph speed limit on unpaved surfaces. ▪ On dry days, sweep up any dirt and debris spilled onto paved surfaces immediately to reduce re-suspension of particulate matter caused by vehicle movement. Clean approach routes to construction sites daily for construction-related dirt in dry weather. ▪ Develop as quickly as possible all disturbed areas as directed by the San Diego Unified Port District's Planning and Green Port Department and/or SDAPCD to reduce dust generation. ▪ Limit the daily grading volumes/area. Prior to the commencement of construction activities, the Mitsubishi Cement Corporation Project Proponent shall submit evidence to the San Diego Unified Port District's Planning and Green Port Department of the project proponent's compliance with the BMPs and that construction equipment is maintained and properly tuned in accordance with manufacturers' specifications, which shall be subject to confirmation by the San Diego Unified Port District's Planning and Green Port Department during construction. **MM-GHG-2R: Comply with San Diego Unified Port District Climate Action Plan Measures.** Prior to approval of all discretionary actions and/or Coastal Development Permits, the Mitsubishi Cement Corporation Project Proponent shall be required to implement the following measures to be consistent with the Climate Action Plan.	

Table ES-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			• Vessels shall comply with the San Diego Unified Port District's voluntary vessel speed reduction program, which targets 80 percent compliance. • Vessels that are subject to the ARB's at berth regulation (dry bulk vessels are not subject to the at-berth regulation) shall comply with ARB's at berth regulation that requires shore power or alternative control technology regulation for certain vessel fleets for 80 percent of eligible calls by 2020, minus idle time to clear customs consistent with California Air Resources Board regulations. The TAMT Final PEIR assumed 1.5 hours of idle time for vessels to embark/disembark, which applies to all shore power and/or alternative control technologies employed at the terminal. This is a Project feature made into a mitigation measure to ensure compliance (see MM-GHG-9 for an explanation of the Proposed Project's shore power features). • Designated truck haul routes shall be used, and the project proponent shall decrease onsite movements where practicable. • No commercial drive-through shall be implemented. • Compliance with Assembly Bill 939 and the City of San Diego's Recycling Ordinance shall be mandatory and shall include recycling at least 50 percent of solid waste; compliance with the City of San Diego's Construction and Demolition Debris Deposit Ordinance shall be mandatory and shall include recycling at least 65 percent of all construction debris. This measure shall be applied during construction and operation of the Proposed Project. • 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	

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Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			mitigation measure shall be provided to the San Diego Unified Port District's Planning and Green Port Department by the Project Proponent on an annual basis through the end of the lease or 2035 (buildout of the TAMT Redevelopment Plan), whichever occurs first. **MM-GHG-3: Electric Cargo Handling Equipment Upgrades.** A. Prior to January 1, 2020, the San Diego Unified Port District shall ensure that at least three pieces of existing non-electric cargo handling equipment at the terminal are replaced by electric cargo handling equipment, none of which were previously operating at the terminal during the 2013/2014 baseline year of the EIR analysis. Possible ways the electric cargo handling equipment may be obtained include, but are not limited to, the following: 1. Purchased, leased, or otherwise acquired, in whole or in part, through funding provided to a tenant by the San Diego Unified Port District; 2. Purchased, leased, or otherwise acquired, in whole or in part, through funding provided to a tenant by other sources; or 3. Purchased, leased, or otherwise acquired, in whole or in part, by the tenant in compliance with a condition of a discretionary approval issued by the San Diego Unified Port District. Written evidence of the acquisition of the electric cargo handling equipment and the equipment it will replace and remove from further operation at the terminal must be provided to the San Diego Unified Port District. The San Diego Unified Port District shall further ensure that the electric cargo handling equipment is in use at each of the three nodes throughout the expected operating life. This will be accomplished by requiring each tenant that employs electric cargo handling equipment pursuant to this measure to report the equipment's annual number of hours of operation to the San Diego Unified Port District and by requiring the San Diego Unified Port District to monitor use of the electric cargo handling equipment as part of the San Diego Unified Port District's TAMT equipment inventory.	

Table ES-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			MM-GHG-4: Electric Cargo Handling Equipment Upgrades. This measure has multiple steps for compliance, as specified below. A. Prior to January 1, 2025, the San Diego Unified Port District also shall ensure that no fewer than 20 non-electric yard trucks in operation are replaced at the TAMT by 20 electric yard trucks. Possible ways the electric yard trucks may be obtained include, but are not limited to, the following: 1. Purchased, leased, or otherwise acquired, in whole or in part, through funding provided to a tenant by the San Diego Unified Port District; 2. Purchased, leased, or otherwise acquired, in whole or in part, through funding provided to a tenant by other sources; or 3. Purchased, leased, or otherwise acquired, in whole or in part, by the tenant in compliance with a condition of a discretionary approval issued by the San Diego Unified Port District. Written evidence of the acquisition of the electric yard trucks, and the non-electric yard trucks they will replace and remove from further operation at the terminal, must be provided to the San Diego Unified Port District. The San Diego Unified Port District shall further ensure that the electric yard trucks are in use at the TAMT throughout the expected operating life of the equipment. Each tenant that employs electric trucks pursuant to this measure shall report the equipment's annual number of hours of operation to the San Diego Unified Port District, and the San Diego Unified Port District shall monitor use of the electric trucks as part of the San Diego Unified Port District's TAMT equipment inventory. B. Prior to January 1, 2030, the San Diego Unified Port District also shall ensure that no fewer than three existing non-electric reach stackers and ten non-electric forklifts in operation are replaced at the TAMT by three fully electric reach stackers and ten fully electric forklifts. Possible ways the electric reach stackers and forklifts may be obtained include, but are not limited to:	

Table ES-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			1. Purchased, leased, or acquired, in whole or in part, through funding provided to the tenant by the San Diego Unified Port District; 2. Purchased, leased, or acquired, in whole or in part, through funding provided to the tenant by other sources; or 3. Purchased, leased, or otherwise acquired, in whole or in part, by the tenant in compliance with a condition of a discretionary approval issued by the San Diego Unified Port District. Written evidence of the acquisition of the three electric reach stackers and ten electric forklifts and the conventional equipment they will replace and remove from further operation at the terminal must be provided to the San Diego Unified Port District. The San Diego Unified Port District shall further ensure that the electric reach stackers and forklifts are in use at the TAMT throughout the expected operating life of the equipment. Each tenant that employs electric reach stackers or electric forklifts pursuant to this measure shall report the equipment's annual number of hours of operation to the San Diego Unified Port District, and the San Diego Unified Port District shall monitor use of the electric reach stackers and forklifts as part of the San Diego Unified Port District's TAMT equipment inventory. D. The electric equipment employed pursuant to paragraphs A, B, and C of this mitigation measure may be replaced by other technologies or other types of cargo handling equipment as long as the replacement equipment achieves the same or greater criteria pollutant, toxic air contaminant, and greenhouse gas emission reductions as compared to the equipment required by paragraphs A, B, and C of this mitigation measure. **MM-GHG-5R: Implement Enhanced Vessel Speed Reduction Program Beyond Climate Action Plan Compliance for Future Operations Associated with the TAMT Plan.** The Mitsubishi Cement Corporation shall be required to comply with the Enhanced VSR Program. Mitsubishi Cement Corporation shall, beginning with the first vessel call to the Port, comply with 80% of its OGVs reducing	

Table ES-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			their speeds to 12 knots or less starting at 20 nautical miles from Point Loma. The Mitsubishi Cement Corporation shall comply with 90% of its OGVs calling to the Port reducing their speeds to 12 knots starting at 40 nautical miles from Point Loma upon the occurrence of the earlier of either of the following two scenarios: ▪ Prior to the annual number of dry bulk vessel calls reaching 91 calls annually (e.g., 76 new calls over the TAMT Final PEIR's baseline condition);or ▪ Beginning January 1, 2030, irrespective of the number of calls on an annual basis. To help the District implement the Beyond 2013 CAP VSR Program before reaching 91 dry bulk vessel calls annually, Mitsubishi Cement Corporation shall provide the District with a rolling estimate of anticipated vessels calls every 6 months. The San Diego Unified Port District will verify compliance through analysis of Automatic Identification System data or by requesting a vessel's Electronic Chart Display Identification System log from the captain. **MM-GHG-6R: Implement a Renewable Energy Project, or Other Verifiable Actions or Activities on Tidelands, or Purchase the Equivalent Greenhouse Gas Offsets from a California Air Resources Board Approved Registry or a Locally Approved Equivalent Program for Future Operations Associated with the TAMT Plan.** A. Options for Reducing GHG Emissions. The Mitsubishi Cement Corporation shall do one or more of the following to achieve the required reductions in 2025, 2030, and 2035 greenhouse gas (GHG) emissions specified below, in the following order of priority: 1. Incorporate a renewable energy project: ▪ within the Tenth Avenue Marine Terminal; ▪ within the San Diego Unified Port District's jurisdiction; or	

Table ES-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			▪ adjacent to the San Diego Unified Port District's jurisdiction; or 2. Undertake other verifiable actions or activities on Tidelands, approved by the District, such as electrification of equipment including vehicles and trucks, financial contribution to a future local or District GHG emission reduction program on Tidelands (locally approved equivalent program), or similar activities or actions that reduce operational GHG emissions; or 3. Purchase GHG emission offset credits which 1) are real, additional, permanent, quantifiable, verifiable, and enforceable as specified in California Health and Safety Code § 38562(d)(1) and (2) and as these terms are further defined in California Code of Regulations, Title 17, § 95802 (see below); 2) use a protocol consistent with or as stringent as California Air Resources Board (CARB) protocol requirements under California Code of Regulations, Title 17, § 95972(a); and 3) are issued by a CARB-approved offset registry. For offset credits from projects outside California, Mitsubishi Cement Corporation must demonstrate in writing to the satisfaction of the District that the offset project meets requirements equivalent to or stricter than California's laws and regulations for ensuring the validity of offset credits. For purposes of this section, the definitions are as follows: a. "Real" means, in the context of offset projects, that GHG reductions or GHG enhancements result from a demonstrable action or set of actions, and are quantified using appropriate, accurate, and conservative methodologies that account for all GHG emissions sources, GHG sinks, and GHG reservoirs within the offset project boundary and account for uncertainty and the potential for activity-shifting leakage and market-shifting leakage. [17 CCR 95802]	

Table ES-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			b. "Additional" means, in the context of offset credits, greenhouse gas emission reductions or removals that exceed any greenhouse gas reduction or removals otherwise required by law, regulation or legally binding mandate, and that exceed any greenhouse gas reductions or removals that would otherwise occur in a conservative business-as-usual scenario. [17 CCR 95802] c. "Permanent" means in the context of offset credits, either that GHG reductions and GHG removal enhancements are not reversible, or when GHG reductions and GHG removal enhancements may be reversible, that mechanisms are in place to replace any reversed GHG emission reductions and GHG removal enhancements to ensure that all credited reductions endure for at least 100 years. [17 CCR 95802] d. "Quantifiable" means in the context of offset credits, the ability to accurately measure and calculate GHG reductions or GHG removal enhancements relative to a project baseline in a reliable and replicable manner for all GHG emission sources, GHG sinks, or GHG reservoirs included within the offset project boundary, while accounting for uncertainty and activity-shifting leakage and market-shifting leakage [17 CCR 95802] e. "Verifiable" means that a non-California offset project is located in a state that has laws and regulations equivalent to or stricter as California's with respect to ensuring the validity of offsets and an Offset Project Data Report assertion is well documented and transparent such that it lends itself to an objective review by an accredited verification body. [17 CCR 95802] f. "Enforceable" means the authority for the offset purchaser to hold the offset provider liable and	

Table ES-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			to take appropriate action if any of the above requirements are not met. [adapted from definition in 17 CCR 95802 for use in this measure] "Enforceable" also means that the offset must be backed by a legal instrument or contract that defines exclusive ownership and the legal instrument can be enforced within the legal system of the State of California. B. Required Annual GHG Emissions Reductions: The option(s) implemented pursuant to paragraph A above shall achieve the following required GHG reductions for the activities of the Proposed Project for years 2025, 2030, and 2035: 1. 2025 reduction: 568 $MTCO_2e$ per year or 2,345 MWh/year. 2. 2030 reduction: 1,622 $MTCO_2e$ per year or 7,675 MWh/year. 3. 2035 reduction: 1,693 $MTCO_2e$ per year or 8,013 MWh/year. The required 2025, 2030, and 2035 GHG emissions reductions are based on the maximum throughput of 600,000 metric tons (MT) per year via 24 calls to port annually. The required reductions may be reduced at the discretion of the District, based on the actual amount of throughput and hours at berth in a given year and the other adjustment provisions specified below. C. Implementation of GHG Emissions Reduction Options. Prior to the first call of the first year of operation and annually thereafter, the District shall notify the Mitsubishi Cement Corporation of the option(s) available for achieving the annual maximum required GHG emissions reduction in the order of priority specified above, and the Mitsubishi Cement Corporation shall: 1. Develop a renewable energy project(s) or take other verifiable actions or activities identified by the District to meet or partially meet the required amount of $MTCO_2e$ or MWh reductions specified above.	

Table ES-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			a. If the Mitsubishi Cement Corporation develops a renewable energy project(s), or takes other verifiable actions or activities to reduce GHG emissions, the Mitsubishi Cement Corporation shall submit to the District's Energy Department/Team, for its review and approval, a report specifying the annual amount of $MTCO_2e$ or MWh reduction achieved by the project(s), actions, or activities; submit evidence that the renewable energy project, actions, or activities are not being used to offset GHG emissions for any other project or entity; and submit any other information requested by the District's Energy Department/Team to verify the amount of GHG emissions reduction achieved by the project, actions or activities (collectively, "GHG Emission Reduction Report"). b. If the GHG Emission Reduction Report is approved, a reduction to the required offsets shall be calculated by the District's Energy Department/Team, and the reduction of offsets shall be transmitted to the Mitsubishi Cement Corporation in writing and the amount of GHG reduction shall count towards the required GHG reduction for the Proposed Project ("GHG Reduction"). 2. Purchase GHG emission offsets in conformance with paragraph A(3) above in an amount sufficient to achieve the required reduction of $MTCO_2e$ or MWh specified above, which may be decreased by the amount of annual $MTCO_2e$ or MWh reduction that is achieved by any renewable energy project(s) or other verifiable action or activities if developed and/or implemented pursuant to paragraph (1) above. The purchase of offsets to achieve the required reduction in $MTCO_2e$ or MWh shall occur as follows: a. Purchase offsets for the first 2 years of operation; b. Purchase offsets at least annually thereafter, prior to any calls to port for the corresponding	

Table ES-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			timeframe, beginning with the third year of operation, for the life of the Proposed Project's operations or until termination of the lease agreement between the District and the Mitsubishi Cement Corporation. The Mitsubishi Cement Corporation may purchase more than 1 year of operational emissions offsets, consistent with the amount of MTCO2e or MWh reduction specified above for the corresponding timeframe of 2025, 2030, or 2035; and c. On or before the first ship call in the first year of operation of the proposed project and annually thereafter, Mitsubishi Cement Corporation shall submit certificates for offsets purchased to achieve the required GHG emission reductions, including written verification by a qualified consultant approved by the District that the offsets meet the requirements for GHG emission offset credits set forth in paragraph A(3) above, to the District's Energy Department/Team. D. Adjustments to Required GHG Emissions Reductions. If the Mitsubishi Cement Corporation complies with paragraphs A(1) or A(2) above, in an amount that meets the total amount of $MTCO_2e$ or MWh reductions specified above for 15 years of operation to meet the 2035 reduction target, or complies with paragraph A(3) above and purchases the requisite offsets for 15 years, or does a combination of paragraphs A(1), (2), and (3) to meet the 2035 reduction target, then nothing further shall be required under this mitigation measure. 1. Reduction of Emissions through Development of a Renewable Energy Project Requirement: Although none are identified at this time, the Mitsubishi Cement Corporation may be required by the District to develop a renewable energy project at any time during the life of the project (subject to future approvals and the priorities listed above) and may request a reduction of required offsets. If any reduction in offsets is requested by the Mitsubishi Cement	

Table ES-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			Corporation because of the development of a renewable energy project(s), the Mitsubishi Cement Corporation shall submit a GHG Emission Reduction Report for the District Energy Department's review pursuant to the process specified above in paragraph C(1) above and required offsets shall be determined by the District and reduced. 2. Reduction of Emissions through Verifiable Actions or Activities on Tidelands Requirement: Although none are identified at this time, the Mitsubishi Cement Corporation may be required by the District to take other verifiable actions or activities at any time during the life of the project (subject to future approvals and the priorities listed above) and may request a reduction of required offsets. If any reduction in offsets is requested by the Mitsubishi Cement Corporation because of the other verifiable actions or activities on tidelands, the Mitsubishi Cement Corporation shall submit a GHG Emission Reduction Report for the District Energy Department's review pursuant to the process specified above in paragraph C(1), and required offsets shall be determined by the District and reduced. 3. Reduction of Emissions through Purchase of Offsets: Subsequent to purchasing GHG emission offsets pursuant to paragraph C(2) above, the Mitsubishi Cement Corporation's future annual purchase of offsets to achieve the GHG emission reductions specified in paragraph B above may be adjusted if the preceding year's throughput is less than 600,000 metric tons (the maximum allowed annual throughput), and/or the annual calls to port are less than 24 (the maximum allowed number of calls; 24 calls at 168 hours per call, or 4,032 annual hours at berth). The District or a District-retained consultant (at the Mitsubishi Cement Corporation cost) shall calculate, using the best available science, the amount of unused GHG reduction offsets based on the actual throughput and/or time at berth. Any unused offsets shall be used for the next year of operation of the	

Table ES-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			Proposed Project and the Mitsubishi Cement Corporation shall purchase offsets in the necessary amounts (required amount less any unused offsets) for the subject year. This procedure shall be repeated on an annual basis. In the event that newly discovered information shows that an offset, previously certified as compliant pursuant to paragraph C(3)(c), does not comply with the requirements of paragraph A(3), Mitsubishi Cement Corporation shall purchase an equivalent amount of replacement offsets that comply with the requirements of paragraph A(3) within 30 days after receiving notice of the noncompliance. After verification of unused and available offsets, unused offsets may replace previously compliant offsets should those offsets subsequently be determined noncompliant with paragraph A(3). At the Mitsubishi Cement Corporation's written request to the District, Mitsubishi Cement Corporation may waive the annual adjustment described above and purchase the required $MTCO_2e$ or MWh offsets on at least an annual basis. ~~The Mitsubishi Cement Corporation shall do one or more of the following to achieve requisite reductions to meet the 2025, 2030, and 2035 greenhouse gas (GHG) reduction targets, in order of priority:~~ ~~(1) Incorporate a renewable energy project:~~ ~~• within the Tenth Avenue Marine Terminal;~~ ~~• within the San Diego Unified Port District's jurisdiction; or~~ ~~• adjacent to the San Diego Unified Port District's jurisdiction; or~~ ~~(2) Other verifiable actions or activities on Tidelands such as electrification of equipment including vehicles and trucks, financial contribution to a future local or District GHG emission reduction program on Tidelands (locally approved equivalent program), or similar activities or actions that reduce operational GHG emissions; or~~	

Table ES-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			~~(3) Purchase California Air Resource Board (CARB) verified GHG emission offsets.~~ ~~The option(s) implemented shall achieve requisite GHG reductions for the activities of the Project for years 2025, 2030, and 2035. As specified below, the 2025, 2030, and 2035 GHG reduction targets are based on the maximum throughput of 600,000 metric tons (MT) per year.~~ ~~The maximum metric tons of carbon dioxide equivalent ($MTCO_2e$) or megawatt-hours per year (MWh/year) reduction requirement for each time period is as follows (calculated assuming 600,000 MT of throughout via 24 calls to port annually) but the maximum requirement may be reduced at the discretion of the District, depending on the hours at berth and the amount of throughput in a given year and based on the other reduction requirements specified below:~~ ~~A. 2025 reduction target: 568 $MTCO_2e$ per year or 2,345 MWh/year.~~ ~~B. 2030 reduction target: 1,622 $MTCO_2e$ per year or 7,675 MWh/year.~~ ~~C. 2035 reduction target: 1,693 $MTCO_2e$ per year or 8,013 MWh/year.~~ ~~Prior to the first call of the first year of operation, the Mitsubishi Cement Corporation shall either:~~ ~~I. Develop a renewable energy project(s) or take other verifiable actions or activities to meet or partially meet the amount of $MTCO_2e$ or MWh reductions specified above.~~ ~~a. If the Mitsubishi Cement Corporation develops a renewable energy project(s), or takes actions or conducts activities to reduce GHG emissions, the Mitsubishi Cement Corporation shall submit a report specifying the annual amount of $MTCO_2e$ or MWh reduction achieved by the project(s), actions, or activities; submit evidence that the renewable energy project, actions, or activities are not being used to offset GHG emissions for any other project or entity; and any other information needed to verify that amount to the Districts Energy Department for its review and approval (collectively, "GHG Emission Reduction Report").~~	

Table ES-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			~~b. If the GHG Emission Reduction Report is approved, a reduction to the required offsets shall be calculated by the District's Energy Department, and the reduction of offsets shall be transmitted to the Mitsubishi Cement Corporation in writing and the amount of GHG reduction shall count towards the required GHG reduction for the Proposed Project ("GHG Reduction").~~	
			~~II. Purchase the requisite GHG emission offsets to reduce the amount of $MTCO_2e$ or MWh specified above, which may be decreased by the amount of annual $MTCO_2e$ or MWh reduction that is achieved by the renewable energy project(s), action, or activities if developed and/or implemented. The offsets shall be purchased by a CARB verified entity and shall not have been previously used for a different GHG reduction project. The purchased offsets shall be linked to a GHG reduction project or activity that has already occurred. All certificates of purchased offsets shall be submitted to the District for its review that the criteria, above, has been met. The purchase of requisite offsets to reduce the amount of $MTCO_2e$ or MWh, shall occur as follows:~~	
			~~a. Purchase offsets for the first 2 years of operation; and~~	
			~~b. Purchase offsets at least annually thereafter, prior to any calls to port for the corresponding timeframe, beginning with the third year of operation, for the life of the operation or termination of the lease agreement between the District and the Mitsubishi Cement Corporation. The Mitsubishi Cement Corporation may purchase more than 1 year of operational emissions offsets, consistent with the amount of $MTCO_2e$ or MWh reduction specified above for the corresponding timeframe of 2025, 2030, or 2035.~~	
			~~At this time, within the TAMT, there are no solar ready rooftops without renewable energy projects already being implemented. But such projects may be identified in the future, and the Mitsubishi Cement Corporation may choose at that time to participate or develop the future identified renewable energy project(s).~~	
			~~If the Mitsubishi Cement Corporation complies with (1) or (2) above, in an amount that meets the total amount of $MTCO_2e$ or MWh reductions specified above for 15 years of operation (to~~	

Table ES-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			~~meet the 2035 reduction target) or complies with (3) above and purchases the requisite offsets for 15 years, or does a combination of (1), (2), and (3) to meet the 2035 reduction target, then nothing further shall be required under this mitigation measure.~~	
			~~Subsequent to fulfilling the requirement of 3, annual purchase of offsets as specified in 3A, 3B, and 3C may be adjusted if the preceding years throughput is less than 600,000 metric tons (the maximum allowed annual throughput), and/or the annual calls to port are less than 24 (the maximum allowed number of calls; 24 calls at 168 hours per call, or 4,032 annual hours at berth). The District or a District retained consultant (at the Mitsubishi Cement Corporation cost) shall calculate, using the best available science, the amount of unused GHG reduction offsets based on the actual throughput and/or time at berth. Any unused offsets shall be used for the next year of operation of the Proposed Project and the Mitsubishi Cement Corporation shall purchase offsets in the necessary amounts (required amount less any unused offsets) for the subject year. This procedure shall be repeated on an annual basis. At the Mitsubishi Cement Corporation's written request to the District, Mitsubishi Cement Corporation may waive the annual adjustment described above and purchase the required $MTCO_2e$ or MWh offsets on at least an annual basis.~~	
			~~Reduction of Emissions through Development of a Renewable Energy Project Requirement: Although none are identified at this time, the Mitsubishi Cement Corporation may develop a renewable energy project at any time during the life of the project (subject to future approvals and the priorities listed above) and may request a reduction of required offsets. If any reduction in offsets is requested by the Mitsubishi Cement Corporation because of the development of a renewable energy project(s), the Mitsubishi Cement Corporation shall submit a GHG Emission Reduction Report for the District Energy Department's review pursuant to the process specified above in (1) and required offsets shall be reduced.~~	
			~~Reduction of Emissions through Verifiable Actions or Activities on Tidelands Requirement: Although none are identified at this time, the Mitsubishi Cement Corporation may take actions or implement activities at any time during the life of the project~~	

Table ES-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			~~(subject to future approvals and the priorities listed above) and may request a reduction of required offsets. If any reduction in offsets is requested by the Mitsubishi Cement Corporation because of the verified actions or activities on tidelands, the Mitsubishi Cement Corporation shall submit a GHG Emission Reduction Report for the District Energy Department's review pursuant to the process specified above in (1), and required offsets shall be reduced.~~ **MM-GHG-7R: Annual Inventory Submittal and Periodic Technology Review.** A. The Mitsubishi Cement Corporation shall comply with the San Diego Unified Port District's Annual Inventory and Periodic Technology Review Program as follows: (1) Prior to January 30th of each year of operations, Mitsubishi Cement Corporation shall provide an inventory of all mobile equipment associated with its TAMT operations that generate criteria pollutants, toxic air contaminants and greenhouse gases. The annual inventory shall identify the year, make, VIN or other identification number, fuel type, and model of the equipment that was used in the previous year, as well as the number of hours of operation for each piece of equipment, including but not limited to heavy-duty drayage and non-drayage trucks, yard equipment, assist and ocean-going tugs, ocean-going vessels, bulk material handling equipment, and any other type of cargo handling equipment. The purpose of the annual inventory is to track emissions and equipment at TAMT and to assist in the District's periodic technological reviews, pursuant to TAMT Redevelopment Plan MM-GHG-7. (2) Within twelve (12) months of commencement of truck loadout activities, Mitsubishi Cement Corporation shall implement a zero emission truck demonstration project at TAMT ("Demonstration Project") which uses zero emission trucks for the transport of cement and cementitious material from its TAMT facility. The Demonstration Project shall operate for a period of not less than twelve (12) months and shall include one	

Table ES-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			or more zero emission trucks. If market conditions require Mitsubishi Cement Corporation to temporarily cease truck loadout operations at TAMT, the 12 months shall be tolled until Mitsubishi Cement Corporation resumes regular truck loadout operations. The Demonstration Project will evaluate the capability of zero emission trucks to transport cement and cementitious materials from Mitsubishi Cement Corporation's TAMT facility, determine the operational logistics of the use of zero emission trucks with increasing deployment, and better inform the District's metrics for determining the feasibility of zero emission trucks. (3) Within three (3) months after completion of the Demonstration Project, Mitsubishi Cement Corporation shall submit a written report to the District which sets forth the data collected during the Demonstration Project and identifies opportunities and barriers for larger deployment of zero emission trucks at Mitsubishi Cement Corporation's TAMT facility. The Demonstration Project is intended to assist the District in its Periodic Technology Review pursuant to TAMT MM-GHG-7 by providing information regarding the feasibility of using zero emission trucks to service Mitsubishi Cement Corporation's operations at TAMT. (4) Within six (6) months after completion of the Demonstration Project, Mitsubishi Cement Corporation shall submit a zero emission truck infrastructure plan ("Infrastructure Plan") to the District. The Infrastructure Plan shall include, at a minimum, the location of needed charging stations and other equipment needs, power requirements for each charging station and any necessary upgrades and other improvements to support the use of zero emission trucks in Mitsubishi Cement Corporation's operations at TAMT. The Infrastructure Plan also shall identify ancillary infrastructure needs related to potential operational changes from incorporating zero emission trucks, including coordination with	

Table ES-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation

Mitsubishi Cement Corporation's customers at key locations to service San Diego County and necessary accommodations for drivers and other personnel. The Infrastructure Plan is intended to assist the District in its Periodic Technology Review pursuant to TAMT MM-GHG-7 by providing information regarding the feasibility of using zero emission trucks to service Mitsubishi Cement Corporation's operations at TAMT.

B. Beginning a year after approval of the Project and continuing each year during the term of the Mitsubishi Cement Corporation's lease with the District, the District shall include in its Periodic Technology Review under TAMT MM-GHG-7 an evaluation of the feasibility of using zero emission trucks for the transport of cement and cementitious material from Mitsubishi Cement Corporation's facility at TAMT ("Annual ZE Truck Feasibility Study"). The District's evaluation of and conclusion regarding feasibility shall be based on the feasibility metrics set forth in Table 1, ZE Truck Feasibility Categories and Metrics, below and shall be made available to the public in an Annual ZE Truck Feasibility Study. The District shall review the feasibility metrics annually and update them as necessary to reflect current data.

Table 1. ZE Truck Feasibility Categories and Metrics

Feasibility Category	Feasibility Metric
Technical	Range
	Torque
	Payload Capacity
	Refueling Time
	Service and maintenance support
	Ancillary energy requirements
Economic	Vehicle cost w/ incentives

Table ES-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)		Significance After Mitigation
				Total Cost of Ownership w/o incentives	
				Charging infrastructure cost	
			Fleet Logistics	Scheduling	
				Truck Assignments	
				% of port trips that ZEVs can meet	
			Charging Infrastructure Availability	On-site/depot	
				On-route/opportunity	
				Public (as needed)	
			Demonstration Project	Information obtained from the demonstration project.	
			Availability of Zero-Emission Trucks	Procurement and delivery availability, including delivery of the trucks to the fleet. * Procurement availability for the full spectrum of potential MCC customers, regardless of size.	
			Annual Throughput	Number of trucks to support annual operations	
			*"fleet" means customers' trucks traveling to or from the Mitsubishi Cement Corporation's facility at TAMT.		
			C. In the event the District's Periodic Technology Review pursuant to TAMT MM-GHG-7R identifies new technology or other practices that are feasible and are equally or more effective in reducing GHG emissions than the mitigation measures adopted by the District for the Mitsubishi Cement Corporation facility, the District may add, modify or substitute in place of an adopted mitigation measure such new technology or other practices as it becomes commercially available, unless the changes to an adopted measure would cause or contribute to an increase in any of the facility's significant environmental impacts.		

Table ES-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			~~The Mitsubishi Cement Corporation shall comply with the San Diego Unified Port District's Annual Inventory and Periodic Technology Review Program by (1) providing an inventory of all the mobile equipment associated with their TAMT site operations that generate criteria pollutants, toxic air contaminants and greenhouse gases on an annual basis to be submitted by January 30th of each year of operations, and (2) working collaboratively with the San Diego Unified Port District staff and/or the local air pollution control district to identify new technologies or other practices that can be incorporated into their operations that help reduce emissions and improve air quality.~~ ~~The Mitsubishi Cement Corporation shall complete the San Diego Unified Port District's equipment inventory spreadsheet annually, which requires tenants to identify the year, make, vin/ID number, fuel type, and model of the equipment that was used in the previous year, including annual hours of operation for each piece of equipment, including but not limited to heavy-duty drayage and non-drayage trucks, yard equipment, assist and ocean-going tugs, ocean-going vessels, bulk material handling equipment, and any other type of cargo handling equipment. The purpose of the inventory is to track emissions and equipment at TAMT and to assist in technological reviews, as described in the TAMT Redevelopment Plan MM-GHG-7.~~ **MM-GHG-8R: Implement Exhaust Emissions Reduction Program at Tenth Avenue Marine Terminal.** The San Diego Unified Port District is tasked with developing an incentive program, based on an emission reduction schedule, that incentivizes tenants and/or terminal operators to reduce mobile source emissions above and beyond the requirements identified in the TAMT Final PEIR. San Diego Unified Port District staff is currently developing the Exhaust Emission Reduction Program as part of their Clean Air Plan update, per the direction of the Board of Port Commissioner's in June 2019. Following completion of the Clean Air Plan update, the Project Proponent will be eligible to participate in the updated plan's Exhaust Emission Reduction Program.	

Table ES-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			MM-GHG-9R: Use of At-Berth Emission Capture and/or Control System to Reduce Vessel Hoteling Emissions. In lieu of the At-Berth Emission Capture and Control System, the Mitsubishi Cement Corporation shall use electric power through connection with the ship's dry-dock breaker system to reduce Vessel Hoteling Emissions. To attain emission reductions equivalent to or greater than the At-Berth Emission Capture and Control System specified in TAMT Redevelopment Plan MM-GHG-8, OGVs that call at the Mitsubishi Corporation Project facility shall use the shore-to-ship power system at least 50 percent of the time while at berth, not including the necessary 1.5 hours to embark and 1.5 hours to disembark to/from the system. Compliance with the 50 percent shore-to-ship power system requirement shall be calculated based on an annual average. Mitsubishi Cement Corporation shall submit annual reports for each year of Project operations to the San Diego Unified Port District's Planning and Green Port Department on or before January 31 of each year, demonstrating compliance with this environmental control measure for the previous calendar year. If an emergency event (as defined in CARB's At-Berth Regulation, Title 17, CCR Section 93118.3, subsection (c)(14)), prevents Mitsubishi Cement Corporation from achieving the required annual average shore-to-ship power rate (equal to or greater than 50 percent), Mitsubishi Cement Corporation may demonstrate compliance over a 2-year period, so long as Mitsubishi Cement Corporation submits documentation to the San Diego Unified Port District's Planning and Green Port Department which describes the emergency event(s) and explains the basis for Mitsubishi Cement Corporation's inability to demonstrate compliance using an annual average. The San Diego Unified Port District's Planning and Green Port Department shall review the documentation submitted by the Mitsubishi Cement Corporation and, if the San Diego Unified Port District's Planning and Green Port Department determines that Mitsubishi Cement Corporation made sufficient effort to comply with the environmental control, it will notify Mitsubishi Cement Corporation in writing that use of the 2-year average is acceptable.	

Table ES-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			**Please note that Mitsubishi' Cement Corporation's annual dry bulk throughput will not be counted towards the 691,418 metric ton dry bulk trigger that requires use of an At-Berth Emission Capture and Control System because Mitsubishi will be relying on a shore-to-ship power system. However, the 691,418 metric ton dry bulk trigger would apply to other dry bulk tenants that do not have shore-power capabilities.*	
			MM-GHG-10: Modernization of Delivery Truck Fleet. No less than 90 percent of the trucks loading cement or cementitious material at the Mitsubishi Cement Corporation facility shall be equipped with an engine that meets one of the following requirements: 1) Is no more than 5 years old, based on engine model year ("5-Year Engine") for each operational year; 2) Has been designed or retrofitted to comply with Federal and State on-road heavy-duty engine emissions standards (e.g., EPA 2010 engine emission standards or successor rules or regulations for on-road heavy duty diesel engines) for a 5-Year Engine ("Emission equivalent Engine"); or 3) Uses alternative engine technology or fuels demonstrated to produce emissions no greater than a 5-Year Engine ("Alternative Equivalent Engine"), including zero emission vehicles powered by electric batteries or hydrogen fuel cells. The remaining 10 percent of the trucks shall comply with all applicable Federal and State heavy-duty on-road truck regulations. In addition, all trucks loading cement or cementitious materials at the Mitsubishi Cement Corporation facility shall be registered and be in compliance with the CARB Truck and Bus Regulation. Confirming that Mitsubishi Cement Corporation's 90 percent requirement for a Modernized Truck Fleet shall be determined on a calendar year basis. Mitsubishi Cement Corporation shall submit documentation of compliance, showing the following information, to the San Diego Unified Port District's Planning and Green Port Department on an annual basis by January 31 following each year of operation: 1) Truck vehicle identification number (VIN), 2) Engine model year,	

Table ES-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			3) Annual truck trips, and 4) If nondiesel technology, manufacturer engine standards.	
4.5 Transportation, Circulation, and Parking				
Project Impacts				
Conflict with an Applicable Program, Plan, Ordinance, or Policy	No New or More Severe Impacts than Previously Identified in the TAMT Final PEIR**.**	PS	**MM-TRA-3R: Widen the Segment of 28th Street between Boston Avenue and National Avenue to a Four-Lane Major Arterial Classification Consistent with the Barrio Logan Public Facilities Financing Plan.** The District currently has an established program to track the number of trucks that enter and exit the terminal each year associated with TAMT operations. Prior to generating an additional 161 new daily truck trips, the District shall pay a fair-share contribution (STC would be responsible for 2.8%) of the cost to widen the roadway segment of 28th Street between Boston Avenue and National Avenue to a Four-Lane Major Arterial classification. The improvement is identified within the Barrio Logan Public Facilities Financing Plan, and therefore would be paid to the City of San Diego in accordance with Section 142.0640 of the San Diego Municipal Code. Payment of the District's fair share shall be completed prior to reaching 161 new daily truck trips. In order to ensure the significant impact does not occur before the District has paid its fair share to the City, the District shall initiate payment once approximately 150 new daily truck trips are reached under the proposed project. The trigger will be determined by the District by examining the ADT over a 1 month timeframe and comparing the ADT to the baseline of 93 daily trucks generating 186 trips per day (33,349 trucks per year divided by 360 days multiplied by 2 trips for each truck) and 935 daily employee trips (315 existing employees multiplied by 3 trips per day). At the District's discretion, the District may seek reimbursement from tenants that would contribute new daily trips in proportion to their contribution. ~~Based on the Proposed Project's contribution of new daily trips, a fair share contribution of 1.6% of the total cost to widen the roadway segment shall be paid by the Mitsubishi Cement~~	SU

Table ES-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			~~Corporation to the City prior to 150 new daily truck trips being generated.~~ **MM-TRA-4~~R~~: Westbound Right-Turn Overlap Phase at Norman Scott Road/32nd Street/Wabash Boulevard Intersection.** The San Diego Unified Port District currently has an established program to track the number of trucks that enter and exit the terminal each year associated with TAMT operations. Prior to generating an additional 195 new daily trips, the San Diego Unified Port District shall coordinate with the California Department of Transportation to determine the San Diego Unified Port District's fair share payment to fund the addition of a westbound right-turn overlap phase to the intersection of Norman Scott Road/32nd Street/Wabash Boulevard, a California Department of Transportation–controlled intersection, to improve the delay caused by the proposed project. This would reduce the delay associated with the project by 20.8 seconds during the AM peak hour and by 19.9 seconds during the PM peak hour compared to unmitigated conditions, and would effectively reduce delay at this intersection to below current levels. (Note, for the STC Alternative, this mitigation measure would reduce the unmitigated delay associated with this alternative by 19.4 seconds during the AM peak hour and by 19.3 seconds during the PM peak hour.) In order to ensure the significant impact does not occur before the San Diego Unified Port District has paid its fair share to the California Department of Transportation, the San Diego Unified Port District shall initiate payment once approximately 150 new daily trips are reached under the proposed project. The trigger will be determined by the San Diego Unified Port District by examining the average daily trips over a 1 month timeframe and comparing the average daily trips to the baseline of 93 daily trucks generating 186 trips per day (33,349 trucks per year divided by 360 days multiplied by 2 trips for each truck) and 935 daily employee trips (315 existing employees multiplied by 3 trips per day). At the San Diego Unified Port District's discretion, the San Diego Unified Port District may seek reimbursement from tenants that would contribute new daily trips in proportion to their contribution. ~~Based on the Proposed Project's contribution of new daily trips, a fair share contribution of 1.4% of the total cost to improve the~~	

Table ES-1. Project Impacts and Mitigation Measures

Issue	Impact	Significance Before Mitigation	Mitigation Measure(s)	Significance After Mitigation
			~~intersection shall be paid by the Mitsubishi Cement Corporation to the District prior to 150 new daily trips being generated.~~	

4.2.2 Changes to Chapter 4, Section 4.1, *Air Quality and Health Risk*

Pages 4.1-27 through 4.1-28

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

TAMT Final PEIR Mitigation Measure *The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMT Plan, adopted by the District in December 2016 as part of the Final Environmental Impact Report for the TAMT Plan.*	**Mitsubishi Cement Corporation Project SEIR Mitigation Measure** *Project mitigation measures are a combination of applicable TAMT Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMT Final PEIR mitigation measures are provided with additions shown in double underline and deletions indicated in ~~strikeout~~ format.*	**Project Applicability/Reason for Modification or New Project Mitigation Measure**
AIR QUALITY AND HEALTH RISK		
MM-AQ-2: Implement Diesel Emission-Reduction Measures During Construction and Operations of Future TAMT Plan Components. The project proponent shall implement the following measures during construction and project operations, subject to verification by the District. i. All project proponents shall limit all construction and operations equipment, drayage, and delivery truck idling times by shutting down equipment when not in use and reducing the maximum idling time to less than 3 minutes. The project proponent shall install clear signage regarding the limitation on idling time at the delivery driveway and loading areas and shall submit quarterly reports of violators to the District. This measure shall be enforced by terminal supervisors, and repeat violators shall be subject to penalties pursuant to California airborne toxics control measure 13 California Code of Regulations Section 2485. The project proponent shall submit evidence of the use of diesel emission reduction measures to the District through annual reporting, with the first report due 1 year from the date of project completion and each report due exactly 1 year after, noting all violations with relevant identifying information of the vehicles and drivers in violation of these measures.	**MM-AQ-2R: Implement Diesel Emission-Reduction Measures During Construction and Operations of Future TAMT Plan Components.** The Mitsubishi Cement Corporation Project Proponent ~~project proponent~~ shall implement the following measures during construction and project operations, subject to verification by the San Diego Unified Port District's Planning and Green Port Department. i. The Mitsubishi Cement Corporation Project Proponent ~~All project proponents~~ shall limit all construction and operations equipment, drayage, and delivery truck idling times by shutting down equipment when not in use and reducing the maximum idling time to less than 3 minutes. Clear signage regarding the limitation on idling time at the delivery driveway and loading areas has been installed on terminal to provide actual notice of this requirement to all drivers. This measure shall be enforced by the terminal supervisors or by a Port designated functional-equivalent, who will submit quarterly reports of violators to San Diego Unified Port District's Planning and Green Port Department and repeat violators shall be subject to penalties pursuant to California airborne toxics control measure 13 California Code of Regulations Section 2485. The Project Proponent ~~project proponent~~ shall submit evidence of the use of diesel emission reduction measures to the San Diego Unified Port District's Planning and	MM-AQ-2 applies to the Proposed Project. Modifications to the MM-AQ-2 are limited to changes in how the San Diego Unified Port District is referred to (e.g. San Diego Unified Port District instead of District).

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

TAMT Final PEIR Mitigation Measure *The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMT Plan, adopted by the District in December 2016 as part of the Final Environmental Impact Report for the TAMT Plan.*	**Mitsubishi Cement Corporation Project SEIR Mitigation Measure** *Project mitigation measures are a combination of applicable TAMT Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMT Final PEIR mitigation measures are provided with additions shown in double underline and deletions indicated in ~~strikeout~~ format.*	**Project Applicability/Reason for Modification or New Project Mitigation Measure**
ii. The project proponent shall verify that all construction and operations equipment is maintained and properly tuned in accordance with manufacturers' specifications. Prior to the commencement of construction and operations activities using diesel-powered vehicles or equipment, the project proponent shall verify that all vehicles and equipment have been checked by a certified mechanic and determined to be running in proper condition prior to admittance into any terminal leasehold. The project proponent shall submit a report by the certified mechanic of the condition of the construction and operations vehicles and equipment to the District prior to commencement of their use.	Green Port Department through annual reporting, with the first report due 1 year from the date of project completion and each report due exactly 1 year after, noting all violations with relevant identifying information of the vehicles and drivers in violation of these measures. ii. The Mitsubishi Cement Corporation Project Proponent ~~project proponent~~ shall verify that all construction and operations equipment is maintained and properly tuned in accordance with manufacturers' specifications. Prior to the commencement of construction and operations activities using diesel-powered vehicles or equipment, the Mitsubishi Cement Corporation Project Proponent ~~project proponent~~ shall verify that all vehicles and equipment have been checked by a ~~certified~~ mechanic experienced with such equipment and determined to be running in proper condition prior to admittance into any terminal leasehold. The Mitsubishi Cement Corporation Project Proponent ~~project proponent~~ shall submit a report by the ~~certified~~ mechanic of the condition of the construction and operations vehicles and equipment to the San Diego Unified Port District's Engineering Department during the construction phase and the Planning and Green Port Department during the operation phase prior to commencement of their use.	
Not Applicable	**MM-AQ-10: Modernization of Delivery Truck Fleet**. No less than 90 percent of the trucks loading cement or cementitious material at the Mitsubishi Cement Corporation facility shall be equipped with an engine that meets one of the following requirements: 1) Is no more than 5 years old, based on engine model year ("5-Year Engine") for each operational year;	MM-AQ-10 is a new mitigation measure identified for the Proposed Project.

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

TAMT Final PEIR Mitigation Measure *The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMT Plan, adopted by the District in December 2016 as part of the Final Environmental Impact Report for the TAMT Plan.*	**Mitsubishi Cement Corporation Project SEIR Mitigation Measure** *Project mitigation measures are a combination of applicable TAMT Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMT Final PEIR mitigation measures are provided with additions shown in double underline and deletions indicated in ~~strikeout~~ format.*	**Project Applicability/Reason for Modification or New Project Mitigation Measure**
	2) Has been designed or retrofitted to comply with federal and state on-road heavy-duty engine emissions standards (e.g. EPA 2010 engine emission standards or successor rules or regulations for on-road heavy duty diesel engines) for a 5-Year Engine ("Emission equivalent Engine"); or 3) Uses alternative engine technology or fuels demonstrated to produce emissions no greater than a 5-Year Engine ("Alternative Equivalent Engine"), including zero emission vehicles powered by electric batteries or hydrogen fuel cells. The remaining 10 percent of the trucks shall comply with all applicable federal and state heavy-duty on-road truck regulations. In addition, all trucks loading cement or cementitious materials at the Mitsubishi Cement Corporation facility shall be registered and be in compliance with the CARB Truck and Bus Regulation. In order to confirm that Mitsubishi Cement Corporation's 90 percent requirement for a Modernized Truck Fleet shall be determined on a calendar year basis. Mitsubishi Cement Corporation shall submit documentation of compliance, showing the following information, to the San Diego Unified Port District's Planning and Green Port Department on an annual basis by January 31 following each year of operation: 1) Truck vehicle identification number (VIN), 2) Engine model year, 3) Annual truck trips, and 4) If nondiesel technology, manufacturer engine standards.	

4.2.3 Changes to Chapter 4, Section 4.2, *Greenhouse Gas Emissions and Climate Change*

Page 4.2-5

4.2.2.1 Methodology

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

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

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

Operational emissions were assessed using details provided by the Project Proponent. Emissions associated with Project-related activity, including OGVs, tugboats, trucks, worker commute vehicles, equipment, and electricity consumption are based on similar methods used in the TAMT Final PEIR, including CARB's methodologies for OGVs and tugboats, EMFAC for estimating exhaust emissions from on-road trucks and worker commute vehicles, EPA emission factors for Tier 4 offroad diesel equipment, and San Diego Gas & Electric Company's (SDG&E) most recent and projected future electricity emission rates. <u>While the local cement demand is currently being met through other marine terminals and cement plants throughout the southern California area, the project would allow for more efficient local import and distribution to the San Diego area. The activities associated with the Project were assessed as new emissions when, in fact, the area is currently serviced from outside the region and the truck delivery from the Project would displace existing longer route deliveries into the San Diego region.</u> A detailed description of the methodology for estimating emissions is provided in Appendix C.

Pages 4.2-25 through 4.2-30

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

TAMT Final PEIR Mitigation Measure *The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMT Plan, adopted by the District in December 2016 as part of the Final Environmental Impact Report for the TAMT Plan.*	**Mitsubishi Cement Corporation Project SEIR Mitigation Measure** *Project mitigation measures are a combination of applicable TAMT Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMT Final PEIR mitigation measures are provided with additions shown in double underline and deletions indicated in ~~strikeout~~ format.*	**Project Applicability/Reason for Modification or New Project Mitigation Measure**
GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE		
MM-GHG-6: Implement a Renewable Energy Project or Purchase the Equivalent Greenhouse Gas Offsets from a California Air Resources Board Approved Registry or a Locally Approved Equivalent Program for Future Operations Associated with the TAMT Plan. Prior to the any discretionary approvals and/or issuance of a Coastal Development Permit(s), the project proponents of future components considered in the TAMT plan shall incorporate renewable energy within the TAMT or within/adjacent to areas of the San Diego Unified Port District's jurisdiction; otherwise, the project proponents shall purchase greenhouse gas reduction credits as specified herein to achieve requisite reductions to meet the 2035 reduction target. This requirement may include a micro-grid or similar type of energy management system to help distribute the loads and/or assist in energy storage. To meet the 2035 reduction target at full TAMT plan buildout (using full-buildout throughput numbers listed in Table 3-3 of Chapter 3, Project Description), the renewable energy project must offset 27,625 metric tons of carbon dioxide equivalent ($MTCO_2e$) per year or 130,751 megawatt-hours per year (MWh/year) or the equivalent amount of greenhouse gas offsets under the MPC scenario or 18,206 $MTCO_2e$ per year or 86,172 MWh/year or the equivalent amount of greenhouse gas offsets under the STC Alternative.	**MM-GHG-6R: Implement a Renewable Energy Project, or Other Verifiable Actions or Activities on Tidelands, or Purchase the Equivalent Greenhouse Gas Offsets from a California Air Resources Board Approved Registry or a Locally Approved Equivalent Program for Future Operations Associated with the TAMT Plan.** A. Options for Reducing GHG Emissions. The Mitsubishi Cement Corporation shall do one or more of the following to achieve the required reductions in 2025, 2030, and 2035 greenhouse gas (GHG) emissions specified below, in the following order of priority: 1. Incorporate a renewable energy project: • within the Tenth Avenue Marine Terminal; • within the San Diego Unified Port District's jurisdiction; or • adjacent to the San Diego Unified Port District's jurisdiction; or 2. Undertake other verifiable actions or activities on Tidelands, approved by the District, such as electrification of equipment including vehicles and trucks, financial contribution to a future local or District GHG emission reduction program on Tidelands (locally approved equivalent program), or similar activities or actions that reduce operational GHG emissions; or	MM-GHG-6R applies to the Proposed Project. The mitigation measure has been updated to recognize the Proposed Projects specific operational parameters while maintaining the original priority of mitigation efforts, which includes taking actions or modifying operational processes before pursuing the purchase of GHG emission offsets. The mitigation measure also allows for the auditing of purchased credits to account for the potential differences between the projected activities analyzed in this Draft EIR and the real word operations that will be monitored as a normal course of TAMT business operations. Further, mitigation measure MM-GHG-6R has been clarified to ensure enforceability of the offset credits and avoid deferment.

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

TAMT Final PEIR Mitigation Measure *The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMT Plan, adopted by the District in December 2016 as part of the Final Environmental Impact Report for the TAMT Plan.*	**Mitsubishi Cement Corporation Project SEIR Mitigation Measure** *Project mitigation measures are a combination of applicable TAMT Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMT Final PEIR mitigation measures are provided with additions shown in double underline and deletions indicated in ~~strikeout~~ format.*	**Project Applicability/Reason for Modification or New Project Mitigation Measure**
Because it is unknown if the full buildout will ever be achieved given it is based on market demand, the amount of greenhouse gas offsets (whether from renewable energy or purchasing of offsets) per project proposed under the TAMT plan must reduce its fair share of the full buildout GHG emissions amount (i.e., fair share of 27,625 $MTCO_2e$ under the MPC scenario or 18,206 $MTCO_2e$ under the STC Alternative), which shall be calculated over the entire life of the project proponent's lease agreement with the District or (if no lease) over the life of the project. As such, a calculation of the greenhouse gas emissions that would be generated by a project proponent's project over the life of the lease at the TAMT or the project life is required to determine the sufficient amount of renewable energy mitigation or greenhouse gas offsets. This proportion shall be based on anticipated throughput of the project proposed under the TAMT plan and shall include all potential emission sources (e.g., trucks, vessels, employees, cargo handling equipment). Evidence shall be submitted to the District prior to the commencement of construction activities. Because it is unknown how "solar ready" the available rooftop areas are within the TAMT, once at the design phase, the renewable energy project may be determined infeasible. Should this determination of infeasibility be made by the San Diego Unified Port District after considering	3. Purchase GHG emission offset credits which 1) are real, additional, permanent, quantifiable, verifiable, and enforceable as specified in California Health and Safety Code § 38562(d)(1) and (2) and as these terms are further defined in California Code of Regulations, Title 17, § 95802 (see below); 2) use a protocol consistent with or as stringent as California Air Resources Board (CARB) protocol requirements under California Code of Regulations, Title 17, § 95972(a); and 3) are issued by a CARB-approved offset registry.[1] For offset credits from projects outside California, Mitsubishi Cement Corporation must demonstrate in writing to the satisfaction of the District that the offset project meets requirements equivalent to or stricter than California's laws and regulations for ensuring the validity of offset credits. For purposes of this section, the definitions are as follows: a. "Real" means, in the context of offset projects, that GHG reductions or GHG enhancements result from a demonstrable action or set of actions, and are quantified using appropriate, accurate, and conservative methodologies that account for all GHG emissions sources, GHG sinks, and GHG reservoirs within the offset project boundary and account for uncertainty and the potential for activity-shifting leakage and market-shifting leakage. [17 CCR 95802]	

[1] Currently approved offset registries include the American Carbon Registry (ACR), Climate Action Reserve (CAR) and Verra (formerly the Verified Carbon Standard). See: https://ww3.arb.ca.gov/cc/capandtrade/offsets/registries/registries.htm

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

TAMT Final PEIR Mitigation Measure *The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMT Plan, adopted by the District in December 2016 as part of the Final Environmental Impact Report for the TAMT Plan.*	**Mitsubishi Cement Corporation Project SEIR Mitigation Measure** *Project mitigation measures are a combination of applicable TAMT Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMT Final PEIR mitigation measures are provided with additions shown in <u>double underline</u> and deletions indicated in ~~strikeout~~ format.*	**Project Applicability/Reason for Modification or New Project Mitigation Measure**
evidence submitted by the project proponent related to any structural limitations (i.e., the rooftops cannot support a renewable energy system), then three additional options are available, listed here in order of priority. The San Diego Unified Port District shall either require the renewable energy project to be built off site within the San Diego Unified Port District's jurisdiction, or within the adjacent community (City of San Diego), or shall require the proponent to purchase the equivalent amount of greenhouse gas offsets from a California Air Resources Board approved registry, or a locally approved equivalent program. The selected option or a combination of the above-mentioned options must achieve a total annual reduction of 27,625 $MTCO_2e$ at full TAMT plan buildout under the MPC scenario or 18,206 $MTCO_2e$ under the STC Alternative assuming throughput numbers are reached by this point in time. Otherwise, the reduction amount will be proportional to the growth experienced at the TAMT, achieve the same reductions noted in the analysis, and scaled to the actual growth that occurs.	b. <u>"Additional" means, in the context of offset credits, greenhouse gas emission reductions or removals that exceed any greenhouse gas reduction or removals otherwise required by law, regulation or legally binding mandate, and that exceed any greenhouse gas reductions or removals that would otherwise occur in a conservative business-as-usual scenario. [17 CCR 95802]</u> c. <u>"Permanent" means in the context of offset credits, either that GHG reductions and GHG removal enhancements are not reversible, or when GHG reductions and GHG removal enhancements may be reversible, that mechanisms are in place to replace any reversed GHG emission reductions and GHG removal enhancements to ensure that all credited reductions endure for at least 100 years. [17 CCR 95802]</u> d. <u>"Quantifiable" means in the context of offset credits, the ability to accurately measure and calculate GHG reductions or GHG removal enhancements relative to a project baseline in a reliable and replicable manner for all GHG emission sources, GHG sinks, or GHG reservoirs included within the offset project boundary, while accounting for uncertainty and activity-shifting leakage and market-shifting leakage [17 CCR 95802]</u> e. <u>"Verifiable" means that a non-California offset project is located in a state that has laws and regulations equivalent to or stricter as California's with respect to ensuring the validity of offsets and an Offset Project Data Report assertion is well documented and transparent such that it lends itself to an objective review by an accredited verification body. [17 CCR 95802]</u> f. <u>"Enforceable" means the authority for the offset purchaser to hold the offset provider liable and to take appropriate</u>	

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

TAMT Final PEIR Mitigation Measure *The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMT Plan, adopted by the District in December 2016 as part of the Final Environmental Impact Report for the TAMT Plan.*	**Mitsubishi Cement Corporation Project SEIR Mitigation Measure** *Project mitigation measures are a combination of applicable TAMT Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMT Final PEIR mitigation measures are provided with additions shown in double underline and deletions indicated in ~~strikeout~~ format.*	**Project Applicability/Reason for Modification or New Project Mitigation Measure**
	action if any of the above requirements are not met. [adapted from definition in 17 CCR 95802 for use in this measure] "Enforceable" also means that the offset must be backed by a legal instrument or contract that defines exclusive ownership and the legal instrument can be enforced within the legal system of the State of California. B. Required Annual GHG Emissions Reductions: The option(s) implemented pursuant to paragraph A above shall achieve the following required GHG reductions for the activities of the Proposed Project for years 2025, 2030, and 2035: 1. 2025 reduction: 568 $MTCO_2e$ per year or 2,345 MWh/year. 2. 2030 reduction: 1,622 $MTCO_2e$ per year or 7,675 MWh/year. 3. 2035 reduction: 1,693 $MTCO_2e$ per year or 8,013 MWh/year. The required 2025, 2030, and 2035 GHG emissions reductions are based on the maximum throughput of 600,000 metric tons (MT) per year via 24 calls to port annually. The required reductions may be reduced at the discretion of the District, based on the actual amount of throughput and hours at berth in a given year and the other adjustment provisions specified below. C. Implementation of GHG Emissions Reduction Options.	

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

TAMT Final PEIR Mitigation Measure *The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMT Plan, adopted by the District in December 2016 as part of the Final Environmental Impact Report for the TAMT Plan.*	**Mitsubishi Cement Corporation Project SEIR Mitigation Measure** *Project mitigation measures are a combination of applicable TAMT Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMT Final PEIR mitigation measures are provided with additions shown in <u>double underline</u> and deletions indicated in ~~strikeout~~ format.*	**Project Applicability/Reason for Modification or New Project Mitigation Measure**
	<u>Prior to the first call of the first year of operation and annually thereafter, the District shall notify the Mitsubishi Cement Corporation of the option(s) available for achieving the annual maximum required GHG emissions reduction in the order of priority specified above, and the Mitsubishi Cement Corporation shall:</u> <u>1. Develop a renewable energy project(s) or take other verifiable actions or activities identified by the District to meet or partially meet the required amount of $MTCO_2e$ or MWh reductions specified above.</u> <u>a. If the Mitsubishi Cement Corporation develops a renewable energy project(s), or takes other verifiable actions or activities to reduce GHG emissions, the Mitsubishi Cement Corporation shall submit to the District's Energy Department/Team, for its review and approval, a report specifying the annual amount of $MTCO_2e$ or MWh reduction achieved by the project(s), actions, or activities; submit evidence that the renewable energy project, actions, or activities are not being used to offset GHG emissions for any other project or entity; and submit any other information requested by the District's Energy Department/Team to verify the amount of GHG emissions reduction achieved by the project, actions or activities (collectively, "GHG Emission Reduction Report").</u> <u>b. If the GHG Emission Reduction Report is approved, a reduction to the required offsets shall be calculated by the District's Energy Department/Team, and the</u>	

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

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	reduction of offsets shall be transmitted to the Mitsubishi Cement Corporation in writing and the amount of GHG reduction shall count towards the required GHG reduction for the Proposed Project ("GHG Reduction"). 2. Purchase GHG emission offsets in conformance with paragraph A(3) above in an amount sufficient to achieve the required reduction of $MTCO_2e$ or MWh specified above, which may be decreased by the amount of annual $MTCO_2e$ or MWh reduction that is achieved by any renewable energy project(s) or other verifiable action or activities if developed and/or implemented pursuant to paragraph (1) above. The purchase of offsets to achieve the required reduction in $MTCO_2e$ or MWh shall occur as follows: a. Purchase offsets for the first 2 years of operation; b. Purchase offsets at least annually thereafter, prior to any calls to port for the corresponding timeframe, beginning with the third year of operation, for the life of the Proposed Project's operations or until termination of the lease agreement between the District and the Mitsubishi Cement Corporation. The Mitsubishi Cement Corporation may purchase more than 1 year of operational emissions offsets, consistent with the amount of $MTCO_2e$ or MWh reduction specified above for the corresponding timeframe of 2025, 2030, or 2035; and	

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

TAMT Final PEIR Mitigation Measure *The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMT Plan, adopted by the District in December 2016 as part of the Final Environmental Impact Report for the TAMT Plan.*	**Mitsubishi Cement Corporation Project SEIR Mitigation Measure** *Project mitigation measures are a combination of applicable TAMT Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMT Final PEIR mitigation measures are provided with additions shown in <u>double underline</u> and deletions indicated in ~~strikeout~~ format.*	**Project Applicability/Reason for Modification or New Project Mitigation Measure**
	c. <u>On or before the first ship call in the first year of operation of the proposed project and annually thereafter, Mitsubishi Cement Corporation shall submit certificates for offsets purchased to achieve the required GHG emission reductions, including written verification by a qualified consultant approved by the District that the offsets meet the requirements for GHG emission offset credits set forth in paragraph A(3) above, to the District's Energy Department/Team.</u> <u>D. Adjustments to Required GHG Emissions Reductions.</u> <u>If the Mitsubishi Cement Corporation complies with paragraphs A(1) or A(2) above, in an amount that meets the total amount of $MTCO_2e$ or MWh reductions specified above for 15 years of operation to meet the 2035 reduction target, or complies with paragraph A(3) above and purchases the requisite offsets for 15 years, or does a combination of paragraphs A(1), (2), and (3) to meet the 2035 reduction target, then nothing further shall be required under this mitigation measure.</u> <u>1. Reduction of Emissions through Development of a Renewable Energy Project Requirement: Although none are identified at this time, the Mitsubishi Cement Corporation may be required by the District to develop a renewable energy project at any time during the life of the project (subject to future approvals and the priorities listed above) and may request a reduction of required offsets. If any reduction in offsets is requested by the Mitsubishi Cement Corporation because of the development of a renewable</u>	

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	energy project(s), the Mitsubishi Cement Corporation shall submit a GHG Emission Reduction Report for the District Energy Department's review pursuant to the process specified above in paragraph C(1) above and required offsets shall be determined by the District and reduced. 2. Reduction of Emissions through Verifiable Actions or Activities on Tidelands Requirement: Although none are identified at this time, the Mitsubishi Cement Corporation may be required by the District to take other verifiable actions or activities at any time during the life of the project (subject to future approvals and the priorities listed above) and may request a reduction of required offsets. If any reduction in offsets is requested by the Mitsubishi Cement Corporation because of the other verifiable actions or activities on tidelands, the Mitsubishi Cement Corporation shall submit a GHG Emission Reduction Report for the District Energy Department's review pursuant to the process specified above in paragraph C(1), and required offsets shall be determined by the District and reduced. 3. Reduction of Emissions through Purchase of Offsets: Subsequent to purchasing GHG emission offsets pursuant to paragraph C(2) above, the Mitsubishi Cement Corporation's future annual purchase of offsets to achieve the GHG emission reductions specified in paragraph B above may be adjusted if the preceding year's throughput is less than 600,000 metric tons (the maximum allowed annual throughput), and/or the annual calls to port are less than 24 (the maximum allowed number of calls; 24 calls at 168 hours per call, or 4,032 annual hours at berth). The District	

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	or a District-retained consultant (at the Mitsubishi Cement Corporation cost) shall calculate, using the best available science, the amount of unused GHG reduction offsets based on the actual throughput and/or time at berth. Any unused offsets shall be used for the next year of operation of the Proposed Project and the Mitsubishi Cement Corporation shall purchase offsets in the necessary amounts (required amount less any unused offsets) for the subject year. This procedure shall be repeated on an annual basis. In the event that newly discovered information shows that an offset, previously certified as compliant pursuant to paragraph C(3)(c), does not comply with the requirements of paragraph A(3), Mitsubishi Cement Corporation shall purchase an equivalent amount of replacement offsets that comply with the requirements of paragraph A(3) within 30 days after receiving notice of the noncompliance. After verification of unused and available offsets, unused offsets may replace previously compliant offsets should those offsets subsequently be determined noncompliant with paragraph A(3). At the Mitsubishi Cement Corporation's written request to the District, Mitsubishi Cement Corporation may waive the annual adjustment described above and purchase the required $MTCO_2e$ or MWh offsets on at least an annual basis. ~~The Mitsubishi Cement Corporation shall do one or more of the following to achieve requisite reductions to meet the 2025, 2030, and 2035 greenhouse gas (GHG) reduction targets, in order of priority:~~	

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MM-GHG-7: Annual Inventory Submittal and Periodic Technology Review. The San Diego Unified Port District regularly monitors technologies for reducing air emissions as part of its Climate Action Plan and long-range sustainability goals, which encourage the San Diego Unified Port District and its tenants to use cleaner technologies over time as they become available and feasible. As a condition of approval of any new or amended real estate agreement or Coastal Development Permit, the San Diego Unified Port District shall require the project proponent to submit to the San Diego Unified Port District an annual inventory of all equipment that generates criteria pollutant, toxic air contaminant, and greenhouse gas emissions operated by the project proponent at the TAMT throughout the life of the lease up to 2035 (buildout of the TAMT plan). The equipment inventory shall include the year, make, and model of the equipment that was used in the previous year, including annual hours of operation for each piece of equipment, including but not limited to heavy-duty drayage and non-drayage trucks, yard equipment, assist and ocean-going tugs, ocean-going vessels, bulk material handling equipment, and any other type of cargo handling equipment. The purpose of the inventory is to track emissions and equipment at TAMT and to assist in technological reviews, as described below.	~~(1) Incorporate a renewable energy project:~~ ~~• within the Tenth Avenue Marine Terminal;~~ ~~• within the San Diego Unified Port District's jurisdiction; or~~ ~~• adjacent to the San Diego Unified Port District's jurisdiction; or~~ ~~(2) Other verifiable actions or activities on Tidelands such as electrification of equipment including vehicles and trucks, financial contribution to a future local or District GHG emission reduction program on Tidelands (locally approved equivalent program), or similar activities or actions that reduce operational GHG emissions; or~~ ~~(3) Purchase California Air Resource Board (CARB) verified GHG emission offsets.~~ ~~The option(s) implemented shall achieve requisite GHG reductions for the activities of the Project for years 2025, 2030, and 2035. As specified below, the 2025, 2030, and 2035 GHG reduction targets are based on the maximum throughput of 600,000 metric tons (MT) per year.~~ ~~The maximum metric tons of carbon dioxide equivalent ($MTCO_2e$) or megawatt-hours per year (MWh/year) reduction requirement for each time period is as follows (calculated assuming 600,000 MT of throughout via 24 calls to port annually)~~	

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To promote new emission control technologies, the San Diego Unified Port District will perform a Periodic Technology Review annually. The Periodic Technology Review will coincide with monitoring and reporting pursuant to the San Diego Unified Port District's Climate Action Plan, and will include the following: 1. Develop and maintain an inventory of equipment in operation at the TAMT that generates criteria pollutant, toxic air contaminant, and greenhouse gas emissions, including the equipment model year, model name, and annual hours of operation, based on the annual tenant inventories submitted to the San Diego Unified Port District as described above. 2. Identify and assist with enforcement of changes to emission regulations for heavy-duty trucks, yard equipment, tugs, vessels, bulk handling equipment, and other equipment that generates criterial pollutant, toxic air contaminant, and greenhouse gas emissions. 3. Identify, and assist with implementation of, any feasible new emissions-reduction technologies that may reduce emissions at the project site, including technologies applicable to heavy-duty trucks, yard equipment, tugs, vessels, and bulk handling equipment. 4. Collaborate with the California Air Resources Board and San Diego Air Pollution Control District to ensure these technologies are available and to identify funding opportunities, including funding from the Prop 1B: Good Movement Emission Reduction Program, among others. 5. Prioritize older equipment in operation at the TAMT that generates the highest levels of criterial pollutant,	~~but the maximum requirement may be reduced at the discretion of the District, depending on the hours at berth and the amount of throughput in a given year and based on the other reduction requirements specified below:~~ ~~A. 2025 reduction target: 568 $MTCO_2e$ per year or 2,345 MWh/year.~~ ~~B. 2030 reduction target: 1,622 $MTCO_2e$ per year or 7,675 MWh/year.~~ ~~C. 2035 reduction target: 1,693 $MTCO_2e$ per year or 8,013 MWh/year.~~ ~~Prior to the first call of the first year of operation, the Mitsubishi Cement Corporation shall either:~~ ~~I. Develop a renewable energy project(s) or take other verifiable actions or activities to meet or partially meet the amount of $MTCO_2e$ or MWh reductions specified above.~~ ~~a. If the Mitsubishi Cement Corporation develops a renewable energy project(s), or takes actions or conducts activities to reduce GHG emissions, the Mitsubishi Cement Corporation shall submit a report specifying the annual amount of $MTCO_2e$ or MWh reduction achieved by the project(s), actions, or activities; submit evidence that the renewable energy project, actions, or activities are not being used to offset GHG emissions for any other project or entity; and any other information needed to verify that amount to the Districts Energy Department for its~~	

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toxic air contaminant, and greenhouse gas emissions to be replaced based on the level of emissions and cost-effectiveness of the emissions reduction (i.e., biggest reduction per dollar), and identify implementation mechanisms including, but not limited to, tenant-based improvements, grant programs, or a combination thereof, based on regulatory requirements and the feasibility analyses specified in paragraph 3 above. Use the Carl Moyer Program, or similar cost effectiveness criteria, to assess the economic feasibility (e.g., cost effectiveness) of the identified new technologies. 6. Ensure that any upgraded or retired equipment is accounted for as part of the San Diego Unified Port District's Maritime Emissions Inventory and Climate Action Plan. If Periodic Technology Review identifies new technology that will be effective in reducing emissions compared to the equipment in operation at the time of the review, and the San Diego Unified Port District determines that installation or use of the technology is feasible, the San Diego Unified Port District shall require the use of such technology as a condition of any discretionary approval issued by the San Diego Unified Port District for any new, expanded, or extended operations at the TAMT. Furthermore, the District and/or project proponent must demonstrate that emissions of volatile organic compounds (VOCs) would be less than 75 pounds per day on a peak day once cargo throughput exceeds 4,000,000 metric tons annually. If technological advancements are unable to reduce VOC emissions to 75 pounds per day or less on a peak day, then the District shall	~~review and approval (collectively, "GHG Emission Reduction Report").~~ ~~b. If the GHG Emission Reduction Report is approved, a reduction to the required offsets shall be calculated by the District's Energy Department, and the reduction of offsets shall be transmitted to the Mitsubishi Cement Corporation in writing and the amount of GHG reduction shall count towards the required GHG reduction for the Proposed Project ("GHG Reduction").~~ ~~II. Purchase the requisite GHG emission offsets to reduce the amount of $MTCO_2e$ or MWh specified above, which may be decreased by the amount of annual $MTCO_2e$ or MWh reduction that is achieved by the renewable energy project(s), action, or activities if developed and/or implemented. The offsets shall be purchased by a CARB verified entity and shall not have been previously used for a different GHG reduction project. The purchased offsets shall be linked to a GHG reduction project or activity that has already occurred. All certificates of purchased offsets shall be submitted to the District for its review that the criteria, above, has been met. The purchase of requisite offsets to reduce the amount of $MTCO_2e$ or MWh, shall occur as follows:~~ ~~a. Purchase offsets for the first 2 years of operation; and~~ ~~b. Purchase offsets at least annually thereafter, prior to any calls to port for the corresponding timeframe;~~	

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limit the number of vessels allowed to no more than three on a peak day once total throughput exceeds 4,000,000 metric tons annually. These operational restrictions will ensure that VOC emissions do not exceed threshold standards established by the San Diego Air Pollution Control District. Verification of compliance with this measure is the responsibility of the District.	~~beginning with the third year of operation, for the life of the operation or termination of the lease agreement between the District and the Mitsubishi Cement Corporation. The Mitsubishi Cement Corporation may purchase more than 1 year of operational emissions offsets, consistent with the amount of $MTCO_2e$ or MWh reduction specified above for the corresponding timeframe of 2025, 2030, or 2035.~~ ~~At this time, within the TAMT, there are no solar ready rooftops without renewable energy projects already being implemented. But such projects may be identified in the future, and the Mitsubishi Cement Corporation may choose at that time to participate or develop the future identified renewable energy project(s).~~ ~~If the Mitsubishi Cement Corporation complies with (1) or (2) above, in an amount that meets the total amount of $MTCO_2e$ or MWh reductions specified above for 15 years of operation (to meet the 2035 reduction target) or complies with (3) above and purchases the requisite offsets for 15 years, or does a combination of (1), (2), and (3) to meet the 2035 reduction target, then nothing further shall be required under this mitigation measure.~~ ~~Subsequent to fulfilling the requirement of 3, annual purchase of offsets as specified in 3A, 3B, and 3C may be adjusted if the preceding years throughput is less than 600,000 metric tons (the maximum allowed annual throughput), and/or the annual calls~~	

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	~~to port are less than 24 (the maximum allowed number of calls: 24 calls at 168 hours per call, or 4,032 annual hours at berth). The District or a District-retained consultant (at the Mitsubishi Cement Corporation cost) shall calculate, using the best available science, the amount of unused GHG reduction offsets based on the actual throughput and/or time at berth. Any unused offsets shall be used for the next year of operation of the Proposed Project and the Mitsubishi Cement Corporation shall purchase offsets in the necessary amounts (required amount less any unused offsets) for the subject year. This procedure shall be repeated on an annual basis. At the Mitsubishi Cement Corporation's written request to the District, Mitsubishi Cement Corporation may waive the annual adjustment described above and purchase the required $MTCO_2e$ or MWh offsets on at least an annual basis.~~ ~~Reduction of Emissions through Development of a Renewable Energy Project Requirement: Although none are identified at this time, the Mitsubishi Cement Corporation may develop a renewable energy project at any time during the life of the project (subject to future approvals and the priorities listed above) and may request a reduction of required offsets. If any reduction in offsets is requested by the Mitsubishi Cement Corporation because of the development of a renewable energy project(s), the Mitsubishi Cement Corporation shall submit a GHG Emission Reduction Report for the District Energy Department's review pursuant to the process specified above in (1) and required offsets shall be reduced.~~	

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	~~Reduction of Emissions through Verifiable Actions or Activities on Tidelands Requirement: Although none are identified at this time, the Mitsubishi Cement Corporation may take actions or implement activities at any time during the life of the project (subject to future approvals and the priorities listed above) and may request a reduction of required offsets. If any reduction in offsets is requested by the Mitsubishi Cement Corporation because of the verified actions or activities on tidelands, the Mitsubishi Cement Corporation shall submit a GHG Emission Reduction Report for the District Energy Department's review pursuant to the process specified above in (1), and required offsets shall be reduced.~~ **MM-GHG-7R: Annual Inventory Submittal and Periodic Technology Review.** A. The Mitsubishi Cement Corporation shall comply with the San Diego Unified Port District's Annual Inventory and Periodic Technology Review Program as follows: (1) Prior to January 30th of each year of operations, Mitsubishi Cement Corporation shall provide an inventory of all mobile equipment associated with its TAMT operations that generate criteria pollutants, toxic air contaminants and greenhouse gases. The annual inventory shall identify the year, make, VIN or other identification number, fuel type, and model of the equipment that was used in the previous year, as well as the number of hours of operation for each piece of equipment, including but not limited to heavy-duty drayage and non-drayage trucks, yard equipment,	MM-GHG-7 applies to the Proposed Project. Modifications to MM-GHG-7 clarify the intent of the mitigation measure and the annual reporting requirements as well as the Project Proponent's requirement to work cooperatively with the District in the future should new technologies become available and are feasibly implemented in the Proposed Project operations. In addition, the District hired two consulting firms, ICF and CalStart, both with zero emission technology expertise, to conduct a zero-emission truck feasibility study (see Exhibit 4 of Chapter 5, Comments Received and District Responses for the *Zero Emission Truck Feasibility Study for Mitsubishi Cement Corporation*, dated November 2020 ("Feasibility Study")). CalStart was a consultant requested by Environmental Health Coalition to be hired for the Feasibility Study. After obtaining operational characteristics of Mitsubishi Cement Corporation's largest customer, the Feasibility Study analyzed the feasibility of deploying zero-emission

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	assist and ocean-going tugs, ocean-going vessels, bulk material handling equipment, and any other type of cargo handling equipment. The purpose of the annual inventory is to track emissions and equipment at TAMT and to assist in the District's periodic technological reviews, pursuant to TAMT Redevelopment Plan MM-GHG-7. (2) Within twelve (12) months of commencement of truck loadout activities, Mitsubishi Cement Corporation shall implement a zero emission truck demonstration project at TAMT ("Demonstration Project") which uses zero emission trucks for the transport of cement and cementitious material from its TAMT facility. The Demonstration Project shall operate for a period of not less than twelve (12) months and shall include one or more zero emission trucks. If market conditions require Mitsubishi Cement Corporation to temporarily cease truck loadout operations at TAMT, the 12 months shall be tolled until Mitsubishi Cement Corporation resumes regular truck loadout operations. The Demonstration Project will evaluate the capability of zero emission trucks to transport cement and cementitious materials from Mitsubishi Cement Corporation's TAMT facility, determine the operational logistics of the use of zero emission trucks with increasing deployment, and better inform the District's metrics for determining the feasibility of zero emission trucks. (3) Within three (3) months after completion of the Demonstration Project, Mitsubishi Cement Corporation	trucks. Based on recommendations from the Feasibility Study, mitigation measure MM-GHG-7R has been revised to require actions by the District and Mitsubishi Cement Corporation, including implementation of a Demonstration Project(s) for the use of Zero Emission Trucks, the preparation and submittal to the District for review and approval of an Infrastructure Plan that would support the ability to operate Zero Emission Trucks, and annual review and update of the Feasibility Study. The original aspects of MM-GHG-7R relating to the Annual Equipment Inventory and Periodic Technology Review remain intact. Potential GHG emission reductions from the revised MM-GHG-7R have not been credited towards the Project's GHG reduction calculations and thus, determination of impact significance, because the amount of reduction and timing is unknown. Additionally, despite the revisions to MM-GHG-7R, greenhouse gas impacts remain significant and unavoidable. Additional modifications are limited to changes in how the San Diego Unified Port District is referred to (e.g., San Diego Unified Port District instead of District).

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	shall submit a written report to the District which sets forth the data collected during the Demonstration Project and identifies opportunities and barriers for larger deployment of zero emission trucks at Mitsubishi Cement Corporation's TAMT facility. The Demonstration Project is intended to assist the District in its Periodic Technology Review pursuant to TAMT MM-GHG-7 by providing information regarding the feasibility of using zero emission trucks to service Mitsubishi Cement Corporation's operations at TAMT. (4) Within six (6) months after completion of the Demonstration Project, Mitsubishi Cement Corporation shall submit a zero emission truck infrastructure plan ("Infrastructure Plan") to the District. The Infrastructure Plan shall include, at a minimum, the location of needed charging stations and other equipment needs, power requirements for each charging station and any necessary upgrades and other improvements to support the use of zero emission trucks in Mitsubishi Cement Corporation's operations at TAMT. The Infrastructure Plan also shall identify ancillary infrastructure needs related to potential operational changes from incorporating zero emission trucks, including coordination with Mitsubishi Cement Corporation's customers at key locations to service San Diego County and necessary accommodations for drivers and other personnel. The Infrastructure Plan is intended to assist the District in its Periodic Technology Review pursuant to TAMT MM-GHG-7 by providing information regarding the feasibility of using zero	

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	emission trucks to service Mitsubishi Cement Corporation's operations at TAMT. B. Beginning a year after approval of the Project and continuing each year during the term of the Mitsubishi Cement Corporation's lease with the District, the District shall include in its Periodic Technology Review under TAMT MM-GHG-7 an evaluation of the feasibility of using zero emission trucks for the transport of cement and cementitious material from Mitsubishi Cement Corporation's facility at TAMT ("Annual ZE Truck Feasibility Study"). The District's evaluation of and conclusion regarding feasibility shall be based on the feasibility metrics set forth in Table 1, ZE Truck Feasibility Categories and Metrics, below and shall be made available to the public in an Annual ZE Truck Feasibility Study. The District shall review the feasibility metrics annually and update them as necessary to reflect current data. TABLE 1 ZE Truck Feasibility Categories and Metrics Feasibility Category: Technical — Feasibility Metric: Range; Torque; Payload capacity; Refueling time; Service and maintenance support	

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	Ancillary energy requirements	
Economic	Vehicle cost	
	Total Cost of Ownership	w/ incentives
		w/o incentives
	Charging infrastructure cost	
	Comparison with non-TAMT supply chain	
Fleet Logistics	Scheduling	
	Truck Assignments	
	% of port trips that ZEVs can meet	
Charging Infrastructure Availability	On-site/depot	
	On-route/opportunity	
	Public (as needed)	
Demonstration Project	Information obtained from the demonstration project.	
Availability of Zero Emission Trucks	Procurement and delivery availability, including delivery of the trucks to the fleet. * Procurement availability for the full spectrum of potential MCC customers, regardless of size.	
Annual Throughput	Number of trucks to support annual operations	

*"fleet" means customers' trucks traveling to or from the Mitsubishi Cement Corporation's facility at TAMT.

C. In the event the District's Periodic Technology Review pursuant to TAMT MM-GHG-7R identifies new technology or other practices that are feasible and are equally or more effective in reducing GHG emissions than the mitigation measures adopted by the District for the Mitsubishi

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

TAMT Final PEIR Mitigation Measure *The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMT Plan, adopted by the District in December 2016 as part of the Final Environmental Impact Report for the TAMT Plan.*	**Mitsubishi Cement Corporation Project SEIR Mitigation Measure** *Project mitigation measures are a combination of applicable TAMT Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMT Final PEIR mitigation measures are provided with additions shown in double underline and deletions indicated in ~~strikeout~~ format.*	**Project Applicability/Reason for Modification or New Project Mitigation Measure**
	Cement Corporation facility, the District may add, modify or substitute in place of an adopted mitigation measure such new technology or other practices as it becomes commercially available, unless the changes to an adopted measure would cause or contribute to an increase in any of the facility's significant environmental impacts. ~~The Mitsubishi Cement Corporation shall comply with the San Diego Unified Port District's Annual Inventory and Periodic Technology Review Program by (1) providing an inventory of all the mobile equipment associated with their TAMT site operations that generate criteria pollutants, toxic air contaminants and greenhouse gases on an annual basis to be submitted by January 30th of each year of operations, and (2) working collaboratively with the San Diego Unified Port District staff and/or the local air pollution control district to identify new technologies or other practices that can be incorporated into their operations that help reduce emissions and improve air quality.~~ ~~The Mitsubishi Cement Corporation shall complete the San Diego Unified Port District's equipment inventory spreadsheet annually, which requires tenants to identify the year, make, vin/ID number, fuel type, and model of the equipment that was used in the previous year, including annual hours of operation for each piece of equipment, including but not limited to heavy-duty drayage and non-drayage trucks, yard equipment, assist and ocean-going tugs, ocean-going vessels, bulk material handling equipment, and any other type of cargo handling equipment. The purpose of the inventory is to track emissions~~	

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

TAMT Final PEIR Mitigation Measure *The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMT Plan, adopted by the District in December 2016 as part of the Final Environmental Impact Report for the TAMT Plan.*	**Mitsubishi Cement Corporation Project SEIR Mitigation Measure** *Project mitigation measures are a combination of applicable TAMT Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMT Final PEIR mitigation measures are provided with additions shown in double underline and deletions indicated in ~~strikeout~~ format.*	**Project Applicability/Reason for Modification or New Project Mitigation Measure**
	~~and equipment at TAMT and to assist in technological reviews, as described in the TAMT Redevelopment Plan MM-GHG-7.~~	
Not Applicable	**MM-GHG-10: Modernization of Delivery Truck Fleet.** No less than 90 percent of the trucks loading cement or cementitious material at the Mitsubishi Cement Corporation facility shall be equipped with an engine that meets one of the following requirements: 1) Is no more than 5 years old, based on engine model year ("5-Year Engine") for each operational year; 2) Has been designed or retrofitted to comply with Federal and State on-road heavy-duty engine emissions standards (e.g., EPA 2010 engine emission standards or successor rules or regulations for on-road heavy duty diesel engines) for a 5-Year Engine ("Emission equivalent Engine"); or 3) Uses alternative engine technology or fuels demonstrated to produce emissions no greater than a 5-Year Engine ("Alternative Equivalent Engine"), including zero emission vehicles powered by electric batteries or hydrogen fuel cells. The remaining 10 percent of the trucks shall comply with all applicable Federal and State heavy-duty on-road truck regulations. In addition, all trucks loading cement or cementitious materials at the Mitsubishi Cement Corporation facility shall be registered and be in compliance with the CARB Truck and Bus Regulation. Confirming that Mitsubishi Cement Corporation's 90 percent requirement for a Modernized Truck Fleet shall be determined on a calendar year basis. Mitsubishi Cement Corporation shall submit documentation of compliance, showing the following information, to the San Diego Unified Port District's	MM-GHG-10 is a new mitigation measure identified for the Proposed Project.

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

TAMT Final PEIR Mitigation Measure *The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMT Plan, adopted by the District in December 2016 as part of the Final Environmental Impact Report for the TAMT Plan.*	**Mitsubishi Cement Corporation Project SEIR Mitigation Measure** *Project mitigation measures are a combination of applicable TAMT Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMT Final PEIR mitigation measures are provided with additions shown in <u>double underline</u> and deletions indicated in ~~strikeout~~ format.*	**Project Applicability/Reason for Modification or New Project Mitigation Measure**
	<u>Planning and Green Port Department on an annual basis by January 31 following each year of operation:</u> <u>1) Truck vehicle identification number (VIN),</u> <u>2) Engine model year,</u> <u>3) Annual truck trips, and</u> <u>4) If nondiesel technology, manufacturer engine standards.</u>	

4.2.4 Changes to Chapter 4, Section 4.5, *Transportation, Circulation, and Parking*

Pages 4.5-19 through 4.5-21

Operation

Roadway Segments

Operation of the Proposed Project would not result in any new or more severe significant impacts on study area roadway segments compared to what was previously disclosed in the TAMT Final PEIR. However, the Proposed Project would generate vehicle trips that would contribute to the overall significant impact from TAMT Plan buildout on the roadway segment of 28th Street between Boston Avenue and National Avenue identified in the TAMT Final PEIR. As identified in the TAMT Final PEIR, to mitigate for significant impacts from buildout of the TAMT Plan (which includes future projects such as the Proposed Project) on the roadway segment of 28th Street between Boston Avenue and National Avenue, the segment would need to be expanded to its ultimate classification as a Four Lane Major Arterial. Implementation of this improvement would improve the traffic operations at this affected roadway segment to LOS C, reducing the impact to a less-than-significant level. TAMT Final PEIR mitigation measure **MM-TRA-3** identified a 2.8 percent fair share contribution by the District of the cost to widen the roadway to a Four Lane Major Arterial classification and that the roadway impact would occur when future projects contemplated under TAMT Plan generate 161 new daily truck trips.

The Proposed Project would generate up to 176 trucks per day during peak operation and would contribute to the exceedance of the V/C ratio on the segment of 28th Street between Boston Avenue and National Avenue. Therefore, TAMT Final PEIR mitigation measure **MM-TRA-3** would apply to the Proposed Project. As noted in TAMT Final PEIR mitigation measure **MM-TRA-3,** the District shall initiate payment once approximately 150 new daily truck trips are reached under the proposed project. However, the District may seek reimbursement from future projects that would contribute new daily trips in proportion to their contribution.

~~Utilizing the same fair share contribution identified in the TAMT Final PEIR, the Proposed Project would be responsible for contributing 1.6 percent of the total cost to widen the segment of 28th Street between Boston Avenue and National Avenue.~~

$$\text{~~Fair Share Percent (\%) =~~} \frac{\text{~~(Project Volume: 353 ADT)~~}}{\text{~~(Baseline Volume: 22,112)~~} + \text{~~(Project Volume: 353 ADT)~~}}$$

~~The roadway segment widening improvement has been identified as part of the overall improvement to the 28th Street roadway segment between National Avenue and Main Street in the Barrio Logan Public Facilities Financing Plan. However, the Barrio Logan Public Facilities Financing Plan indicates that the design and construction of the improvement will be scheduled when funding becomes available. To ensure consistency with TAMT Final PEIR Mitigation Measure **MM-TRA-3,** the Proposed Project would contribute 1.6 percent of the total cost to widen the roadway segment, while the District (or other future projects) would contribute the remaining 1.2 percent of total cost to the City to ensure the entire 2.8 percent fair share contribution is provided to the City of San Diego. As such, TAMT Final PEIR mitigation~~

~~measure **MM-TRA-3** has been modified to reflect the Proposed Project's fair share contribution to the roadway improvement as mitigation measure **MM-TRA-3R.**~~

Intersections

Operation of the Proposed Project would not result in any new or more severe significant impacts on study area intersections compared to what was previously disclosed in the TAMT Final PEIR. However, the Proposed Project would generate vehicle trips that would contribute to the overall significant impact from TAMT Plan buildout on the Norman Scott Road/32nd Street/Wabash Boulevard intersection identified in the TAMT Final PEIR. To mitigate for significant impacts from buildout of the TAMT Plan (which includes future projects such as the Proposed Project) on the Norman Scott Road/32nd Street/Wabash Boulevard intersection, the TAMT Final PEIR identified the improvement of the intersection by adding a westbound right-turn overlap phase. Implementation of this improvement would improve the traffic operations at this affected intersection by reducing the delay associated with the TAMT Plan. With the improvement, the intersection would operate at LOS F in the AM peak hour (with an average delay of 93.6 seconds) and LOS D in the PM peak hour (with an average delay of 54.1 seconds), effectively reducing delay at this intersection to below current levels. The TAMT Final PEIR noted that the intersection impact would occur when future projects contemplated under TAMT Plan generate 195 new daily truck trips. This is the point at which TAMT operations would contribute more than 1.0 second of delay in the AM peak hour at the Norman Scott Road/32nd Street/Wabash Boulevard intersection.

The TAMT Final PEIR identified mitigation measure **MM-TRA-4** to ensure that the fair share contribution is triggered once TAMT operations generate approximately 150 new daily trips~~, which outlines when the fair share contribution to the affected intersection is triggered,~~ and outlines the mechanism for how the fair share contribution for the ~~roadway~~ intersection improvement would be paid, a tracking program to monitor the number of trucks that enter and exit TAMT, and how the District may seek reimbursement from future projects that would contribute new daily trips to the intersection in proportion to their contribution. The Proposed Project would generate up to 176 trucks per day during maximum operation. ~~As such, TAMT Final PEIR Mitigation Measure **MM-TRA-4** has been modified to reflect the Proposed Project's contribution to the intersection improvement as Mitigation Measure **MM-TRA-4R**.~~

Pages 4.5-23 through 4.5-25

Table 4.5-9. Comparison of Construction and Operational Traffic TAMT Final PEIR Mitigation Measures to Proposed Project Draft SEIR Mitigation Measures

TAMT Final PEIR Mitigation Measure *The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMT Plan, adopted by the District in December 2016 as part of the Final Environmental Impact Report for the TAMT Plan.*	**Mitsubishi Cement Corporation Project SEIR Mitigation Measure** *Project mitigation measures are a combination of applicable TAMT Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMT Final PEIR mitigation measures are provided with additions shown in double underline and deletions are indicated in ~~strikeout~~ format.*	**Project Applicability/Reason for Modification or New Project Mitigation Measure**
TRANSPORTATION AND CIRCULATION		
MM-TRA-3: Widen the Segment of 28th Street between Boston Avenue and National Avenue to a Four-Lane Major Arterial Classification Consistent with the Barrio Logan Community Plan. The District currently has an established program to track	**MM-TRA-3R: Widen the Segment of 28th Street between Boston Avenue and National Avenue to a Four-Lane Major Arterial Classification Consistent with the ~~Barrio Logan Community Plan~~ Barrio Logan Public Facilities Financing Plan.** The District	**MM-TRA-3** applies to the Proposed Project. Modifications to **MM-TRA-3** are limited to identifying updates to the Barrio Logan Public Facilities Financing Plan

Table 4.5-9. Comparison of Construction and Operational Traffic TAMT Final PEIR Mitigation Measures to Proposed Project Draft SEIR Mitigation Measures

TAMT Final PEIR Mitigation Measure *The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMT Plan, adopted by the District in December 2016 as part of the Final Environmental Impact Report for the TAMT Plan.*	**Mitsubishi Cement Corporation Project SEIR Mitigation Measure** *Project mitigation measures are a combination of applicable TAMT Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMT Final PEIR mitigation measures are provided with additions shown in double underline and deletions are indicated in ~~strikeout~~ format.*	**Project Applicability/Reason for Modification or New Project Mitigation Measure**
the number of trucks that enter and exit the terminal each year associated with TAMT operations. Prior to generating an additional 161 new daily truck trips, the District shall pay a fair-share contribution (MPC would be responsible for 3.9% and STC would be responsible for 2.8%) of the cost to widen the roadway segment of 28th Street between Boston Avenue and National Avenue to a Four-Lane Major Arterial classification. The improvement is identified within the draft Barrio Logan Community Plan, and therefore would be paid to the City of San Diego in accordance with Section 142.0640 of the San Diego Municipal Code. Payment of the District's fair share shall be completed prior to reaching 161 new daily truck trips. In order to ensure the significant impact does not occur before the District has paid its fair share to the City, the District shall initiate payment once approximately 150 new daily truck trips are reached under the proposed project. The trigger will be determined by the District by examining the ADT over a 1-month timeframe and comparing the ADT to the baseline of 93 daily trucks generating 186 trips per day (33,349 trucks per year divided by 360 days multiplied by 2 trips for each truck) and 935 daily employee trips (315 existing employees multiplied by 3 trips per day). At the District's discretion, the District may seek reimburse-ment from tenants that would contribute new daily trips in proportion to their contribution.	currently has an established program to track the number of trucks that enter and exit the terminal each year associated with TAMT operations. Prior to generating an additional 161 new daily truck trips, the District shall pay a fair-share contribution (~~MPC would be responsible for 3.9% and~~ STC would be responsible for 2.8%) of the cost to widen the roadway segment of 28th Street between Boston Avenue and National Avenue to a Four-Lane Major Arterial classification. The improvement is identified within the ~~draft Barrio Logan Community Plan~~ Barrio Logan Public Facilities Financing Plan, and therefore would be paid to the City of San Diego in accordance with Section 142.0640 of the San Diego Municipal Code. Payment of the District's fair share shall be completed prior to reaching 161 new daily truck trips. In order to ensure the significant impact does not occur before the District has paid its fair share to the City, the District shall initiate payment once approximately 150 new daily truck trips are reached under the proposed project. The trigger will be determined by the District by examining the ADT over a 1-month timeframe and comparing the ADT to the baseline of 93 daily trucks generating 186 trips per day (33,349 trucks per year divided by 360 days multiplied by 2 trips for each truck) and 935 daily employee trips (315 existing employees multiplied by 3 trips per day). At the District's discretion, the District may seek reimbursement from tenants that would contribute new daily trips in proportion to their contribution. ~~Based on the Proposed Project's contribution of new daily trips, a fair share contribution of 1.6% of the total cost to widen the roadway segment shall be paid by the Mitsubishi Cement Corporation to the City prior to 150 new daily truck trips being generated.~~	and the Proposed Project's fair share contribution to the roadway improvements.
MM-TRA-4: Westbound Right-Turn Overlap Phase at Norman Scott Road/32nd Street/Wabash Boulevard Intersection. The San Diego Unified Port District currently has an established program to track the number of trucks that enter and exit the terminal each year associated with TAMT operations. Prior to generating an additional 195 new daily trips,	**MM-TRA-4R: Westbound Right-Turn Overlap Phase at Norman Scott Road/32nd Street/Wabash Boulevard Intersection.** The San Diego Unified Port District currently has an established program to track the number of trucks that enter and exit the terminal each year associated with TAMT operations. Prior to generating an additional 195 new daily trips,	~~**MM-TRA-4** applies to the Proposed Project. Modifications to **MM-TRA-4** are limited to identifying the Proposed Project's fair share contribution to the roadway improvements.~~**MM-TRA-4**

Table 4.5-9. Comparison of Construction and Operational Traffic TAMT Final PEIR Mitigation Measures to Proposed Project Draft SEIR Mitigation Measures

TAMT Final PEIR Mitigation Measure *The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMT Plan, adopted by the District in December 2016 as part of the Final Environmental Impact Report for the TAMT Plan.*	**Mitsubishi Cement Corporation Project SEIR Mitigation Measure** *Project mitigation measures are a combination of applicable TAMT Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMT Final PEIR mitigation measures are provided with additions shown in double underline and deletions are indicated in ~~strikeout~~ format.*	**Project Applicability/Reason for Modification or New Project Mitigation Measure**
the San Diego Unified Port District shall coordinate with the California Department of Transportation to determine the San Diego Unified Port District's fair share payment to fund the addition of a westbound right-turn overlap phase to the intersection of Norman Scott Road/32nd Street/Wabash Boulevard, a California Department of Transportation–controlled intersection, to improve the delay caused by the proposed project. This would reduce the delay associated with the project by 20.8 seconds during the AM peak hour and by 19.9 seconds during the PM peak hour compared to unmitigated conditions, and would effectively reduce delay at this intersection to below current levels. (Note, for the STC Alternative, this mitigation measure would reduce the unmitigated delay associated with this alternative by 19.4 seconds during the AM peak hour and by 19.3 seconds during the PM peak hour.) In order to ensure the significant impact does not occur before the San Diego Unified Port District has paid its fair share to the California Department of Transportation, the San Diego Unified Port District shall initiate payment once approximately 150 new daily trips are reached under the proposed project. The trigger will be determined by the San Diego Unified Port District by examining the average daily trips over a 1-month timeframe and comparing the average daily trips to the baseline of 93 daily trucks generating 186 trips per day (33,349 trucks per year divided by 360 days multiplied by 2 trips for each truck) and 935 daily employee trips (315 existing employees multiplied by 3 trips per day). At the San Diego Unified Port District's discretion, the San Diego Unified Port District may seek reimbursement from tenants that would contribute new daily trips in proportion to their contribution.	the San Diego Unified Port District shall coordinate with the California Department of Transportation to determine the San Diego Unified Port District's fair share payment to fund the addition of a westbound right-turn overlap phase to the intersection of Norman Scott Road/32nd Street/Wabash Boulevard, a California Department of Transportation–controlled intersection, to improve the delay caused by the proposed project. This would reduce the delay associated with the project by 20.8 seconds during the AM peak hour and by 19.9 seconds during the PM peak hour compared to unmitigated conditions, and would effectively reduce delay at this intersection to below current levels. (Note, for the STC Alternative, this mitigation measure would reduce the unmitigated delay associated with this alternative by 19.4 seconds during the AM peak hour and by 19.3 seconds during the PM peak hour.) In order to ensure the significant impact does not occur before the San Diego Unified Port District has paid its fair share to the California Department of Transportation, the San Diego Unified Port District shall initiate payment once approximately 150 new daily trips are reached under the proposed project. The trigger will be determined by the San Diego Unified Port District by examining the average daily trips over a 1-month timeframe and comparing the average daily trips to the baseline of 93 daily trucks generating 186 trips per day (33,349 trucks per year divided by 360 days multiplied by 2 trips for each truck) and 935 daily employee trips (315 existing employees multiplied by 3 trips per day). At the San Diego Unified Port District's discretion, the San Diego Unified Port District may seek reimbursement from tenants that would contribute new daily trips in proportion to their contribution. ~~Based on the Proposed Project's contribution of new daily trips, a fair share contribution of 1.4% of the total cost to improve the intersection shall be paid by the Mitsubishi Cement Corporation to the District prior to 150 new daily trips being generated.~~	applies to the Proposed Project. No modifications to **MM-TRA-4** are proposed for the Project

Page 4.5-26

Intersections

Implementation of **MM-TRA-4~~R~~** would reduce the Proposed Project's contribution to the overall significant impact from TAMT Plan buildout on the Norman Scott Road/32nd Street/Wabash Boulevard intersection. However, similar to what was described in the TAMT Final PEIR, the timing and implementation of the necessary improvement are within the exclusive jurisdiction of Caltrans and not the District. As such, the District cannot ensure that the improvement to the intersection would be made when needed. Therefore, while **MM-TRA-4~~R~~** would reduce the intersection impact to a less-than-significant level, the impact would be significant and unavoidable because of the uncertainty regarding the timing and implementation of the recommended improvement to the Norman Scott Road/32nd Street/Wabash Boulevard intersection. As this finding is consistent with the finding in the TAMT Final PEIR, the Proposed Project would not result in new or more severe intersection impacts than what was disclosed in the TAMT Final PEIR.

Page 4.5-31

Table 4.5-10. Comparison of Parking TAMT Final PEIR Mitigation Measures to Proposed Project Draft SEIR Mitigation Measures

TAMT Final PEIR Mitigation Measure *The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMT Plan, adopted by the District in December 2016 as part of the Final Environmental Impact Report for the TAMT Plan.*	**Mitsubishi Cement Corporation Project SEIR Mitigation Measure** *Project mitigation measures are a combination of applicable TAMT Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMT Final PEIR mitigation measures are provided with additions shown in double underline and deletions are indicated in ~~strikeout~~ format.*	**Project Applicability/Reason for Modification or New Project Mitigation Measure**
PARKING		
MM-TRA-7: Proponents for Future Project Components, New Leases, or Lease Renewals Shall Prepare a Parking Management Plan. Prior to approval of any new project component or any new lease/lease renewal at TAMT, the project proponent (e.g., tenant) shall submit a Parking Management Plan to the District for review and approval, demonstrating that there would be adequate parking to accommodate all projected operational parking within their tenant's leasehold or within an area available for use as parking. The Parking Management Plan shall consider the following. i. The identification of areas within the tenant's leasehold to accommodate the new project component's, new lease's, or renewed lease's parking needs. ii. Reserved parking spaces outside the tenant's leasehold at the TAMT, as authorized by the District through formal agreement signed by the District's Director of Maritime or his/her designee. iii. Alternative transportation options to reduce parking demand such as subsidized transit	~~The Project-level SEIR for the Proposed Project has satisfied and is consistent with~~TAMT Final PEIR **MM-TRA-7** is not necessary because there is adequate parking and the Proposed Project does not result in new or more severe parking impacts compared to those disclosed in the TAMT Final PEIR.	The Project SEIR ~~and Traffic Impact Analysis~~ contains information pertaining to the availability of parking on TAMT for the Proposed Project. Based on the parking analysis in this SEIR and information obtained from ~~the traffic impact analysis and~~ maritime staff coordination, there is adequate parking available for the Proposed Project on TAMT.

Table 4.5-10. Comparison of Parking TAMT Final PEIR Mitigation Measures to Proposed Project Draft SEIR Mitigation Measures

TAMT Final PEIR Mitigation Measure *The following mitigation measures were included in the Mitigation Monitoring and Reporting Program prepared for the TAMT Plan, adopted by the District in December 2016 as part of the Final Environmental Impact Report for the TAMT Plan.*	**Mitsubishi Cement Corporation Project SEIR Mitigation Measure** *Project mitigation measures are a combination of applicable TAMT Final PEIR mitigation measures and additional Project-specific mitigation measures. Project-specific modifications to applicable TAMT Final PEIR mitigation measures are provided with additions shown in double underline and deletions are indicated in ~~strikeout~~ format.*	**Project Applicability/Reason for Modification or New Project Mitigation Measure**
passes, bicycle racks, employee vanpools, or other carpooling incentive programs. iv. Preferential parking for carpools/vanpools. v. Employee shuttles to/from the union hall at shift changes, as feasible. vi. Reserved parking spaces with an offsite parking provider at either a parking garage or parking lot for the duration of the tenant's lease, which shall include a shuttle program. The offsite parking spaces shall be authorized through a formal agreement with a parking provider and is subject to approval by the District. vii. Employer Coordination with SANDAG's iCommute Program. The TAMT Parking Management Plan requires review and approval from the District's Director of Maritime, which shall be based on consultation with the TAMT Superintendent. All TAMT Parking Management Plans shall be enforced by the TAMT Superintendent.		

4.2.5 Changes to Chapter 5, *Cumulative Impacts*

Page 5-3

5.2.1 Cumulative Projects List

Table 5-1 provides a list of the cumulative projects relevant to the cumulative analysis for the Proposed Project. These projects were identified and compiled by District Staff in coordination with the City of San Diego. The projects listed in the proposed project's cumulative study area have had applications submitted or have been approved, are under construction, or have recently been completed. The cumulative projects identified in the study area are listed in Table 5-1 and the locations are shown in Figure 5-1 (project numbering corresponds to numbers shown on Figure 5-1). Other relevant previously prepared documents were also consulted to ensure completeness of the cumulative project list.

As disclosed in the TAMT Final PEIR, the District has been discussing general growth projections with the U.S. Navy related to the Navy's Pacific Rebalance of Assets/Pivot West Strategy. Specifically, the U.S. Navy anticipates a 46 percent increase in both naval vessels (24 vessels) and active-duty military and dependents (15,880) between Fiscal Years 2015 and 2020 reporting to Naval Base San Diego. Naval Base San Diego is approximately 1.6 miles south of the Proposed Project. This potential increase in personnel

reporting to the base in the general project vicinity is being disclosed for consideration by the decision-makers, but cumulative traffic impacts would not be more severe than what was disclosed in the TAMT Final PEIR.

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5. Comments Received and District Responses

5.1 Introduction

The Draft Subsequent Environmental Impact Report (SEIR) was available for public review for 57 days beginning on December 19, 2019, and ending on February 14, 2020. The San Diego Unified Port District (District) posted an electronic version of the Draft SEIR on the District's website, hard copies were sent to the City of San Diego's Central Library and Logan Heights Branch Library, and a hard copy was available for review at the District's Administration Building at 3165 Pacific Highway, San Diego, CA 92101. A Notice of Availability was posted with the County Clerk on December 19, 2019; posted on the District's website; and mailed to various agencies, organizations, individuals, and known interested parties. All requisite documents, including the Notice of Completion form, were sent to the State Clearinghouse on December 19, 2019.

5.2 Comments Received on the Draft SEIR

The District received 20 comment letters on the Draft SEIR during the public review period. Topics included air quality and health risks; greenhouse gas (GHG) emissions and climate change; hydrology and water quality; transportation, circulation and parking; and cumulative impacts. Table 5-1 lists the agencies, organizations, and interested parties that provided comment letters. Each comment letter was assigned a letter (e.g., Comment Letter A) and each issue that was raised within each comment letter has been assigned a consecutive number that corresponds to a response number (e.g., Response to Comment A-1).

Table 5-1. Agencies, Organizations, and Interested Parties that Submitted Comment Letters on the Draft SEIR

Letter	Agency/Organization	Dated	Received	Page
State Agencies				
A	State Clearinghouse	2/4/20	2/4/20	5-3
B	California Department of Transportation, District 11	2/13/20	2/13/20	5-4
Regional and Local Agencies				
C	San Diego Association of Governments	2/13/20	2/13/20	5-8
D	City of San Diego Planning Department	2/20/20	2/14/20	5-10
Organizations				
E	San Diego Regional Chamber of Commerce	1/21/20	1/31/20	5-13
F	San Diego County Hispanic Chamber of Commerce	1/21/20	2/14/20	5-14
G	San Diego Port Tenants Association	1/21/20	1/21/20	5-15
H	San Diego Fleet Week Foundation	1/21/20	1/25/20	5-16
I	Working Waterfront Group	1/21/20	1/21/20	5-17
J	Barrio Logan College Institute	1/22/20	1/29/20	5-19
K	Classroom of the Future	1/24/20	1/31/20	5-20
L	San Diego Military Advisory Council	1/24/20	1/31/20	5-21
M	Family Health Centers of San Diego	1/29/20	1/29/20	5-22
N	Junior Achievement of San Diego County	2/6/20	2/14/20	5-23
O	South County Economic Development Council	2/6/20	2/13/20	5-24
P	R.E. Staite Engineering, Inc.	2/11/20	2/14/20	5-25
Q	Environmental Health Coalition	2/14/20	2/14/20	5-27

Table 5-1. Agencies, Organizations, and Interested Parties that Submitted Comment Letters on the Draft SEIR

Letter	Agency/Organization	Dated	Received	Page
R	Industrial Environmental Association	2/14/20	2/14/20	5-45
S	Mitsubishi Cement Corporation	3/4/20	3/4/20	5-46
T	HomeAid San Diego	n.d.	1/25/20	5-49
U	SAY San Diego	4/29/20	4/29/20	5-50
V	Environmental Health Coalition	5/18/20	5/18/20	5-54

5.3 Comment Letters and Responses

Comment Letter A

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit

Gavin Newsom
Governor

Kate Gordon
Director

February 4, 2020

Peter Eichar
San Diego Unified Port District
3165 Pacific Highway P.O. Box 120488
San Diego, CA 92101

Subject: Mitsubishi Cement Corporation at Warehouse C: Bulk Cement Warehouse and Loading Facility Project
SCH#: 2017091051

Dear Peter Eichar:

A-1 The State Clearinghouse submitted the above named SIR to selected state agencies for review. The review period closed on 2/3/2020, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act, please visit: https://ceqanet.opr.ca.gov/2017091051/2 for full details about your project.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL 1-916-445-0613 state.clearinghouse@opr.ca.gov www.opr.ca.gov

Response to Comment A-1

The comment notes the State agencies that received the Draft SEIR for comment and the date the comment period closed. In addition, the comment notes that the Project has complied with the State Clearinghouse review requirements for the Draft SEIR pursuant to the California Environmental Quality Act (CEQA).

The District appreciates the Office of Planning and Research's coordination of the Draft SEIR.

Comment Letter B

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY Gavin Newsom, Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 11
4050 TAYLOR STREET, MS-240
SAN DIEGO, CA 92110
PHONE (619) 688-6075
FAX (619) 688-4299
TTY 711
www.dot.ca.gov

Making Conservation a California Way of Life.

February 13, 2020

11-SD-75
PM 21.58
11-SD-5
PM 14.39
Mitsubishi Cement Corporation at Warehouse C:
Bulk Cement Warehouse and Loading Facility Project
DEIR SCH#2017091051

Mr. Peter Eichar
San Diego Unified Port District
Development Services Department
3165 Pacific Highway
San Diego, CA 92101

Dear Mr. Eichar:

B-1 Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Draft Environmental Impact Report (DEIR) for the Mitsubishi Cement Corporation at Warehouse C: Bulk Cement Warehouse and Loading Facility Project located near Interstate 5 (I-5) and (State Route 75 (SR-75) at the Tenth Avenue Marine Terminal in the Barrio Logan area. The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

Caltrans has the following comments:

B-2 1. Please provide additional details for Table 4-1 proposed project trip generation, including the peak hour rates/splits and employee rates.

B-3 2. The provided Synchro files' delay results do not match the delay results shown in the traffic impact study, please clarify.

B-4 3. Please clarify the proposed transportation mitigation for the Tenth Avenue Marine Terminal is separate from the Mitsubishi Warehouse C project transportation mitigation.

B-5 4. Provide additional details for mitigation measure MM-TRA-4R and analysis that this mitigation will improve the intersection. Per Caltrans 2002 "Guide for the

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

Response to Comment B-1

The comment notes that Caltrans received a copy of the Draft SEIR for the Proposed Project, summarizes the mission of Caltrans, and indicates that comments follow.

The District appreciates Caltrans's interest in the Proposed Project. This comment is an introductory comment and does not raise any environmental issues requiring a response pursuant to CEQA. The specific comments raised following this introduction are listed separately along with the District's individual responses.

Response to Comment B-2

The comment requests that additional details for Table 4-1 Proposed Project trip generation be provided, including the peak hour rates/splits and employee rates.

Please see Table 4-1 of the Comparative Traffic Impact Analysis (Appendix H of the SEIR), which includes details for the Proposed Project's AM and PM Peak Hour rates and splits, as well as the trip generation rates for trucks and dock workers (employees). Therefore, no changes to the Comparative Traffic Impact Analysis or Draft SEIR are required.

Response to Comment B-3

The comment suggests that the provided Synchro files' delay results do not match the delay results in the traffic impact study and request clarification.

Linscott Law & Greenspan (LLG), the traffic engineer for the Proposed Project, reviewed the SYNCHRO output sheets appended to the Comparative Traffic Impact Analysis (October 14, 2019) with the results tables and found the delays matched. There are several reasons reviewing results online using the program may indicate different results than in the appendix and traffic study. In the past, LLG has received this comment from Caltrans, and the result was that the reviewer was looking at a different Highway Capacity Manual (HCM) version or SYNCRHO version online than that utilized in the analysis and reported in the appendix materials. The version used in this analysis is the most recent HCM6 and the most recent SYNCHRO V.10. No changes to the Draft SEIR are required.

Response to Comment B-4

The comment requests clarification on whether the proposed transportation mitigation for the Tenth Avenue Marine Terminal is separate from the Proposed Project's transportation mitigation.

The Mitsubishi Cement Corporation at Warehouse C project is a subsequent activity that falls within the broader scope of the Tenth Avenue Marine Terminal Redevelopment Program and the associated *Final Environmental Impact Report: Tenth Avenue Marine Terminal Redevelopment Plan and Demolition and Initial Rail Component* (TAMT Final PEIR) certified by the District in December 2016 (State Clearinghouse #2015031046). The District prepared an SEIR to determine whether the Proposed Project would result in any new or more severe significant impacts from those disclosed in the TAMT Final PEIR. As a tiered document (see Subsection 4.5.3.1), the SEIR applies the same mitigation measures from the TAMT Final PEIR to the Proposed Project, as applicable (see Tables 4.5-9 and 4.5-10), with any necessary modifications to specific mitigation measures applicable for the Proposed Project. Because no new or more severe transportation impacts were identified for the Mitsubishi Cement Corporation at Warehouse C project, the same mitigation measures from the TAMT Final PEIR were determined to be applicable to the Proposed Project. Therefore, no changes to the Draft SEIR are required.

Response to Comment B-5

The comment requests additional details for mitigation measure **MM-TRA-4R** and analysis showing that this mitigation will improve the intersection. The comment states that, per Caltrans' 2002 *Guide for the Preparation of Traffic Impact Studies*, this mitigation measure needs to be fully implemented by the Proposed Project instead of a fair share contribution of 1.4% of the total cost.

As noted in the response to comment B-4, the District determined that the Proposed Project falls within the broader scope of the Tenth Avenue Marine Terminal Redevelopment Program and the associated TAMT Final PEIR, which was certified by the District in December 2016. As shown in Table 4.5-9 of the Draft SEIR prepared for the Proposed Project, mitigation measure **MM-TRA-4R** includes the same requirements identified in mitigation measure **MM-TRA-4** from the TAMT Final PEIR, with minor only modifications added to indicate the Proposed Project's fair share contribution.

However, in response to other comments provided on the Draft SEIR (see Comment Letter S), mitigation measure **MM-TRA-4R** has been revised to

remove the identified fair share contribution percentage and clarify that the District shall pay the legally proportional fair share contribution for the proposed improvements to the affected intersection, rather than Mitsubishi Cement Corporation. The legally proportional fair share contribution to be paid by the District shall be based on coordination between the District and Caltrans. As stated on pages 4.5-20 and 4.5-21 of the Draft SEIR, the intersection impact would occur when future projects contemplated under the TAMT Plan generate 195 new daily truck trips. However, to ensure that a significant impact does not occur before the District has paid its fair share to Caltrans, the District shall initiate payment once approximately 150 new daily trips are generated. These requirements are consistent with those identified in mitigation measure **MM-TRA-4** from the certified TAMT Final PEIR, as restated in **MM-TRA-4R** in the Draft SEIR for the Proposed Project.

This revision is a minor clarification that does not affect the conclusions of the impact analysis or effectiveness of this mitigation measure. These changes are reflected in Chapter 4, *Errata and Revisions*, of the Final SEIR.

Mr. Peter Eichar
February 13, 2020
Page 2

B-5 cont. Preparation of Traffic Impact Studies" this mitigation measure needs to be fully implemented by the Mitsubishi Warehouse C project instead of a fair share contribution of 1.4% of the total cost.

B-6 5. Caltrans sent a comment letter for the Notice of Preparation on October 16, 2017 regarding the state highway systems to include in the traffic impact study. Please provide a response or justification as to why the traffic study did not implement or analyze the locations identified in our comment letter.

B-7 If you have any questions, please contact Mark McCumsey, of the Caltrans Development Review Branch, at (619) 688-6802 or by e-mail sent to mark.mccumsey@dot.ca.gov

Sincerely,

MAURICE EATON, Branch Chief
Local Development and Intergovernmental Review Branch

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

Response to Comment B-6

The comment notes that Caltrans submitted a comment letter on the Notice of Preparation for the Proposed Project regarding the state highway facilities to be included in the traffic impact study. The comment requests an explanation as to why the traffic study did not analyze the locations identified in the comment letter.

Please see responses to comments B-4 and B-5. The Proposed Project falls within the broader scope of the Tenth Avenue Marine Terminal Redevelopment Program and the associated TAMT Final PEIR. As such, the District prepared an SEIR for the Proposed Project tiering from the TAMT Final PEIR. For consistency with the TAMT Final PEIR, the Comparative Traffic Impact Analysis and SEIR prepared for the Proposed Project evaluated the same freeway segments as those analyzed in the TAMT Final PEIR. Additionally, Linscott, Law & Greenspan, the traffic engineer for the Proposed Project, determined that the Project would not contribute 50 or more peak hour trips in either direction on any freeway segments, and therefore a project-specific freeway segment analysis was not warranted. Therefore, no changes to the Draft SEIR are required.

Response to Comment B-7

The comment letter concludes by providing the Caltrans contact name and information for questions pertaining to the letter sent in response to the Draft SEIR.

The District appreciates Caltrans' interest in the Proposed Project and notes the contact information provided. No changes to the Draft SEIR are required as a result of this comment.

Comment Letter C

From: Hentrich, Katie
To: Peter Eichar
Cc: Litchney, Seth; Culp, Linda
Subject: Mitsubishi Cement Corporation Draft SEIR - SANDAG Comments
Date: Thursday, February 13, 2020 11:44:11 AM
Attachments: image001.png

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Mr. Eichar,

C-1 Thank you for the opportunity to comment on the Port of San Diego's Mitsubishi Cement Corporation at Warehouse C Draft SEIR. SANDAG is submitting the comment below:

C-2
- Figure 4.5-4, Total Project Traffic Volumes, indicates that 60 project trucks will be utilizing the Harbor Drive/32nd Street intersection each day during the AM and PM peak hours. Half of these vehicles (15 in the AM peak and 15 in the PM peak) will be making southbound right turns from 32nd Street to Harbor Drive. Due to the high skew angle of this intersection, southbound right turns are difficult for large trucks, leading to unlawful maneuvers. Please demonstrate that the anticipated project truck can safely navigate turns through the Harbor Drive/32nd Street intersection. If trucks cannot be shown to safely navigate this intersection, then prohibiting trucks from utilizing this intersection should be a condition of approval, and the truck traffic should be rerouted and reanalyzed in the Draft SEIR.

C-3 If there are any questions, please contact me, Seth Litchney (cc'd), or Linda Culp (cc'd).

Thank you very much,

Katie Hentrich
Associate Regional Energy/Climate Planner

SANDAG
(619) 595-5609
401 B Street, Suite 800, San Diego, CA 92101

SANDAG

Facebook | Twitter | YouTube | Instagram
SANDAG *offices are open Tuesday-Friday and every other Monday from 8 a.m.-5 p.m.*

Response to Comment C-1

The comment is an introductory statement indicating that SANDAG is providing comments on the Draft SEIR for the Proposed Project.

The District appreciates SANDAG's interest in the Proposed Project. This comment is an introductory comment and does not raise any environmental issues requiring a response pursuant to CEQA. The specific comments raised following this introduction are listed separately along with the District's individual responses.

Response to Comment C-2

The comment identifies the number of daily Project-related trucks (60 trucks) that would use the Harbor Drive/32nd Street intersection during the AM and PM peak hours. The comment indicates that half (30) of these trucks would make a southbound right turn and suggests that the high skew angle of the intersection leads to trucks making unlawful maneuvers. The comment requests that it be demonstrated that Project trucks can safely navigate turns through the Harbor Drive/32nd Street intersection. The comment further requests that trucks be prohibited from using this intersection as condition of Project approval if they cannot be shown to safely navigate the intersection, and suggests that the truck traffic should be rerouted and reanalyzed in the Draft SEIR.

The comment raises several issues related to the safe navigation of trucks turning onto the Harbor Drive/32nd Street intersection and suggests that a portion of these trucks are currently making unlawful maneuvers. The use of the Harbor Drive/32nd Street is a City of San Diego designated truck route, which was approved by the City Council on December 4, 2018 (City Council Resolution R-2019-249) to direct truck traffic away from residential uses in the Barrio Logan community and onto designated routes to access the interstate highway system. The City of San Diego designated truck route is provided as Exhibit 1 of this chapter. Additionally, no technical or design evidence has been provided to support the claim that trucks using the Harbor Drive/32nd Street intersection cannot make the turn nor has substantial evidence been provided that they are making illegal maneuvers when making southbound right turns onto this intersection. Moreover, the use of the Harbor Drive/32nd Street intersection by trucks coming to and from the Tenth Avenue Marine Terminal, as well as numerous other locations along the working waterfront of San Diego Bay, is an existing condition.

While the current use of the Harbor Drive/32nd Street intersection by trucks is an existing condition, the potential impacts of additional truck traffic on this intersection from future marine terminal operations was previously analyzed in the certified TAMT Final PEIR. As demonstrated in Table 4.10-30 of the TAMT Final PEIR (page 4.10-44), the additional vehicle trips generated at full TAMT Plan buildout, including trucks and workers, would not cause operations at the Harbor Drive/32nd Street intersection to degrade to unacceptable levels. Additionally, the TAMT Final PEIR determined that buildout of the TAMT Plan would not substantially increase hazards due to a design feature, such as sharp curves or dangerous intersections, as no changes to offsite transportation facilities were proposed as part of the project, including the Harbor Drive/32nd Street intersection. Similarly, the Proposed Project, which falls within the broader scope of the Tenth Avenue Marine Terminal Redevelopment Program and the associated TAMT Final PEIR, does not propose any changes to this intersection or other offsite transportation facilities, and no new or more severe impacts related to increased hazards from design features were identified in the Draft SEIR for the Proposed Project. Therefore, no changes to the Draft SEIR are required.

Response to Comment C-3

The comment letter concludes by providing the SANDAG contact name and information.

The District appreciates SANDAG's interest in the Proposed Project and notes the contact information provided. No changes to the Draft SEIR are required as a result of this comment.

Comment Letter D

The City of SAN DIEGO
Planning Department

February 20, 2020

San Diego Unified Port District
Attn: Peter Eichar, Development Services Department
P.O. Box 120488
San Diego, CA 92112-0488

Subject: **CITY OF SAN DIEGO COMMENTS ON THE NOTICE OF AVAILABITY OF A DRAFT SUBSEQUENT EIR FOR MITSUBISHI CEMENT CORPORATION BULK CEMENT WAREHOUSE AND LOADING FACILITY PROJECT (SCH# 2017091051)**

Dear Mr. Eichar,

D-1 The City of San Diego ("City") Planning Department has received the Draft Subsequent EIR prepared by the San Diego Unified Port District ("Port") and distributed it to applicable City departments for review. The City, as a Responsible Agency under CEQA, has reviewed the Draft EIR and appreciates this opportunity to provide comments to the Port of San Diego.

In response to this request for public comments, the City has identified potential environmental issues that may result in a significant impact to the environment. Continued coordination between the City, the Port, and other local, regional, state, and federal agencies will be essential. Following are comments on the Draft Subsequent EIR for your consideration.

CITY TRANSPORTATION & STORM WATER DEPARTMENT– MARK G. STEPHENS, ASSOCIATE PLANNER– MGStephens@sandiego.gov, (858) 541-4361

D-2 The City Storm Water Division provided comments during 2017 on the Notice of Preparation (NOP) and Initial Study Checklist for the Mitsubishi Cement Corporation Bulk Cement Warehouse and Loading Facility Project referencing description of potential impacts from construction, reduced storm flow capacity, accidental spills or releases, and propeller wash, among other factors, and made prior comments on the Tenth Avenue Marine Terminal Redevelopment Plan Environmental Impact Report (EIR) that formed the foundation for this subsequent environmental review. The Draft Subsequent EIR for the Mitsubishi Cement Corporation Bulk Cement Warehouse and Loading Facility Project states on page ES-11 that the proposed project "would not change the amount of impervious surface or alter existing drainage patterns," and "no changes to the site's existing drainage system are proposed." "Additionally, no changes to the existing piles at Berths 10-7/10-8 are proposed, and no in-water activity, such as dredging or fill, is proposed or required."

With this background, if any changes potentially affecting drainage or water quality occur as the process proceeds, we would appreciate being kept informed. With initial work on the Tenth Avenue Marine Terminal Modernization Project having been undertaken, including Demolition and Site Improvements for Transit Shed 1, including storm water best management practices, and

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San Diego, CA 92123
sandiego.gov/planning/

T (619) 235-5200
sandiego.gov

Response to Comment D-1

The comment is an introductory comment indicating that the City of San Diego Planning Department received the Draft SEIR and distributed it to the applicable City departments for review. The City notes that is has reviewed the Draft SEIR and is providing comments for consideration.

The District appreciates the City's interest in the Proposed Project. This comment is an introductory comment and does not raise any environmental issues requiring a response pursuant to CEQA. The specific comments raised following this introduction are listed separately along with the District's individual responses.

Response to Comment D-2

The comment notes that the City Stormwater Division provided comments during the Notice of Preparation public review period referencing potential impacts from construction, reduced stormwater flow capacity, accidental spills or releases, and propeller wash, among other factors; as well as prior comments on the Draft PEIR for the Tenth Avenue Marine Terminal Redevelopment Plan and Demolition and Initial Rail Component project. The comment summarizes text from the Draft SEIR stating that the Proposed Project would not change the area of impervious surfaces, alter existing drainage patterns or systems, or result in in-water work such as dredging or fill. The comment notes that the City would like to be informed of any changes that may affect water quality or drainage as the process proceeds, taking into consideration improvements currently underway at the marine terminal being undertaken as part of the Tenth Avenue Marine Terminal Redevelopment Plan and Demolition and Initial Rail Component project, and update the Final SEIR as necessary to reflect the most current information related to drainage and water quality.

The comment raises several points related to hydrology and water quality but does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis in the Draft SEIR. However, the comment requests that the Final SEIR reflect the most current information related to drainage and water quality considering the demolition of Transit Shed # 1 and demolition and site work related to Transit Shed #2 and rail improvements. The current status (i.e., from the time the SEIR analysis was completed) of the demolition of Transit Sheds #1 and #2 is disclosed in Section 2.3.2.1 of the Draft SEIR; however, there are no changes surrounding their demolition from what was described in the TAMT Final PEIR that could affect drainage and

water quality beyond what was previously disclosed in the PEIR. As part of these TAMT Redevelopment Program project components, the District installed a comprehensive stormwater best management practices (BMP) facility to treat the largest TAMT drainage basin (approximately 41 acres). Additionally, the District is currently in the design phase of an additional stormwater BMP facility that addresses a separate TAMT drainage basin (approximately 19 acres); however, this second phase of stormwater improvement is not part of the transit shed demolition project. These stormwater improvements were analyzed in the TAMT Final PEIR and are not an element of this Proposed Project. The District will continue to coordinate with the City on any changes that may affect water quality or drainage at the Tenth Avenue Marine Terminal. No changes to the Draft SEIR are required as a result of this comment.

D-2 cont. Demolition and Site Work for Transit Shed 2 and Rail Improvements, please reflect the most current information relating to drainage and water quality in the Final EIR.

D-3 Thank you for the opportunity to provide comments on the Draft Subsequent EIR. Please contact me directly if there are any questions regarding the contents of this letter or if the Port would like to meet with City staff to discuss our comments. Please feel free to contact Rebecca Malone, Senior Planner, directly via email at RMalone@sandiego.gov or by phone at 619-446-5371.

Sincerely,

Mike Hansen, Director
Planning Department

cc: Reviewing Departments (via email)
Review and Comment online file

9485 Aero Drive, MS 413
San Diego, CA 92123
sandiego.gov/planning/

T (619) 235-5200
sandiego.gov

Response to Comment D-3

The comment letter states that the City of San Diego appreciates the opportunity to comment on the Draft SEIR and concludes by providing the City's contact name and information.

The District appreciates City of San Diego's interest in the Proposed Project. This comment does not raise any environmental issues needing a response pursuant to CEQA.

Comment Letter E

San Diego Regional Chamber

402 West Broadway, Suite 1000
San Diego, CA 92101-3585
p: 619.544.1300
www.sdchamber.org

January 21, 2020

Peter Eicher
Development Services Department
San Diego Unified Port District
P. O. Box 120488
San Diego, CA 92112-0488

Sent via e-mail: peicher@portofsandiego.org

RE: UPD #EIR-2016-178, SCH #2017091051 Mitsubishi Cement Corporation at Warehouse C: Bulk Cement Warehouse and Loading Facility Project, City of San Diego; San Diego County, California

Dear Mr. Eicher:

E-1 The San Diego Regional Chamber of Commerce is dedicated to making San Diego the most business-friendly region in California. As the largest member-supported business organization on the West Coast, we are focused on creating a business climate were organizations can grow and thrive while creating jobs.

Even though Mitsubishi Cement Corporation (MCC) has yet to begin operations at the Port of San Diego and is going through the Environmental Impact Review process, they have been an active member of the Chamber, even serving as a prominent sponsor for our 149th Anniversary Celebration on Feb.13. They are committed to being deeply involved in the San Diego community and are a supporter of the Chamber and its pro-business and philanthropic activities.

The strengths of the Chamber are in our members. We therefore strongly support the MCC Warehouse C: Bulk Cement Warehouse and Loading Facility Project located at the Third Avenue Marine Terminal in the Port of San Diego. The MCC project will supply local jobs, provide much-needed cement products that are the foundation for many of the region's vital infrastructure projects and ensure San Diego gains an organization that is dedicated to being a good community steward.

Sincerely,

Stefanie Benvenuto
Vice President, Public Affairs
San Diego Regional Chamber of Commerce

Response to Comment E-1

The commenter expresses their support for the Proposed Project. The comments are general in nature and do not address a specific environmental issue in the Draft SEIR. These comments do not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of environmental impacts presented in the Draft SEIR. Therefore, no changes to the Draft SEIR are required in response to this comment. However, the comment will be presented to the Board of Port Commissioners.

Comment Letter F

SAN DIEGO COUNTY
HISPANIC
CHAMBER
OF COMMERCE

January 21, 2020

Peter Eichar
Development Services Department
San Diego Unified Port District
P. O. Box 120488
San Diego, CA 92112-0488

Sent via e-mail: peichar@portofsandiego.org

RE: UPD #EIR-2016-178, SCH #2017091051 Mitsubishi Cement Corporation at Warehouse C: Bulk Cement Warehouse and Loading Facility Project, City of San Diego; San Diego County, California

Dear Mr. Eichar:

F-1 The San Diego County Hispanic Chamber of Commerce (SDCHCC) is San Diego's largest business association representing the San Diego-Tijuana Hispanic Business community for over 20 years. The SDCHCC is a non-profit founded by a group of men and women business owners who felt a need for an organization to assist and promote the interests of the Hispanic entrepreneur in San Diego County. Over the last 20 years the SDCHCC has elevated itself to become the leading Hispanic organization in the County, advocating for the Hispanic businessperson and the Latino community. The diverse membership of over 500 active members and affiliates is an ideal mixture of small business owners, corporate representatives, and government leaders.

We are writing in support of the Mitsubishi Cement Corporation's (MCC) Warehouse C: Bulk Cement Warehouse and Loading Facility Project, which is currently beginning environmental review at the Port of San Diego's Tenth Avenue Marine Terminal (TAMT).

We support a healthy working waterfront that offers our community a diverse place to live, work and play. Mitsubishi will add local jobs and bolster our local economy. Mitsubishi has shown us they are a good neighbor that invests in diversity and that is dedicated to our community.

Sincerely,

Iris Garcia, Chairwoman
San Diego County, Hispanic Chamber of Commerce

Response to Comment F-1

The commenter expresses their support for the Proposed Project. The comments are general in nature and do not address a specific environmental issue in the Draft SEIR. These comments do not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of environmental impacts presented in the Draft SEIR. Therefore, no changes to the Draft SEIR are required in response to this comment. However, the comment will be presented to the Board of Port Commissioners.

Comment Letter G

SAN DIEGO PORT TENANTS ASSOCIATION

January 21, 2020

Peter Eichar
Development Services Department
San Diego Unified Port District
P. O. Box 120488
San Diego, CA 92112-0488

Sent via e-mail: peichar@portofsandiego.org

RE: UPD #EIR-2016-178, SCH #2017091051 Mitsubishi Cement Corporation at Warehouse C: Bulk Cement Warehouse and Loading Facility Project, City of San Diego; San Diego County, California

Dear Mr. Eichar:

Formed in 1989, the San Diego Port Tenants Association (SDPTA) is a coalition of businesses and industries dedicated to enhancing trade, recreation, commerce, and tourism on San Diego Bay's tidelands, while protecting the area's environment. SDPTA membership includes representatives of manufacturing; ship building and repair; shipping and trade; marinas; commercial and sports fishermen; energy; the cruise ship industry; yacht clubs, aerospace and airport industries; the hospitality industry, including hotels, restaurants and retail merchants; as well as the U.S. Navy.

G-1

We are writing in support of the Mitsubishi Cement Corporation's (MCC) Warehouse C: Bulk Cement Warehouse and Loading Facility Project, which is currently beginning environmental review at the Port of San Diego's Tenth Avenue Marine Terminal (TAMT). MCC supports the mission and vision of the SDPTA through corporate sponsorships and a commitment to support growth in the region. MCC is aligned with San Diego's efforts to enhance the San Diego community, through business efforts and community spirit. This MCC project will support jobs, enhance opportunities for smart development and will do so with the environment in mind. SDPTA continues to work on deployment of new alternative energy heavy duty vehicles to help meet the Port of San Diego's Climate Action Plan goals. SDPTA also produces an event called "Operation Clean Sweep," the largest bay-wide cleanup and the only one featuring both military and civilian divers along with shoreside volunteers. MCC provides sponsorship support as well as volunteers to Operation Clean Sweep. MCC also support the SDPTA Annual Dinner that works to generate funding for advocacy efforts aimed at supporting tenants at the port.

MCC will be a valued member of the port community upon completion of their EIR. Mitsubishi Cement Corporation will bring a wealth of support for infrastructure to the thriving Port of San Diego, providing jobs and economic vitality to the region.

Sincerely,
San Diego Port Tenants Association

Sharon Cloward
President

2390 SHELTER ISLAND DRIVE, SUITE 210 · SAN DIEGO, CALIFORNIA 92106 · (619) 226-6546 · FAX (619) 566-4056
EMAIL: Sharon@sdpta.com, Corchelle@sdpta.com, Chelsea@sdpta.com
WEB: www.sdpta.com

Response to Comment G-1

The commenter expresses their support for the Proposed Project. The comments are general in nature and do not address a specific environmental issue in the Draft SEIR. These comments do not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of environmental impacts presented in the Draft SEIR. Therefore, no changes to the Draft SEIR are required in response to this comment. However, the comment will be presented to the Board of Port Commissioners.

Comment Letter H

FLEET WEEK SAN DIEGO

San Diego Fleet Week Foundation 3639 Midway Drive, Suite B #429, San Diego, CA 92110

January 21, 2020

Peter Eicher
Development Services Department
San Diego Unified Port District
P. O. Box 120488
San Diego, CA 92112-0488

Sent via e-mail: peicher@portofsandiego.org

RE: UPD #EIR-2016-178, SCH #2017091051 Mitsubishi Cement Corporation at Warehouse C: Bulk Cement Warehouse and Loading Facility Project, City of San Diego; San Diego County, California

Dear Mr. Eicher:

Mitsubishi Cement Corporation has been a "strong" supporter of Fleet Week San Diego, one of the Port of San Diego's "signature" events.

H-1 I have met on several occasions with the senior leadership of MCC's San Diego team and have been extremely impressed by their corporate commitment to the San Diego community and the Port of San Diego. I am confident that the establishment of an MCC warehouse and loading facility at the TAMT will be a positive addition to the Port's maritime infrastructure, with significant economic impact to the San Diego region.

Sincerely,

L B Blumberg

L. B. Blumberg
CAPT USN, Retired

Executive Director
San Diego Fleet Week Foundation

Response to Comment H-1

The commenter expresses their support for the Proposed Project. The comments are general in nature and do not address a specific environmental issue in the Draft SEIR. These comments do not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of environmental impacts presented in the Draft SEIR. Therefore, no changes to the Draft SEIR are required in response to this comment. However, the comment will be presented to the Board of Port Commissioners.

Comment Letter I

THE
WORKING WATERFRONT
ON SAN DIEGO BAY

January 21, 2020

Peter Eichar
Development Services Department
San Diego Unified Port District
P. O. Box 120488
San Diego, CA 92112-0488

Sent via e-mail: peichar@portofsandiego.org

RE: UPD #EIR-2016-178, SCH #2017091051 Mitsubishi Cement Corporation at Warehouse C: Bulk Cement Warehouse and Loading Facility Project, City of San Diego; San Diego County, California

Dear Mr. Eichar:

Formed in 2004, the Working Waterfront Group (WWG) is a collaborative organization of ship-building, ship-repair, trade, military, labor, fishing, environmental and industry leaders and supporters who seeks to influence policy to improve the economic and environmental well-being of the San Diego region. The Working Waterfront industries and partners are dedicated to environmental sustainability measures that protect natural resources. Working Waterfront Group members are community partners involved in neighborhood improvements and programs.

We are writing in support of the Mitsubishi Cement Corporation's (MCC) Warehouse C: Bulk Cement Warehouse and Loading Facility Project, which is currently beginning environmental review at the Port of San Diego's Tenth Avenue Marine Terminal (TAMT).

I-1

WWG has stayed involved and has monitored the environmental process that was completed in December of 2016. The WWG has and will continue to support the optimization of the TAMT in order to attract new business opportunities while creating jobs for our region.

The Mitsubishi project is aligned with San Diego's efforts to grow the TAMT and fill vacant warehouse space with companies that will enhance the San Diego community, both through business efforts, as well as through community spirit.

The MCC project will support jobs, will enhance opportunities for smart development in the San Diego region, and will do so with the environment in mind. Fully built, the project is expected to bring nearly $1 million in revenue for the Port of San Diego. What's more, the availability of construction materials, like cement, can help accelerate infrastructure revitalization and economic development throughout San Diego.

Contribute significantly to the region's economy through the preservation of these businesses and the family-supporting waterfront jobs they provide.

Response to Comment I-1

The commenter expresses their support for the Proposed Project. The comments are general in nature and do not address a specific environmental issue in the Draft SEIR. These comments do not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of environmental impacts presented in the Draft SEIR. Therefore, no changes to the Draft SEIR are required in response to this comment. However, the comment will be presented to the Board of Port Commissioners.

Members
American Tunaboat Association
BAE Systems San Diego Ship Repair
BNSF Railway
Chesapeake Fish Company
Cal Marine Cleaning
CEMEX
Continental Maritime
Coordinated Maritime Services
GP Kelco
Dixieline Lumber and Home Centers
Dole Fresh Fruit Co.
Driscoll Boat Works
General Dynamics NASSCO
Harborside Refrigerated Services
Harvest Meat Company Incorporated
Honor Marine Electronics
Industrial Environmental Association
International Longshore and Warehouse Union
Koehler Kraft Co. Inc.
Lee & Associates
Marine Group Boat Works
National City Chamber of Commerce
Nielsen Beaumont Marine, Inc.
Otay Mesa Chamber of Commerce
Pacific Merchant Shipping Association
Pacific Ship Repair and Fabrication, Inc.
Pasha Automotive Services
Port of San Diego
Port of San Diego Ship Repair Association
R.E. Staite Engineering
San Diego & Imperial Valley Railroad
San Diego-Imperial Counties Labor Council
San Diego Freight Rail Consulting
San Diego Military Advisory Council
San Diego Port Tenants Association
San Diego Regional Chamber of Commerce
San Diego Regional Economic Development Corporation
San Diego Ship Repair Association
SDG&E
Shelter Island Boatyard
Solar Turbines
South County Economic Development Council
Stevedoring Services of America
Sun Harbor Marina
The Jamkovich Company
Westflex Industrial

WWG
Mitsubishi Cement Corporation
Page 2

I-1 cont.

WWG has stayed up to date with MCC in preparation of this project. There is no question, this project is the right fit for the Port as we move to grow and enhance clean commerce coming in and out of our Port.

Sincerely,

John Pasha
Pasha Automotive Services
Co-Chair, Working Waterfront Group

Dennis DuBard
General Dynamics NASSCO
Co-Chair, Working Waterfront Group

Contribute significantly to the region's economy through the preservation of these businesses and the family-supporting waterfront jobs they provide.

Comment Letter J

RECEIVED
JAN 29 2020
San Diego Unified Port District
Development Services Department

BARRIO LOGAN COLLEGE INSTITUTE

January 22, 2020

Peter Eichar
Development Services Department
San Diego Unified Port District
P. O. Box 120488
San Diego, CA 92112-0488

Sent via e-mail: peichar@portofsandiego.org

RE: UPD #EIR-2016-178, SCH #2017091051 Mitsubishi Cement Corporation at Warehouse C: Bulk Cement Warehouse and Loading Facility Project, City of San Diego; San Diego County, California

Dear Mr. Eichar:

Barrio Logan is primarily a Latino community near downtown San Diego of rich cultural heritage and history. We have a thriving community of advocates and community leaders working toward a better, safer Barrio Logan. As a pillar of hope in the community, Barrio Logan College Institute (BLCI) provides opportunities for families struggling to find resources and economic prosperity. BLCI starts preparing kids for college and careers through after-school programs that begin in third grade and supports them through college completion.

J-1 Mitsubishi Cement Corporation (MCC) has supported children and families of BLCI since 2017 by funding the annual College Road Trip, which provides students the opportunity to explore various college campuses throughout the state. MCC leadership understands that education is the pathway out of poverty and to success and has become an ardent BLCI advocate.

We are writing in support of the Mitsubishi Cement Corporation's (MCC) Warehouse C: Bulk Cement Warehouse and Loading Facility Project, which is currently beginning environmental review at the Port of San Diego's Tenth Avenue Marine Terminal (TAMT).

It is clear that MCC values education while also being a sound community partner.

Sincerely,

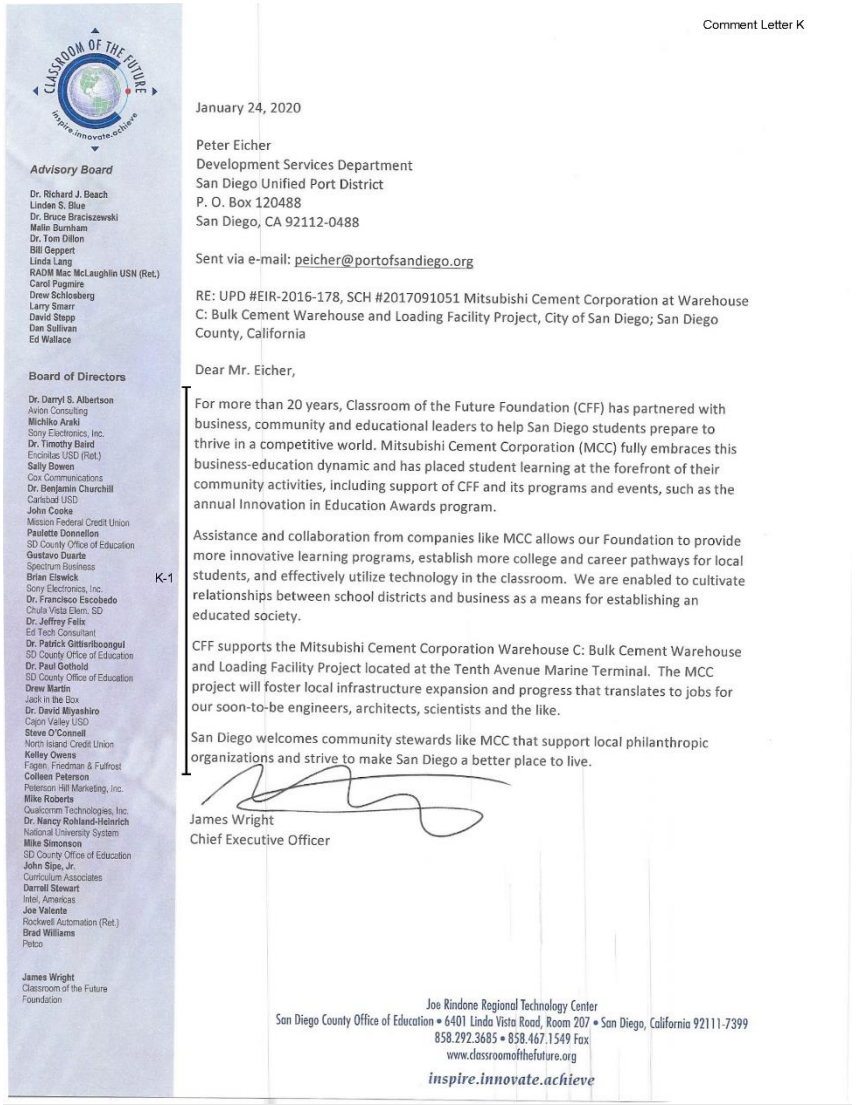
Barbara Ybarra, Interim Executive Director

Preparing Families for College

2114 National Avenue • San Diego, CA 92113 • Phone (619) 232-4686 • Fax (619) 232-4689 • www.blci.org

Response to Comment J-1

The commenter expresses their support for the Proposed Project. The comments are general in nature and do not address a specific environmental issue in the Draft SEIR. These comments do not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of environmental impacts presented in the Draft SEIR. Therefore, no changes to the Draft SEIR are required in response to this comment. However, the comment will be presented to the Board of Port Commissioners.



Comment Letter K

CLASSROOM OF THE FUTURE
inspire.innovate.achieve

January 24, 2020

Peter Eicher
Development Services Department
San Diego Unified Port District
P. O. Box 120488
San Diego, CA 92112-0488

Sent via e-mail: peicher@portofsandiego.org

RE: UPD #EIR-2016-178, SCH #2017091051 Mitsubishi Cement Corporation at Warehouse C: Bulk Cement Warehouse and Loading Facility Project, City of San Diego; San Diego County, California

Dear Mr. Eicher,

K-1

For more than 20 years, Classroom of the Future Foundation (CFF) has partnered with business, community and educational leaders to help San Diego students prepare to thrive in a competitive world. Mitsubishi Cement Corporation (MCC) fully embraces this business-education dynamic and has placed student learning at the forefront of their community activities, including support of CFF and its programs and events, such as the annual Innovation in Education Awards program.

Assistance and collaboration from companies like MCC allows our Foundation to provide more innovative learning programs, establish more college and career pathways for local students, and effectively utilize technology in the classroom. We are enabled to cultivate relationships between school districts and business as a means for establishing an educated society.

CFF supports the Mitsubishi Cement Corporation Warehouse C: Bulk Cement Warehouse and Loading Facility Project located at the Tenth Avenue Marine Terminal. The MCC project will foster local infrastructure expansion and progress that translates to jobs for our soon-to-be engineers, architects, scientists and the like.

San Diego welcomes community stewards like MCC that support local philanthropic organizations and strive to make San Diego a better place to live.

James Wright
Chief Executive Officer

Joe Rindone Regional Technology Center
San Diego County Office of Education • 6401 Linda Vista Road, Room 207 • San Diego, California 92111-7399
858.292.3685 • 858.467.1549 Fax
www.classroomofthefuture.org
inspire.innovate.achieve

Response to Comment K-1

The commenter expresses their support for the Proposed Project. The comments are general in nature and do not address a specific environmental issue in the Draft SEIR. These comments do not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of environmental impacts presented in the Draft SEIR. Therefore, no changes to the Draft SEIR are required in response to this comment. However, the comment will be presented to the Board of Port Commissioners.

SDMAC
SAN DIEGO MILITARY ADVISORY COUNCIL

Comment Letter L

January 24, 2020
Peter Eicher
Development Services Department
San Diego Unified Port District
P. O. Box 120488
San Diego, CA 92112-0488

Sent via e-mail: peicher@portofsandiego.org

RE: UPD #EIR-2016-178, SCH #2017091051 Mitsubishi Cement Corporation at Warehouse C: Bulk Cement Warehouse and Loading Facility Project, City of San Diego; San Diego County, California

Dear Mr. Eicher:

L-1 A core principal of the San Diego Military Advisory Council (SDMAC) since its founding in 2004 has been to advance the partnership between the military and the business community. Mitsubishi Cement Corporation (MCC) fully understood this equation when they began enthusiastically supporting the San Diego region military and defense communities in 2018, even though the company had yet to begin operations at the Port of San Diego Tenth Avenue Marine Terminal.

SDMAC has supported the terminal's revitalization project, due to both the terminal's military importance as well as the project's positive impact on business and jobs. We are confident Mitsubishi Cement Corporation will be a strong addition to the local maritime business, with projections for employing hundreds and generating substantial income for the Port. Additionally, their project is critical to furthering infrastructure development that is occurring and projected in our region, all of which requires convenient access to vital construction materials like cement. This includes our region's military construction projects from Imperial Beach up to Camp Pendleton.

In summary, SDMAC is writing to support the MCC Warehouse C: Bulk Cement Warehouse and Loading Facility Project located at the Tenth Avenue Marine Terminal, which is currently undergoing environmental review at the Port of San Diego. The MCC venture fully corresponds with efforts to fill warehouse space with companies that will enhance the community via business endeavors and community spirit.

Sincerely,

Mark Balmert
Executive Director

409 Camino Del Rio South
Suite 302
San Diego, CA 92108
www.SDMAC.org

Response to Comment L-1

The commenter expresses their support for the Proposed Project. The comments are general in nature and do not address a specific environmental issue in the Draft SEIR. These comments do not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of environmental impacts presented in the Draft SEIR. Therefore, no changes to the Draft SEIR are required in response to this comment. However, the comment will be presented to the Board of Port Commissioners.

Comment Letter M

FAMILY HEALTH CENTERS OF SAN DIEGO

Family Health Centers of San Diego
823 Gateway Center Way, San Diego CA 92102
P: (619) 515-2300 F: (619) 237-1856 FHCSD.org

"Exceptional in Every Way"

Beach Area Family Health Center
Chase Avenue Family Health Center
Chula Vista Family Health Center
City Heights Family Health Center
Diamond Neighborhoods Family Health Center
Downtown Family Health Center at Connections
El Cajon Family Health Center
Elm Street Family Health Center
FamilyHealth at City College
FamilyHealth at College Grove
FamilyHealth on Commercial
Grossmont Spring Valley Family Health Center
Hillcrest Family Health Center
Ibarra Family Health Center
Lemon Grove Family Health Center
Logan Heights Family Health Center
Mobile Medical Units
National City Family Health Center
North Park Family Health Center
Oak Park Family Health Center
Rice Family Health Center
Sherman Heights Family Health Center

January 29, 2020

Peter Eichar
Senior Planner, Development Services Department
San Diego Unified Port District
P. O. Box 120488
San Diego, CA 92112-0488

Sent via e-mail: peichar@portofsandiego.org

RE: UPD #EIR-2016-178, SCH #2017091051 - Mitsubishi Cement Corporation at Warehouse C: Bulk Cement Warehouse and Loading Facility Project, City of San Diego; San Diego County, California

Dear Mr. Eichar:

M-1

I write today on behalf of Family Health Centers of San Diego to offer support for Mitsubishi Cement Corporation's Warehouse C: Bulk Cement Warehouse and Loading Facility Project, currently beginning environmental review at the Port of San Diego's Tenth Avenue Marine Terminal.

Family Health Centers of San Diego's mission is to provide caring, affordable, high-quality health care and supportive services to everyone, with a special commitment to uninsured, low-income and medically underserved persons. Our services began in Barrio Logan in 1970 and since that time we've developed a longstanding partnership with the Port of San Diego.

Annually, our staff provides care to more than 210,000 unique patients—a third of our region's low-income patients—through nearly one million healthcare encounters. The breadth of our clinic locations, services and programs has grown over the last five decades, making us the largest community clinic provider of health care to the uninsured in the county and one of the top 10 largest community clinic organizations in the nation.

Our work would not be possible without the generosity of our corporate partners like Mitsubishi Cement Corporation. We look forward to a continued valuable partnership with them as they begin to take root in the thriving, diverse community of Barrio Logan.

Regards,

Fran Butler-Cohen
CEO

Accredited by The Joint Commission

Response to Comment M-1

The commenter expresses their support for the Proposed Project. The comments are general in nature and do not address a specific environmental issue in the Draft SEIR. These comments do not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of environmental impacts presented in the Draft SEIR. Therefore, no changes to the Draft SEIR are required in response to this comment. However, the comment will be presented to the Board of Port Commissioners.

Comment Letter N-1

Junior Achievement of San Diego County

February 6, 2020

Peter Eichar
Development Services Department
San Diego Unified Port District
P. O. Box 120488
San Diego, CA 92112-0488

Sent via e-mail: peichar@portofsandiego.org

RE: UPD #EIR-2016-178, SCH #2017091051 Mitsubishi Cement Corporation at Warehouse C: Bulk Cement Warehouse and Loading Facility Project, City of San Diego; San Diego County, California

Dear Mr. Eichar:

N-1

The Junior Achievement San Diego mission is to impact more than 80,000 students a year by teaching them how to get a job, start a business and manage their money. This is achieved by providing a real-world connection for students – a realistic link between K-12 learning in the classroom and the 21st century workplace.

By establishing tangible workplace experiences, Junior Achievement creates the rare education bridge for students to discover authentic and practical work-life practices. When Mitsubishi Cement Corporation (MCC) initially came to San Diego, one of their first stops was to take a first-hand tour of JA BizTown, where students visit a simulated town to operate banks, manage restaurants, write checks and vote for mayor. This ultimately led to MCC's corporate sponsorship of our annual Business Hall of Fame dinner.

We are proud to share how MCC's investment in JA is directly supporting San Diego students' efforts to get our communities "real world ready" and support their continued efforts to invest in our community.

Sincerely,

Siddhartha Vivek
President & CEO

619-682-5155 4756 Mission Gorge Place San Diego, CA 92120 www.jasandiego.org

Response to Comment N-1

The commenter expresses their support for the Proposed Project. The comments are general in nature and do not address a specific environmental issue in the Draft SEIR. These comments do not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of environmental impacts presented in the Draft SEIR. Therefore, no changes to the Draft SEIR are required in response to this comment. However, the comment will be presented to the Board of Port Commissioners.

Comment Letter O

SCEDC
South County Economic Development Council

February 6, 2020

Peter Eichar
Development Services Department
San Diego Unified Port District
P. O. Box 120488
San Diego, CA 92112-0488

Sent via e-mail: peichar@portofsandiego.org

RE: UPD #EIR-2016-178, SCH #2017091051 Mitsubishi Cement Corporation at Warehouse C: Bulk Cement Warehouse and Loading Facility Project, City of San Diego; San Diego County, California

Dear Mr. Eicher:

The South County Economic Development Council (South County EDC or SCEDC) was formed in 1989 by a group of South San Diego County business and community leaders to promote education and encourage economic development in the South San Diego County Region. Our member cities are anchored in South San Diego: Imperial Beach, National City, Chula Vista, San Diego, and Coronado. We also work with our partners in the northern portion of Baja California in the cities of Mexicali, Tijuana, Tecate, Rosarito and Ensenada.

We are writing in support of Mitsubishi Cement Corporation's (MCC) Draft Subsequent Environmental Impact Report (SIER). On January 31, 2020 at 2:30pm, the South County EDC's Public Policy committee voted to support MCC's Draft SIER. Subsequently, on the morning of February 4, 2020, South County EDC's Board of Directors voted to approve MCC's Draft SIER. This MCC project will assist South County's robust economic growth and prosperity as well as ongoing development throughout San Diego County. Given current new construction and revitalization trends in the region, it is anticipated that the increasing demand for cement cannot be satisfied through domestic sources. This supply imbalance can be addressed through MCC's plan to complement domestic cement supplies with imported cement and aggregate products through the Port of San Diego, which is an optimal use of the Tenth Avenue Marine Terminal's (TAMT's) underutilized capacity.

O-1

The revitalization project is also expected to support employment growth, providing up to 50 jobs per day during construction. Once MCC operations actually commence, the project projections include seven full-time employees and up to 35 part-time.

SCEDC has had the pleasure of working with MCC leadership, who have been active stewards of business and very supportive of the SCEDC mission. We look forward to continuing this important relationship.

Sincerely,

Cindy Gompper-Graves
President and CEO

780 Bay Blvd., Suite 204, Chula Vista, CA 91910
(619) 424.5143 • Fax (619) 424.5738
www.SouthCountyEDC.com

Response to Comment O-1

The commenter expresses their support for the Proposed Project. The comments are general in nature and do not address a specific environmental issue in the Draft SEIR. These comments do not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of environmental impacts presented in the Draft SEIR. Therefore, no changes to the Draft SEIR are required in response to this comment. However, the comment will be presented to the Board of Port Commissioners.

Comment Letter P

R. E. STAITE ENGINEERING INC.
ESTABLISHED 1938 CLASS A LICENSE 834821

February 11, 2020 *Sent via e-mail: peicher@portofsandiego.org*

San Diego Unified Port District
Development Services Department
PO Box 120488
San Diego, California 92112-0488

Attn: Peter Eicher

Re: Mitsubishi Cement Corporation at Warehouse C:
Bulk Cement Warehouse and Loading Facility Project
Tenth Avenue Marine Terminal - Port of San Diego
City of San Diego, California

Subject: **UPD #EIR-2016-178, SCH #2017091051**

Dear Mr. Eicher:

P-1 R.E. Staite Engineering, Inc. (RES), established in 1938, is a small business, general engineering contractor with offices and marine facilities in San Diego and Northern California on Mare Island in Vallejo. RES has continuous operations on the port of San Diego and has been a port tenant since 1965, and specializes in marine and heavy civil construction, deep pile foundations, bridge construction, dredging and bay remediation and has successfully completed projects along the western seaboard from Panama to Alaska.

I am a third-generation San Diegan who became president of RES in 1978. Throughout my business endeavors and associations through the community, I met Michael Jasberg, Executive Vice President and COO for Mitsubishi Cement Corporation, who I consider to be an honorable, upstanding businessman. Mike and I have been associated for over ten years which has allowed me to closely follow the MCC-Port of San Diego relationship and MCC's entreaty to commence import operations at the Tenth Avenue Marine Terminal.

I can vouch personally that MCC is a quality business operation that will enhance ongoing infrastructure development within San Diego. MCC will import cement and aggregate products through the Port that will address escalating demands throughout the region that can't otherwise be satisfied through domestic sources. In addition to supplying local jobs and boosting the Port's economy, Mike believes MCC should be a fixture in the community and a participant in an assortment of philanthropic enterprises.

2145 E. Belt Street, San Diego, California 92113 • phone: 619.233-0178 fax: 619.233.3706

Response to Comment P-1

The commenter expresses their support for the Proposed Project. The comments are general in nature and do not address a specific environmental issue in the Draft SEIR. These comments do not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of environmental impacts presented in the Draft SEIR. Therefore, no changes to the Draft SEIR are required in response to this comment. However, the comment will be presented to the Board of Port Commissioners.

P-1 cont. I have witnessed MCC work diligently during the past few years to thoroughly address noise, traffic and environmental impacts to the Port and surrounding areas, and I whole-heartedly support the Mitsubishi Cement Corporation's (MCC) Warehouse C: Bulk Cement Warehouse and Loading Facility Project which is currently undergoing environmental review.

Sincerely,

R.E. STAITE ENGINEERING, INC.

R A Carpenter

R.A. Carpenter
President

2145 E. Belt Street, San Diego, California 92113 • phone: 619.233-0178 fax: 619.233.3706

Comment Letter Q

ENVIRONMENTAL HEALTH COALITION
2727 HOOVER AVE., SUITE 202 - NATIONAL CITY, CA 91950 - (619) 474-0220 - WWW.ENVIRONMENTALHEALTH.ORG

February 14, 2020

San Diego Unified Port District
Development Services Department
Attn: Peter Eichar
Via email to peichar@portofsandiego.org

Re: Environmental Health Coalition Comments on SEIR for the Mitsubishi Cement Corporation at Warehouse C: Bulk Cement Warehouse and Loading Facility Project (UDP #EIR-2016-178, SCH #2017091051)

Dear Mr. Eichar:

Q-1 Environmental Health Coalition (EHC) is a 40-year-old environmental justice organization. EHC builds grassroots campaigns to confront the unjust consequences of toxic pollution, discriminatory land use, and unsustainable energy policies. Through leader development, organizing and advocacy, EHC improves the health of children, families, neighborhoods and the natural environment in the San Diego/Tijuana region.

EHC appreciates the opportunity to comment on the Mitsubishi project, and the ample time afforded for review of the draft SEIR. Our comments are as follows.

1. PROJECT OBJECTIVES

In our comment letter on the Notice of Preparation for this project dated October 6, 2017, EHC recommended these project objectives:

Q-2
- Minimize or eliminate air pollution, traffic, and other environmental impacts on adjacent communities.
- Use cleanest available technologies for moving freight and powering equipment and vehicles.
- Comply with or exceed the greenhouse gas (GHG) reduction goals of the Port of San Diego's Climate Action Plan (10% below 2006 levels by 2020) and California's SB 32, which requires reduction of GHG levels to 40% of 1990 levels by 2030.

EMPOWERING PEOPLE. ORGANIZING COMMUNITIES. ACHIEVING JUSTICE.
EMPODERANDO A LA GENTE. ORGANIZANDO A LAS COMUNIDADES. LOGRANDO LA JUSTICIA.

Response to Comment Q-1

The comment provides background on the commenter. The District appreciates the Environmental Health Coalition's history in the region and its interest in the Proposed Project. This comment does not raise any environmental issues requiring a response pursuant to CEQA or the analysis itself. The specific comments raised in the pages that follow this introduction are listed separately along with the District's individual responses.

Response to Comment Q-2

The comment restates Notice of Preparation (NOP) comments on the Project's objectives that the commenter believes were not included in the SEIR. The statement of objectives should include the underlying purpose of the particular proposed project (State CEQA Guidelines Section 15124(b); *In re Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings (*2008) 43 Cal.4th 1143, 1163). Hence, each project will have different project objectives. The Proposed Project proposes construction of a cement and cementitious material import, storage, and distribution facility within TAMT that would provide a local source of cementitious materials, which would reduce the need for imports from outside the region.

The objectives, or underlying purpose, of the Proposed Project include:

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

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

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

These objectives were vetted through the District and reflect the underlying purpose of the Project, and no additional objectives need be added.

The commenter suggests that Objective #2 related to eliminating or substantially reducing truck trips and distances from other more distant ports that presently deliver cementitious materials to the San Diego region is not substantiated in the analysis, and states that such an analysis would enhance the credibility of this environmental review. The comment correctly asserts the analysis did not substantiate this objective because that analysis is not required for project objectives (State CEQA Guidelines Section 15124(b)), which are to include the underlying purpose(s) of the project (State CEQA Guidelines Section 15124(b); *In re Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings (*2008) 43 Cal.4th 1143, 1163). Additionally, the rationale and justification for the Project, as well as the context for the Project objectives, including Objective #2, is explained on page ES-3 of the Draft SEIR.

Consistent with State CEQA Guideline 15082(b), responses to NOPs should identify significant environmental issues and reasonable alternatives and mitigation measures. Proposing additional project objectives and implying their need for evaluation is not consistent with the intent of such notices or required to be analyzed to provide credibility.

These objectives state clearly the underlying purpose of the Project as required by State CEQA Guidelines Section 15124(b), and additional objectives are not warranted. No changes have been made to the Draft SEIR.

None of these is included in the Project Description for the SEIR. We continue to recommend these as important objectives for any project on the Tidelands area.

The draft SEIR does include the following objective:

Q-2 cont.

- Eliminate or substantially reduce truck trips and distances from other more distant ports which presently deliver cementitious material necessary to serve the San Diego region.

However, the draft SEIR contains no analysis to support any conclusion that this objective will be met by the project. No information is included to verify that in fact any trucks at all are coming from outside the region, or that this truck traffic will be reduced by the presence of this source of cementitious material. Some analysis to show that the added community impacts of the project are counterbalanced by significant environmental benefits would enhance the credibility of this environmental review.

2. ENVIRONMENTAL IMPACTS

A. AIR QUALITY

Q-3

Recalculate emissions and HRA using Mitsubishi ships. The TAMT PEIR and HRA, on which this draft SEIR is tiered, were done using estimates based on generic bulk cargo ships. The mitigation trigger threshold of 691,418 MT was derived using these generic estimates. Now that a specific bulk carrier service is proposed for TAMT, it should be possible to recalculate the emissions and health risks assessment with the more specific information on the actual bulk ships that Mitsubishi will be using for this project.

Similarly, fuel barge frequencies and emissions were estimated using generic information in the PEIR. Presumably, Mitsubishi has information on which ships they will be using and the distance of the trips the ships will be taking. A more precise estimate of the need for fueling and of the fueling barge emissions is possible and should be completed for the SEIR.

Q-4

Ensure cleanest possible trucks. The draft SEIR states that the peak number of truck trips per day is 1056 PCE (p. 4.5-8), based on a peak 176 trucks per day, or 352 truck trips. This is a substantial increase to the total truck traffic going through or around the community from TAMT, and in fact comprises 60% of the full truck PCE estimated for the entire STC

Response to Comment Q-3

The comment recommends revising the emissions and health risk assessment (HRA) to be based on Mitsubishi Cement Corporation-specific ships. As the commenter notes, the emissions and HRA are based on generic or average bulk carrier ships and implies that Mitsubishi Cement Corporation presumably knows the vessels that will call at TAMT.

Mitsubishi Cement Corporation does not own Ocean Going Vessels (OGV) that transport dry-bulk goods, but instead relies on various parties that provide "tramper" or "tramp service" that have no fixed route or schedule. Any effort to estimate specific, or guess which, OGVs within the global fleet would serve the Proposed Project is too speculative and arbitrary. The method for estimating Project-related OGV emissions and associated health risk was accomplished by basing the emission estimates on the average bulk OGV from the Port of Long Beach. This method of using average vessel power, travel speed, engine size, engine load, and emissions profile used in the analysis rather than specifications for specific OGV, which is unknown for the Proposed Project, is consistent with the California Air Resources Board's (CARB's) 2019 OGV Methodology Update and the At-Berth Regulation. For reference, see CARB's methodology, *General Emissions Inventory Methodology and Sources*, specifically Section 3, which is based on vessel averages, at: https://ww3.arb.ca.gov/msei/ordiesel/draft2019ogvinv.pdf, which is incorporated herein by reference. Therefore, the emissions estimates and HRA are based on the best available information.

No changes to the vessel calculations and HRA are warranted. Please see the letter provided by Mitsubishi Cement Corporation in Exhibit 2 of this chapter for clarifying information related to ships that will service the Proposed Project.

The commenter states that fuel barge emissions should be re-evaluated using Mitsubishi Cement Corporation-specific information.

The analysis presented in this SEIR (see the technical memorandum in Appendix C), for fuel barge-related emissions was estimated in relation to Project-related OGVs consistent with the analysis within the TAMT Final PEIR. Mitsubishi Cement Corporation does not own or operate the fuel barge and tug and has no control over its activities. The analysis in this SEIR is the same as the TAMT Final PEIR, and assumes fuel barge activity increases with the number of OGV calls. It is unknown whether specific OGV calls—Mitsubishi

Cement Corporation or otherwise—would require fueling while at berth, en route to TAMT while in the harbor (San Diego Bay), or after departing TAMT, because the need for fueling near TAMT varies on an OGV call-to-call basis. Fuel barge services closest to San Diego are home ported in Long Beach, California; as such, they are not typically called to provide service within San Diego Bay. Additionally, Mitsubishi Cement Corporation does not dictate the timing or frequency of fuel barge calls to the OGV that is transporting Mitsubishi Cement Corporation goods, in this instance cementitious materials. It is the captain of the OGV who determines when and where to obtain fuel. Given these factors, the potential effects of fuel barge activity are estimated by applying the same method and assumptions used in the TAMT Final PEIR, and consistently carrying these assumptions and method forward within this SEIR. No changes to the fuel barge analysis are warranted.

No changes have been made to the Draft SEIR.

Response to Comment Q-4

The comment states that the Proposed Project's peak day of 176 truck trips comprises 60% of the TAMT truck trips assumed in the TAMT Plan.

The 60% number provided by the commenter is presumed to be based on the 176 peak daily truck trips provided in Table 4.5-4 of the Draft SEIR and the 296 daily truck trips for the Sustainable Terminal Capacity (STC) Alternative of the TAMT Final PEIR (certified by the District in December 2016) provided in Table 4.5-3 of the Draft SEIR. As noted in Section 3.4 of the Draft SEIR (Project Description), the Project would generate approximately 24,000 truck trips annually, approximately 67 total truck trips per average day, and up to 176 truck trips on the peak day during maximum loading. For purposes of this analysis, the peak day of 176 trucks was used to estimate the potential worst-case traffic and air quality impacts. However, on an average day or annual time scale, the Project's portion of TAMT buildout truck activity is much lower.

For example, Proposed Project annual truck activity is estimated to be 24,000 trucks annually, which is about 23% of the projected truck traffic at TAMT buildout, which assumed 106,560 annual truck trips (296 trucks per day, 360 terminal days per year). Therefore, while the Project does increase truck activity above baseline conditions as described in the TAMT Final PEIR, this increase is well within the annual truck trip volumes analyzed in the TAMT

Final PEIR. No change to truck emission estimates have been made to the Draft SEIR.

The comment also recommends ensuring the cleanest trucks possible, and recommends all trucks be zero-emission at the earliest possible date achievable. Proposed Project mitigation measures **MM-AQ-10** and **MM-GHG-10** require that no less than 90% of the trucks loading cement or cementitious material at TAMT be equipped with an engine that emits no more than would be expected of a 5-year-old truck during the entirety of Project operations. These mitigation measures are well beyond the requirements of the District's Clean Truck Program, as well as CARB's drayage truck, and truck and bus rules. These mitigation measures result in a 33% reduction in NO_X and a 34% reduction in Diesel Particulate Matter compared to trucks that do not meet this criterion. This requirement is consistent with the requirement Mitsubishi Cement Corporation operates under at the Port of Long Beach. Mitsubishi Cement Corporation will comply with CARB and District requirements when they are implemented and as applicable to their operations. CARB is currently working on an Advanced Clean Truck Regulation in order to accelerate a large-scale transition of zero-emission medium- and heavy-duty vehicles from Class 2B to Class 8. However, CARB notes that the technology is not yet available to suit all needs, but as technology advances, zero-emission trucks will become suitable for more applications. See CARB's Frequently Asked Questions (FAQ) sheet here: https://ww2.arb.ca.gov/resources/fact-sheets/advanced-clean-trucks-fact-sheet, incorporated herein by reference.

The District regularly monitors technologies for reducing air emissions as part of its Climate Action Plan and long-range sustainability goals, which encourage the District and its tenants to use cleaner technologies over time as they become available and feasible. As a condition of approval of any new or amended real estate agreement or Coastal Development Permit, the District requires the project proponent to submit to the District an annual inventory of all equipment that generates criteria pollutant, toxic air contaminant, and greenhouse gas emissions operated by the project proponent at the TAMT throughout the life of the lease up to 2035 (buildout of the TAMT plan). The purpose of the inventory is to track emissions and equipment at TAMT. This requirement is captured in both mitigation measures for Air Quality and Greenhouse Gases (**MM-AQ-7** and **MM-GHG-7**).

In addition, the District hired two consulting firms, ICF and CalStart, both with zero emission technology expertise, to conduct a zero-emission truck feasibility study (see Exhibit 4 of this chapter for the *Zero Emission Truck*

Feasibility Study for Mitsubishi Cement Corporation, dated November 2020 ("Feasibility Study")). CalStart was a consultant requested by EHC to be hired for the Feasibility Study. After obtaining operational characteristics of Mitsubishi Cement Corporation's largest customer, the Feasibility Study analyzed the feasibility of deploying zero-emission trucks within the following four Feasibility Categories that include 16 metrics:

- Technical metrics: range, torque, payload capacity, refueling time, service and maintenance support and ancillary energy requirements;
- Economic metrics: vehicle cost, the total cost of ownership with and without financial incentives (public funding such as grants) and the cost of charging infrastructure;
- Fleet logistics metrics: scheduling, truck assignments and percent of port trips that zero emission trucks can meet; and
- Charging infrastructure availability metrics: on-site/depot charging, on-route/opportunity charging and charging on or at public properties/facilities.

The District will annually review these metrics, report any changes in feasibility, and make public the results of that review. Further, the District will also evaluate additional metrics, including:

- Demonstration Project(s) information obtained during use of zero emission trucks tested during Mitsubishi Cement Corporation operations;
- Availability of Zero Emission Trucks: assess the commercial availability of zero emission trucks for procurement; and
- Annual Throughput: evaluation of cementitious materials throughput to better understand the number of trucks, or fleet size necessary for annual operations.

It should be noted that Mitsubishi Cement Corporation is the supplier of cementitious materials and its customers own and operate the trucks that pick up and deliver materials from TAMT; Mitsubishi Cement Corporation does not control its customers or its customer's truck fleets.

The Feasibility Study concluded that the use of Zero Emission Trucks is currently infeasible. In particular, the Feasibility Study found that:

1. Battery electric trucks in 2020 have low feasibility for both the 130-mile range and 300-mile range.
2. Battery electric vehicles in 2023 have increased feasibility for both the 130-mile range and 300-mile range duty cycles, although barriers exist and need to be overcome and, therefore, use of Zero Emission Trucks is likely still infeasible.
3. Incentive funding of some sort will be required in both 2020 and 2023 to support the Total Cost of Ownership.
4. Fleet adoption between 2020 and 2023 will need to include potential changes in truck assignments and scheduling, which impact current business models and economic/competitive viability.
5. Depot charging by 2023 may be feasible, while other charging locations and types (i.e., en-route/opportunity and public charging) remain less certain.

As indicated in conclusion 2 above, some of the metrics stand out as barriers both now and in 2023. These metrics are *range, vehicle cost, scheduling*, and *charging*. Range is a central issue for electric vehicles. With current battery technology, the range of electric Class 8 trucks caps out at around a 150-mile range on a single charge, significantly short of the 300-mile range desired. Based on discussions with Original Equipment Manufacturers and use of the Zero Emissions Technology Inventory, the range of electric trucks will likely increase over the next three years, and manufacturers are stating they expect to have battery-electric Class 8 trucks able to achieve farther ranges than they can now and potentially achieve a 300-mile range in that timeframe. Hence, use of zero emission trucks in 2020 is currently infeasible.

Based on recommendations from the Feasibility Study, mitigation measure **MM-GHG-7R** has been revised to require actions by the District and Mitsubishi Cement Corporation, including implementation of a Demonstration Project(s) for the use of Zero Emission Trucks, the preparation and submittal to the District for review and approval of an Infrastructure Plan that would support the ability to operate Zero Emission Trucks, and annual review and update of the Feasibility Study. The original aspects of **MM-GHG-7R** relating to the Annual Equipment Inventory and Periodic Technology Review remain intact. Potential GHG emission reductions from the revised **MM-GHG-7R** have not been credited towards the Project's GHG reduction calculations and, thus, determination of impact significance, because the amount of reduction and timing is unknown. Additionally, despite the revisions to **MM-GHG-7R,** greenhouse gas impacts remain significant and unavoidable.

TAMT Final PEIR mitigation **measure MM-AQ-7** continues to obligate the District to continue to monitor grant funding and demonstrate opportunities to purchase zero and near-zero emission technologies. There continue to be various demonstration projects at the Port to test the viability of various zero and near-zero emissions equipment pieces at TAMT, the National City Marine Terminal, the shipyards, and the boatyards. including demonstration of electric yard tractors, drayage trucks, and reach stackers at TAMT, a 40,000-pound electric forklift at the shipyards, electric forklifts at the boatyards, and electric yard trucks and drayage trucks at the National City Marine Terminal. It should be noted that some of this equipment is specific to certain tenant operations, and not all tenants use these certain types of equipment listed above, including Mitsubishi Cement Corporation. All of these demonstration projects help the District's overall understanding of the technologies and how zero and near-zero technologies can be used to facilitate freight movement and industrial activities along the working waterfront.

The federal Environmental Protection Agency (EPA) also acknowledges in its *Port Strategy Assessment* that there may be limitations for applying these technologies for port drayage operations, and advances in battery technology may not enable all-electric port drayage trucks until at least 2030.

The changes described above to **MM-GHG-7R** have been made in the MMRP and are described in the Errata and Revisions.

Q-4 cont. Alternative. It is important to ensure that all project related trucks are zero emission vehicles at the earliest possible date that this is achievable.

Q-5 **Annual Technology Review for ZEV Trucks**. The TAMT PEIR calls for annual technology review, as air quality mitigation MM-AQ-7. EHC recommends that the most current review be used to determine the feasibility of ZEV trucks for some or all of the cargo hauling to locations within the San Diego region, and that this analysis be repeated annually in conjunction with the TAMT technology review. We request also that the technology review be available on the District website and accessible by the public.

Q-6 **Estimate Fugitive Particulates for All Project Options**. The project description notes that there are two options for truck loading; Option A (inside Warehouse C) versus Option B (outside Warehouse C). There are also two options for unloading bulk cargo: 6 feet below ground or 40 feet above ground. The SEIR must include estimates of fugitive dusts for all options.

Q-7 **Calculate air quality impacts to potential residents in the Barrio Logan transition zone south of Main Street.** Since the June 2014 citywide referendum overturned the Barrio Logan Community Plan Update adopted by the San Diego City Council in the fall of 2013, residential development in the transition zone is possible; analysis of impacts to residents must assume that residences may be present closer to TAMT than are current residences.

B. GREENHOUSE GASES

Q-8 The TAMT PEIR concluded that post-2020 operations of the project would create significant GHG impacts, even after implementation of the mitigation measures. Given this conclusion, all possible avenues to reducing project GHG emissions should be included as mitigations.

Q-9 **Ensure Cleanest Trucks**. As noted above, the TAMT PEIR requires an annual technology review. This should include assessment of the feasibility of ZEV trucks for some or all of the cargo hauling to locations within the San Diego region. We request that the technology review be available on the District website and accessible by the public.

Q-10 **Implement VSR**. EHC supports mitigation MM-GHG-5R requiring Vessel Speed Reduction, and requests that documentation of VSR be available on the District website and accessible by the public.

Mitigations for GHG impacts include zero emission construction equipment and trucks; solar PV panels on rooftops on and off the terminal; subsidized alternative transportation for workers; and local hire to reduce emissions from employee vehicles.

Response to Comment Q-5

The comment requests that the annual technical review, implemented as part of TAMT Final PEIR mitigation measure **MM-AQ-7,** also include a review of zero emission trucks for hauling of TAMT cargo to destinations within San Diego County. The commenter also requests that annual technology reviews be available to the public and posted to the District's website.

See response to comment Q-4.

Additionally, **MM-AQ-7R** and **MM-GHG-7R** require tenants to submit annual reports to the District that summarize equipment, hours, and activity for all sources related to operations, which includes not only onsite mobile and cargo handling equipment, but also truck activity whether fueled by diesel, natural gas, or electricity.

The District regularly monitors technologies for reducing air emissions as part of its Climate Action Plan and long-range sustainability goals, which encourage the District and its tenants to use cleaner technologies over time as they become available and feasible. As a condition of approval of any new or amended real estate agreement or Coastal Development Permit, the District requires the project proponent to submit to the District an annual inventory of all equipment that generates criteria pollutant, toxic air contaminant, and greenhouse gas emissions operated by the project proponent at the TAMT throughout the life of the lease up to 2035 (buildout of the TAMT plan). The purpose of the inventory is to track emissions and equipment at TAMT. This requirement is captured in both mitigation measures for Air Quality and Greenhouse Gases (**MM-AQ-7** and **MM-GHG-7**).

In addition to the equipment inventory, mitigation measure **MM-GHG-7R** has been revised to require actions by the District and Mitsubishi Cement Corporation, including implementation of a Demonstration Project(s) for the use of zero emission trucks, the preparation and submittal to the District for review and approval of an Infrastructure Plan that would support the ability to operate zero emission trucks, and annual review and update of the Feasibility Study. The original aspects of **MM-GHG-7R** relating to the Annual Equipment Inventory and Periodic Technology Review remain intact. Potential GHG emission reductions from the revised **MM-GHG-7R** have not been credited towards the Project's GHG reduction calculations and thus determination of impact significance, because the amount of reduction and timing is unknown.

Additionally, despite the revisions to **MM-GHG-7R**, greenhouse gas impacts remain significant and unavoidable.

As noted in response to comment Q-4, there are various demonstration projects at the Port, and the District will continue to monitor the availability and feasibility of demonstration projects and technologies for use at the Port. In addition, information regarding implementation of mitigation will be available to the public. The changes described above to **MM-GHG-7R** have been made in the MMRP and are described in Chapter 4, *Errata and Revisions*.

Response to Comment Q-6

The comment requests fugitive particulate matter (PM) from truck loading and unloading activities be estimated for all Project options.

The air quality analysis estimates fugitive PM from truck loading activities for both options in the truck loading calculation sheets in Appendix C. As shown there, fugitive PM emissions associated with truck loading are the same under either option, although exhaust emissions from the payloader are slightly higher under Option 1 (truck loading within Warehouse C) due to the increased payloader use associated with loading the trucks inside the warehouse versus the more automated loading of trucks outside of the warehouse (Option 2). While emissions from both options are quantified (Appendix C), the worst case of these options is presented in the Draft SEIR. With regards to unloading, there is no difference in emission estimates between the above- or below-ground unloading options because both options would allow material to be pneumatically transferred to Warehouse C in pipes. Because the fugitive PM estimates for all loading and unloading options are disclosed in the Draft SEIR, and are correct, no changes have been made to the Draft SEIR.

Response to Comment Q-7

The comment requests analysis of air quality impacts for potential future residential users closer to TAMT than under existing conditions.

CEQA requires an EIR to consider the effects of the project on the existing physical environment (see State CEQA Guidelines Section 15125(a)(3) and 15126.2), not on development that may be allowed to occur in the future under applicable land use and zoning laws. For CEQA purposes, existing conditions are generally the conditions that exist at the time the NOP is issued to the public (see State CEQA Guidelines section 15125). To the District's

knowledge, no residential development is proposed in this area, and CEQA does not require an analysis of such an unknown use. Furthermore, the area north and east of TAMT is recommended to be developed with exclusively industrial uses and/or commercial/ industrial uses in the Barrio Logan Community Plan, while the area to the south is within District Tidelands where residential use is prohibited. Therefore, to be consistent with the requirements of CEQA, the air quality analysis and HRA analyze the net increase in air emissions and toxic air contaminants (TACs) over the existing baseline conditions and evaluate their potential effects under existing conditions rather than a speculative future scenario wherein residential uses are closer to an active marine terminal.

The HRA analyzes risk at the closest existing receptors, similar to the TAMT Final PEIR, with the highest concentrations at residences, schools, and parks seen at receptors to the southeast of the Project site. The HRA analyzed risk at park receptors immediately adjacent to the Proposed Project, including both Ballpark Village developments, but did not assume residents would be present in the transition zone. However, even if this transition zone were developed and risk analyzed, the impacts disclosed in this SEIR would remain unchanged because the highest pollution concentrations are located at the southeast portion of the Project site, not at the transition zone. Moreover, as discussed on page 4.1-53 of the Draft SEIR, the Proposed Project would not result in new or more severe impacts from TACs. Therefore, the health risk analysis in the Draft SEIR is sufficient, and no additional analysis is required. No changes to the Draft SEIR are required.

Response to Comment Q-8

The comment summarizes the post-2020 GHG impact presented in the TAMT Final PEIR, and suggests that all possible means of reducing emissions should be included in the analysis.

The comment does not describe or recommend any specific mitigation measures, actions, programs, or technology that can avoid or mitigate GHG emissions. The District has identified and required all known feasible mitigation measures to reduce significant GHG impacts, as well as other significant environmental impacts. See Attachment 1 of this Final SEIR (Mitigation Monitoring and Reporting Program). The specific comments raised in the pages that follow this comment are listed separately along with the District's individual responses.

Response to Comment Q-9

The comment recommends ensuring the cleanest trucks possible, and recommends all trucks be zero-emission at the earliest possible date achievable.

This is the same comment as introduced in Comment Q-4. See responses to Comment Q-4 above.

Response to Comment Q-10

The commenter supports the vessel speed reduction (VSR) requirement and suggests that VSR information and reporting be made available to the public on the District's website.

This commenter supports the mitigation, and no environmental concerns are raised in this comment; therefore, no changes to the Draft SEIR are required.

In terms of making VSR reporting public, the currently voluntary vessel speed reduction program has been ongoing since April 1, 2009. As part of the District's Clean Air Program and **MM-GHG-5R**, the District would use the same reporting to track compliance with the Project's mitigation measures. Continued application of the current compliance tracking system will continue to be managed by Planning & Green Port staff and will allow District staff to independently verify compliance with these mitigation measures.

In the last part of this comment, the commenter summarizes some suggested mitigation measures, which are detailed in subsequent comments. This portion of the comment raises no specific concerns, but other comments in the pages that follow are listed separately along with the District's individual responses.

Q-11 **MM-GHG-3 and MM-GHG-4**: EHC supports these mitigation measures, which, per the TAMT PEIR, will be implemented throughout the terminal. We urge the Port to ensure public transparency; information available to the public must be sufficiently specific, detailed, and dated so that public can independently verify the mitigations are being implemented.

Q-12 **MM-GHG-6R**: EHC supports this set of mitigation measures and their prioritization as indicated in the SEIR. The process for selecting any of these measures, and verification that higher priority measures were not feasible, is needed in order to monitor implementation of this mitigation. Documentation of the measures chosen and the GHG reductions achieved must be publicly available.

Q-13 **MM-GHG-7R**: EHC supports this mitigation measure and requests that the equipment inventory be publicly available.

Q-14 **MM-GHG-9R**: EHC supports this mitigation measure; however, we recommend averaging ship to shore percentage time over no more than 6 months, not 2 full years.

C. PARKING

Q-15 The PEIR for TAMT (MM-TRA-7) states that prior to approval of any new project component or any new lease/lease renewal at TAMT, the project proponent (e.g., tenant) shall submit a Parking Management Plan to the District for review and approval, demonstrating that there would be adequate parking to accommodate all projected operational parking within their tenant's leasehold or within an area available for use as parking. MM-TRA-7 also includes what the Parking Management Plan shall include. No Parking Management Plan has been included in the DSEIR. Therefore, it is incorrect to state that the Project-level SEIR for the Proposed Project has satisfied MM-TRA-7 and is consistent with TAMT Final PEIR MM-TRA-7. MM-TRA-7 applies to the Proposed Project and the SEIR must be revised as such.

Response to Comment Q-11

The commenter supports **MM-GHG-3** and **MM-GHG-4** and suggests that information related to electric equipment upgrades be made available to the public.

Compliance with TAMT Final PEIR mitigation has been included in various Agenda Items presented to the Board and will be compiled in the upcoming Maritime Clean Air Strategy. In addition, information regarding implementation of mitigation will be available to the public. No changes to the Draft SEIR are required.

Response to Comment Q-12

The commenter supports the mitigation prioritization shown for **MM-GHG-6R** and suggests that information regarding the measures chosen, verification of mitigation measure option(s) deemed not feasible, and reductions achieved be made available to the public.

See response to comment Q-11 above. Compliance with TAMT Final PEIR mitigation has been included in various Agenda Items presented to the Board and will be compiled in the upcoming Maritime Clean Air Strategy. In addition, information regarding implementation of mitigation will be available to the public. No changes to the Draft SEIR are required.

Response to Comment Q-13

The commenter supports **MM-GHG-7R** and suggests that information regarding annual equipment inventory reporting be made available to the public.

See response to comment Q-11 above. Compliance with TAMT Final PEIR mitigation has been included in various Agenda Items presented to the Board and will be compiled in the upcoming Maritime Clean Air Strategy. In addition, information regarding implementation of mitigation will be available to the public. No changes to the Draft SEIR are required.

Response to Comment Q-14

The commenter supports **MM-GHG-9R** but recommends that ship-to-shore percentage for reporting be based on no more than 6 months of activity instead of the 2 years written in the mitigation measure.

Mitigation measure **MM-AQ-9R** requires annual reporting of the shore power use, with a provision for emergency events to allow for a 2-year average. The throughput requirements and shore power requirements are annual, so the annual reporting requirement is consistent with other reporting requirements. The 2-year provision is only applicable if certain conditions are met, to the satisfaction of the San Diego Unified Port District's Planning and Green Port Department. No changes to the Draft SEIR are required.

Response to Comment Q-15

The comment restates the requirements from **MM-TRA-7** of the TAMT PEIR to submit a Parking Management Plan to the District prior to the approval of any new project component or any new lease/lease renewal at TAMT that demonstrates that there will be adequate parking to accommodate all projected operational parking within the tenant's leasehold or within an area available as parking. The comment suggests that the Draft SEIR incorrectly states that the SEIR for the Proposed Project has satisfied TAMT Final PEIR mitigation measure **MM-TRA-7** because no Parking Management Plan has been included in the Draft SEIR. The comment further states that **MM-TRA-7** applies to the Proposed Project and suggests that the Draft SEIR should be revised as such.

MM-TRA-7 from the TAMT Final PEIR is not necessary as the Proposed Project would have adequate parking and thus would not result in new or more severe parking impacts compared to those disclosed in the TAMT Final PEIR. The TAMT Final PEIR disclosed (see pages 4.10-57 through 4.10-59) that the maximum number of daily workers at TAMT was based on the permanent number of full-time employees (or full-time equivalents) and the total number of dockworkers that would be needed for a 24-hour period at full buildout of terminal operations, in 2035. The daily worker projections reflect existing tenants as of March 2015 (i.e., the NOP date for the TAMT Draft PEIR), new tenants, and additional spot cargo. The maximum number of dockworkers for a 24-hour period is based on berthing capacity, which only allows a maximum of four ocean-going vessels at one time (i.e., Berths 10-1/10-2, 10-3/10-4, 10-5/10-6, and 10-7/10-8). Assuming that four vessels are berthed simultaneously at TAMT (assuming full buildout in 2035), the maximum number of dockworkers handling the most intensive cargo types within a 24-hour period would be 611 (existing + new at buildout). This is a highly conservative estimate, as the terminal would not be able to sustain all available berths being occupied, along with the associated terminal cargo handling equipment in operation, for long periods of time. In addition to dockworkers, approximately 63 new permanent office employees were estimated for a total of 228 office workers at TAMT buildout in 2035. In sum,

up to 839 employees could be present at TAMT over a 24-hour period under buildout conditions in 2035 with four vessels at berth simultaneously.

While the Board of Port Commissioners ultimately adopted the Sustainable Terminal Capacity (STC) alternative, which reduced annual cargo throughput by 25% at buildout (compared to the project as originally proposed in the TAMT Draft PEIR), the analysis for the STC alternative did not assume a corresponding reduction in employees at buildout. As disclosed in the TAMT Final PEIR (see page 7-26), daily worker activity is dictated (and limited) by berthing capacity, and the maximum number of vessels that could call on or berth at TAMT on a given day would not change under the STC Alternative. As such, the number of workers on a given day would not change relative to the originally proposed project. Therefore, the impact analysis for buildout of the STC Alternative accounted for up to 839 employees potentially being present at TAMT over a 24-hour period with all four berths occupied.

The TAMT Final PEIR (see page 4.10-60) assumed that all 63 new office employees would work during the day shift (e.g., busiest 8-hour shift), which would be combined with the existing 165 office workers, resulting in up to 228 office employees being present at TAMT during the day. Berthing capacity, however, would limit the number of dock workers to no more than 154 additional dock workers during an 8-hour period, which would amount to a high of up to 298 dock workers during the busiest 8-hour shift. This yields a total of 526 workers (e.g., 228 permanent employees + 298 dock workers) that could be at TAMT during the busiest 8-hour shift once full buildout is reached. Following demolition of Transit Sheds #1 and #2 under the Demolition and Initial Rail Component of the TAMT Plan, available parking on the terminal would be reduced to 599 spaces. It should be noted that the TAMT Final PEIR assumed the eventual demolition of Warehouse C, which would further reduce on-terminal parking by 85 spaces to a total of 514 available spaces. However, because the Proposed Project would re-use Warehouse C rather than demolish it, these parking spaces would remain available for terminal use under Proposed Project conditions. The Proposed Project would not result in the removal of any parking on TAMT that would result in a reduction of available parking on the terminal (see page 4.5-29 of the Draft SEIR).

Once operational, the Proposed Project would require one full-time supervisor and up to three maintenance staff workers to be onsite at all times, for a total of four long-term onsite workers. Because the Proposed Project involves the re-use of Warehouse C, these four employees would be

able to use the 85 existing parking spaces at the warehouse that would have otherwise been removed as a result of its demolition.

Vessel unloading and truck loading operations are considered independent activities that may either occur at different times or simultaneously. During truck loading operations up to three additional workers would be required, for a total of seven onsite workers per shift. During ship unloading operations, up to 16 additional workers per shift would be required, for a total of 20 workers onsite. When vessel unloading and truck loading occur at the same time, the maximum operational scenario, up to 20 additional workers would be required, for a total of 24 onsite workers per shift for two shifts per day. As identified in the TAMT Final PEIR, dock workers responsible for loading and unloading shipments typically park closest to where they have been assigned for a particular shift, provided the parked cars do not obstruct terminal operations. Onsite workers associated with vessel unloading for the Proposed Project would park adjacent to Berths 10-7 and 10-8, consistent with assumptions made for dock worker parking in the TAMT Final PEIR and disclosed on pages 4.5-28 and 4.5-29 of the Draft SEIR. As shown on Exhibit 3 of this chapter, approximately 30 unstriped parking spaces are available adjacent to Berth 10-7, conservatively assuming a width of approximately 12 feet per parking space. As such, there would be sufficient parking adjacent to Berth 10-7 to accommodate the 20 maximum additional workers required when vessel unloading and truck loading occur simultaneously.

Based on the information presented in the TAMT Final PEIR and the Draft SEIR, and as further clarified in this response, adequate parking to accommodate all anticipated Proposed Project operations workers is available on TAMT. Therefore, **MM-TRA-7** from the TAMT Final PEIR is not necessary as the Proposed Project would have adequate parking and thus would not result in new or more severe parking impacts compared to those disclosed in the TAMT Final PEIR.

The Final SEIR has been edited to clarify that **MM-TRA-7** is not necessary rather than having been satisfied, as currently stated in the Draft SEIR. These changes are reflected in Chapter 4, *Errata and Revisions*, of this Final SEIR. However, this revision is a minor clarification that does not affect the conclusions of the impact analysis in this SEIR.

Table 4.5-10

~~The Project-level SEIR for the Proposed Project has satisfied and is consistent with~~ TAMT Final PEIR **MM-TRA-7** is not necessary because there

D. CUMULATIVE IMPACTS

Q-16 Include Navy's Pacific Pivot and arrival of more emissions from ship transit and hoteling in San Diego Bay.[1] Two new aircraft carriers are to be homeported at NASNI which would include additional shipyard emissions from higher volumes of ship repair and maintenance activities.[2]

Q-17 In closing, we thank you for the opportunity to comment on this CEQA document. Questions may be directed to Joy Williams (619-474-0220 x110) or to Danny Serrano (619-474-0220 x 104).

Joy Williams
Research Director

Danny Serrano
Campaign Director, TFN

[1] https://www.sandiegouniontribune.com/military/sd-me-housing-navy-20170816-story.html
[2] https://www.sandiegouniontribune.com/news/military/story/2020-01-20/two-more-navy-aircraft-carriers-to-bring-economic-boost-of-almost-2-billion-to-san-diego-in-2020

is adequate parking and the Proposed Project does not result in new or more severe parking impacts compared to those disclosed in the TAMT Final PEIR.

Response to Comment Q-16

The commenter suggests that activity associated with the Navy's *Pacific Pivot* and the anchoring of aircraft carriers in the Bay be included in the cumulative impact analysis.

The Navy provided a comment letter on a recent District EIR (Dole Refrigerated Rack Improvements Project), which included growth projections as well as information on two pier improvement projects: one at Pier 8 and the other at Pier 12. This discussion, which is similar to the discussion in the TAMT PEIR, has been added to Chapter 5.0, *Cumulative Impacts*, to include the potential changes in Navy activity within the Bay.

This information has been added to the SEIR, but all significance determinations and any associated mitigation remain unchanged, and this information is not considered new information pursuant to Section 15088.5 of the State CEQA Guidelines. Pursuant to Section 15088.5 of the State CEQA Guidelines, the information is not considered significant new information because the new information added to the Final EIR does not deprive the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect that the District has declined to implement. Specifically, the new information does not result in:

1. a new significant environmental impact;
2. a substantial increase in the severity of an environmental impact that would result unless mitigation measures are adopted that reduce the impact to a level of insignificance;
3. a feasible project alternative or mitigation measure that is considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the District declined to adopt it; or
4. the determination that the Draft EIR is so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

The Proposed Project falls within the broader scope of the Tenth Avenue Marine Terminal Redevelopment Program and the associated TAMT Final PEIR, which considered potential changes in Navy activity within the Bay in the cumulative impact analysis of the TAMT PEIR. As demonstrated in the analysis throughout this SEIR, the Proposed Project would not result in any new or more severe impacts than disclosed in the TAMT Final PEIR. Therefore, the SEIR has satisfied the requirements of CEQA, including Section 15130. These changes are reflected in Chapter 4, *Errata and Revisions*, of this Final SEIR. No other changes are required to the Draft SEIR.

Response to Comment Q-17

This comment concludes the comment letter and provides a contact name and information.

The District appreciates EHC's interest in the Proposed Project. This comment does not raise any issues requiring a response pursuant to CEQA.

Comment Letter R

INDUSTRIAL ENVIRONMENTAL ASSOCIATION
Promoting Industry and Protecting the Environment

February 14, 2020

Mr. Peter Eichar
Development Services Director
San Diego Unified Port District

TRANSMITTED VIA EMAIL

Dear Mr. Eichar,

R-1

On behalf of the Board of Directors of the Industrial Environmental Association, I am writing to express our strong support for Mitsubishi Cement Corporation's (MCC) Draft Subsequent Environmental Impact Report (SIER).

This MCC project will contribute to economic growth and employment as well as ongoing development throughout San Diego. MCC seeks to provide cement to a thriving San Diego in an environmentally responsible manner that incorporates state of the art technology. As an example, a vacuum unloading system will efficiently suction material from the ship and transport it to Warehouse C using a sealed pneumatic system. The dust filtration system, or "baghouses," will capture dust from the warehouse storage area and truck loading racks; all of the captured dust will be recycled back into the process.

Truly, the nature of this business has changed significantly, thanks to new transport technologies and companies like Mitsubishi that take their responsibilities seriously. The revitalization project will support employment growth, providing up to 50 jobs per day during construction as well as seven full-time employees, up to 35 part-time workers and hundreds of indirect jobs throughout the span of the project.

San Diego is fortunate to have a company like MCC investing in this community.

Sincerely,

Jack Monger
CEO

1330 Orange Avenue, Suite 100 • Coronado, California 92118 • (619) 522-9000
www.iea-sd.com

Response to Comment R-1

The commenter expresses their support for the Proposed Project. The comments are general in nature and do not address a specific environmental issue in the Draft SEIR. These comments do not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of environmental impacts presented in the Draft SEIR. Therefore, no changes to the Draft SEIR are required in response to this comment. However, the comment will be presented to the Board of Port Commissioners.

Comment Letter S

MITSUBISHI CEMENT CORPORATION
151 CASSIA WAY, HENDERSON, NEVADA 89014-6616
TELEPHONE (702) 932-3900 FAX (702) 932-3909

March 4, 2020

Peter Eichar
Development Services Department
San Diego Unified Port District
P.O. Box 120488
San Diego, CA 92112-0488

Sent via e-mail: peicher@portofsandiego.org

Re: UPS #EIR-2016-178, SCH#2017091051 – Mitsubishi Cement Corporation at Warehouse C: Bulk Cement Warehouse and Loading Facility Project

Dear Mr. Eichar:

S-1 As the applicant for the above-captioned project, Mitsubishi Cement Corporation appreciates the Port District's time and diligence in preparing the EIR.

In order to ensure our understanding of the proposed mitigation measures included in the Draft EIR, we are writing to request clarification from the District regarding the following language:

S-2 • In MM-AQ 2R, please clarify the Port's understanding of a "certified mechanic," since there may not be "certifying" bodies for mechanics for some types of equipment.

S-3 • In MM-GHG 6R, please clarify the scope of "verifiable actions or activities on Tidelands."

S-4 • In MM-TRA 3R and -TRA 4R, please clarify the responsible parties for the identified improvements.

S-5 Thank you for taking the time to address our requests for clarification. We look forward continuing to work with the Port and the community to bring this project to completion.

Sincerely,

Michael W. Jasberg
Executive Vice President & COO

Response to Comment S-1

This comment is an introductory statement indicating that Mitsubishi Cement Corporation is the project applicant and appreciates the District's due diligence in preparing this Draft SEIR. The comment requests clarification regarding mitigation, as indicated in the following comments.

The District appreciates Mitsubishi Cement Corporation's interest in the Proposed Project. This comment is an introductory comment and does not raise any environmental issues requiring a response pursuant to CEQA. The specific comments raised following this introduction are listed separately along with the District's individual responses.

Response to Comment S-2

This comment requests clarification on the "certified mechanic" wording in mitigation measure **MM-AQ-2R,** as there may not be "certifying" bodies for mechanics for certain types of equipment.

There are organizations that certify mechanics. For example, the National Institute for Automotive Service Excellence (ASE) provides certification for light duty vehicles, heavy duty trucks, marine engines, and diesel equipment. While a certificate provides proof that a diesel mechanic has completed a formal training program, there are qualified mechanics that do not have this formal training and certificate, and such certification is not required if the mechanic has experience with the equipment. As such, the District has revised **MM-AQ-2R** as suggested to change "certified mechanic" to "mechanic experienced with such equipment." This revision is a minor clarification that would not result in any changes to the emission estimates or effectiveness of the mitigation in the Draft SEIR. These changes are reflected in Chapter 4, *Errata and Revisions*, of this Final SEIR. No further changes are required.

Response to Comment S-3

This comment requests clarification on the scope of "verifiable actions or activities on Tidelands" in mitigation measure **MM-GHG-6R.**

The mitigation measure intends to acknowledge there may be actions, activities, or technology not currently developed, known, or tested, that could become available over the life of the Project (up to 15 years) that may be able to provide the requisite amount of emission reduction. As an example, while heavy-duty electric trucks capable of hauling cementitious material are not commercially available today, they may be within the life of the Project. If this

occurs, the reduced emissions associated with an electric heavy-duty truck would be accounted in the same fashion and method as the emission of diesel engine heavy duty trucks. Electrification of trucks is the most anticipated option for the future and is why the example is provided under (2) of the mitigation measure (Other verifiable actions or activities on Tidelands such as electrification of equipment including vehicles and trucks). However, note that "verifiable actions or activities on Tidelands" must be related to Mitsubishi Cement Corporation's operations at TAMT. Actions or activities at another location (i.e., off District Tidelands) where Mitsubishi Cement Corporation operates is not allowable under **MM-GHG-6R**. For example, use of an electric heavy-duty truck to haul material to or from TAMT is a verifiable action, but use of an electric heavy-duty truck for activities solely at Long Beach or another location is not allowable under **MM-GHG-6R**. No changes to the Draft SEIR are required.

Response to Comment S-4

This comment requests clarification on the responsible parties for implementing improvements associated with mitigation measures **MM-TRA-3R** and **MM-TRA-4R**.

The District has revised mitigation measures **MM-TRA-3R** and **MM-TRA-4R** to clarify that the District shall pay for the proposed improvements to the affected roadway and intersection, in accordance with the fair share contributions identified in the certified TAMT Final PEIR. It should be noted that **MM-TRA-4** from the TAMT Final PEIR, which formed the basis for **MM-TRA-4R**, did not identify a fair share contribution for the impact on the Norman Scott Road/32nd Street/Wabash Boulevard intersection, but rather stated that the District shall coordinate with Caltrans to determine the District's legally proportional fair share payment towards improving this intersection. However, as indicated in **MM-TRA-3R** and **MM-TRA-4R**, the District may seek reimbursement from tenants that would contribute new daily trips in proportion to their contribution. Please see response to comment B-5 for a more detailed explanation of **MM-TRA-4R**. This revision is a minor clarification that does not affect the conclusions of the impact analysis or effectiveness of these mitigation measures. These changes are reflected in Chapter 4, *Errata and Revisions*, of this Final SEIR. No further changes are required.

Response to Comment S-5

This comment concludes the comment letter by thanking the District for working with them.

The District appreciates Mitsubishi Cement Corporation's interest in the Proposed Project. This comment does not raise any issues requiring a response pursuant to CEQA.

Comment Letter T

HomeAid San Diego
P.O. Box 927068
San Diego, CA 92192-7068
T 858.793.6292
F 858.630.2827
homeaidsd.org

Peter Eichar
Development Services Department
San Diego Unified Port District
P. O. Box 120488
San Diego, CA 92112-0488

RE: UPD #EIR-2016-178, SCH #2017091051 Mitsubishi Cement Corporation at Warehouse C: Bulk Cement Warehouse and Loading Facility Project, City of San Diego; San Diego County, California

Dear Mr. Eichar:

Since 2002, nonprofit HomeAid San Diego has been renovating and building facilities in San Diego that house individuals and families who are homeless or at risk of becoming homeless.

Our clients are the social service agencies that provide programs to help move people beyond their homeless situation to become self-supporting citizens of their communities. We bring together project teams who are professionals in the building industry and ask them to provide pro bono or discounted professional services, materials and labor to our projects. Whether design professionals, material suppliers or construction subcontractors and laborers, our building partners give back to the communities in which they live and work.

T-1 This highly successful Housing Development Program is possible due to the generosity of building professionals and product suppliers, such as Mitsubishi Cement Corporation (MCC), who believe in supporting their communities by doing what they do best -- build! To date in San Diego, HomeAid has built or renovated 26 facilities for the homeless at a project value of $34.5 million, with $6 million in donations, creating over 700 new permanent beds for the homeless.

HomeAid looks to our building partners to help us provide more affordable solutions to our homeless crisis. Potential building partners like MCC, whose management we've met on several occasions and wants to be an integral part of the San Diego community, provide professional expertise and a product that is literally the foundation of every facility we build to house the homeless.

This is the reason we are writing in support of the Mitsubishi Cement Corporation's Warehouse C: Bulk Cement Warehouse and Loading Facility Project, which is currently undergoing environmental review at the Port of San Diego's Tenth Avenue Marine Terminal (TAMT).

Sincerely,

Alexis Parker

Alexis Parker
Executive Director
HomeAid San Diego

Response to Comment T-1

The commenter expresses their support for the Proposed Project. The comments are general in nature and do not address a specific environmental issue in the Draft SEIR. These comments do not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of environmental impacts presented in the Draft SEIR. Therefore, no changes to the Draft SEIR are required in response to this comment. However, the comment will be presented to the Board of Port Commissioners.

Comment Letter U

SAY San Diego
Social Advocates for Youth

April 29, 2020

San Diego Unified Port District
Development Services Department
Attention: Peter Eichar
Via email to peichar@portofsandiego.org

Subject: SEIR for the Mitsubishi Cement Corporation (MCC) at Warehouse C: Bulk Cement Warehouse and Loading Facility Project (UDP #EIR-2016-178, SCH #2017091051)

Dear Mr. Eichar:

U-1 For almost 50 years, SAY San Diego has been a primary provider of critical services for youth, families, and communities throughout the San Diego region. SAY is one of the most impactful nonprofit organizations in the County, serving nearly 26,000 individuals annually through direct services alone and another 60,000 San Diegans through community outreach events connecting individuals and families to health care, healthy living, safe and drug free homes and parks and various stabilization and self-sufficiency services.

U-2 With this in mind, SAY San Diego appreciates the opportunity to comment on the Mitsubishi Cement Corporation (MCC) project. We look forward to the economic benefits the project will bring to Barrio Logan and surrounding neighborhoods and to the many families we serve; however, we have received Environmental Health Coalition's (EHC) comment letter and agree with all their proposed mitigation measures and recommendations for additional analyses.

U-3 As you aware, Barrio Logan has long been impacted by more than its share of air pollution and greenhouse gases; it is in the top 5% of the most polluted communities in the entire State, per CalEnviroScreen. Such poor air quality causes Barrio Logan's children to be two times more likely to have asthma than the rest of the county. Studies show toxic air pollution causes strokes, dementia, low birth weights, reduced intelligence, lung disease, cardiovascular disease, and various cancers, among other health risks. Scientists are now linking air pollution to mental and behavioral health issues. It is a pressing public health issue that needs to be considered comprehensively when evaluating projects in the Barrio Logan community.

U-4 We ask MCC and the Port District to include all the mitigation measures outlined in EHC's comment letter to ensure that the project does not further contribute to the toxic pollution plaguing our community. The mitigation measures include, but are not limited to:

U-5 1. Minimizing or eliminating air pollution, traffic, and other environmental impacts on adjacent communities.

U-6 2. Using the cleanest available technologies for moving freight and powering equipment and vehicles.

Mid-City Family Resource Center | 4275 El Cajon Boulevard, Suite 101 | San Diego, CA 92105 | 619.283.9624 | info@saysandiego.org
SAY San Diego is a 501(c)(3) Tax-Exempt Nonprofit Organization. Tax ID: 23-7107958

www.saysandiego.org

Response to Comment U-1

The comment provides background on the commenter and describes the services the nonprofit provides to the community.

The District appreciates SAY's interest in the Proposed Project. This comment is an introductory comment and does not raise any environmental issues requiring a response pursuant to CEQA. The specific comments raised following this introduction are listed separately along with the District's individual responses.

Response to Comment U-2

The comment recognizes the potential economic benefits of the Proposed Project, indicates the commenter's review of another commenter's letter (Comment Letter Q from Environmental Health Coalition, EHC) and supports EHC's proposed mitigation measures and recommendations for additional analyses. Please see the responses to Comments Q-3 through Q-16 for the District's responses to the recommendations made by the EHC comment letter.

The comment does not describe or recommend any specific mitigation measures, actions, programs, or technology that can avoid or mitigate potential impacts identified within the Draft SEIR. The comment does not identify any specific additional analysis that would be required to adequately identify potential impacts from the Proposed Project. The District has identified and required all known feasible mitigation measures to reduce significant environmental impacts that resulted from the analysis presented in the Draft SEIR and technical appendices. See Attachment 1 of this Final SEIR (Mitigation Monitoring and Reporting Program).

Response to Comment U-3

The comment provides information and statistics for the Barrio Logan community relating to air pollution and greenhouse gases. The comment further describes the negative health effects generally of air pollution on public health and states that public health issues need to be considered when evaluating projects in the Barrio Logan Community.

A Health Risk Assessment was prepared, and the results were disclosed, in Section 4.1, Air Quality and Health Risk, of the Draft SEIR. As discussed on page 4.1-53 of the Draft SEIR, the Proposed Project would not result in new or

more severe impacts from Toxic Air Contaminants. Implementation of modified TAMT Final PEIR mitigation measures **MM-AQ-1** and **MM-AQ-2** would ensure that impacts remain less than significant, and no new or more severe impacts than what has been disclosed in the certified TAMT Final PEIR would occur. The modified mitigation measures are **MM-AQ-1R** and **MM-AQ-2R**. Implementation of mitigation measures **MM-AQ-1** through **MM-AQ-9** from the TAMT Final PEIR, plus new mitigation measure **MM-AQ-10**, would reduce emissions from all sources. Table 4.1-10 of the Draft SEIR provides a comparison summary of the construction- and operation-related air quality mitigation measures previously identified in the TAMT Final PEIR for the TAMT Plan and how those mitigation measures apply to the Proposed Project. The Health Risk Analysis in the Draft SEIR is sufficient, and no additional analysis is required.

Regarding greenhouse gas emissions, mitigation measures **MM-GHG-1R** through **MM-GHG-9R** as revised from the TAMT Final PEIR to clearly address the Proposed Project implementation characteristics, in addition to **MM-GHG-10**, which has been developed specifically for this Proposed Project, would apply. Table 4.2-7 provides a comparison summary of the construction and operation GHG mitigation measures previously identified in the TAMT Final PEIR for the TAMT Plan and how those mitigation measures apply to the Proposed Project. The analysis of potential direct and cumulative GHG emission impacts and feasible mitigation measures to address those emissions are identified in the Draft SEIR, and no additional analysis is required. No changes to the Draft SEIR are required.

Response to Comment U-4

The comment requests the District include all mitigation measures outlined in the EHC comment letter (see Comment Letter Q).

EHC's comment letter does not describe or recommend any specific mitigation measures, actions, programs, or technology that can avoid or mitigate potential impacts that were not already identified within the Draft SEIR. As EHC expresses support for the mitigation measures and requests the results of those actions, programs, or technology be made available to the general public, it is presumed that SAY is also in support of the measures and their public reporting. Compliance with TAMT Final PEIR mitigation has been included in various Agenda Items presented to the Board and will be compiled in the upcoming Maritime Clean Air Strategy. In addition, the District is working on a way to update the public regarding implementation of mitigation. No changes to the Draft SEIR are required.

Response to Comment U-5

The comment recommends requiring mitigation to address air quality, traffic, and other environmental impacts.

The comment does not describe or recommend any specific mitigation measures, actions, programs, or technology that can avoid or mitigate air quality, traffic, or other potential impacts. Rather, the comment is descriptive of what mitigation measures should achieve. The District has identified and required all known feasible mitigation measures to reduce significant air quality and traffic impacts, as well as other significant environmental impacts. See Attachment 1 of this Final SEIR (Mitigation Monitoring and Reporting Program). No changes to the Draft SEIR are required.

Response to Comment U-6

The comment recommends the Proposed Project be required to use the cleanest available technologies for moving freight and powering equipment.

The comment does not describe or recommend any specific technology. Rather, the comment is descriptive of what mitigation measures should require. The District has identified and required all known feasible mitigation measures related to the monitoring of technological advancements, including their use for the Proposed Project and TAMT operations overall. See Attachment 1 of this Final SEIR (Mitigation Monitoring and Reporting Program). No changes to the Draft SEIR are required.

U-7 3. Complying with or exceeding the greenhouse gas (GHG) reduction goals of the Port of San Diego's Climate Action Plan (10% below 2006 levels by 2020) and California's SB 32, which requires reduction of GHG levels to 40% of 1990 levels by 2030.

U-8 Thank you for the opportunity to comment on this project. If you have any questions, please contact Tyler Linvill at tyler.linvill@saysandiego.org or myself at kevin@saysandiego.org

Sincerely,

Kevin O'Neill
Vice President, Community Engagement

Response to Comment U-7

The comment recommends complying with the District's Climate Action Plan and California Legislation known as Senate Bill (SB) 32 regarding the reduction of GHG emissions.

The District has identified and required all known feasible mitigation measures to reduce significant GHG impacts, as well as other significant environmental impacts, including compliance with the District's Climate Action Plan, which are aimed at meeting the goals set forth in SB 32. See Attachment 1 of this Final SEIR (Mitigation Monitoring and Reporting Program). No changes to the Draft SEIR are required.

Response to Comment U-8

The comment thanks the District for the opportunity to comment on the Draft SEIR and concludes by providing contact information for SAY.

The District appreciates SAY's interest in the Proposed Project. This comment does not raise any environmental issues needing a response pursuant to CEQA.

Comment Letter V

ENVIRONMENTAL HEALTH COALITION | 40 YEARS
2727 HOOVER AVE., SUITE 202 | NATIONAL CITY, CA. 91950 | (619)474-0220 | ENVIRONMENTALHEALTH.ORG

May 18, 2020

San Diego Unified Port District
Development Services Department
Attn: Peter Eichar
Via email to peichar@portofsandiego.org

Re: April 28, 2020 Meeting Between Environmental Health Coalition (EHC) and Port Staff to discuss EHC Comments on the SEIR for the Mitsubishi Cement Corporation at Warehouse C: Bulk Cement Warehouse and Loading Facility Project (UDP #EIR-2016-178, SCH #2017091051)

Dear Mr. Eichar:

V-1 Thank you for meeting with us virtually on April 28th to discuss our comment letter on the SEIR for the Mitsubishi Cement Corporation at Warehouse C (Project) and for all of your time collaborating with EHC. I wanted to follow-up with a letter highlighting certain items we've communicated on or since April 28th and to reiterate what EHC is advocating for in association with the Project.

V-2 1. EHC is aware that Port staff and the Chair of the Barrio Logan Community Planning Group (BL CPG) are coordinating to add this Project to the BL CPG's May agenda. EHC is requesting that Port staff present to and get input from the BL CPG prior to going to the Board of Port Commissioners (BPC) even if this means delaying the Port's targeted June 2020 BPC meeting.

V-3 V-4 V-5 2. EHC strongly recommends that the Port identify the number of trucks that will service Project warehouse operations; subsequently develop goals for the Project to ensure a certain percentage of those truck are electric zero-emission vehicles at the start of operations, and an increased percentage by 2025 or 2030; and, to include these goals into the AB 617 Community Emissions Reduction Plan (CERP). These solutions align with the BPC's direction to Port staff in regards to the MCAS Early Strategies to be integrated into the AB 617 CERP.

V-6 3. Port staff mentioned that they are considering posting information online regarding Tenth Avenue Martine Terminal mitigation measures and various tenants requirements so that the information is more accessible and centralized. EHC supports this.

Response to Comment V-1

The comment acknowledges District staff collaboration and communication with Environmental Health Coalition (EHC) on the Proposed Project and states their wish to reiterate comments previously provided.

The District appreciates EHC's interest in the Proposed Project. This comment is an introductory comment and does not raise any environmental issues requiring a response pursuant to CEQA. The specific comments raised following this introduction are listed separately along with the District's individual responses.

Response to Comment V-2

The comment acknowledges communication between District Staff and the Chair of the Barrio Logan Community Planning Group and requests District Staff meet with that group prior to the June 2020 Board of Port Commissioners meeting.

District Staff attended the virtual Barrio Logan Community Planning Group meeting on the evening of May 20, 2020. The Proposed Project was on the agenda as an information item during which District Staff provided a brief project status, summary of impacts and mitigation focusing on greenhouse gas and air quality, and relayed information regarding the schedule for the release of the Final SEIR on June 11, 2020, and the Board of Port Commissioners hearing scheduled for June 23, 2020.

This comment does not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of environmental impacts presented in the Draft SEIR. Therefore, no changes to the Draft SEIR are required in response to this comment. However, the comment will be presented to the Board of Port Commissioners.

Response to Comment V-3

Commenter recommends identification of the number of trucks that will service the Proposed Project warehouse operations.

Within Subsection 4.5.3 of the Draft SEIR, Proposed Project operations involving truck trips are described with supporting data contained in Table 4.5-4, *Peak Project Operational Trip Generation*. The 176 peak daily truck trips provided in Table 4.5-4 of the Draft SEIR and the 296 daily truck trips for the Sustainable Terminal Capacity (STC) Alternative of the TAMT Final PEIR

(certified by the District in December 2016) is provided in Table 4.5-3 of the Draft SEIR. As noted in Section 3.4 of the Draft SEIR (*Project Description*), the Proposed Project would generate approximately 24,000 truck trips annually, approximately 67 total truck trips per average day, and up to 176 truck trips on the peak day during maximum loading. For purposes of the analysis, the peak day of 176 trucks was used to estimate the potential worst-case traffic and air quality impacts. However, on an average day or annual time scale, the Proposed Project's portion of TAMT buildout truck activity is much lower.

For example, Proposed Project annual truck activity is estimated to be 24,000 trucks annually, which is about 23% of the projected truck traffic at TAMT buildout, which assumed 106,560 annual truck trips (296 trucks per day, 360 terminal days per year). Therefore, while the Project does increase truck activity above baseline conditions as described in the TAMT Final PEIR, this increase is well within the annual truck trip volumes analyzed in the TAMT Final PEIR. No change to truck emission estimates has been made to the Draft SEIR.

Because the SEIR discloses the number of trucks that will service the Proposed Project operations, no changes to the Draft SEIR are required in response to this comment. However, the comment will be presented to the Board of Port Commissioners.

Response to Comment V-4

The commenter recommends developing goals that call for an unspecified percentage of trucks servicing the Proposed Project be electric zero emission vehicles at the start of operations and increasing in 2025 and 2030.

Zero emission heavy duty trucks are not commercially available. Proposed Project mitigation measures **MM-AQ-10** and **MM-GHG-10** require that no less than 90% of the trucks loading cement or cementitious material at TAMT be equipped with an engine that emits no more than would be expected of a 5-year-old truck during the entirety of Project operations. These mitigation measures are well beyond the requirements of the District's Clean Truck Program, as well as CARB's drayage truck, and truck and bus rules. Mitsubishi Cement Corporation will comply with CARB and District requirements when they are implemented and as applicable to their operations. CARB is currently working on an Advanced Clean Truck Regulation in order to accelerate a large-scale transition of zero-emission medium- and heavy-duty vehicles from Class 2B to Class 8. However, CARB notes that the technology is not yet available to suit all needs, but as technology advances, zero-emission trucks will become

suitable for more applications. See CARB's Frequently Asked Questions (FAQ) sheet here: https://ww2.arb.ca.gov/resources/fact-sheets/advanced-clean-trucks-fact-sheet, incorporated herein by reference. Mitsubishi Cement Corporation will be required to abide by any applicable regulations once they are adopted

This is a similar comment as introduced in Comment Q-4. See responses to Comment Q-4 above. The District regularly monitors technologies for reducing air emissions as part of its Climate Action Plan and long-range sustainability goals, which encourage the District and its tenants to use cleaner technologies over time as they become available and feasible. As a condition of approval of any new or amended real estate agreement or Coastal Development Permit, the District requires the project proponent to submit to the District an annual inventory of all equipment that generates criteria pollutant, toxic air contaminant, and greenhouse gas emissions operated by the project proponent at the TAMT throughout the life of the lease up to 2035 (buildout of the TAMT plan). The purpose of the inventory is to track emissions and equipment at TAMT. This requirement is captured in both mitigation measures for Air Quality and Greenhouse Gases (**MM-AQ-7** and **MM-GHG-7**).

In addition to the equipment inventory, mitigation measure **MM-GHG-7R** has been revised to require actions by the District and Mitsubishi Cement Corporation, including implementation of a Demonstration Project(s) for the use of zero emission trucks, the preparation and submittal to the District for review and approval of an Infrastructure Plan that would support the ability to operate zero emission trucks, and annual review and update of the Feasibility Study. The original aspects of **MM-GHG-7R** relating to the Annual Equipment Inventory and Periodic Technology Review remain intact. Potential GHG emission reductions from the revised **MM-GHG-7R** have not been credited towards the Project's GHG reduction calculations and thus determination of impact significance, because the amount of reduction and timing is unknown. Additionally, despite the revisions to **MM-GHG-7R**, greenhouse gas impacts remain significant and unavoidable.

As noted in response to comment Q-4, there are various demonstration projects at the Port, and the District will continue to monitor the availability and feasibility of demonstration projects and technologies for use at the Port. In addition, information regarding implementation of mitigation will be available to the public.

The changes described above to **MM-GHG-7R** have been made in the MMRP and are described in Chapter 4, *Errata and Revisions*, of this Final SEIR.

Response to Comment V-5

The commenter recommends including the goals for electric zero emission trucks from the preceding comment be incorporated into the Community Emissions Reduction Plan (CERP) and asserts the goals to be solutions aligned with direction staff received from the Board on the Maritime Clean Air Strategy.

The CERP is the Plan for the Assembly Bill (AB) 617 Portside Community, which includes Barrio Logan, Logan Heights, Sherman Heights, and West National City. The CERP will first need to be adopted by the San Diego County Air Pollution Control District (APCD), and then be adopted by CARB. The District is one of several stakeholders participating in the preparation of the CERP but is not charged with its adoption, as such the District does not have the discretion to include goals into the CERP.

As part of the District's development of the Maritime Clean Air Strategy (MCAS), District staff intends to provide a status update to the Board of Port Commissioners during summer 2020, on development of the MCAS and provide information pertaining to early Emission Reduction Strategies that could feed into or inform goals, policies, and objectives of the CERP. The early Emission Reduction Strategies will include potential emission reduction opportunities related to (1) electrifying cargo handling equipment at the two marine terminals, (2) identifying potential short-haul on-road electric truck routes, and (3) emission reduction opportunities for vessels while at-berth.

No changes are required or have been made to the Draft SEIR.

Response to Comment V-6

The comment relays information from a previous discussion between District staff and EHC relating to the posting of information online to facilitate access to information and supports this effort.

District staff has a plan to post monitoring reports and other technical information on the District's website. Additional information is also made publicly available through correspondence (Board Memos) and Agenda Sheets to the Board of Port Commissioners, which are readily available on the District's website.

V-7

4. In 2018, the City of San Diego adopted a preferred truck route[1] in and around Barrio Logan to avoid diesel trucks driving on neighbourhood streets. Despite this welcomed development, many trucks still cut through the neighbourhood emitting PM 2.5 among other pollutants and predispose children and families to serious health impediments including asthma and cancer. We strongly encourage that the Project incorporate training on the truck route and the importance of abiding by it into their trucking contractor onboarding program.

V-8

In closing, we thank you for your time and consideration. I can be reached at 619-850-1527 or via email dannyvs@environmentalhealth.org should you have any questions.

Sincerely,

Danny Serrano, AICP
Campaign Director

[1] https://docs.sandiego.gov/council_reso_ordinance/rao2018/R-312086.pdf

No changes are required or have been made to the Draft SEIR.

Response to Comment V-7

The commenter identifies the City of San Diego designated truck route and its aid in reducing pollution and associated reduction in health issues and encourages truck route training to be a component of a District contractor onboarding program.

Mitigation measures for air quality and greenhouse gas emissions (**MM-AQ-3R** and **MM-GHG-2R**) require the Proposed Project to comply with the District's Climate Action Plan (CAP), one measure of which states that "Designated truck haul routes shall be used, and the Project Proponent shall decrease onsite movements where practicable." Further, District staff responsible for operations at the Tenth Avenue Marine Terminal do perform truck driver training that includes the following:

- Informational pamphlets are given to all new truckers.
- During operations meetings with new cargo customers, the pamphlets are distributed and discussed.
- Personnel at the front gate hand out the pamphlets to new over the road trucks entering the terminal.
- A 24-hour hotline is checked every day for reported violators, who are then tracked down.

Additionally, a proposed condition of the Coastal Development Permit for the Project requires use of the designated truck haul routes.

No changes are required or have been made to the Draft SEIR.

Response to Comment V-8

The comment thanks the District and concludes by providing contact information for EHC.

The District appreciates EHC's interest in the Proposed Project. This comment does not raise any environmental issues needing a response pursuant to CEQA.

Exhibit 1

City of San Diego Designated Truck Routes

The City of San Diego

Staff Report

DATE ISSUED: 10/31/2018

TO: City Council

FROM: Transportation & Storm Water

SUBJECT: Establish Commercial Vehicle Prohibitions on Various Streets in Barrio Logan

Primary Contact:	Gary Pence	Phone: (619) 533-3184
Secondary Contact:	Duncan Hughes	Phone: (619) 533-3141

Council District(s): 8

OVERVIEW:

This item will establish five-ton commercial vehicle prohibitions on various streets in the community of Barrio Logan. The purpose of this proposal is to prevent large commercial vehicles from using these low volume residential streets to access the nearby commercial facilities and freeway entrances.

PROPOSED ACTIONS:

1. A Resolution authorizing the establishment of five-ton commercial vehicle prohibitions on Boston Avenue between 28th Street and 32nd Street, Main Street between 28th Street and 32nd Street, 29th Street between Boston Avenue and Main Street, 30th Street between Boston Avenue and Main Street, 31st Street between Boston Avenue and Main Street, Sigsbee Street between Logan Avenue and Harbor Drive, and Beardsley Street between Main Street and Harbor Drive. Commercial vehicles over five-tons but with a height over 13 feet 6 inches are exempt from the prohibition on Boston Avenue between 28th Street and 29th Street.
2. The Chief Financial Officer is authorized to expend funds not to exceed $1,319 from 100000 General Fund, Transportation & Storm Water Department – Street Division's (211611) operating budget, for the installation of the necessary signs to establish the commercial vehicle prohibitions on Boston Avenue between 28th Street and 32nd Street, Main Street between 28th Street and 32nd Street, 29th Street between Boston Avenue and Main Street, 30th Street between Boston Avenue and Main Street, 31st Street between Boston Avenue and Main Street, Sigsbee Street between Logan Avenue and Harbor Drive, and Beardsley Street between Main Street and Harbor Drive.
3. Declaring that the action to Establish Commercial Vehicle Prohibitions on Various Streets in Barrio Logan is categorically exempt from the California Environmental Quality Act (CEQA), pursuant to State CEQA Guidelines Section 15301 (Existing Facilities) which allows for the operation, repair, maintenance, permitting leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of use beyond that existing at the time of the lead agency's determination.
4. Declaring that the Council of the City of San Diego has determined that an exception to the exemption as set forth in CEQA Guidelines Section 15300.2 does not apply.

DISCUSSION OF ITEM:

This action will prohibit commercial vehicles with a rated capacity of five tons or more from using the streets listed below and shown on the attached diagram (streets in yellow). By law, passenger buses, public utility vehicles, and

commercial vehicles with an origin or destination on the affected streets are exempt from the provision. Council approval is required for this action according to Municipal Code Section 85.04.

The affected streets are:

1) Boston Avenue between 28th Street and 32nd Street
2) Main Street between 28th Street and 32nd Street
3) 29th Street between Boston Avenue and Main Street
4) 30th Street between Boston Avenue and Main Street
5) 31st Street between Boston Avenue and Main Street
6) Sigsbee Street between Logan Avenue and Harbor Drive
7) Beardsley Street between Main Street and Harbor Drive

The attached diagram also shows other nearby streets that currently have similar commercial vehicle prohibitions, and the existing designated Truck Route. The Truck Route has signs that guide trucks along the preferred route through the community to access Interstate 5 and Interstate 15 freeways. However, a segment of the Truck Route on 32nd Street has a Navy owned pedestrian bridge with a low clearance level. Although most commercial vehicles will be able to safely pass beneath this bridge, commercial vehicles with a height exceeding 13 feet 6 inches will be exempt from the restriction on Boston Avenue between 28th Street and 29th Street. This is so that those large vehicles can avoid the bridge and utilize the Boston Avenue on-ramp to Interstate 5 southbound, to access Interstate 15. The Navy owned pedestrian bridge is under consideration for removal in the future in which case the exemption on Boston Avenue will be removed.

This proposal was initiated by the residents that live on the affected streets and the Environmental Health Coalition. The purpose of this proposal is to prevent large commercial vehicles from using low volume residential streets to access the nearby commercial facilities and freeway entrances. The residents submitted a petition requesting this action and the Environmental Health Coalition made a presentation to the Environment Committee requesting that the City support this proposal. City staff conducted analysis of traffic flow in the area and determined this prohibition to be warranted. In addition, the Port District, Caltrans, National City, and the Barrio Logan Planning Group support this proposal. The Police Department has committed to providing enforcement on the streets with commercial vehicle prohibitions once the resolution has passed, and the appropriate signs have been installed.

City Strategic Plan Goal(s)/Objective(s):
Goal #3: Create and sustain a resilient and economically prosperous City.
Objective #1: Create dynamic neighborhoods that incorporate mobility, connectivity, and sustainability.

Fiscal Considerations:
The commercial vehicle prohibition signs will be installed by the City of San Diego Street Division at a cost of $1,319. Funds are available in Street Division's operating budget.

Environmental Impact:
This activity is categorically exempt from CEQA pursuant to State CEQA Guidelines Section 15301 (Existing Facilities).

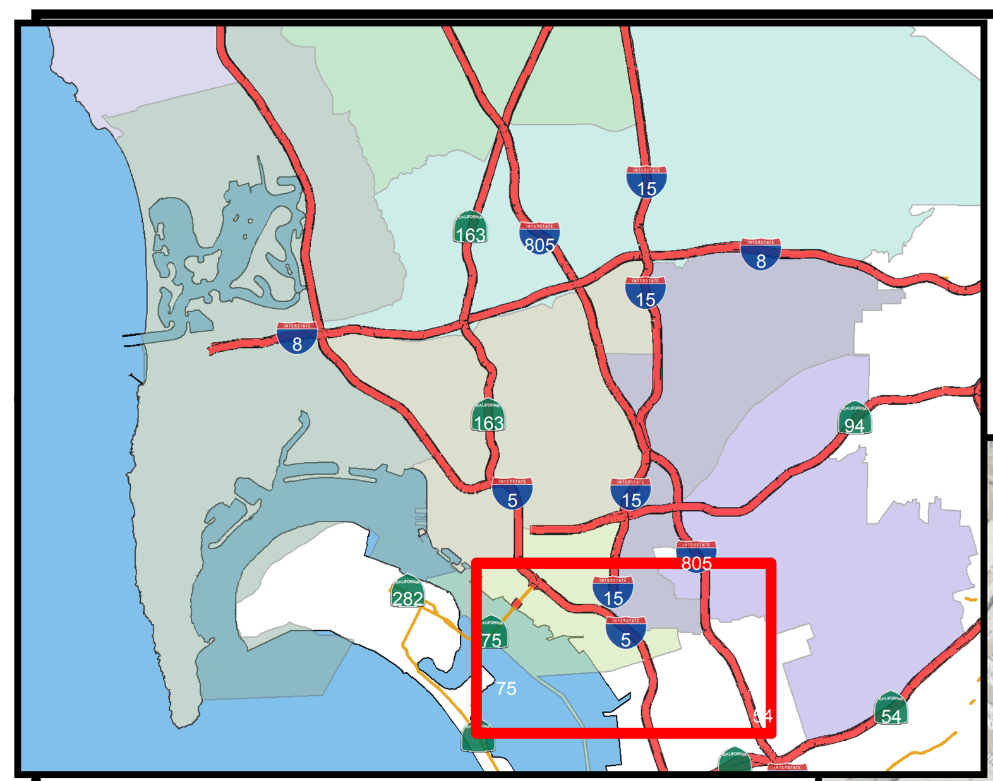
Equal Opportunity Contracting Information (if applicable):
As City Forces will install the signs with no contracting involved, this action is not subject to the City's Equal Opportunity Contracting (San Diego Ordinance No. 18173, Section 22.2701 through 22.2708) or Non-Discrimination in Contracting Ordinance (San Diego Municipal Code Sections 22.3501 through 22.3517).

Previous Council and/or Committee Actions:
The Environmental Health Coalition made a presentation to the Environment Committee on this proposal. The item was heard at Environment Committee on April 12, 2018. Motion by Chair Alvarez to request that the appropriate City Departments, with the Transportation and Storm Water Department taking the lead role, examine the Environmental Health Coalition's (EHC) proposed Barrio Logan Clean Air and Safe Streets Ordinance and return to the Environment Committee with the appropriate draft resolution and/or ordinance that would create and implement a truck route in Barrio Logan in accordance with the EHC proposal. Second by Councilmember Gómez.

Key Stakeholders and Community Outreach Efforts:

The Port District, Caltrans, National City, and the Barrio Logan Planning Group support this proposal. Adjacent residents will benefit from reduced commercial vehicle traffic on their streets.

Kris McFadden	Johnnie Perkins, Jr.
Department Director	Deputy Chief Operating Officer, Infrastructure/Public Works



The City of SAN DIEGO

TRUCK ROUTE & PROHIBITION MAP

Legend

- Proposed_Truck_Route
- Proposed_Truck_Prohibition
- Existing_Truck_Prohibition

COMMUNITY NAME: BARRIO LOGAN Date: 11/1/2018

SanGIS

COUNCIL DISTRICT: 8

Exhibit 2

Mitsubishi Marine Vessel Information

MITSUBISHI CEMENT CORPORATION
151 CASSIA WAY, HENDERSON, NEVADA 89014-6616
TELEPHONE (702) 932-3900 FAX (702) 932-3909

March 4, 2020

Peter Eichar
Development Services Department
San Diego Unified Port District
P.O. Box 120488
San Diego, CA 92112-0488

Sent via e-mail: peicher@portofsandiego.org

Re: UPS #EIR-2016-178, SCH#2017091051 – Mitsubishi Cement Corporation at Warehouse C: Bulk Cement Warehouse and Loading Facility Project

Dear Mr. Eichar:

As requested by the Port District staff, Mitsubishi Cement Corporation (MCC) is clarifying the information related to ships that are expected to deliver cement.

Like many other bulk terminal operators, MCC does not own the ships that will be used to transport cement to its San Diego terminal. Nor are the bulk ships dedicated to cement transport; they are owned by many diverse parties to transport a variety of bulk products around the world. These "tramp service" or "tramper" vessels are ships that generally have no fixed routing, itinerary or schedule or are available at short notice (or fixture) to load any cargo from any port to any port. Therefore, the same tramper vessels are not expected to frequently call (i.e., will not regularly return to the terminal on a subsequent delivery).

The ships expected to deliver cement for MCC were included in the TAMT Final Program EIR. The emissions factors used in the draft SEIR are the most current emission factors for bulk cargo ships for southern California (i.e., Port of Long Beach emission inventory factors). Therefore, no new or more specific information is available that would change the analysis in the draft SEIR.

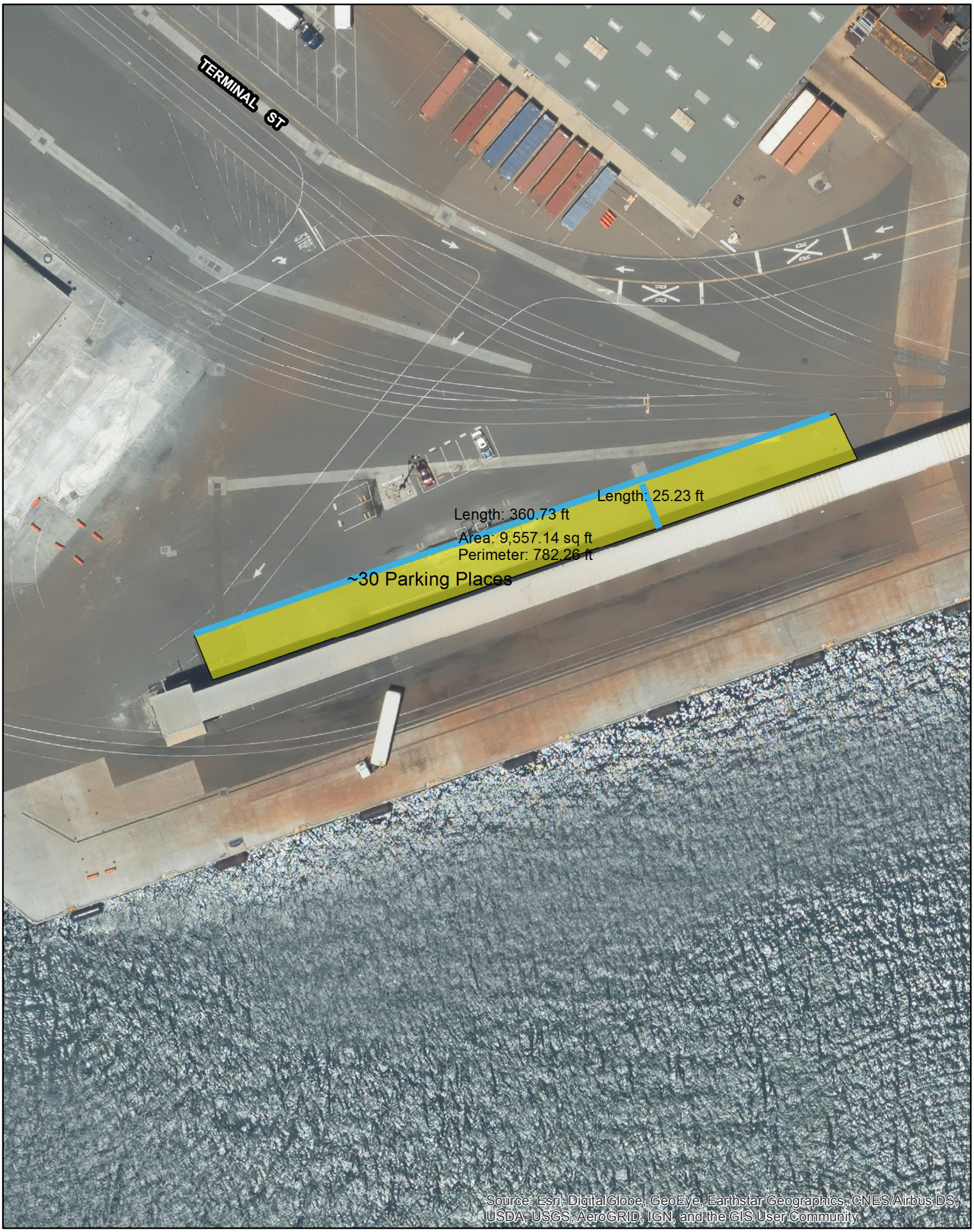
Please contact me if you have further questions.

Sincerely,

Michael W. Jasberg
Executive Vice President & COO

Exhibit 3

Onsite Parking at Berth 10-7



0 30 60 90 120 Feet

This map was generated by the Port of San Diego online GIS.

Author: Date Created: 4/2/2020 9:42:27 AM

Exhibit 4

Zero Emission Truck Feasibility Study

Zero Emission Truck Feasibility Study for Mitsubishi Cement Corporation

November 2020

Submitted to:
Port of San Diego

Submitted by:
ICF and CALSTART

Table of Contents

Tables

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Introduction

Deployment of battery electric, heavy-duty Class 8 trucks (gross vehicle weight rating [GVWR] > 26,000) is expected to increase throughout the next decade. Technological improvements are increasing the energy density of batteries and market forces are decreasing the costs for electric drivetrains. Meanwhile, the regulatory environment in California is shifting with the adoption of the Advanced Clean Truck Regulation, requiring manufacturers of medium- and heavy-duty trucks to begin selling zero emission vehicles by 2024, and the development of a new zero emission fleet regulation that likely will require use of zero emission vehicles in the foreseeable future. Other state policies are supporting the deployment of infrastructure to support transportation electrification—particularly in the freight sector.

Although production and use of battery-electric Class 8 trucks is rather nascent, short-range (less than 150 miles) and predictable route applications may be well suited for battery electric trucks. However, longer range freight transportation with less predictable routes may be difficult to service with battery electric trucks at this time.

Mitsubishi Cement Corporation (MCC) is seeking a lease and Coastal Development Permit for construction and operation at the Port of San Diego's (Port) Tenth Avenue Marine Terminal (TAMT). The transport of cement from TAMT to offsite locations and construction sites will be conducted by MCC's customers, the producers of cement ready-mix products. Freight transport is conducted with Class-8 vehicles utilizing pneumatic bottom dump trailers. The Mitsubishi project CEQA analysis assumed each truck to travel an average round trip distance of 124 miles and relates to the attainment status of air quality standards within San Diego County; therefore, haul truck trip emissions were confined to those occurring within the County. Additionally, the proposed Project is designed to service the San Diego area. Customers outside of San Diego County are expected to be more efficiently supplied by other sources of cement and cementitious materials. However, MCC's preferred customer transports and delivers cement throughout Southern California and its fleet does not include dedicated trucks to specific geographic locations. These trucks operate long distances (on average between 300-400 miles on a daily basis, with heavy weight (approximately 80,000 pounds including the truck, trailer, and cargo). As a result, the current duty cycles of MCC's customers make it difficult to implement battery electric trucks.

The purpose of this study is twofold: (1) develop metrics to determine feasibility for zero emission, battery electric Class 8 trucks given MCC's customers duty cycles and logistics, and (2) guide decision-making for a transition to zero emission trucks that may service MCC's proposed project site at the Port's TAMT.

This study is broken out into five separate tasks: (1) Fleet and Infrastructure Analysis, (2) Operational Analysis, (3) Economic Analysis, (4) Feasibility Metrics, and (5) Recommendations.

I. Fleet and Infrastructure Analysis

1. Purpose

The purpose of this section is to provide background information on the current state of electric truck and charging technology, MCC's primary customers' vehicle characteristics, and regulations and grant programs affecting trucks.

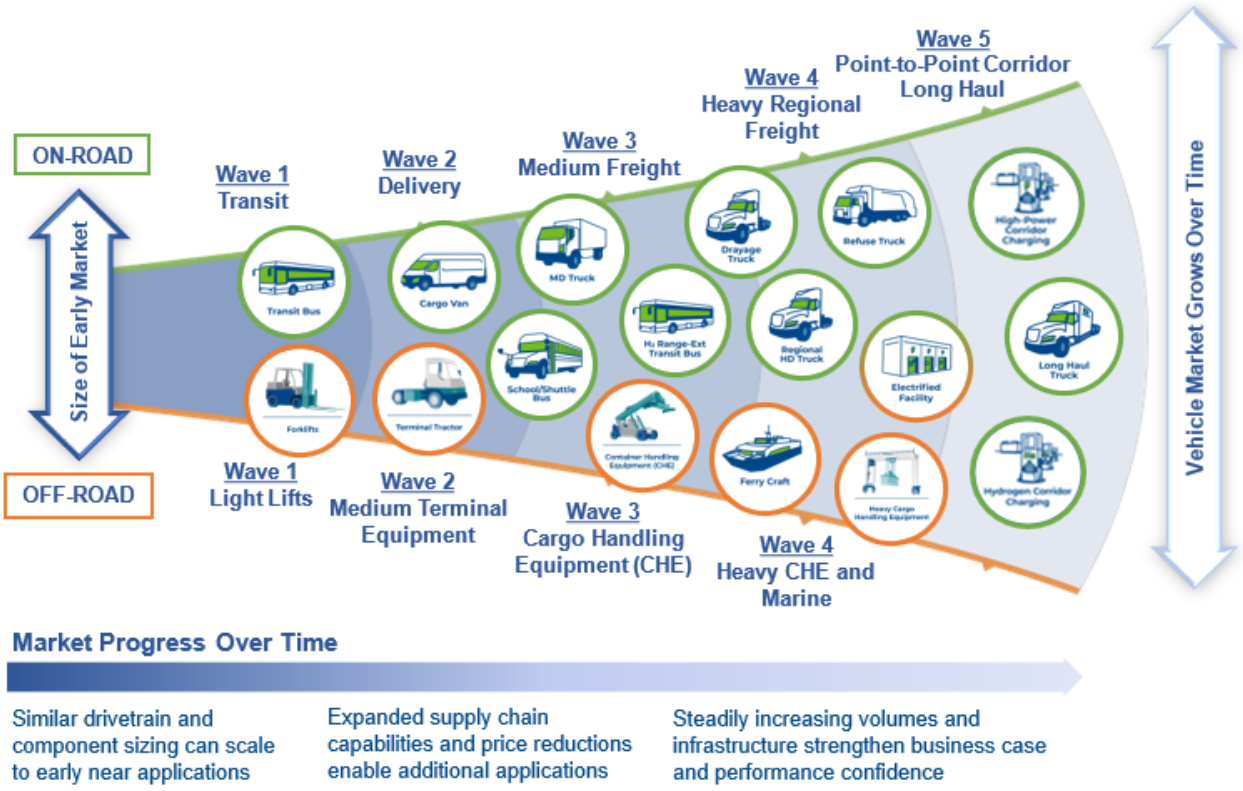
2. Current State of Technology

Heavy-duty electric vehicles have been slower to evolve and implement compared to light- and medium-duty vehicles, but a specific emphasis and focus has been placed on drayage trucks. Traditionally, electric drive trains are most effective for short, regular duty cycles in urban areas with stop-and-go traffic. This includes transit buses, school buses, yard tractors, and drayage trucks. Drayage trucks are cargo vehicles with predictable routes that transport goods between ports and freight facilities and warehouses. Conventional port drayage trucks are considered to have less than 100 daily vehicle miles traveled (VMT), with multiple stops at the Port, and overnighting at their home fleet base, making them prime candidates for electrification with currently available Class 8 electric trucks. As transload and freight facilities are being located farther from the ports, the typical daily VMT may be higher.

CALSTART's Drive to Zero Beachhead Strategy[1] identifies the commercial vehicle market segments where zero- and near-zero technologies are most likely to succeed first. They are typically urban applications where vehicles operate along known routes and over relatively shorter distances and can recharge overnight at depots. The flow of innovation follows the transition from first-success beachhead applications, expanding to larger-volume, longer-distance, and more demanding applications that can make use of core zero-emission commercial vehicle (ZECV) powertrain components and supply chains, as shown in Figure I-1. The beachhead model's projections for zero-emission freight vehicles (ZEFV) start with smaller vehicles, such as cargo vans and yard tractors, as first-success applications in receptive markets around the world. The components and supply chains for these vehicles can be transferred and fashioned into new applications that will meet more rigorous duty cycles in heavier vehicles. The progression from lighter to heavier freight vehicles in an expanding market is shown in Figure I-1, with the progress from port yard hostlers to medium-duty freight and eventually heavy-duty regional freight.

[1] CALSTART: 2020. The Beachhead Model: Catalyzing Mass-Market Opportunities for Zero-Emission Commercial Vehicles. Available online at https://globaldrivetozero.org/public/The_Beachhead_Model.docx.

Figure I-1. "Beachhead Pathways" for Zero-Emission Vehicle Commercialization[2]



Based on the current market, the zero-emission vehicle market is approaching the end of Wave 2 in the beachhead model. It is projected that Wave 4 technologies will be commercialized in 2023 as supported by data in the Zero Emission Technology Inventory (ZETI) and discussed below.

2.1 Vehicles

Traditional truck and engine manufacturers, including Daimler, Volvo, and Cummins, have all developed zero-emission freight vehicles or technologies that have at least entered demonstration phases. Tesla, which has rapidly grown to become a leading global automaker, expects to bring its all-electric Semi truck to market by 2022. Nikola, a startup hydrogen fuel cell truck manufacturer, has secured commitments from major fleets such as InBev and was valued at more than $12 billion after its Initial Public Offering, though its first production model has not yet been manufactured.[3]

[2] CALSTART: 2020. The Beachhead Model: Catalyzing Mass-Market Opportunities for Zero-Emission Commercial Vehicles. Available online at https://globaldrivetozero.org/public/The_Beachhead_Model.docx.

[3] *Nikola's $12 Billion Nasdaq Debut Is A Boost For Hydrogen Trucks–And Founder Trevor Milton's Fortune*. Available online at https://www.forbes.com/sites/alanohnsman/2020/06/04/nikolas-12-billion-nasdaq-debut-is-a-boost-for-hydrogen-trucksand-founder-trevor-miltons-fortune/.

ZETI[4] is a shared knowledgebase of commercially available offerings for zero-emission medium- and heavy-duty vehicles and was used to identify 17 Class 8 electric trucks that can perform the required drayage truck duty cycle. Commercial availability is defined as "ready for immediate production based on placed orders." Of these trucks 5 are expected to be commercially available by the end of 2020, while another 7 should become available over the next 2–3 years. Each has a range of over 100 miles, which is enough to complete the average drayage truck duty cycle of less than 100 miles on a single charge. Table I-1 shows the currently available and future available trucks for Class 8 applications. The availability dates listed in Table I-1 are the current or projected dates based on manufacturer announcements, and the vehicles may potentially be offered in limited quantities or actual availability date may change.

Table I-1 Current Available and Future Available Trucks for Class 8 Applications

Manufacturer	Model	Battery Size (kWh)	Torque (ft-lb)	Range (miles)	Availability or Expected Availability
Emoss	EMS 16 Serie (U.S.)	120–200	1,550–2,500	78–130	2019
Emoss	EMS 18 Serie (U.S.)	120–240	2,500	52–155	2019
BYD	8TT	435	1,770	150	2020
Peterbilt	579EV	396	NA	150	2020
XOS	ET-One	NA	4,700	300	TBD
Volvo	VNR Electric	300/560	NA	75–175	2020
Lion	Lion8T	588	5,300	210	2021
Kenworth	T680E	396	NA	150	2021
Mercedes-Benz	EActros (U.S.)	240	715	124	2021
Navistar	Navistar Class 8	107–321	NA	250	2021
Nikola	Tre EV (U.S.)	720	NA	250	2021
Tesla	Semi	NA	NA	300/500	2021/2023
Freightliner/ Daimler	eCascadia	550	NA	250	2022

kWh = kilowatt hours; ft-lb = foot pound

To support the growth of the market, the California Air Resources Board (CARB) created a program that provides significant incentives at the point of purchase for electric trucks and buses: the Hybrid and Zero-Emission Truck and Bus Voucher Incentive Program (HVIP).[5] Currently no vouchers have been redeemed for on-road heavy-duty trucks under the HVIP

[4] Drive to Zero's Zero-emission Technology Inventory (ZETI) Tool Version 5.5. Available online at https://globaldrivetozero.org/tools/zero-emission-technology-inventory/.
[5] California Air Resource Board. 2020. *HVIP Eligible Vehicle Catalog*. Available online at https://www.californiahvip.org/how-to-participate/#Eligible-Vehicle-Catalog.

program, suggesting there remains high uncertainty in the performance of these vehicles.[6] However, many of the Class 7-8 electric trucks in California have been deployed in demonstration and pilot programs and separate from HVIP (see Section 2.3 for more details). For fleet and truck owners to purchase electric trucks through HVIP outside of demonstration and pilot program, they need to confident the technology will work for their specific application and use case and that has not occurred yet.

For Class 8 long-distance trucks, vehicle ranges are expected to increase as manufacturers develop longer-range batteries and configurations for trucks, with the Tesla semi planned to exceed 500 miles near the 2023 timeframe. It is important to emphasize that these are planned releases from manufacturer announcements, and actual availability may change. Fuel cell electric vehicles (FCEVs) will also compete for long-distance truck market share, with several FCEV models emerging within the next few years.

2.2 Charging Infrastructure

Pilot projects involving electric Class 8 trucks use charging stations at power levels of 150 kW DC, or 50 kW DC in some cases. A vehicle with a battery pack of 250 kilowatt hours (kWh) can charge up to 80% in approximately 90 minutes at 150 kW or in 4–5 hour at 50 kW. Figure I-2 and Figure I-3 show examples of MD and HD vehicle chargers. The ABB HVC has a power range of 100–150 kW with a voltage range from 150–850 V DC and sequential charging with up to three outlets with 100 kW and 150 kW per vehicle. The ChargePoint Express Plus has a modular and scalable architecture that allows for up to four Power Blocks to serve each station and send up to 500 kW to a single vehicle.

Figure I-2. ABB HVC 150 kW

[6] California HVIP. 2020. *Deployed Vehicle Mapping Tool.* Available online at https://www.californiahvip.org/tools-results/#deployed-vehicle-mapping-tool. Accessed September 2020.

Figure I-3. ChargePoint Express Plus

In 2018, SAE International released the standard SAE J3068 for medium-duty (MD) and heavy-duty (HD) vehicles, which is similar to the European IEC 62196 (aka Type 2 or CCS Combo). In fact, it is the European charging derivative adopted by SAE for MD and HD electric vehicles (EVs). SAE J3068 was needed because SAE J1772 or its combo version (SAE J1772 Combo) does not support three-phase charging, and single-phase charging was limited to 19.2 kilowatts (kW). Many commercial and industrial locations in the U.S. and Canada are equipped with three-phase power, and SAE J3068 enables the use of three-phase 480 volts (V) (up to 133 kW at 160 amperes [amps]), as well as 600 V alternating current (AC) (up to 166 kW at 160A). In addition, SAE J3105 applies to overhead charging and SAE J2954/2 to HD wireless charging. Both overhead and wireless have been used for electric buses but not for electric trucks, at least not to date.

Connectors CCS1 are expected to be used widely in North America. However, in some electric truck pilot projects CCS2 type connectors have been in use. The need for higher power charging has created a shift toward direct current (DC) charging as well. It also shifts some costs away from vehicles toward infrastructure because higher charging power rates are typically more expensive, and vehicles charging solely by DC fast charging will not bear the added costs of on-board AC/DC inverters.

Table I-2 lists the most common types of charging stations, with details such as connectors and power levels. Proprietary stations and connector types, such as those for Tesla, are not included.

Table I-2 Examples of Different Chargers and Charging Stations[7]

Charging Station Level (Electric Current Type)	U.S. Connector Type	Power	Fill Time for a 100kWh Battery (80% Fill)	Voltage	Best Commercial Use Case Example
Level 2 (Alternative Current (AC) 1-phase)	 SAE J1772	> 3.7 kW ≤ 22kW	7 kW = 12.5 hours 22kW = 4 hours	208/240V	Medium- and heavy-duty vehicles that sit parked for 5+ hours at a time
Level 3 (Direct Current (DC) Fast Charging)	 CHAdeMO	> 22 kW ≤ 43.5 kW	2+ hours	277/480V	Medium- and heavy-duty vehicles with shorter routes/smaller battery packs that have a natural pause in their duty cycle of around 2 hour or more; medium- and heavy-duty vehicles with a longer route / larger battery packs that can charge over several hours
Level 3 Combo (AC, DC Fast Charging) Note: Combined Charging System (CCS1) Combo 1 Connector is currently used in North America, but the CCS2 combo 2 may be used in North American MD/HD applications.	 J1772 CCS1  J3068 CCS2	Today, <450 kW, projected up to 1 MW	15+ minutes (future) 40+ minutes (today)	Industrial voltage levels (speak with your utility)	Medium- and heavy-duty vehicles that have a natural pause in their duty cycles (e.g. while waiting at a loading dock) that is less than 2 hours
Inductive Charging (DC)		Inductive charging equipment uses an electromagnetic field to transfer electricity to a plug-in electric vehicle without a cord. In HD applications, inductive charging is often used for in-route charging on bus routes with 150-300 kW charging capability.			

There is currently no standardized system that could service the various sizes, types, and models of various EV Trucks, but there are several options that look promising.

Because the energy capacity of electric truck batteries is expected to increase, a concurrent need for higher levels of charging can be expected. Current standards allow for charging up to 350 kW, with research being conducted around very high-power charging (at 1 megawatt [MW]

[7] CALSTART. 2020. *Chicago Commercial Electric Vehicle Readiness Guidelines*. Available online at https://www.chicago.gov/content/dam/city/progs/env/MDHDCommercialEVReadiness.pdf

and higher).[8] Tesla trucks, expected in pilot projects in 2021, are expected to charge at 500 kW with a proprietary charging system.

Charging infrastructure for HD electric trucks will primarily be located at a fleet's domicile (depot charging) as fleets are expected to charge at the end of their workday. Fleet sites with a few vehicles may be able to manage using existing utility interconnections, while larger projects may require facility upgrades to accommodate the power requirements of multiple electric trucks charging concurrently.

To help with transitioning to electric trucks and buses the state of California and utility companies have implemented incentives and programs to encourage electrification of commercial vehicles. The HVIP program, mentioned earlier, provides funding for electric trucks and buses. Similarly, the California Energy Commission (CEC) is preparing a program that will provide incentive funding to support installations of MD and HD charging infrastructure throughout the state.

California utilities have programs and/or special rates designed to support and install make-ready charging infrastructure at host sites.

- **Southern California Edison (SCE):** *Charge Ready Transport Program* proposed the installation of at least 870 commercial charging stations over the next 5 years.
- **Pacific Gas and Electric (PG&E):** *EV Fleet Program* aims to support 6,500+ electric vehicles being deployed across numerous MD and HD fleet applications.
- **San Diego Gas & Electric (SDG&E):** *High-Power Electric Vehicle Rate (EV-HP*) is a proposed pricing plan for electric commercial trucks and buses.

These utility programs provide special rates that eliminate demand charges (or provide a 5-year moratorium on demand charges), provide incentives for each electric vehicle at the site, and/or entirely cover the cost of the utility side of the meter to the stub-out for the charging hardware. Some municipal utilities, such as the Sacramento Municipal Utility District and Los Angeles Department of Water and Power, also have special programs for transportation electrification. Public charging for electric trucks is currently not available. However, individual stations and corridor electrification for MD and HD electric trucks are in the planning stage. One public charging station for electric trucks is planned at a Loves station in Southern California as part of the Volvo LIGHTS project and should be installed in 2021. Other locations are being planned along and around important corridors. US West Coast utilities recently completed a study to map out charging infrastructure locations along the Interstate (I-) 5 corridor.[9] The proposed first phase would install charging infrastructure at 27 sites to serve both MD and HD trucks. In the second phase (by 2030) about half of these sites would be expanded to accommodate higher power charging for HD electric trucks.

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[8] CharIN (CharIN, 2019). *CharIN Steering Committee paves the way for the development of a CCS compliant plug for commercial vehicles with >2MW*. Available online at: https://www.charinev.org/news/news-detail-2018/news/charin-steering-committee-paves-the-way-for-the-development-of-a-ccs-compliant-plug-for-commercial-v/.

[9] *West Coast Clean Transit Corridor Initiative, 2020*. Available online at: https://www.westcoastcleantransit.com/.

2.3 Current Truck Demonstration Projects

In 2019, Californians consumed approximately 114 million gasoline gallon equivalents of electricity for transportation, accounting for approximately 5% of the total alternative fuel demand in the state.[10] While vehicle electrification for HD vehicles has been slower to evolve than light- and medium-duty applications, several technology demonstrations for Class 7-8 trucks have been deployed across the country, and at ports within the state specifically. Table I-3 summarizes the Class 8 truck demonstration projects currently ongoing statewide. Project funding in many cases also includes matching funds.

Table I-3 Examples of Current Class 8 Demonstration or Pilot Projects

Demonstration Program	Year and Cost	Location	Trucks	Types of Cargo
California Collaborative Advanced Technology Drayage Truck Demonstration	2018 $40M	Ports of Stockton, Oakland, Los Angeles, Long Beach, and San Diego	44 HD pre-commercial Class 8; 37 battery electric trucks 25 BYD trucks with 100-124 mile range; 12 Peterbilt/Transpower trucks with 110–150 mile range	Containerized cargo
Daimler Trucks North America (also known as Freightliner)	April 2019 $16M	Throughout Southern California	20 battery-electric trucks	Containerized cargo
CARB Zero and Near Zero-emissions Freight Facilities	Late 2018 $205 million	Throughout California	10 projects: zero emission HD truck and off-road equipment	Containerized cargo/ Food & Beverage
Volvo Low Impact Green Heavy Transports Solutions (“LIGHTS”) Project	March 2019 $90.7 million	Ports of Long Beach and Los Angeles	23 HD battery electric trucks; up to 175 mile range with charging	Containerized cargo
Sustainable Terminals Accelerating Regional Transformation (“START”) Project	January 2019 Unknown	5 at the Port of Long Beach; 10 at the Port of Oakland	Peterbilt and Transpower battery electric Class 8 drayage	Containerized cargo
Frito Lay Transformative Zero and Near-Zero Emission Freight Facility Project	March 2019 $30.8 million	Modesto, California	15 HD Tesla battery-electric tractors along with 38 Low NO_X trucks and 8 Peterbilt e220 battery-electric trucks.	Food & Beverage

[10] CARB. 2019. *Data Dashboard: 2011-2019 Performance of the Low Carbon Fuel Standard.* Available online at: https://www.arb.ca.gov/fuels/lcfs/dashboard/dashboard.htm. Accessed August 2020.

Demonstration Program	Year and Cost	Location	Trucks	Types of Cargo
Zero-Emission Beverage Handling and Distribution at Scale	March 2018 $11.3 million	Four Anheuser-Busch facilities: Pomona, CA, Riverside, CA, Carson CA	21 battery-electric Class 8 BYD trucks 40 kW BYD chargers	Food & Beverage
San Diego Port Tenants Association Sustainable Freight Demonstration	August 2016 $8.2 million	Port of San Diego	4 Class 8 BYD Trucks	Autos; Break-bulk products

NO_X = oxides of nitrogen

3. Regulations and Grant Programs Effecting Trucks

3.1 On-Road Heavy-Duty Diesel Vehicles (In-Use) Truck and Bus Regulation

The On-Road Heavy Duty Diesel Vehicle Truck and Bus Regulation requires existing HD trucks to be replaced with trucks meeting the latest oxides of nitrogen (NO_X) and particulate matter Best Available Control Technology (BACT) levels, or be retrofitted to meet these levels. Trucks with a GVWR less than 26,000 pounds (most construction trucks) are required to replace older engines with 2010 or newer engines, or equivalent, by January 2023. Trucks with a GVWR greater than 26,000 pounds (most drayage trucks) must meet particulate matter BACT standards, and upgrade to a 2010 or newer model year emissions equivalent engine pursuant to the compliance schedule set forth by the rule. By January 1, 2023, all model year 2007 Class 8 drayage trucks are required to meet NO_X and particulate matter BACT (i.e., EPA 2010 and newer) standards.

3.2 Advanced Clean Trucks

CARB's Advanced Clean Trucks (ACT) regulation was adopted earlier this year and aims to accelerate the sales of heavy-duty electric vehicles. It consists of two parts, a manufacturer component and a fleet reporting component. Manufacturers are required to sell an increasing percentage of zero-emission vehicles between 2024 and 2035. By 2035, 40% of Class 8 truck purchases will be required to be zero emission. Fleets with 50 or more vehicles will be required to report on their fleet's composition and activities in order to help CARB craft new strategies to hasten the adoption of zero-emission vehicles. Table I-4 shows the projection of annual Class 7

and 8 tractor truck sales under the ACT.[11] There are approximately 180,000 Class 7-8 tractors in California.[12]

Table I-4 Projection of Zero-Emission Class 7 and 8 Tractor Truck Sales Under the ACT

Model Year	Percentage of Zero-Emission Trucks Sold
2024	5%
2025	7%
2026	10%
2027	15%
2028	20%
2029	25%
2030	30%
2031	35%
2032	40%
2033	40%
2034	40%
2035	40%

3.3 Upcoming Advanced Clean Fleets

The Advanced Clean Fleets rule is an upcoming regulation that has the goal of reaching a zero-emission truck and bus California fleet everywhere by 2045. CARB has stated its intent to require specific market segments, such as port drayage, to transition to zero emission trucks by 2035. The specific details of this regulation have not yet been made publicly available, but fleets should be aware of it and plan accordingly. Governor Newsom's recent Executive Order (N-79-20) reinforces California's push toward zero emission requirements for drayage trucks by 2035.[13]

3.4 Heavy-Duty Engine and Vehicle Omnibus Regulation

The Low NO_X Omnibus Rule is a recent rule that requires all HD vehicles built in 2024 and thereafter to emit far fewer nitrogen oxide particles and particulate matter. The regulation will require NO_X emissions to be reduced by 90% and particulate matter emissions by 50%. This

[11] https://www.nrdc.org/experts/patricio-portillo/california-makes-history-clean-trucks-rule#:~:text=In%20a%20groundbreaking%20win%2C%20the,the%20Advanced%20Clean%20Trucks%20rule.&text=Beginning%20in%202024%2C%20manufacturers%20must,40%2D75%20percent%20by%202035.

[12] https://ww3.arb.ca.gov/regact/2019/act2019/30dayattd.pdf.

[13] Executive Order N-79-20: https://www.gov.ca.gov/wp-content/uploads/2020/09/9.23.20-EO-N-79-20-text.pdf.

rule is intended to keep NO_X requirements for diesel vehicles low as CARB transitions fully to a zero-emissions vehicle program.

II. Operational Analysis

1. Purpose

The purpose of this section is to document the truck operations of MCC's primary customer. In addition, this operational analysis identifies the technical and logistical requirements for electric trucks to fulfill the current duty cycles of MCC's primary customer.

2. Typical MCC Customer Vehicle Characteristics and Charging Requirements

Typical MCC customers will be driving Class 8 heavy duty trucks requiring the highest end of power and torque rating. MCC's primary customer currently drives Mack Pinnacle CXU612 model trucks outfitted with the Mack MP8 diesel engine. Table II-1 shows the main characteristics of the primary customer vehicle. Values for toque and displacement were not directly supplied and come from manufacturer specification sheets for the Mack MP8 engine.[14]

Table II-1 MCC Primary Customer Vehicle Characteristics

Vehicle Characteristics	Value
Engine	MP8
Horsepower	450
Torque	1,460–1,860 foot pounds
Displacement	13 liters
Wheel Base	209 inches

Figure II-1 shows a Mack Pinnacle CXU612 model truck and a bulk trailer with pneumatic power take off (PTO) that is used to transport cement and/or cementitious materials. PTO is where power and energy requirements for the trailer are supplied by the engine of the truck.

[14] https://www.macktrucks.com/powertrain-and-suspensions/engines/mp8/.

Figure II-1. Example of MCC Primary customer Trucks and Trailers

As discussed in Section I.2.2, overnight or depot charging of Class 8 trucks are expected to use DC fast charging at 150 kW. Opportunity charging is expected to use higher rates, at least 350 kW in the 5-year timeframe, and potentially 1 and 2 MW in the long term. Currently, charging rates are limited to 120-150 kW for battery safety and reliability. MCC's primary customer trucks cover longer ranges than are possible for current models of electric trucks and would require both opportunity charging during the day and overnight charging to meet their daily duty-cycle requirements.

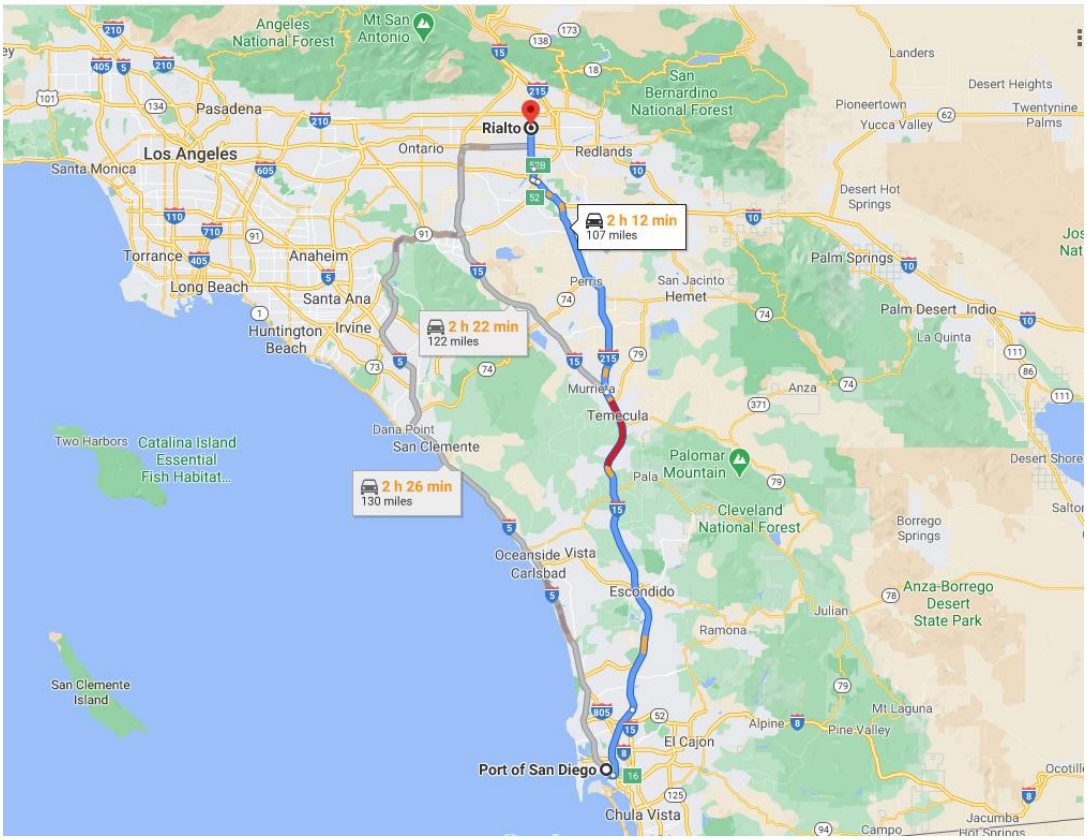
3. MCC Primary customer Truck Operations

MCC does not own or operate a truck fleet to distribute their cement and material throughout the region. Rather, MCC sells cement and material to customers who must pick up the material at TAMT.

MCC's primary customer is based out of Rialto, California in San Bernardino County, and currently performs work throughout Southern California, including San Diego County. These types of operations do not use a dedicated service route. The goal for long-haul heavy-duty truck fleet operations is to minimize miles travelled without transporting cargo or with empty trailers (also known as "deadheading"), for this reason trucks are dispatched live form their current location to their next pick-up, again attempting to maximize efficiency and minimize miles traveled without empty trailers. For MCC customer operations, these trucks would travel between the new cargo destination at the Port of San Diego and Rialto each day with multiple deliveries that may or may not be associated with cementitious materials stored at the TAMT. As an example, a truck from the fleet would pick-up a load in the Rialto area and travel to its drop-off destination, then be dispatched to another pick-up/drop-off destination, and so on until reaching the San Diego region and then ending at the TAMT. The same scenario of pick-up/drop-off would repeat for the truck on its way back to Rialto from the San Diego region. This live-dispatching occurs over two 10-hour work shifts, leaving only 4 hours a day during the work week where the truck is not actively used for cargo transport. Additionally, it is not certain that a specific truck leaving the Rialto yard will end up in San Diego; depending upon that day's book of business, it may or may not be known what a particular truck hauling route may be for the day. Conservatively, these trucks would travel over 100 miles before reaching the Port and

travel over 100 miles back to Rialto. Figure II-2 shows the mapped transportation distance between Rialto and the Port.

Figure II-2. Map of Various Truck Routes from Rialto to the Port of San Diego



Expected operations for the trucks once they arrive in San Diego County are to deliver their initial load and then visit TAMT two to three times each day before picking up a final load for drop-off on the way back to Rialto. The expected mileage per day is 300–400 miles, and potentially much less within the area that includes the Port Tidelands and adjacent neighborhoods. The Draft EIR for the proposed Mitsubishi project assumed each truck to travel an average round trip distance of 124 miles, consistent with the TAMT Final PEIR (Draft EIR Appendix C, Page C-11). The CEQA significance thresholds used in the impact analysis are regional and relate to the attainment status of air quality standards within San Diego County. As a result, haul truck trip emissions were confined to those occurring within the County. Additionally, the proposed Project is designed to service the San Diego area. The exact locations served would be dependent on customer needs, but for purposes of analysis, trucks are expected to travel between the Project site and the Riverside County line. Customers beyond the Riverside County line are expected to be more efficiently supplied by other sources of cement. Serving areas further away from TAMT by other source locations is consistent with the operational characteristics of Mitsubishi's primary customers' on-demand dispatching as described above.

The expected operating day for a truck in MCC's primary customer is 20 hours over two 10-hour shifts. A total fleet of approximately 50 trucks is expected to meet the maximum number of 176 truck trips on a peak day, but it is estimated that only 60–75% of these truck trips would be

performed by the primary customer. The fleet operator has roughly 80 trucks for dry bulk freight transport in their Rialto-based fleet and does not currently dedicate trucks specifically to Port of San Diego or other San Diego area cargo movements. The Rialto fleet is changed over every 5 years, partially based on mitigation measures imposed by project approval conditions and partly because of the high use nature of operating heavy-duty fleets, so all trucks operated by the fleet are 5 years old or newer.

When the trucks visit the Port or any cement loading facility, it is estimated that each fill takes less than 10 minutes and then takes 45 minutes to an hour to unload at the batch plant. In addition, there is an onboard PTO requirement of 50 horsepower (hp) or 37 kW, for the entirety of each unloading event. Each truck transports approximately 27.5 short tons[15] (55,000 pounds) of cement or cementitious material per load. The baseline range of energy consumption for a Class 8 electric truck is 2.0–2.5 kWh/mile. Assuming 5 loads for 300 miles/day operation and 6 loads for a 400 miles/day operation, when including the PTO demand, the average energy consumption increases to 2.5–3.0 kWh/mile.

It is not anticipated that the trucks will idle or wait long enough to opportunity charge at the Port without materially increasing the turnaround time. Increasing turnaround times to allow for charging would reduce efficiency in the trucking operations.[16] With battery packs that can last for 150–200 miles, trucks may need to charge up to 3 or more hours throughout the day to complete the current 300–400 mile daily duty cycle. Higher load charging, on the order of 250 kW, could reduce this time to 2 hours or less. Table II-2 provides an example of a 400-mile route between Rialto, San Diego County, and back.

Table II-2 Example of a Rialto and Port Daily Route

Route Segment	Estimated Miles	Diesel Consumption (6 miles/ gallon)	Electricity Consumption (Remaining kWh Charge)*		Charging Requirements to Complete Segment (hours)	
			Low – 2.5 kWh/mile	High – 3.0 kWh/mile	150 kW Charging	250 kW Charging
Rialto to Local Pick-ups in San Bernardino	70	8.3 gallons	175 kWh (275 kWh)	210 kWh (240 kWh)	0	0
San Bernardino To TAMT	100	16.7 gallons	250 kWh (25 kWh)	300 kWh (-60 kWh)	0–0.4	0–0.4
TAMT to Local Batch Plants (average)	130	25 gallons	325 kWh (-300 kWh)	390 kWh (-390 kWh)	2–2.5	1.2–1.5
TAMT to Rialto	100	16.7 gallons	250 kWh (-250 kWh)	300 kWh (-300 kWh)	1.7–2	1–1.2

[15] 27.5 short tons equals 25 metric tons
[16] It should be noted that other zero emission truck technologies, such as hydrogen fuel cells, would not require this additional time to charge/refill.

Route Segment	Estimated Miles	Diesel Consumption (6 miles/ gallon)	Electricity Consumption (Remaining kWh Charge)* Low – 2.5 kWh/mile	Electricity Consumption (Remaining kWh Charge)* High – 3.0 kWh/mile	Charging Requirements to Complete Segment (hours) 150 kW Charging	Charging Requirements to Complete Segment (hours) 250 kW Charging
TOTAL	400	66.7 gallons	1000 kWh (-550 kWh)	1200 kWh (-750 kWh)	3.7–5	2.2–3

* Notes – Assumes 500 kWh battery with 90% available SOC (450 kWh available); kWh/mile inclusive of PTO events, not solely onroad fuel economy.

4. Potential Charging Locations

There are three potential locations where battery electric trucks could potentially charge: a fleet's home base yard, such as in Rialto; at or nearby the Port's marine terminal; and at batch plants operated by MCC's customers. Charging infrastructure would be required at each location, with chargers capable of at least 120–150 kW each. Any successful implementation of electric trucks will require overnight charging at the fleet's yard. With the maximum charge time to full capacity being up to 4 hours (based on 150 kW charging), one charger with two ports for two trucks could be installed.

For opportunity charging throughout the day to extend the vehicle range from 150–200 miles (per single charge) for existing Class 8 electric trucks to 300–400 miles to complete the typical duty cycle, the electric trucks will need to charge 3–4 hours during the duty-cycle with a 120–150 kW charger. Locations for opportunity charging could take place at logical points of rest, such as at or near the Port's marine terminal or at the batch plants. The Port and MCC could install infrastructure for charging at the terminal or at adjacent or nearby properties where trucks would likely need to charge for an hour or more at a time. However, charging requirements would cause increased operational costs for MCC's customers as their efficiency decreases (and costs increase) as trucks stop operating during charging times. It should also be noted that Ports typically do not encourage charging stations within marine terminals, as space is at a premium for cargo loading, unloading and storage operations (the same logic as not putting gas stations in marine terminals).

It is important to note that the necessary charging infrastructure may require upgrades to the electricity service at specific locations. Each location may differ based on current electricity requirements. Permanent batch plants where cement is delivered may represent good locations for charging infrastructure. However, existing batch plants require less than 50 kW of electric service, which would require significant electricity service upgrades at each facility, with the actual upgrades per location dependent on capacity in the area.

5. Weight and Payload Implications

A concern with alternative fueled trucks is that increased weight from batteries (electric trucks) or compressed gas tanks (compressed natural gas trucks) will decrease the payload for each truck, reducing the efficiency and increasing the cost of moving goods. In 2018, California

adopted Assembly Bill (AB) 2061, which increased the upper weight limit of zero- or near-zero emission vehicles by 2,000 pounds (1 short ton) from 80,000 to 82,000 pounds.

Current batteries have an energy density of 140 to 170 watt-hours per kilogram (Wh/kg). The specific energy of the resulting battery pack is typically 30–40% lower, or 80–120 Wh/kg.[17] Table II-3 shows the battery size, weight, and estimated displaced cargo a Class 8 electric truck battery. The displaced cargo amount also takes into account both AB 2061 and that electric trucks, especially the engine, are lighter than diesel trucks and reduces the displaced cargo from the battery weight by a combined 2 tons.

Table II-3 Battery Density and Weight

Battery Size (kWh)	Energy Density (Wh/kg)	Weight (tons)	Displaced Cargo Weight (tons)
435	80–120	4.0–6.0	2.0–4.0

Because the current fleet transports 27.5 tons per load, approximately an additional 7-14% more vehicle trips would be required to transport the same tons of cargo.[18] The additional truck trips may increase operating expenses unless there are cost savings by using electric trucks.

III. Economic Analysis

1. Purpose

The purpose of this section is to perform a total cost of ownership (TCO) analysis which compares the costs to procure and operate a diesel truck and an electric truck for a set period of time. This analysis is based on a first owner/operator basis by MCC's primary customer.

2. TCO Methodology

The main cost categories of the TCO are grouped into five categories: vehicle cost, infrastructure cost (i.e., capital and operations and maintenance [O&M]), fuel cost, vehicle operations and maintenance, and incentives.

2.1 Vehicle Cost

Table III-1 presents the vehicle costs for diesel and electric trucks.

Table III-1 Summary of Inputs

Input Category	Diesel	Electric	Source
Vehicle Cost	$110,000	$350,000 – 2020 $275,000 – 2023	CalETC report; conversations with OEMs

[17] https://mkt-bcg-com-public-images.s3.amazonaws.com/public-pdfs/legacy-documents/file36615.pdf.
[18] 27.5 tons – 2 tons = 25.5 tons. 1 – 25.5/27.5 = 7%.

The values were selected by the project team from previous research and conversations with truck manufacturers. Two vehicle cost scenarios were run for electric trucks with the expected decreases in prices, increased production volumes, and decreasing battery prices. Bloomberg New Energy Finance and other organizations have predicted significant battery cost reductions over the next decade. These price reductions are consistent with analysis performed by ICF in their report for CalETC.[19]

Residual value can also be an important factor to the TCO. The analysis presented here is based on a first owner-operator basis, which would traditionally include the resale or residual value of the truck. The decision was made to exclude the residual value of the trucks from this analysis for multiple reasons. The significant amount of miles driven by MCC's primary customer is in excess of 500,000 miles over 5 years, which reduces the potential resale value.

There are also significant uncertainties in the residual value of electric trucks. The resale value of trucks is dependent on both the initial value of the truck and the cost of a new vehicle at the time of resale. The projected decreasing cost of new batteries and electric trucks combined with the limited data and information on the total battery life, in years and cycles, for the battery pack, will significantly limit the resale value of early adoption electric trucks. The other component costs, such as electric motors, heating, and cooling systems, and other control systems, are expected to decrease over the same time frame as manufacturing processes improve and components are transferred between models and segments.

2.2 Infrastructure Cost

There are two contributing elements to the infrastructure cost: capital costs and ongoing operations and maintenance. For diesel trucks, diesel stations have already been built and there are no additional capital costs. The Argonne National Laboratory AFLEET model[20] includes operations and maintenance of approximately $5,000 per station per year, for a station servicing 20 trucks, with an electricity demand of 0.1 kWh per diesel gallon.

For charging station costs, the infrastructure costs will vary based on site characteristics. For this analysis, the assumption of $40,000 for the charger and $48,000 to the fleet owner for installation are based on the ICF CalETC report[21] and assume a 150 kW charger. The AFLEET model estimates an operations and maintenance cost of $4,000 per station for overall electrical maintenance and networking costs. The assumption is that there will be one charger for two trucks in Rialto and one charger for two trucks in San Diego County, resulting in a one charger per truck overall ratio.

[19] https://caletc.com/assets/files/ICF-Truck-Report_Final_December-2019.pdf
[20] https://greet.es.anl.gov/afleet_tool
[21] https://caletc.com/assets/files/ICF-Truck-Report_Final_December-2019.pdf

2.3 Fuel Cost

The costs associated with fueling include the cost of the fuel, the amount of fuel consumed, and electricity, when the fueling or charging takes place. When the charging takes place and how much charging occurs are necessary inputs to determine the weighted electricity rate.

2.3.1 Fuel Consumption

The TCO analysis was run for three different driving operations: 130, 300, and 400 miles per day. The 300 and 400 miles per day operations best represent the current range of operations for MCC's primary customer. The 130 miles per day scenario represents the estimated mileage which will be needed to transport MCC's products from TAMT throughout San Diego County as presented in Section II.2. In all scenarios it is assumed that the trucks operate 300 days per year, which results in 45,000, 90,000 and 120,000 miles per year.

The fuel economy, based on conversations with MCC's primary customer and the CalETC report, for the existing diesel trucks is 6 miles per gallon of diesel. The TCO analysis utilizes the 2.5 kWh/mile aggregate fuel economy when including the PTO during unloading, as discussed in Section II.2.

2.3.2 Diesel Prices

Diesel fuel prices are based on the trajectory of the CEC Revised Transportation Energy Demand Forecast,[22] current diesel prices, and an estimated 15% reduction in price due to bulk fuel purchasing compared to retail. The resulting diesel prices start at $2.84 per gallon and increase to $3.03 in the fifth year.

2.3.3 Electricity Prices

For MCC's primary customer, charging would occur at the home base facility in Rialto, which is in SCE's service territory and utilize opportunity charging while in the area of the Port in SDG&E's service territory. Because of this, the rates for each service territory needed to be analyzed.

SCE and SDG&E Commercial Rates

SCE has an approved rate structure for MD and HD trucks: Time-of-Use (TOU) -EV-8. This rate structure includes a 5-year phase-in period from 2019–2023 where there are no monthly demand charges and only energy charges. From 2024–2028 the demand charges are phased back in with the full rate in 2029. [23]

SDG&E is currently waiting for approval of their MD and HD electric vehicle rate structure: EV-HP. The EV-HP rate structure includes two parts: (1) TOU based energy charges and (2) a monthly subscription charge for demand costs. Figure III-1 and Figure III-2 present SDG&E's EV-HP rate structure's energy and subscription charges.

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[22] California Energy Commission (CEC), *Revised Transportation Energy Demand Forecast, 2018-2030*, Staff Report, February 2018, CEC-200-2018-003.https://efiling.energy.ca.gov/GetDocument.aspx?tn=223241.

[23] Southern California Edison (SCE), *Schedule TOU-EV-8*, 2019. https://library.sce.com/content/dam/sce-doclib/public/regulatory/tariff/electric/schedules/general-service-&-industrial-rates/ELECTRIC_SCHEDULES_TOU-EV-8.pdf

Figure III-1. SDG&E EV-HP TOU Energy Charges

Proposed EV-HP Energy Charges for bundled customers		
	Summer	Winter
On-peak	$0.39	$0.37
Off-peak	$0.16	$0.16
Super Off-peak	$0.11	$0.11

Figure III-2. SDG&E EV-HP Subscription Charges

Table WS-1 - Recovery of Non-Coincident Distribution Demand Costs		
	Schedule AL-TOU	**Schedule EV-HP**
Non-Coincident Distribution Demand Charge ($/kW)		
Secondary	$9.12	NA
Primary	$9.07	NA
Subscription Charge ($/Month)		
0-25 kW of Subscription Load		
Secondary	NA	$114.00
Primary	NA	$113.37
Each Additional 25 kW of Subscription Load		
Secondary	NA	$228.01
Primary	NA	$226.74
Note: Schedule AL-TOU and Schedule EV-HP rates shown for secondary and primary service voltage levels.		

A charging load profile was developed for a 300- and 400-mile per day route and is shown in Figure III-3 to combined with the rate structure to determine a weighted annual electricity rate. The x-axis shows the hour each day where 1 is 1am and 24 is 12am. The y-axis is the percentage of daily charging that occurs within each hour. It allows for the allocation of energy charged to the battery each day to the hour and electricity rate to quantify a weighted annual electricity rate.

Figure III-3. Charging Load Profiles

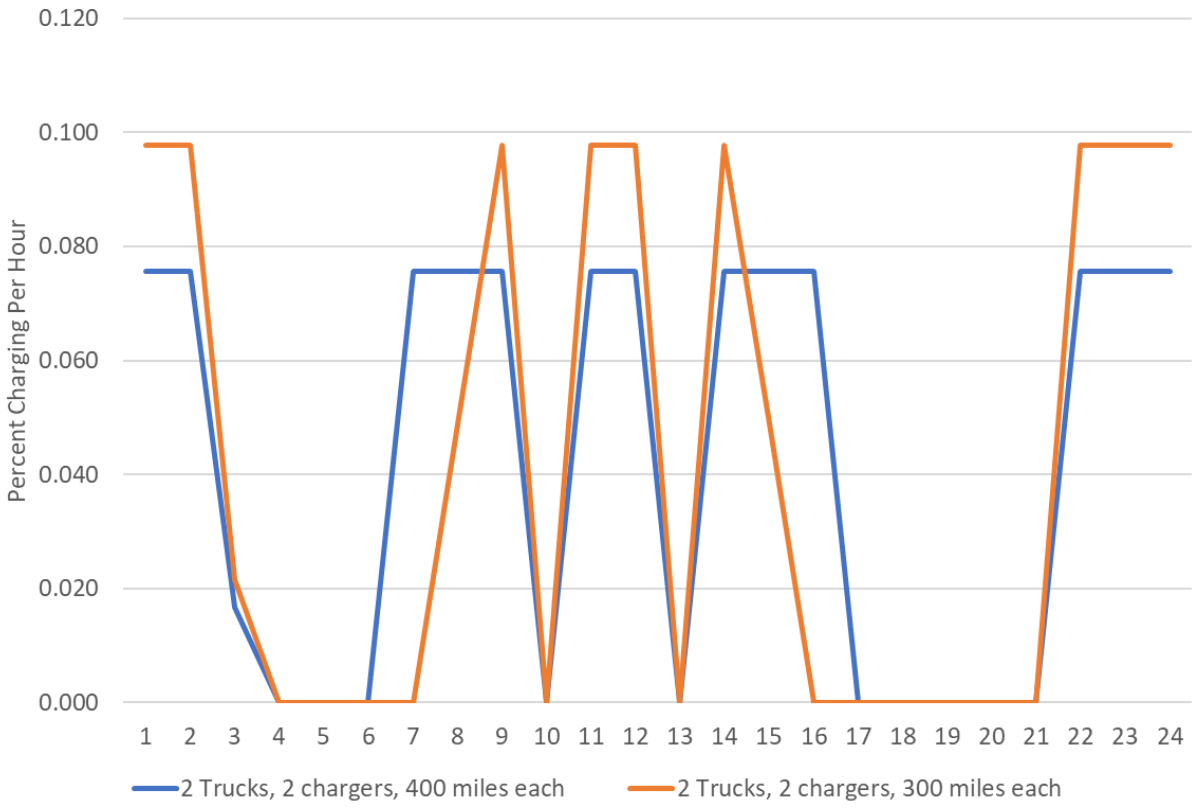


Table III-2 shows the weighted electricity rate between SCE and SDG&E if overnight charging occurs in SCE service territory and opportunity charging occurs in SDG&E territory and the time of day from Figure III-3, with electricity consumption at 2.5 kWh/mile.

Table III-2 Weighted Electricity Rate

Year	400 Miles/day (1,000 kWh/day)	300 Miles/day (750 kWh/day)
2021	$0.17	$0.17
2022	$0.17	$0.17
2023	$0.17	$0.17
2024	$0.17	$0.18
2025	$0.17	$0.18
2026	$0.18	$0.19

For the 130-mile route, 100% of the charging will occur in San Diego County, all during the overnight hours. Coincidentally, when considering the subscription charges and reduced allocated consumption, the weighted electricity rate is $0.17/kWh.

2.4 Maintenance Costs

ICF relied on data from the AFLEET tool for vehicle maintenance costs.[24] For Class 8 drayage and regional freight trucks, the diesel maintenance costs were $0.20/mile and $0.17/mile for electric trucks. Many electric truck manufacturers project significantly lower maintenance costs in the future (approximately 10 year timeframe) compared to diesel, on the order of a 50% reduction. The current reduction in maintenance costs is inclusive of the higher parts and labor rates for electric with the lower volume of trucks on the roads and optimized maintenance staff.

2.5 Potential Incentives

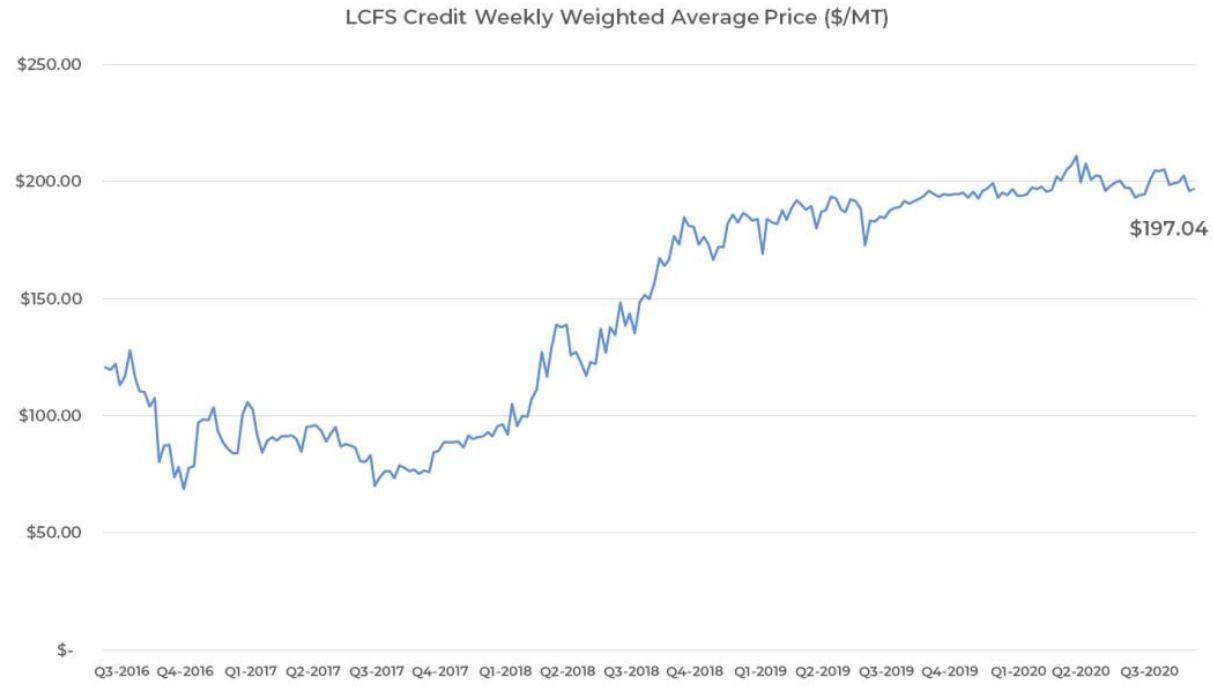
The three policies and/or potential incentives included in the analysis are the Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project (HVIP), utility infrastructure incentives, and the Low Carbon Fuel Standard (LCFS). The HVIP voucher amount for Class 8 trucks is currently $150,000. There is uncertainty about the funding sources, the demand, and the number of vouchers that can be redeemed each year in the HVIP program. Currently there have not been any vouchers redeemed for Class 8 trucks, and each year the HVIP program is oversubscribed. Because of this, the TCO analysis was performed both with and without the HVIP voucher amount. Also, the analysis here does not include the added amount of $15,000 per voucher for trucks based in disadvantaged communities.

The utility infrastructure incentives include those from both SCE and SDG&E that pay for a portion of cost charging infrastructure. The assumption in the analysis is that the utility incentive will cover 50% of the combined infrastructure and installation cost. The scenario run without the HVIP incentive also did not include the utility incentive.

The LCFS allows electric charging, natural gas, and hydrogen station owners to generate credits from using electricity, renewable natural gas, and hydrogen in their vehicles. EV fleet and station owners are able to retain and monetize 100% of the credits generated when utilizing home base fleet charging. Figure III-4 shows historic LCFS credit prices. The analysis includes a credit price of $150/credit to include the potential risk of a reduction in credit prices and the broker and transaction costs for selling the LCFS credits generated.

[24] https://greet.es.anl.gov/afleet_tool

Figure III-4. Historic LCFS Credit Prices [25]



2.6 Summary of Inputs

Table III-3 shows a summary of the inputs for the TCO analysis.

Table III-3 Summary of Inputs

Input Category	Diesel	Electric	Source
Vehicle Cost	$110,000	$350,000 – 2020 $275,000 – 2023	CalETC report; conversations with OEMs
Daily Vehicle Miles Traveled	130, 300, and 400	130, 300, and 400	MCC Primary customer operations
Days per Year	300	300	-
VMT per Year	45,000, 90,000. and 120,000 miles	45,000, 90,000, and 120,000 miles	-
Infrastructure Capital Cost	$0	$88,000 per station ($22,000 per truck for 300 and 400 mile; $11,000 per truck for 130 mile)[26]	CALSTART and CalETC Reports

[25] https://srectradeblog.s3.amazonaws.com/August+2020+-+LCFS+Market+Overview_Final.pdf

[26] $22,000 per truck assumes that four different trucks, given a 5-year turnover, will utilize a single charger over a 20-year lifespan of the equipment.

Input Category	Diesel	Electric	Source
Infrastructure Operations and Maintenance	$5,000/station ($250 per truck) + 0.1 kWh/gallon	$4,000/year	AFLEET
Fuel Prices	Bulk Fuel Pricing (85% of retail) with increasing based on CEC projections	Based on SCE and SDG&E MD/HD Vehicle Rates Structure, weighted $0.17-$0.19/kWh	Modified CEC Projections + Utility Rate Structures
Maintenance Costs	$0.20/mile	$0.17/mile	AFLEET
HVIP	-	$150,000, modeling with and without funding	-
LCFS	-	$150/credit	-

3. TCO Results

The cost elements of the TCO were divided into four categories:

1. **Net Purchase Price**. Includes both the purchase price and HVIP for that scenario.
2. **Infrastructure**. Includes infrastructure capital and O&M plus the utility incentive for that scenario.
3. **O&M**. Vehicle operations and maintenance costs.
4. **Net Fuel Cost**. Includes the net cost of fuel and revenue from the sale of LCFS credits.

Figure III-5 and Figure III-6 show the results of the TCO without and with HVIP and utility incentives at a $350,000 vehicle cost.

Figure III-5. TCO Results – $350,000 Vehicle Cost with No HVIP or Utility Incentives

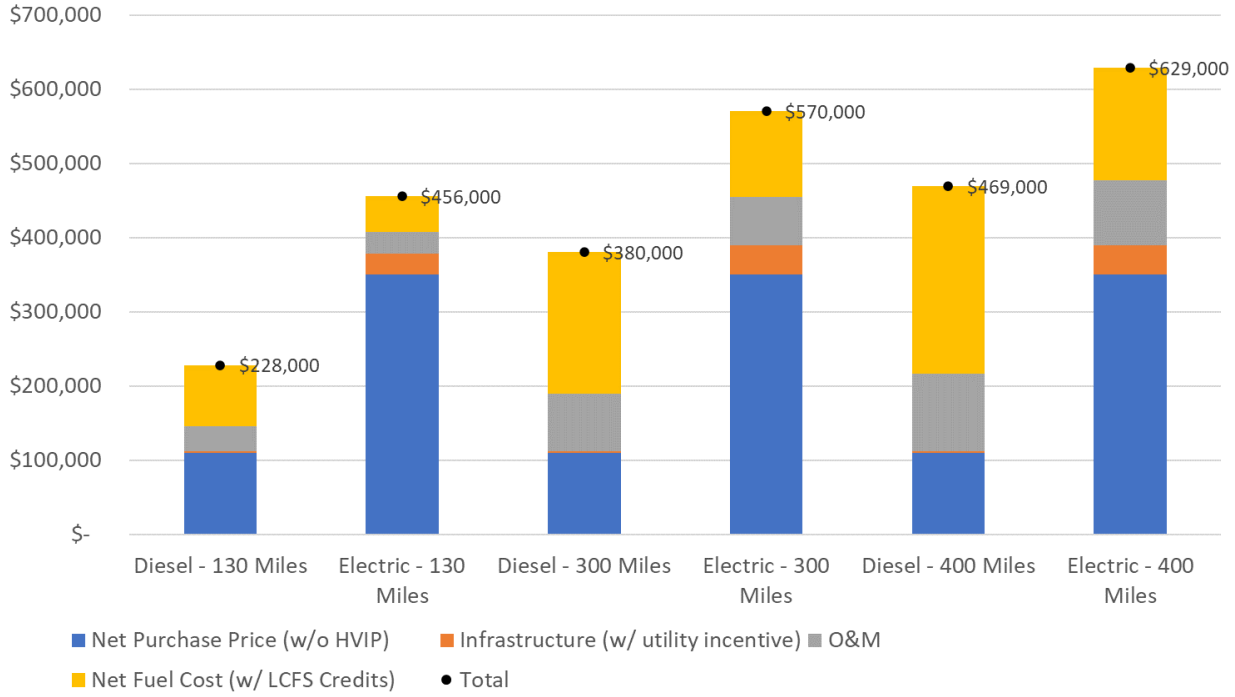
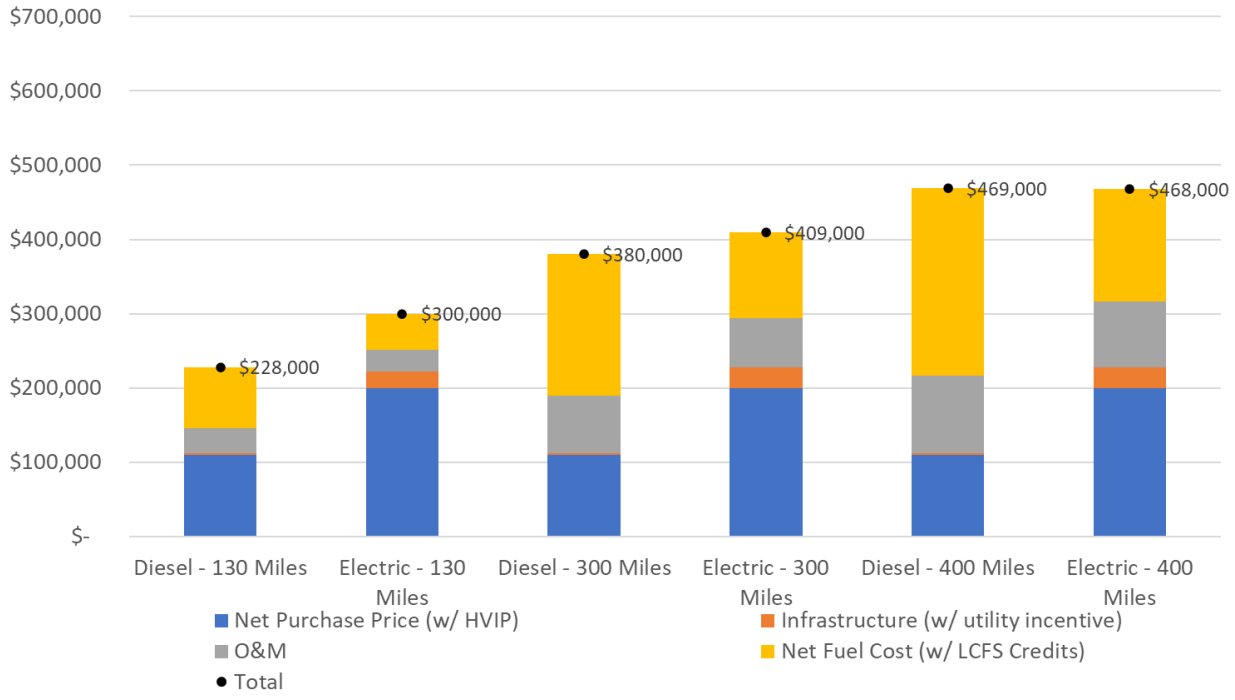


Figure III-6. TCO Results – $350,000 Vehicle Cost with HVIP and Utility Incentives



Without incentives, none of the mileage scenarios are close to having a similar TCO while the 400-mile scenario has the same TCO as diesel when the incentives are included.

Figure III-7. TCO Results – $275,000 Vehicle Cost with No Incentives

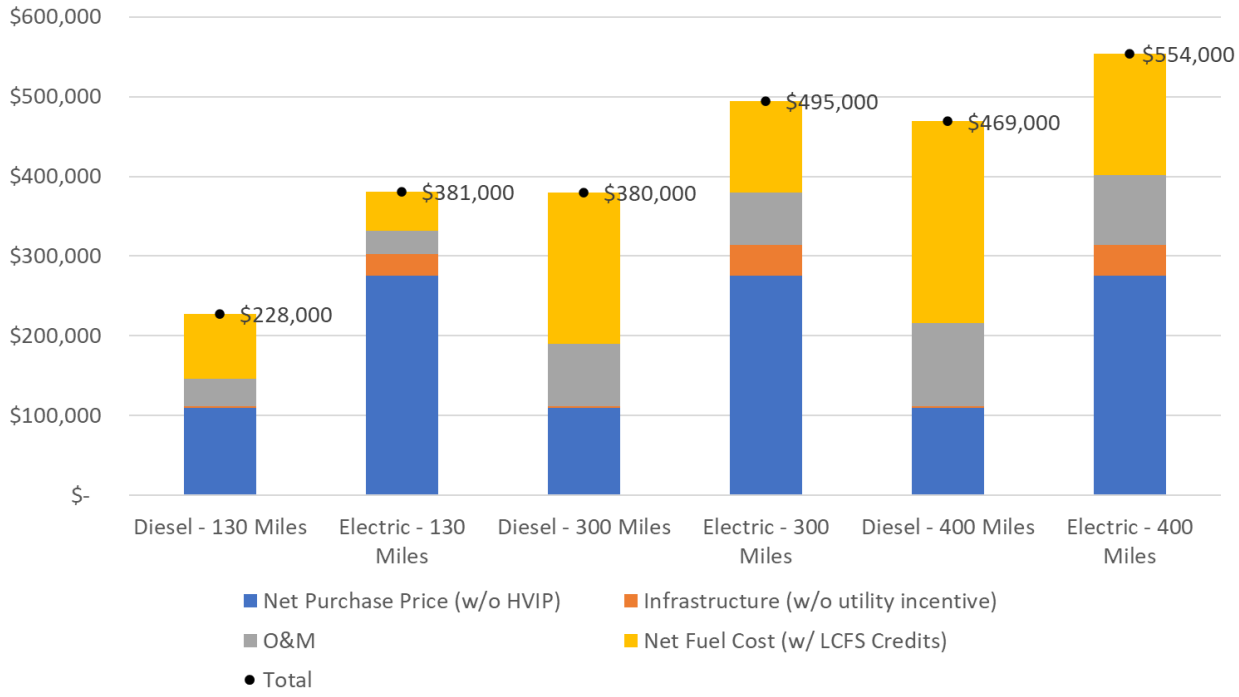


Figure III-8. TCO Results – $275,000 Vehicle Cost with Incentives

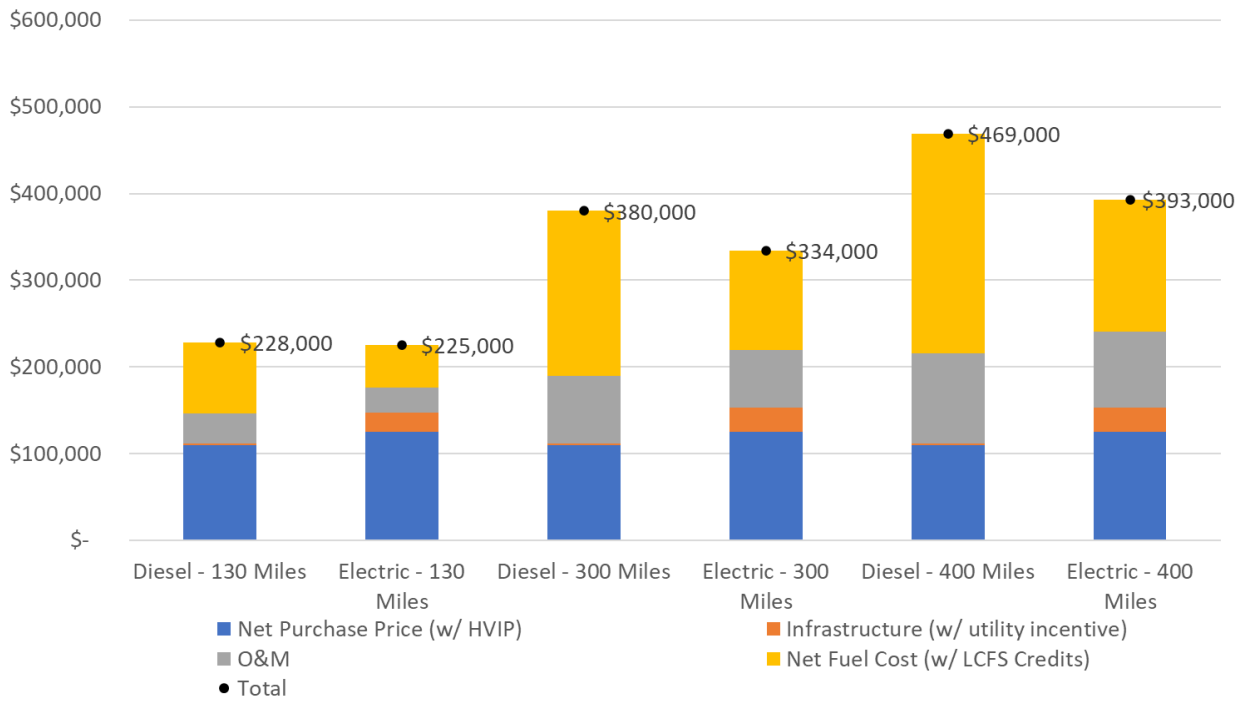


Figure III-7 and Figure III-8 show the results of the TCO without and with HVIP and utility incentives at a $275,000 vehicle cost. Even with a vehicle price reduction of $75,000, without incentives electric trucks do not have a similar TCO in any mileage scenario. When considering incentives, all mileage scenarios have a better TCO than diesel. Depending on available HVIP funding when electric trucks reach an incremental price of $165,000, it is likely the overall voucher amount will be lower than the current $150,000.

The results presented here are for driving the prescribed miles and estimated number of loads per day. The analysis and data in the figures do not represent the 7-14% increase in truck trips required of an electric truck relative to traditional diesel, as shown in Section II.5. Nor does this analysis account for a decrease in efficiency if a truck spends multiple hours per day charging and not in use. When considering the total cost of comparable tons transported, the overall results do not change significantly for the $350,000 vehicle price scenarios. Even with incentives, none of the mileage scenarios show a similar TCO. With a lower electric truck price, without incentives the TCO is not similar in any scenario. When including incentives, only the 300- and 400-mile scenarios have a lower TCO. Appendix I includes the values in Figure III-5, Figure III-6, Figure III-7, and Figure III-8 in addition to the TCO when accounting for 7% incremental trips.

It should be noted that a TCO is an important piece of information when considering the feasibility of implementing alternative technology but is also an incomplete measure. In addition to the cost consideration, the operational considerations need to be taken into account. The load profile in Figure III-3 shows at least three charging events of upwards of an hour or more are needed for the truck to complete the 300 and 400 mile per day operations. These charging events may not be feasible and implementing electric trucks could require infeasible changes to existing operations for trucking companies, especially with the available range of existing and near-term electric trucks. In addition, this TCO is on the truck, not the $/ton delivered, so it does not include driver wages and other dispatch costs that would increase with likely increased downtime during opportunity vehicle charging.

IV. Feasibility Metrics

1. Purpose

The purpose of the Feasibility Assessment is to develop a framework to assess zero emission (ZE) battery-electric Class 8 trucks across different metrics based on MCC's primary customer truck operations, described in Section II. The project team developed a comprehensive set of measures that collectively capture the many criteria important to fleet adoption. The *Feasibility Metrics Scorecard* included metrics grouped into four categories:

- Technical
- Economic
- Fleet Logistics
- Charging Infrastructure Availability

Within these categories, 16 feasibility metrics were rated using a combination of qualitative and quantitative analytical and market assessments made by ICF and CALSTART, and then reported out using a three-tier “traffic light” color coding. Each category and feasibility metric is described in more detail below, followed by a summary of findings.

2. Technical

Technical metrics include vehicle specifications that are important to meet the needs of the fleet duty cycle and operating requirements. The availability of service and maintenance support for ZE trucks is also considered. Metrics related to vehicle specifications were assessed based on Class 8 HD truck requirements that are currently operated by MCC’s primary customer. Table IV-1 summarizes the technical metrics.

Table IV-1 Technical Feasibility Metrics

Category	Feasibility Metric	Description
Technical	Range	Capability of meeting daily range requirement
	Torque	Capability of meeting 1,460-1,860 lb-ft torque requirement
	Payload capacity	Capability of meeting payload requirements of 27.5 tons per load
	Refueling time	Ability to accommodate refueling time within existing operations
	Service and maintenance support	Adequate network of service to support maintenance requirements of zero emission vehicles (ZEVs).
	Ancillary Energy Requirements	Capability to meet 50 hp onboard pneumatics and loading requirement on trailer, equivalent to roughly 40 kWh of energy

3. Economic

Economic metrics include the financial considerations that are summarized in the TCO analysis presented in Task 3 of this report. Though vehicle and charging infrastructure costs are both factored into the TCO analysis, given the high impact and importance of these capital costs, they were identified separately as metrics. For vehicle cost the difference in capital costs should not be higher than 25% in order to be feasible. Note that TCO is assessed based on two scenarios: with incentives and without incentives. This was to account for the uncertainty of availability, demand, and value of incentives that is likely to change in the future.

The economic metrics do not consider higher costs to transport freight based on an increase in vehicle trips due to a reduction in payload capacity and to the increase in downtime to charge the vehicles. However, these are important considerations that may impact adoption of electric vehicles. Table IV-2 summarizes the economic metrics.

Table IV-2 Economic Feasibility Metrics

Category	Feasibility Metric		Description
Economic	Vehicle cost		The capital cost of a ZEV is comparable to that of a baseline vehicle
	Charging infrastructure cost		Capital cost of charging infrastructure
	TCO	w/ incentives	TCO w/ HVIP, utility incentives, and LCFS credits
		w/o incentives	TCO without HVIP, utility incentives, and LCFS credits

4. Fleet Logistics

Fleet logistics criteria include actions that a fleet may put in place while adopting zero-emission trucks. Depending on a fleet and its operations, some may be able to accommodate ZEVs more easily than others. These criteria measure a fleet's ability to adjust route scheduling and truck assignments within their operation to accommodate the adoption of ZEVs. It also includes a quantitative assessment that determines the percentage of trips originating from the port that ZEVs would be able to meet. Table IV-3 summarizes the fleet adoption metrics.

Table IV-3. Fleet Logistics Feasibility Metrics

Category	Feasibility Metric	Description
Fleet Logistics	Scheduling	Can schedules accommodate or be adjusted to accommodate charging time?
	Truck Assignments	Can trucks be assigned to dedicated routes that ZEVs can meet?
	% of Port Trips that ZEVs Can Meet	What % of port trips can commercially available ZEVs meet?

5. Charging Infrastructure

Charging infrastructure is important to enable deployment and operation of ZE trucks, and this metric addresses the availability of charging. Three charging locations and types are considered: on-site/depot, en-route or opportunity charging, and public charging. On-site/depot charging may be at either the fleet's domicile location, at or near the Port, or the batch plants at which the trucks deliver materials. En-route or opportunity charging includes fast chargers along routes that would provide shorter high-powered charging sessions to refill the batteries. Finally, public charging refers to availability or charging outside of a fleet's normal area of operation at publicly available sites. It is important to note that en-route/opportunity charging or public charging may not be necessary metrics if a vehicle's battery capacity can service the entire rout with only the availability of home base or depot charging. Table IV-4 summarizes the charging infrastructure availability metrics.

Table IV-4. Charging Infrastructure Feasibility Metrics

Category	Feasibility Metric	Description

Charging Infrastructure Availability	On-site/depot	Availability of on-site/depot charging infrastructure
	En-route/opportunity	Availability of en-route/opportunity charging infrastructure
	Public(as needed)	Availability of public charging infrastructure

6. Feasibility Metrics Scorecard Results

The *Feasibility Metrics Scorecard* shows the assigned tiers of each of the 16 metrics discussed above. Each metric was evaluated on both quantitative numeric measurements and qualitative assessments of their ability to perform the duties required. They were categorized in a three-tiered "traffic light" methodology: a simple color gradient describing the feasibility of each metric in a few different conditions.

The scorecard legend is shown in Table IV-5. The scorecard is shown in Table IV-6.

Table IV-5. Feasibility Metrics Scorecard Legend

Low feasibility	Feasible, but has barriers that need to be addressed	High feasibility

Red denotes metrics that have "low feasibility." These metrics are difficult to account for and it is unlikely that electric vehicles will meet these metrics. Yellow denotes metrics that are "feasible but have barriers that need to be addressed." This means that the feasibility is conditional on addressing some hurdles. Green denotes metrics that have "high feasibility" and can be comfortably achieved by ZE trucks. Lastly, some metrics are white, which simply denotes that these metrics do not yet have all the information to be properly evaluated.

Each metric has been analyzed based on feasibility today in 2020 and projected feasibility in 2023, and feasibility is assessed based on two different duty-cycles: 130 miles and 300 miles. When interpreting the results of the *Feasibility Metrics Scorecard*, it is important to note that all metrics need not be showing green for a fleet to move forward with implementation of ZEVs and it will depend on which metrics, combined or in isolation, are or are not green. For example, charging infrastructure does not need to be available on-site, en-route, and publicly to operate ZEVs.

For technical feasibility, it is likely that commercially available ZEVs in 2023 will not be able to meet the full range of duty cycles that a fleet requires, nor would it be recommended for a fleet to transition to all ZEVs without first performing a smaller pilot or demonstration. A phased approach starting with a smaller-scale implementation of ZEVs is an important first step for fleets to take as they look to electrify, bringing valuable information that is important for larger-scale deployments. Implementation of ZEVs will also depend on a fleet's ability to accommodate ZE technology within their operations. Therefore, it is important to consider these criteria as a whole when assessing the overall feasibility of implementing ZEVs.

Table IV-6. Feasibility Metrics Scorecard

Category	Feasibility Metric		130-mile		300-mile	
			2020	By 2023	2020	By 2023
Technical	Range					
	Torque					
	Payload capacity					
	Refueling time					
	Service and maintenance support					
	Pneumatics and loading energy					
Economic	Vehicle cost					
	TCO	w/ incentives				
		w/o incentives				
	Charging infrastructure cost					
Fleet Logistics	Scheduling					
	Truck Assignments					
	% of port trips that ZEVs can meet					
Charging Infrastructure Availability	On-site/depot					
	En-route/opportunity					
	Public (as needed)					

7. Summary

Based on the feasibility scorecard we conclude the following:

- Battery electric trucks in 2020 have low feasibility for both the 130-mile range and 300-mile range.
- Battery electric vehicles in 2023 have increased feasibility for both the 130-mile range and 300-mile range duty cycles, although barriers exist and need to be overcome.
- Incentive funding of some sort will be required in both 2020 and 2023 to support the TCO.
- Fleet adoption between 2020 and 2023 will include potential changes in truck assignments and scheduling, which impact current business models and economic/competitive viability.
- Depot charging by 2023 is feasible while other charging locations and types (i.e., en-route/opportunity and public charging) remain less certain.

Upon analyzing the scorecard, some of these metrics stand out as barriers both now and in 2023. These metrics are *range, vehicle cost, scheduling*, and *charging*. Range is a central issue for electric vehicles. With current battery technology, the range of electric Class 8 trucks cap out at around a 150-mile range on a single charge, significantly short of the 300-mile range desired. Based on discussions with OEMs and use of the Zero Emissions Technology Inventory, the range of electric trucks will likely increase over the next three years and manufacturers are stating they expect to have battery-electric Class 8 trucks able to achieve further ranges than they can do now and potentially achieve a 300-mile range in that timeframe. At the time of this analysis, the only vehicle currently anticipated to be produced by 2023 that is projected to feasibly complete this duty cycle is the Tesla Semi, which has been reported by Tesla to have a range of at least 300 miles (and up to 500 miles) on a single charge. This means range is a significant barrier to using electric vehicles on the 300-mile duty cycle and would be conditional

on the Tesla Semi being commercially available by 2023 and the Tesla Semi achieving the performance they currently anticipate.

The second barrier is electric vehicle cost, both now and in 2023, for both duty cycles. Currently, electric Class 8 trucks cost two to three times more than their diesel counterpart and will continue to be more expensive in 2023 despite decreasing costs and increasing production. However, with statewide incentives such as HVIP and LCFS credits, utility incentives, as well as expected infrastructure incentives, electric vehicles may become affordable for the typical fleet by 2023. Currently, without incentives, an electric Class 8 truck for a 300-mile duty cycle has a total cost of ownership of $570,000, while a comparable diesel truck has a total cost of ownership of $380,000. With incentives, the total cost of ownership of the electric vehicle falls to $409,000, only $29,000 more than the diesel vehicle. Thus, the cost difference between electric and diesel likely will decrease by 2023. For a detailed breakdown of the total cost of ownership, please reference Section III.

The third barrier is scheduling and truck assignments, which are another significant hurdle to electric vehicle feasibility. As of now, it is difficult to adjust truck schedules and assignments to account for increased fueling times and/or to a reduction in payload capacity. It is unclear if accommodations for ZEVs could be built into MCC's primary customers' anticipated operations by 2023 and beyond. Direct input from the fleet is required to make an accurate determination of future feasibility for these criteria, as those duty cycles have not yet been set. Therefore, feasibility tiers for fleet adoption metrics were assigned with white.

The fourth and final barrier is a lack of en-route/opportunity charging and an absence of public charging. To enable electric vehicles en-route or opportunity charging would need to be developed—specifically to accommodate the longer duty cycles. Site characteristics where infrastructure upgrades need to take place may pose obstacles for installation. Likewise, public charging for heavy-duty vehicles is not currently available. A lack of public charging represents an instance where a metric of low feasibility does not mean that electric vehicles cannot be adopted. It means that hurdles for adoption need to be overcome. Trucks can still be charged at on-site or at depot facilities and potentially can make use of en-route charging when developed. Due to the current utility incentives offered by SDG&E and state funding, it is expected that en-route charging and public charging will increase in the future.

Some of the metrics are different depending on which duty cycle the truck is operating, 130-miles or 300-miles. Range requirements are much more feasible for a 130-mile duty cycle. Today, most Class 8 electric vehicles have a maximum range of 150 miles, which can complete the shorter duty cycle on a single charge. However, the shorter duty cycle has a significant effect on the total cost of ownership. While operators will save money on battery price and fuel costs, shorter duty cycles save less money on fuel and maintenance compared to diesel trucks. This means, when completing shorter duty cycles, the electric truck has a much longer payback period than trucks operating on longer duty cycles. Short-range trucks also have shorter charging times than longer range trucks. However, this metric is still rated with low feasibility compared to a baseline diesel because charging a short-range truck will take much longer to charge than fueling a diesel truck. In addition, since the shorter duty cycle does not represent the current operating model for the fleets, dedicated truck assignments will be required which may pose an additional economic hurdle for fleets.

As electric vehicle technology is a new and rapidly evolving field, there will be many changes in the upcoming years. In addition to the previously discussed increasing range, a number of metrics will become more feasible in the next 3 years. As service and maintenance technicians are trained and gain more experience, service and maintenance support will likely become more reliable and affordable. Purchase costs of electric vehicles will also decrease over time as production scales up. However, costs are not projected to decrease enough to make the trucks affordable relative to a diesel truck without incentive assistance. Charging time and charging infrastructure cost will also likely decrease, as more powerful chargers are produced and production scales up. Production will likely not have a significant effect on the affordability of chargers but likely will make charging times short enough that charging can be more easily slotted into busy trucking schedules. Lastly, on-site or depot charging has little to no barriers to installation in 2023.

While the focus of this study is on electric trucks, there are other zero-emission options that exist today, most notably hydrogen fuel cell technology. Hydrogen fuel cell vehicles have significant range advantages, comfortably completing the 300-mile duty cycle required by MCC's primary customer. Fueling hydrogen vehicles is analogous to fueling a conventional diesel vehicle and can be done quickly and easily. Unfortunately, because hydrogen vehicles are less commercialized and mass produced than battery electric vehicles (i.e. light-duty vehicles, transit buses), they are more expensive, and the technology is advancing less quickly. Hydrogen trucks currently are in the early demonstration phase. Hydrogen fuel is also quite expensive, costing up to double the amount of diesel. Fueling the trucks is also not an easy task. There are very few options available for public hydrogen fueling, and new hydrogen fueling stations can cost up to $2 million. Regardless, hydrogen fuel cell vehicles remain a zero-emission option for fleets that can demonstrate the ability to deal with these barriers (e.g., cost of the truck and fuel, and lack of fueling infrastructure).

V. Recommendations

1. Purpose

The purpose of this task is to provide recommendations for the Port to consider transitioning to zero emission trucks at the MCC proposed facility. There are four overall recommendations for the Port that start with smaller but tangible results as well as developing an infrastructure plan, surveying and outreach to tenants, and periodic feasibility and regulatory review.

2. Recommendation 1: Vehicle Demonstration

The first recommendation is a vehicle demonstration program at the Port that focuses on MCC and cement/bulk load drivers. The demonstration should allow all drivers of these materials to try out the trucks and experiment with their current operations, including loading at MCC terminal and unloading at batch plants.

This demonstration will allow the trucking companies to evaluate the performance of the new technology and determine the amount and location of charging needed for their operations. They will be able to determine if charging is necessary at batch plants or if all charging can be accommodated at a single location, such as at the Port.

Demonstrations achieve tangible emission reductions and offset conventional (diesel) fueled port trips, the main purpose of which is collecting critical information for successful implementation of zero emission trucks at the Port for each of the different tenants and trucking operations. Demonstrations are a necessary first step to achieving significant and successful implementation of zero emission trucks and will also feed into updates to this feasibility study.

Electric Truck Demonstration

CALSTART has been involved in and tracked the progress of the 8 electric truck demonstrations shown in Table I-3. Demonstrations are critical for the long-term success of electric trucks by allowing drivers and operators to gain first-hand experience of benefits, confirm that operational characteristics will suit their current needs, and allow data and information collection for successful full-scale implementation.

3. Recommendation 2: Infrastructure Plan

The next recommendation is that MCC, as well as the Port, in collaboration with its other tenants, develop a zero-emission infrastructure plan that encompasses at least 10 years. The plan will look past the demonstration period and include infrastructure siting, funding and a timeline of future infrastructure at the Port to reach determined and regulatory levels of electric truck adoption. The plans will help answer the following questions:

- Where should charging be located at or near the Port?
- How much infrastructure would be required at or near the Port to achieve regulatory requirements beyond the demonstration and early deployment of zero emission trucks at the MCC facility?
- Can charging infrastructure build-out occur in tandem with existing electrification build-out (i.e., charging for other needs, such as vessel shore power) to reduce or share construction costs?
- What are potential funding mechanisms to implement the infrastructure plan?

This plan will help inform the Port's decisions and present to the public the role the Port envisions zero emission trucks playing over the life of the infrastructure plan and project.

4. Recommendation 3: Surveys and Outreach

The third recommendation is that the Port conduct surveys and outreach to their tenants. The Port currently has begun a process to better understand trucking operations associated with cargo movement associated with its operations through the Maritime Clean Air Strategy. Continuing to survey tenants will allow the Port to collect information on the tenants' current knowledge base and understanding of upcoming regulations, alternative fuels, and their current trucking operations. The Port can take this opportunity to gain input from the tenants on electric and zero-emission trucks and continue to inform and educate tenants about upcoming drayage truck and Port regulations.

Based on the trucking operations, the Port could then create a prioritization between the tenants and trucking operations across the Port for successful implementation of electric trucks. The best candidates can then work with the Port to apply for the state zero emission truck pilot programs and other funding sources, including AB 617, federal funding, and utility programs for infrastructure. While MCC and its primary customer are the focus of this study, there may be other tenants at the Port that are better candidates for electric trucks and potentially better suited recipients of funding for successful implementation of electric trucks.

5. Recommendation 4: Periodic Feasibility Review

The last recommendation is that the Port conduct an annual review on the feasibility of electric trucks for MCC's primary customer and a regulatory review.

5.1 Technology and Feasibility Review – Vehicle Costs and TCO

The Port should commission a periodic review and update of the Technology and Feasibility Review, on an annual basis due to the evolving nature of the technology. The TCO, and, most importantly, the vehicle price of ZE trucks, should be updated and the feasibility metrics from Section IV should be applied to determine if ZE trucks meet the metrics. This review will continue until the metrics are met and ZE trucks are deemed "Feasible."

During the feasibility review, assessment of other zero emission technologies should take place, including fuel cell technology and hydrogen. Fuel Cell and battery electric technologies are both designated by CARB and the CEC as zero emission vehicles with zero tailpipe emissions. Hydrogen is mainly produced from fossil natural gas through stream methane reformation resulting in greenhouse gas emissions. However, more than a third of hydrogen used in transportation is renewably sourced[27] which can be from reformation of renewable natural gas or electrolysis of renewable electricity.

Hydrogen and fuel cell technology could meet the technical and operational requirements of MCC's primary customer. In this first study, hydrogen was not included because it is in an early stage of development and demonstration. Currently there are no hydrogen trucks that are

[27] Hydrogen FAQs, California Hydrogen Business Council, https://www.californiahydrogen.org/resources/hydrogen-faq/#:~:text=Hydrogen%20is%20one%20of%20the,transportation%20in%20California%20is%20renewable.

available for even limited purchase or demonstration, with only a few small one or two truck demonstrations occurring. In addition, there is limited and costly infrastructure for hydrogen trucks and high fuel prices. There will need to be significant developments on both the vehicle technology and refueling costs before hydrogen can be seriously considered as an alternative.

5.2 Regulatory Review – Upcoming CARB Regulations

Along with the Technology and Feasibility Review we recommend a Regulatory Review to understand the current state of existing and future regulatory policies that will affect drayage truck and Port truck operations. Along with tracking the “Feasible” determination, the Port may require a transition plan to electric and zero emission trucks that is above and beyond the regulatory requirements. With the lead time necessary for infrastructure and vehicle purchases, the transition plan should take effect within 24 months after the “Feasible” determination. It will be up to the Port and its stakeholders to determine, based on the regulatory landscape, how far above and beyond the regulatory requirements the plan should extend.

Appendix I. Figure III-5 to Figure III-8 Values

Exhibit 1. TCO Results – $350,000 Vehicle Cost with No HVIP or Utility Incentives

	Diesel – 130 Miles	Electric – 130 Miles	Diesel – 300 Miles	Electric – 300 Miles	Diesel – 400 Miles	Electric – 400 Miles
Net Purchase Price (w/o HVIP)	$110,000	$350,000	$110,000	$350,000	$110,000	$350,000
Infrastructure (w/ utility incentive)	$2,000	$28,000	$2,000	$39,000	$2,000	$39,000
O&M	$34,000	$29,000	$78,000	$66,000	$104,000	$88,000
Net Fuel Cost (w/ LCFS Credits)	$82,000	$49,000	$190,000	$115,000	$253,000	$152,000
Total	$228,000	$456,000	$380,000	$570,000	$469,000	$629,000
Total Corrected for 7% Trips[1]		$488,000		$610,000		$673,000

[1] Based on a reduction of payload capacity with an electric truck, 7% more electric truck trips may be required to transport a similar amount of cargo. Therefore, an increase in cost of 7% was included in the table.

Exhibit 2. TCO Results – $350,000 Vehicle Cost with HVIP and Utility Incentives

	Diesel – 130 Miles	Electric – 130 Miles	Diesel – 300 Miles	Electric – 300 Miles	Diesel – 400 Miles	Electric – 400 Miles
Net Purchase Price (w/o HVIP)	$110,000	$200,000	$110,000	$200,000	$110,000	$200,000
Infrastructure (w/ utility incentive)	$2,000	$22,000	$2,000	$28,000	$2,000	$28,000
O&M	$34,000	$29,000	$78,000	$66,000	$104,000	$88,000
Net Fuel Cost (w/ LCFS Credits)	$82,000	$49,000	$190,000	$115,000	$253,000	$152,000
Total	$228,000	$300,000	$380,000	$409,000	$469,000	$468,000
Total Corrected for 7% Trips		$321,000		$438,000		$501,000

Exhibit 3. TCO Results – $275,000 Vehicle Cost with No Incentives

	Diesel – 130 Miles	Electric – 130 Miles	Diesel – 300 Miles	Electric – 300 Miles	Diesel – 400 Miles	Electric – 400 Miles
Net Purchase Price (w/o HVIP)	$110,000	$275,000	$110,000	$275,000	$110,000	$275,000
Infrastructure (w/ utility incentive)	$2,000	$28,000	$2,000	$39,000	$2,000	$39,000
O&M	$34,000	$29,000	$78,000	$66,000	$104,000	$88,000
Net Fuel Cost (w/ LCFS Credits)	$82,000	$49,000	$190,000	$115,000	$253,000	$152,000
Total	$228,000	$381,000	$380,000	$495,000	$469,000	$554,000
Total Corrected for 7% Trips		$408,000		$530,000		$593,000

Exhibit 4. TCO Results – $275,000 Vehicle Cost with Incentives

	Diesel - 130 Miles	Electric - 130 Miles	Diesel - 300 Miles	Electric - 300 Miles	Diesel - 400 Miles	Electric - 400 Miles
Net Purchase Price (w/o HVIP)	$110,000	$125,000	$110,000	$125,000	$110,000	$125,000
Infrastructure (w/ utility incentive)	$2,000	$22,000	$2,000	$28,000	$2,000	$28,000
O&M	$34,000	$29,000	$78,000	$66,000	$104,000	$88,000
Net Fuel Cost (w/ LCFS Credits)	$82,000	$49,000	$190,000	$115,000	$253,000	$152,000
Total	$228,000	$225,000	$380,000	$334,000	$469,000	$393,000
Total Corrected for 7% Trips		$241,000		$357,000		$421,000

Attachment 1

Mitigation Monitoring and Reporting Program

Mitigation Monitoring and Reporting Program

Purpose

The purpose of this Mitigation Monitoring and Reporting Program (MMRP) is to ensure that the Mitsubishi Cement Corporation at Warehouse C Project implements environmental mitigation, as required by the Final Subsequent Environmental Impact Report (SEIR) for the Proposed Project. Those mitigation measures have been integrated into this MMRP. The MMRP provides a mechanism for monitoring the mitigation measures in compliance with the SEIR, and the general guidelines for the use and implementation of the monitoring program are described below.

This MMRP is written in accordance with California Public Resources Code Section 21081.6 and Section 15097 of the California Environmental Quality Act (CEQA) Guidelines. California Public Resources Code Section 21081.6 requires the Lead Agency, for each project that is subject to CEQA, to adopt a reporting or monitoring program for changes made to the project, or conditions of approval, adopted in order to mitigate or avoid significant effects on the environment and to monitor performance of the mitigation measures included in any environmental document to ensure that implementation takes place. The San Diego Unified Port District (District) is the designated Lead Agency for the MMRP. The Lead Agency is responsible for review of all monitoring reports, enforcement actions, and document disposition. The Lead Agency will rely on information provided by a monitor as accurate and up to date and will field check mitigation measure status as required.

The District may modify how it will implement a mitigation measure, as long as the alternative means of implementing the mitigation still achieve the same or greater impact reduction. Copies of the measures will be distributed to the participants of the monitoring effort to ensure that all parties involved have a clear understanding of the mitigation monitoring measures adopted.

Format

Mitigation measures applicable to the Project include avoiding certain impacts altogether, minimizing impacts by limiting the degree or magnitude of the action and its implementation, and/or requiring supplemental structural controls. Within this document, mitigation measures are organized and referenced by subject category. Each of the mitigation measures has a numerical reference. The following items are identified for each mitigation measure.

- Mitigation Measures
- Timing and Methods
- Responsible Parties

Mitigation Measures

Provides the language of the mitigation measure in its entirety along with the assigned number.

Timing and Methods

The mitigation measures required for the Project will be implemented at various times before Project construction, during Project construction, prior to Project completion, or during Project operation. The

procedures for implementing all mitigation measures as well as documenting and reporting mitigation implementation efforts are also included.

Responsible Parties

For each mitigation measure, the party responsible for implementation, monitoring and reporting, and verifying successful completion of the mitigation measure is identified.

Table 1. Mitigation, Monitoring, and Reporting Program

Mitigation Measures	Timing and Methods	Responsible Parties
Air Quality and Health Risk		
MM-AQ-1R: Implement Best Management Practices During Construction of Future TAMT Plan Components. The Mitsubishi Cement Corporation Project Proponent shall implement Best Management Practices (BMPs) to reduce air emissions from all construction activities implemented as part of the Proposed Project. The following measures are required to limit construction equipment exhaust from on-road trucks and heavy-duty equipment used during construction. • Ensure that all off-road diesel-powered equipment used during construction between 2020 and 2025 is equipped with the U.S. Environmental Protection Agency (EPA) Tier 3 or cleaner engines, except for specialized construction equipment for which an EPA Tier 3 engine is not available. • Ensure that all off-road diesel-powered equipment used during construction beyond 2025 is equipped with EPA Tier 4 Final or cleaner engines, except for specialized construction equipment for which an EPA Tier 4 Final engine is not available. • Maintain all construction vehicles and equipment according to manufacturers' specifications. • Restrict idling of construction vehicles and equipment to a maximum of 3 minutes when not in use (see MM-AQ-2 for definition of "not in use"). In addition, the Mitsubishi Cement Corporation Project Proponent shall implement the relevant BMPs, consistent with the Project-specific industrial Storm Water Pollution Prevention Plan (SWPPP). In no case would any BMP be implemented if it conflicts with the SWPPP or other applicable water quality permit requirements. BMP dust control measures may include, but are not limited to, the following: • Water the grading areas at least twice daily to minimize fugitive dust. • Stabilize graded areas as quickly as possible to minimize fugitive dust. • Apply chemical stabilizer or pave the last 100 feet of internal travel path within the construction site prior to public road entry. • Install wheel washers adjacent to a paved apron prior to vehicle entry on public roads. • Remove any visible track-out into traveled public streets within 30 minutes of occurrence. • Wet wash the construction access point at the end of each workday if any vehicle travel on unpaved surfaces has occurred. • Provide sufficient perimeter erosion control to prevent washout of silty material onto public roads.	**Timing:** During Project construction. **Method:** Implement specific BMPs during construction.	**Implementation:** Mitsubishi Cement Corporation Project Proponent (during construction), Construction Manager (during construction), and General Contractor (during construction) **Monitoring and Reporting:** Qualified agent, approved by and reporting to the District, District's marine terminal supervisors, Mitsubishi Cement Corporation Project Proponent **Verification:** District

Mitigation Measures	Timing and Methods	Responsible Parties
• Cover haul trucks or maintain at least 12 inches of freeboard to reduce blow-off during hauling. • Suspend all soil disturbance and travel on unpaved surfaces if winds exceed 25 mph. • Cover/water onsite stockpiles of excavated material. • Enforce a 15 mph speed limit on unpaved surfaces. • On dry days, sweep up any dirt and debris spilled onto paved surfaces immediately to reduce re-suspension of particulate matter caused by vehicle movement. Clean approach routes to construction sites daily for construction-related dirt in dry weather. • Develop as quickly as possible all disturbed areas as directed by the San Diego Unified Port District's Planning and Green Port Department and/or SDAPCD to reduce dust generation. • Limit the daily grading volumes/area. Prior to the commencement of construction activities, the Mitsubishi Cement Corporation Project Proponent shall submit evidence to the San Diego Unified Port District's Planning and Green Port Department of compliance with the BMPs and that construction equipment is maintained and properly tuned in accordance with manufacturers' specifications, which shall be subject to confirmation by the San Diego Unified Port District's Planning and Green Port Department during construction.		
MM-AQ-2R: Implement Diesel Emission-Reduction Measures During Construction and Operations of Future TAMT Plan Components. The Mitsubishi Cement Corporation Project Proponent shall implement the following measures during construction and project operations, subject to verification by the San Diego Unified Port District's Planning and Green Port Department. i. The Mitsubishi Cement Corporation Project Proponent shall limit all construction and operations equipment, drayage, and delivery truck idling times by shutting down equipment when not in use and reducing the maximum idling time to less than 3 minutes. Clear signage regarding the limitation on idling time at the delivery driveway and loading areas has been installed on terminal to provide actual notice of this requirement to all drivers. This measure shall be enforced by the terminal supervisors or by a Port designated functional-equivalent, who will submit quarterly reports of violators to San Diego Unified Port District's Planning and Green Port Department and repeat violators shall be subject to penalties pursuant to California airborne toxics control measure 13 California Code of Regulations Section 2485. The Project Proponent shall submit evidence of the use of diesel emission	**Timing:** During Project construction and operations. **Method:** Implement specific diesel-reduction measures during construction and operations.	**Implementation:** Mitsubishi Cement Corporation Project Proponent (during operation and construction), Construction Manager (during construction), and General Contractor (during construction) **Monitoring and Reporting:** Qualified agent, approved by and reporting to the District, District's marine terminal supervisors, Mitsubishi Cement Corporation Project Proponent **Verification:** District

Mitigation Measures	Timing and Methods	Responsible Parties
reduction measures to the San Diego Unified Port District's Planning and Green Port Department through annual reporting, with the first report due 1 year from the date of project completion and each report due exactly 1 year after, noting all violations with relevant identifying information of the vehicles and drivers in violation of these measures. ii. The Mitsubishi Cement Corporation Project Proponent shall verify that all construction and operations equipment is maintained and properly tuned in accordance with manufacturers' specifications. Prior to the commencement of construction and operations activities using diesel-powered vehicles or equipment, the Mitsubishi Cement Corporation Project Proponent shall verify that all vehicles and equipment have been checked by a mechanic experienced with such equipment and determined to be running in proper condition prior to admittance into any terminal leasehold. The Mitsubishi Cement Corporation Project Proponent shall submit a report by the mechanic of the condition of the construction and operations vehicles and equipment to the San Diego Unified Port District's Engineering Department during the construction phase and the Planning and Green Port Department during the operation phase prior to commencement of their use.		
MM-AQ-3R: Comply with San Diego Unified Port District Climate Action Plan Measures. Prior to approval of all discretionary actions and/or Coastal Development Permits, the Mitsubishi Cement Corporation Project Proponent shall be required to implement the following measures to be consistent with the Climate Action Plan. • Vessels shall comply with the District's voluntary vessel speed reduction program, which targets 80 percent compliance. • Vessels that are subject to CARB's at-berth regulation (dry bulk vessels are not subject to the at-berth regulation) shall comply with ARB's at berth regulation that requires shore power or alternative control technology regulation for certain vessel fleets for 80 percent of eligible calls by 2020, minus idle time to clear customs consistent with California Air Resources Board regulations. The TAMT Final PEIR assumed 1.5 hours of idle time for vessels to embark/disembark, which applies to all shore power and/or alternative control technologies employed at the terminal. This is a Project feature made into a mitigation measure to ensure compliance (see MM-AQ-9 for an explanation of the Proposed Project's shore power features). • Designated truck haul routes shall be used, and the Project Proponent shall decrease onsite movements where practicable. • No commercial drive-through shall be implemented.	**Timing:** During Project implementation, through Project operation. **Method:** Implement specific measures designed to be consistent with the San Diego Unified Port District Climate Action Plan (CAP).	**Implementation:** Mitsubishi Cement Corporation Project Proponent **Monitoring and Reporting:** Qualified agent, approved by the District, Mitsubishi Cement Corporation Project Proponent **Verification:** District

Mitigation Measures	Timing and Methods	Responsible Parties
• Compliance with Assembly Bill 939 and the City of San Diego's Recycling Ordinance shall be mandatory and shall include recycling at least 50 percent of solid waste; compliance with the City of San Diego's Construction and Demolition Debris Deposit Ordinance shall be mandatory and shall include recycling at least 65 percent of all construction debris. This measure shall be applied during construction and operation of the Proposed Project. • Light fixtures shall be replaced with lower-energy bulbs such as fluorescent, Light-Emitting Diodes (LEDs), Compact Fluorescent Lights (CFLs), or the most energy-efficient lighting that meets required lighting standards and is commercially available. • Implementation of Climate Action Plan measures will be included as part of any discretionary actions and/or Coastal Development Permit(s) associated with this project. Evidence of implementation and compliance with this mitigation measure shall be provided to the San Diego Unified Port District's Planning and Green Port Department by the Project Proponent on an annual basis through the end of the lease or 2035 (buildout of the TAMT plan), whichever occurs first.		
MM-AQ-4R: Implement Best Available Control Technologies for Conveyor System and Bulk Discharge Unloader for Future Dry Bulk Operations associated with the TAMT Plan. As a condition of approval of any new or amended real estate agreement or Coastal Development Permit for the Mitsubishi Cement Corporation Project that would result in an increase in daily or annual throughput over baseline conditions identified in the TAMT Final PEIR, the San Diego Unified Port District shall require the Mitsubishi Cement Corporation Project Proponent to install and use the best available control technologies to achieve a minimum 95% control efficiency for particulate matter by bypassing the existing Conveyor System and Bulk Discharge Unloader and installing a new Conveyor System and Bulk Discharge Unloader that meets the minimum 95% control efficiency. Under no circumstance shall the Project Proponent seeking discretionary approval for dry bulk operations be allowed to increase daily or annual throughput of dry bulk operations without first completing the upgrade or replacement of the existing system, or installation of a new system required above. The recipient of a discretionary approval by the San Diego Unified Port District subject to this mitigation measure shall provide written evidence of implementation and compliance with this mitigation measure to the San Diego Unified Port District on an annual basis through the end of the lease.	**Timing:** Prior to the first discretionary action approval and/or Coastal Development Permits for the Mitsubishi Cement Corporation Project. **Method:** Bypassing the existing Conveyor System and Bulk Discharge Unloader and installing a new Conveyor System and Bulk Discharge Unloader that meets the minimum 95% control efficiency. Evidence of implementation and compliance with this mitigation measure shall be provided to the District on an annual basis through the end of the Project lease.	**Implementation:** Mitsubishi Cement Corporation Project Proponent **Monitoring and Reporting:** District, Mitsubishi Cement Corporation Project Proponent **Verification:** District

Mitigation Measures	Timing and Methods	Responsible Parties
MM-AQ-5R: Implement Vessel Speed Reduction Program Beyond Climate Action Plan Compliance for Future Operations Associated with the TAMT Plan. The Mitsubishi Cement Corporation shall be required to comply with the Enhanced VSR Program. The Mitsubishi Cement Corporation shall, beginning with the first vessel call to the Port, comply with 80% of its OGVs reducing their speeds to 12 knots or less starting at 20 nautical miles from Point Loma. The Mitsubishi Cement Corporation shall comply with 90% of its OGVs calling to the Port, reduce their speeds to 12 knots starting at 40 nautical miles from Point Loma upon the occurrence of the earlier of either of the following two scenarios: • Prior to the annual number of dry bulk vessel calls reach 91 calls annually (e.g., 76 new calls over the TAMT Final PEIR's baseline condition); or • Beginning January 1, 2030, irrespective of the number of calls on an annual basis. To help the District implement the Beyond 2013 CAP VSR Program before reaching 91 dry bulk vessel calls annually, Mitsubishi Cement Corporation shall provide the District with a rolling estimate of anticipated vessels calls every 6 months. The San Diego Unified Port District will verify compliance through analysis of Automatic Identification System data or by requesting a vessel's Electronic Chart Display Identification System log from the captain.	**Timing:** Beginning with the first vessel call to the Port; and prior to the annual number of dry bulk vessel calls reaching 91 calls annually or beginning January 1, 2030, irrespective of the number of calls on an annual basis. Reporting shall occur every 6 months. **Method:** Implement vessel speed reduction measures to comply with the Enhanced VSR Program. Provide evidence of implementation and compliance with this mitigation measure.	**Implementation:** Mitsubishi Cement Corporation Project Proponent, District **Monitoring and Reporting:** District, Mitsubishi Cement Corporation Project Proponent **Verification:** District

MM-AQ-6: Electric Cargo Handling Equipment Upgrades. This measure has multiple steps for compliance, as specified below. A. Prior to January 1, 2020, the San Diego Unified Port District shall ensure that at least three pieces of existing non-electric cargo handling equipment at the terminal are replaced by electric cargo handling equipment, none of which were previously operating at the terminal during the 2013/2014 baseline year of the EIR analysis. Possible ways the electric cargo handling equipment may be obtained include, but are not limited to, the following: 1. Purchased, leased, or otherwise acquired, in whole or in part, through funding provided to a tenant by the San Diego Unified Port District; 2. Purchased, leased, or otherwise acquired, in whole or in part, through funding provided to a tenant by other sources; or 3. Purchased, leased, or otherwise acquired, in whole or in part, by the tenant in compliance with a condition of a discretionary approval issued by the San Diego Unified Port District. Written evidence of the acquisition of the electric cargo handling equipment and the equipment it will replace and remove from further operation at the terminal must be provided to the San Diego Unified Port District. The San Diego Unified Port District shall further ensure that the electric cargo handling equipment is in use at each of the three nodes throughout the expected operating life. This will be accomplished by requiring each tenant that employs electric cargo handling equipment pursuant to this measure to report the equipment's annual number of hours of operation to the San Diego Unified Port District and by requiring the San Diego Unified Port District to monitor use of the electric cargo handling equipment as part of the San Diego Unified Port District's TAMT equipment inventory. B. Prior to January 1, 2025, the San Diego Unified Port District also shall ensure that no fewer than 20 non-electric yard trucks in operation are replaced at the TAMT by 20 electric yard trucks. Possible ways the electric yard trucks may be obtained include, but are not limited to, the following: 1. Purchased, leased, or otherwise acquired, in whole or in part, through funding provided to a tenant by the San Diego Unified Port District; 2. Purchased, leased, or otherwise acquired, in whole or in part, through funding provided to a tenant by other sources; or 3. Purchased, leased, or otherwise acquired, in whole or in part, by the tenant in compliance with a condition of a discretionary approval issued by the San Diego Unified Port District. Written evidence of the acquisition of the electric yard trucks, and the non-electric yard trucks they will replace and remove from further operation at the terminal, must be provided to the San Diego Unified Port District. The San Diego Unified Port District shall further ensure that the electric yard trucks are in use at the TAMT throughout the expected operating life of the equipment. Each tenant that employs electric trucks pursuant to this measure shall report	**Timing:** Prior to January 1, 2020; prior to January 1, 2025; and prior to January 1, 2030. **Method:** MM-AQ-6 will be implemented by the District on a terminal-wide basis. The District is in the process of developing an incentive program to assist with upgrades to electric cargo handling equipment at the TAMT. Mitsubishi Cement Corporation is proposing electric vacuum loaders and only minimal diesel equipment as a feature of the Project.	**Implementation:** District **Monitoring and Reporting:** District **Verification:** District

Mitigation Measures	Timing and Methods	Responsible Parties
the equipment's annual number of hours of operation to the San Diego Unified Port District, and the San Diego Unified Port District shall monitor use of the electric trucks as part of the San Diego Unified Port District's TAMT equipment inventory. C. Prior to January 1, 2030, the San Diego Unified Port District also shall ensure that no fewer than three existing non-electric reach stackers and ten non-electric forklifts in operation are replaced at the TAMT by three fully electric reach stackers and ten fully electric forklifts. Possible ways the electric reach stackers and forklifts may be obtained include, but are not limited to: 1. Purchased, leased, or acquired, in whole or in part, through funding provided to the tenant by the San Diego Unified Port District; 2. Purchased, leased, or acquired, in whole or in part, through funding provided to the tenant by other sources; or 3. Purchased, leased, or otherwise acquired, in whole or in part, by the tenant in compliance with a condition of a discretionary approval issued by the San Diego Unified Port District. Written evidence of the acquisition of the three electric reach stackers and ten electric forklifts and the conventional equipment they will replace and remove from further operation at the terminal must be provided to the San Diego Unified Port District. The San Diego Unified Port District shall further ensure that the electric reach stackers and forklifts are in use at the TAMT throughout the expected operating life of the equipment. Each tenant that employs electric reach stackers or electric forklifts pursuant to this measure shall report the equipment's annual number of hours of operation to the San Diego Unified Port District, and the San Diego Unified Port District shall monitor use of the electric reach stackers and forklifts as part of the San Diego Unified Port District's TAMT equipment inventory. D. The electric equipment employed pursuant to paragraphs A, B, and C of this mitigation measure may be replaced by other technologies or other types of cargo handling equipment as long as the replacement equipment achieves the same or greater criteria pollutant, toxic air contaminant, and greenhouse gas emission reductions as compared to the equipment required by paragraphs A, B, and C of this mitigation measure.		
MM-AQ-7R: Annual Inventory Submittal and Periodic Technology Review. The Mitsubishi Cement Corporation shall comply with the District's Annual Inventory and Periodic Technology Review Program by (1) providing an inventory of all the mobile equipment associated with their TAMT site operations that generate criteria pollutants, toxic air contaminants, and greenhouse gases on an annual basis to be submitted by January 30 of each year of operations, and (2) working collaboratively with District staff and/or the local air pollution control district to identify new technologies or other practices that can be incorporated into their operations that help reduce emissions and improve air quality.	**Timing:** During Project operation, with inventories submitted annually by January 30 of each year. **Method:** Complete the District's equipment inventory spreadsheet and work with District staff and/or the local air pollution control district to identify new technologies or other practices for reducing emissions and improving air quality.	**Implementation:** Mitsubishi Cement Corporation Project Proponent **Monitoring and Reporting:** District, Mitsubishi Cement Corporation Project Proponent **Verification:** District

Mitigation Measures	Timing and Methods	Responsible Parties
The Mitsubishi Cement Corporation shall complete the District's equipment inventory spreadsheet annually, which requires tenants to identify the year, make, VIN/ID number, fuel type, and model of the equipment that was used in the previous year, including annual hours of operation for each piece of equipment, including but not limited to heavy-duty drayage and non-drayage trucks, yard equipment, assist and ocean-going tugs, ocean-going vessels, bulk material handling equipment, and any other type of cargo handling equipment. The purpose of the inventory is to track emissions and equipment at TAMT and to assist in technological reviews, as described in the TAMT Plan MM-AQ-7, the San Diego Unified Port District's Periodic Technology Review will coincide with monitoring and reporting pursuant to the San Diego Unified Port District's Climate Action Plan and will include the actions specified in TAMT Plan MM-AQ-7.		
MM-AQ-8: Implement Exhaust Emissions Reduction Program at the Tenth Avenue Marine Terminal. The San Diego Unified Port District is tasked with developing an incentive program, based on an emission reduction schedule, that incentivizes tenants and/or terminal operators to reduce mobile source emissions above and beyond the requirements identified in the TAMT Final PEIR. District staff is currently developing the Exhaust Emission Reduction Program as part of the District's Clean Air Plan update, per the direction of the Board of Port Commissioners in June 2019. Following completion of the Clean Air Plan update, the Project Proponent will be eligible to participate in the updated plan's Exhaust Emission Reduction Program.	**Timing:** Development of the Exhaust Emission Reduction Program as part of the Clean Air Plan update is ongoing. Following completion of the Clean Air Plan update, the Mitsubishi Cement Corporation Project Proponent will be eligible to participate. **Method:** Participate in the updated plan's Exhaust Emission Reduction Program once it has been adopted by the District.	**Implementation:** District, Mitsubishi Cement Corporation Project Proponent **Monitoring and Reporting:** District, Mitsubishi Cement Corporation Project Proponent **Verification:** District
MM-AQ-9R: Use of At-Berth Emission Capture and/or Control System to Reduce Vessel Hoteling Emissions. In lieu of the At-Berth Emission Capture and Control System, the Mitsubishi Cement Corporation shall use electric power through connection with the ship's dry-dock breaker system to reduce Vessel Hoteling Emissions. To attain emission reductions equivalent to or greater than the At-Berth Emission Capture and Control System specified in TAMT Plan MM-AQ-8, ocean going vessels (OGVs) that call at the Mitsubishi Corporation Project facility shall use the shore-to-ship power system at least 50 percent of the time while at berth, not including the necessary 1.5 hours to embark and 1.5 hours to disembark to/from the system. Compliance with the 50 percent shore-to-ship power system requirement shall be calculated based on an annual average. Mitsubishi Cement Corporation shall submit annual reports for each year of Project operations to the San Diego Unified Port District's Planning and Green Port Department on or before January 31 of each year, demonstrating compliance with this environmental control measure for the previous calendar year. If an emergency event [as defined in California Air Resources Board's (CARB's) At-Berth Regulation, Title 17, CCR Section 93118.3, subsection (c)(14)], prevents Mitsubishi Cement Corporation from achieving the required annual average shore-to-ship power rate (equal to or greater than 50 percent), Mitsubishi Cement Corporation may demonstrate compliance over a 2-year period, so long as Mitsubishi Cement Corporation	**Timing:** During Project operation. Annual reports shall be submitted on or before January 31 each year. **Method:** Use of a shore-to-ship power system at least 50 percent of the time while at berth, not including the necessary 1.5 hours to embark and 1.5 hours to disembark to/from the system. Submit annual reports for each year of Project operations to the San Diego Unified Port District's Planning and Green Port Department.	**Implementation:** Mitsubishi Cement Corporation Project Proponent; District **Monitoring and Reporting:** Mitsubishi Cement Corporation Proponent; District **Verification:** District

Mitigation Measures	Timing and Methods	Responsible Parties
submits documentation to the San Diego Unified Port District's Planning and Green Port Department which describes the emergency event(s) and explains the basis for Mitsubishi Cement Corporation's inability to demonstrate compliance using an annual average. The San Diego Unified Port District's Planning and Green Port Department shall review the documentation submitted by the Mitsubishi Cement Corporation and, if the San Diego Unified Port District's Planning and Green Port Department determines that Mitsubishi Cement Corporation made sufficient effort to comply with the environmental control, it would notify Mitsubishi Cement Corporation in writing that use of the two-year average is acceptable. **Please note that Mitsubishi' Cement Corporation's annual dry bulk throughput will not be counted towards the 691,418 metric ton dry bulk trigger that requires use of an At-Berth Emission Capture and Control System because Mitsubishi will be relying on a shore-to-ship power system. However, the 691,418 metric ton dry bulk trigger would apply to other dry bulk tenants that do not have shore-power capabilities.*		
MM-AQ-10: Modernization of Delivery Truck Fleet. No less than 90 percent of the trucks loading cement or cementitious material at the Mitsubishi Cement Corporation facility shall be equipped with an engine that meets one of the following requirements: 1) Is no more than 5 years old, based on engine model year ("5-Year Engine") for each operational year; 2) Has been designed or retrofitted to comply with Federal and State on-road heavy-duty engine emissions standards (e.g., EPA 2010 engine emission standards or successor rules or regulations for on-road heavy duty diesel engines) for a 5-Year Engine ("Emission equivalent Engine"); or 3) Uses alternative engine technology or fuels demonstrated to produce emissions no greater than a 5-Year Engine ("Alternative Equivalent Engine"), including zero emission vehicles powered by electric batteries or hydrogen fuel cells. The remaining 10 percent of the trucks shall comply with all applicable federal and state heavy-duty on-road truck regulations. In addition, all trucks loading cement or cementitious materials at the Mitsubishi Cement Corporation facility shall be registered and be in compliance with the CARB Truck and Bus Regulation. In order to confirm that Mitsubishi Cement Corporation's 90 percent requirement for a Modernized Truck Fleet shall be determined on a calendar year basis. Mitsubishi Cement Corporation shall submit documentation of compliance, showing the following information, to the San Diego Unified Port District's Planning and Green Port Department on an annual basis by January 31 following each year of operation: 1) Truck vehicle identification number (VIN),	**Timing:** During Project operation. Documentation of compliance shall be submitted annually by January 31 of each year. **Method:** Equip 90 percent of trucks loading cement or cementitious material with either a 5-Year Engine, an Emission equivalent Engine, or an Alternative Equivalent Engine. The remaining 10 percent of trucks shall comply with federal and state regulations. Submit documentation of compliance following each year of operation to the San Diego Unified Port District's Planning and Green Port Department.	**Implementation:** Mitsubishi Cement Corporation Project Proponent, District **Monitoring and Reporting:** Mitsubishi Cement Corporation Proponent, District **Verification:** District

Mitigation Measures	Timing and Methods	Responsible Parties
2) Engine model year, 3) Annual truck trips, and 4) If nondiesel technology, manufacturer engine standards.		
Greenhouse Gas Emissions and Climate Change		
MM-GHG-1R: Implement Best Management Practices During Construction of Future TAMT Redevelopment Plan Components. The Mitsubishi Cement Corporation Project Proponent shall implement Best Management Practices (BMPs) to reduce air emissions from all construction activities implemented as part of the Proposed Project. The following measures are required to limit construction equipment exhaust from on-road trucks and heavy-duty equipment used during construction. • Ensure that all off-road diesel-powered equipment used during construction between 2020 and 2025 is equipped with the U.S. Environmental Protection Agency (EPA) Tier 3 or cleaner engines, except for specialized construction equipment for which an EPA Tier 3 engine is not available. • Ensure that all off-road diesel-powered equipment used during construction beyond 2025 is equipped with the EPA Tier 4 Final or cleaner engines, except for specialized construction equipment for which an EPA Tier 4 Final engine is not available. • Maintain all construction vehicles and equipment according to manufacturers' specifications. • Restrict idling of construction vehicles and equipment to a maximum of 3 minutes when not in use (see MM-GHG-2 for definition of "not in use"). In addition, the Mitsubishi Cement Corporation Project Proponent shall implement the relevant BMPs, consistent with the Project-specific industrial Storm Water Pollution Prevention Plan (SWPPP). In no case would any BMP be implemented if it conflicts with the SWPPP or other applicable water quality permit requirements. BMP dust control measures may include, but are not limited to, the following: • Water the grading areas at least twice daily to minimize fugitive dust. • Stabilize graded areas as quickly as possible to minimize fugitive dust. • Apply chemical stabilizer or pave the last 100 feet of internal travel path within the construction site prior to public road entry. • Install wheel washers adjacent to a paved apron prior to vehicle entry on public roads. • Remove any visible track-out into traveled public streets within 30 minutes of occurrence. • Wet wash the construction access point at the end of each workday if any vehicle travel on unpaved surfaces has occurred.	**Timing:** During Project construction and operations. **Method:** Implement specific diesel-reduction measures during construction and operations.	**Implementation:** Mitsubishi Cement Corporation Project Proponent (during construction and operation), Construction Manager (during construction), and General Contractor (during construction) **Monitoring and Reporting:** Qualified agent, approved by and reporting to the District, District's marine terminal supervisors, Mitsubishi Cement Corporation Project Proponent **Verification:** District

Mitigation Measures	Timing and Methods	Responsible Parties
• Provide sufficient perimeter erosion control to prevent washout of silty material onto public roads. • Cover haul trucks or maintain at least 12 inches of freeboard to reduce blow-off during hauling. • Suspend all soil disturbance and travel on unpaved surfaces if winds exceed 25 mph. • Cover/water onsite stockpiles of excavated material. • Enforce a 15 mph speed limit on unpaved surfaces. • On dry days, sweep up any dirt and debris spilled onto paved surfaces immediately to reduce re-suspension of particulate matter caused by vehicle movement. Clean approach routes to construction sites daily for construction-related dirt in dry weather. • Develop as quickly as possible all disturbed areas as directed by the San Diego Unified Port District's Planning and Green Port Department and/or SDAPCD to reduce dust generation. • Limit the daily grading volumes/area. Prior to the commencement of construction activities, the Mitsubishi Cement Corporation Project Proponent shall submit evidence to the San Diego Unified Port District's Planning and Green Port Department of the project proponent's compliance with the BMPs and that construction equipment is maintained and properly tuned in accordance with manufacturers' specifications, which shall be subject to confirmation by the San Diego Unified Port District's Planning and Green Port Department during construction.		
MM-GHG-2R: Comply with San Diego Unified Port District Climate Action Plan Measures. Prior to approval of all discretionary actions and/or Coastal Development Permits, the Mitsubishi Cement Corporation Project Proponent shall be required to implement the following measures to be consistent with the Climate Action Plan. • Vessels shall comply with the San Diego Unified Port District's voluntary vessel speed reduction program, which targets 80 percent compliance. • Vessels that are subject to the ARB's at berth regulation (dry bulk vessels are not subject to the at-berth regulation) shall comply with ARB's at berth regulation that requires shore power or alternative control technology regulation for certain vessel fleets for 80 percent of eligible calls by 2020, minus idle time to clear customs consistent with California Air Resources Board regulations. The TAMT Final PEIR assumed 1.5 hours of idle time for vessels to embark/disembark, which applies to all shore power and/or alternative control technologies employed at the terminal. This is a Project feature made into a mitigation measure to ensure compliance (see MM-GHG-9 for an explanation of the Proposed Project's shore power features).	**Timing:** Confirmation of intent and capability to implement prior to approval of all discretionary actions and/or Coastal Development Permits. **Method:** Implement specific measures designed to be consistent with the District's CAP. Evidence of implementation and compliance with this mitigation measure shall be provided to the San Diego Unified Port District's Planning and Green Port Department on an annual basis through the end of the Project lease or 2035 (buildout of the TAMT Redevelopment Plan), whichever occurs first.	**Implementation:** Mitsubishi Cement Corporation Project Proponent, District **Monitoring and Reporting:** District, Mitsubishi Cement Corporation Project Proponent **Verification:** District

Mitigation Measures	Timing and Methods	Responsible Parties
• Designated truck haul routes shall be used, and the project proponent shall decrease onsite movements where practicable. • No commercial drive-through shall be implemented.		
• Compliance with Assembly Bill 939 and the City of San Diego's Recycling Ordinance shall be mandatory and shall include recycling at least 50 percent of solid waste; compliance with the City of San Diego's Construction and Demolition Debris Deposit Ordinance shall be mandatory and shall include recycling at least 65 percent of all construction debris. This measure shall be applied during construction and operation of the Proposed Project. • Light fixtures shall be replaced with lower-energy bulbs such as fluorescent, Light-Emitting Diodes (LEDs), Compact Fluorescent Lights (CFLs), or the most energy-efficient lighting that meets required lighting standards and is commercially available. Implementation of Climate Action Plan measures will be included as part of any discretionary actions and/or Coastal Development Permit(s) associated with this Project. Evidence of implementation and compliance with this mitigation measure shall be provided to the San Diego Unified Port District's Planning and Green Port Department by the Project Proponent on an annual basis through the end of the lease or 2035 (buildout of the TAMT Redevelopment Plan), whichever occurs first.		
MM-GHG-3: Electric Cargo Handling Equipment Upgrades. A. Prior to January 1, 2020, the San Diego Unified Port District shall ensure that at least three pieces of existing non-electric cargo handling equipment at the terminal are replaced by electric cargo handling equipment, none of which were previously operating at the terminal during the 2013/2014 baseline year of the EIR analysis. Possible ways the electric cargo handling equipment may be obtained include, but are not limited to, the following: 1. Purchased, leased, or otherwise acquired, in whole or in part, through funding provided to a tenant by the San Diego Unified Port District; 2. Purchased, leased, or otherwise acquired, in whole or in part, through funding provided to a tenant by other sources; or 3. Purchased, leased, or otherwise acquired, in whole or in part, by the tenant in compliance with a condition of a discretionary approval issued by the San Diego Unified Port District. Written evidence of the acquisition of the electric cargo handling equipment and the equipment it will replace and remove from further operation at the terminal must be provided to the San Diego Unified Port District. The San Diego Unified Port District shall further ensure that the electric cargo handling	**Timing:** Prior to January 1, 2020. **Method:** MM-GHG-3 will be implemented by the District on a terminal-wide basis. The District is in the process of acquiring and operating electric equipment for use at the TAMT. Mitsubishi Cement Corporation is proposing electric vacuum loaders and only minimal diesel equipment as a feature of the Project.	**Implementation:** District **Monitoring and Reporting:** District **Verification:** District

Mitigation Measures	Timing and Methods	Responsible Parties
equipment is in use at each of the three nodes throughout the expected operating life. This will be accomplished by requiring each tenant that employs electric cargo handling equipment pursuant to this measure to report the equipment's annual number of hours of operation to the San Diego Unified Port District and by requiring the San Diego Unified Port District to monitor use of the electric cargo handling equipment as part of the San Diego Unified Port District's TAMT equipment inventory.		
MM-GHG-4: Electric Cargo Handling Equipment Upgrades. This measure has multiple steps for compliance, as specified below. A. Prior to January 1, 2025, the San Diego Unified Port District also shall ensure that no fewer than 20 non-electric yard trucks in operation are replaced at the TAMT by 20 electric yard trucks. Possible ways the electric yard trucks may be obtained include, but are not limited to, the following: 1. Purchased, leased, or otherwise acquired, in whole or in part, through funding provided to a tenant by the San Diego Unified Port District; 2. Purchased, leased, or otherwise acquired, in whole or in part, through funding provided to a tenant by other sources; or 3. Purchased, leased, or otherwise acquired, in whole or in part, by the tenant in compliance with a condition of a discretionary approval issued by the San Diego Unified Port District. Written evidence of the acquisition of the electric yard trucks, and the non-electric yard trucks they will replace and remove from further operation at the terminal, must be provided to the San Diego Unified Port District. The San Diego Unified Port District shall further ensure that the electric yard trucks are in use at the TAMT throughout the expected operating life of the equipment. Each tenant that employs electric trucks pursuant to this measure shall report the equipment's annual number of hours of operation to the San Diego Unified Port District, and the San Diego Unified Port District shall monitor use of the electric trucks as part of the San Diego Unified Port District's TAMT equipment inventory. B. Prior to January 1, 2030, the San Diego Unified Port District also shall ensure that no fewer than three existing non-electric reach stackers and ten non-electric forklifts in operation are replaced at the TAMT by three fully electric reach stackers and ten fully electric forklifts. Possible ways the electric reach stackers and forklifts may be obtained include, but are not limited to:	**Timing:** Prior to January 1, 2025; prior to January 1, 2030. **Method:** MM-GHG-4 will be implemented by the District on a terminal-wide basis. The District is in the process of acquiring and operating electric equipment for use at the TAMT. Mitsubishi Cement Corporation is proposing electric vacuum loaders and only minimal diesel equipment as a feature of the Project.	**Implementation:** District **Monitoring and Reporting:** District **Verification:** District

Mitigation Measures	Timing and Methods	Responsible Parties
1. Purchased, leased, or acquired, in whole or in part, through funding provided to the tenant by the San Diego Unified Port District; 2. Purchased, leased, or acquired, in whole or in part, through funding provided to the tenant by other sources; or 3. Purchased, leased, or otherwise acquired, in whole or in part, by the tenant in compliance with a condition of a discretionary approval issued by the San Diego Unified Port District. Written evidence of the acquisition of the three electric reach stackers and ten electric forklifts and the conventional equipment they will replace and remove from further operation at the terminal must be provided to the San Diego Unified Port District. The San Diego Unified Port District shall further ensure that the electric reach stackers and forklifts are in use at the TAMT throughout the expected operating life of the equipment. Each tenant that employs electric reach stackers or electric forklifts pursuant to this measure shall report the equipment's annual number of hours of operation to the San Diego Unified Port District, and the San Diego Unified Port District shall monitor use of the electric reach stackers and forklifts as part of the San Diego Unified Port District's TAMT equipment inventory. D. The electric equipment employed pursuant to paragraphs A, B, and C of this mitigation measure may be replaced by other technologies or other types of cargo handling equipment as long as the replacement equipment achieves the same or greater criteria pollutant, toxic air contaminant, and greenhouse gas emission reductions as compared to the equipment required by paragraphs A, B, and C of this mitigation measure.		
MM-GHG-5R: Implement Vessel Speed Reduction Program Beyond Climate Action Plan Compliance for Future Operations Associated with the TAMT Plan. The Mitsubishi Cement Corporation shall be required to comply with the Enhanced VSR Program**.** Mitsubishi Cement Corporation shall, beginning with the first vessel call to the Port, comply with 80% of its OGVs reducing their speeds to 12 knots or less starting at 20 nautical miles from Point Loma. The Mitsubishi Cement Corporation shall comply with 90% of its OGVs calling to the Port reducing their speeds to 12 knots starting at 40 nautical miles from Point Loma upon the occurrence of the earlier of either of the following two scenarios: • Prior to the annual number of dry bulk vessel calls reaching 91 calls annually (e.g., 76 new calls over the TAMT Final PEIR's baseline condition); or	**Timing:** Beginning with the first vessel call to the Port; and prior to the annual number of dry bulk vessel calls reaching 91 calls annually or beginning January 1, 2030, irrespective of the number of calls on an annual basis. Reporting shall occur every 6 months. **Method:** Implement vessel speed reduction measures to comply with the Enhanced VSR Program. Provide evidence of implementation and compliance with this mitigation measure.	**Implementation:** Mitsubishi Cement Corporation Project Proponent, District **Monitoring and Reporting:** District, Mitsubishi Cement Corporation Project Proponent **Verification:** District

Mitigation Measures	Timing and Methods	Responsible Parties
• Beginning January 1, 2030, irrespective of the number of calls on an annual basis. To help the District implement the Beyond 2013 CAP VSR Program before reaching 91 dry bulk vessel calls annually, Mitsubishi Cement Corporation shall provide the District with a rolling estimate of anticipated vessels calls every 6 months. The San Diego Unified Port District will verify compliance through analysis of Automatic Identification System data or by requesting a vessel's Electronic Chart Display Identification System log from the captain.		
MM-GHG-6R: Implement a Renewable Energy Project, or Other Verifiable Actions or Activities on Tidelands, or Purchase the Equivalent Greenhouse Gas Offsets from a California Air Resources Board Approved Registry or a Locally Approved Equivalent Program for Future Operations Associated with the TAMT Plan. **A. Options for Reducing GHG Emissions.** The Mitsubishi Cement Corporation shall do one or more of the following to achieve the required reductions in 2025, 2030, and 2035 greenhouse gas (GHG) emissions specified below, in the following order of priority: 1. Incorporate a renewable energy project: • within the Tenth Avenue Marine Terminal; • within the San Diego Unified Port District's jurisdiction; or • adjacent to the San Diego Unified Port District's jurisdiction; or 2. Undertake other verifiable actions or activities on Tidelands, approved by the District, such as electrification of equipment including vehicles and trucks, financial contribution to a future local or District GHG emission reduction program on Tidelands (locally approved equivalent program), or similar activities or actions that reduce operational GHG emissions; or 3. Purchase GHG emission offset credits which 1) are real, additional, permanent, quantifiable, verifiable, and enforceable as specified in California Health and Safety Code § 38562(d)(1) and (2) and as these terms are further defined in California Code of Regulations, Title 17, § 95802 (see below); 2) use a protocol consistent with or as stringent as California Air Resources Board (CARB) protocol requirements under California Code of Regulations,	**Timing:** Prior to the first call of the first year of operation. **Method:** Implement one or more of the following to achieve requisite reductions to meet the 2025, 2030, and 2035 GHG reduction targets, in order of priority: 1. Incorporate a renewable energy project: • within the Tenth Avenue Marine Terminal; • within the San Diego Unified Port District's jurisdiction; or • adjacent to the San Diego Unified Port District's jurisdiction; or 2. Undertake other verifiable actions or activities on Tidelands, approved by the District, such as electrification of equipment including vehicles and trucks, financial contribution to a future local or District GHG emission reduction program on Tidelands (locally approved equivalent program), or similar activities or actions that reduce operational GHG emissions; or 3. Purchase GHG emission offset credits which 1) are real, additional, permanent, quantifiable, verifiable, and enforceable as specified in California Health and Safety Code § 38562(d)(1) and (2) and as these terms are further defined in California Code of Regulations, Title 17, § 95802 (see below); 2) use a protocol consistent with or as stringent as California Air Resources Board (CARB) protocol	**Implementation:** Mitsubishi Cement Corporation Project Proponent, District **Monitoring and Reporting:** District, Mitsubishi Cement Corporation Project Proponent **Verification:** District

Mitigation Measures	Timing and Methods	Responsible Parties
Title 17, § 95972(a); and 3) are issued by a CARB-approved offset registry.[1] For offset credits from projects outside California, Mitsubishi Cement Corporation must demonstrate in writing to the satisfaction of the District that the offset project meets requirements equivalent to or stricter than California's laws and regulations for ensuring the validity of offset credits. For purposes of this section, the definitions are as follows: a. "Real" means, in the context of offset projects, that GHG reductions or GHG enhancements result from a demonstrable action or set of actions, and are quantified using appropriate, accurate, and conservative methodologies that account for all GHG emissions sources, GHG sinks, and GHG reservoirs within the offset project boundary and account for uncertainty and the potential for activity-shifting leakage and market-shifting leakage. [17 CCR 95802] b. "Additional" means, in the context of offset credits, greenhouse gas emission reductions or removals that exceed any greenhouse gas reduction or removals otherwise required by law, regulation or legally binding mandate, and that exceed any greenhouse gas reductions or removals that would otherwise occur in a conservative business-as-usual scenario. [17 CCR 95802] c. "Permanent" means in the context of offset credits, either that GHG reductions and GHG removal enhancements are not reversible, or when GHG reductions and GHG removal enhancements may be reversible, that mechanisms are in place to replace any reversed GHG emission reductions and GHG removal enhancements to ensure that all credited reductions endure for at least 100 years. [17 CCR 95802] d. "Quantifiable" means in the context of offset credits, the ability to accurately measure and calculate GHG reductions or GHG removal enhancements relative to a project baseline in a reliable and replicable manner for all GHG emission sources, GHG sinks, or GHG reservoirs included within the offset project boundary, while accounting for uncertainty and activity-shifting leakage and market-shifting leakage [17 CCR 95802] e. "Verifiable" means that a non-California offset project is located in a state that has laws and regulations equivalent to or stricter as California's with	requirements under California Code of Regulations, Title 17, § 95972(a); and 3) are issued by a CARB-approved offset registry.[1] For offset credits from projects outside California, Mitsubishi Cement Corporation must demonstrate in writing to the satisfaction of the District that the offset project meets requirements equivalent to or stricter than California's laws and regulations for ensuring the validity of offset credits.	

[1] Currently approved offset registries include the American Carbon Registry (ACR), Climate Action Reserve (CAR) and Verra (formerly the Verified Carbon Standard). See: https://ww3.arb.ca.gov/cc/capandtrade/offsets/registries/registries.htm

Mitigation Measures	Timing and Methods	Responsible Parties
respect to ensuring the validity of offsets and an Offset Project Data Report assertion is well documented and transparent such that it lends itself to an objective review by an accredited verification body. [17 CCR 95802] f. "Enforceable" means the authority for the offset purchaser to hold the offset provider liable and to take appropriate action if any of the above requirements are not met. [adapted from definition in 17 CCR 95802 for use in this measure] "Enforceable" also means that the offset must be backed by a legal instrument or contract that defines exclusive ownership and the legal instrument can be enforced within the legal system of the State of California. **B. Required Annual GHG Emissions Reductions:** The option(s) implemented pursuant to paragraph A above shall achieve the following required GHG reductions for the activities of the Proposed Project for years 2025, 2030, and 2035: 1. 2025 reduction: 568 $MTCO_2e$ per year or 2,345 MWh/year. 2. 2030 reduction: 1,622 $MTCO_2e$ per year or 7,675 MWh/year. 3. 2035 reduction: 1,693 $MTCO_2e$ per year or 8,013 MWh/year. The required 2025, 2030, and 2035 GHG emissions reductions are based on the maximum throughput of 600,000 metric tons (MT) per year via 24 calls to port annually. The required reductions may be reduced at the discretion of the District, based on the actual amount of throughput and hours at berth in a given year and the other adjustment provisions specified below. **C. Implementation of GHG Emissions Reduction Options.** Prior to the first call of the first year of operation and annually thereafter, the District shall notify the Mitsubishi Cement Corporation of the option(s) available for achieving the annual maximum required GHG emissions reduction in the order of priority specified above, and the Mitsubishi Cement Corporation shall:		

Mitigation Measures	Timing and Methods	Responsible Parties
1. Develop a renewable energy project(s) or take other verifiable actions or activities identified by the District to meet or partially meet the required amount of $MTCO_2e$ or MWh reductions specified above. a. If the Mitsubishi Cement Corporation develops a renewable energy project(s), or takes other verifiable actions or activities to reduce GHG emissions, the Mitsubishi Cement Corporation shall submit to the District's Energy Department/Team, for its review and approval, a report specifying the annual amount of $MTCO_2e$ or MWh reduction achieved by the project(s), actions, or activities; submit evidence that the renewable energy project, actions, or activities are not being used to offset GHG emissions for any other project or entity; and submit any other information requested by the District's Energy Department/Team to verify the amount of GHG emissions reduction achieved by the project, actions or activities (collectively, "GHG Emission Reduction Report"). b. If the GHG Emission Reduction Report is approved, a reduction to the required offsets shall be calculated by the District's Energy Department/Team, and the reduction of offsets shall be transmitted to the Mitsubishi Cement Corporation in writing and the amount of GHG reduction shall count towards the required GHG reduction for the Proposed Project ("GHG Reduction"). 2. Purchase GHG emission offsets in conformance with paragraph A(3) above in an amount sufficient to achieve the required reduction of $MTCO_2e$ or MWh specified above, which may be decreased by the amount of annual $MTCO_2e$ or MWh reduction that is achieved by any renewable energy project(s) or other verifiable action or activities if developed and/or implemented pursuant to paragraph (1) above. The purchase of offsets to achieve the required reduction in $MTCO_2e$ or MWh shall occur as follows: a. Purchase offsets for the first 2 years of operation; b. Purchase offsets at least annually thereafter, prior to any calls to port for the corresponding timeframe, beginning with the third year of operation, for the life of the Proposed Project's operations or until termination of the lease agreement between the District and the Mitsubishi Cement Corporation. The Mitsubishi Cement Corporation may purchase more than 1 year of operational emissions offsets, consistent with the amount		

Mitigation Measures	Timing and Methods	Responsible Parties
of $MTCO_2e$ or MWh reduction specified above for the corresponding timeframe of 2025, 2030, or 2035; and c. On or before the first ship call in the first year of operation of the proposed project and annually thereafter, Mitsubishi Cement Corporation shall submit certificates for offsets purchased to achieve the required GHG emission reductions, including written verification by a qualified consultant approved by the District that the offsets meet the requirements for GHG emission offset credits set forth in paragraph A(3) above, to the District's Energy Department/Team. **D. Adjustments to Required GHG Emissions Reductions.** If the Mitsubishi Cement Corporation complies with paragraphs A(1) or A(2) above, in an amount that meets the total amount of $MTCO_2e$ or MWh reductions specified above for 15 years of operation to meet the 2035 reduction target, or complies with paragraph A(3) above and purchases the requisite offsets for 15 years, or does a combination of paragraphs A(1), (2), and (3) to meet the 2035 reduction target, then nothing further shall be required under this mitigation measure. 1. Reduction of Emissions through Development of a Renewable Energy Project Requirement: Although none are identified at this time, the Mitsubishi Cement Corporation may be required by the District to develop a renewable energy project at any time during the life of the project (subject to future approvals and the priorities listed above) and may request a reduction of required offsets. If any reduction in offsets is requested by the Mitsubishi Cement Corporation because of the development of a renewable energy project(s), the Mitsubishi Cement Corporation shall submit a GHG Emission Reduction Report for the District Energy Department's review pursuant to the process specified above in paragraph C(1) above and required offsets shall be determined by the District and reduced. 2. Reduction of Emissions through Verifiable Actions or Activities on Tidelands Requirement: Although none are identified at this time, the Mitsubishi Cement Corporation may be required by the District to take other verifiable actions or activities at any time during the life of the project (subject to future approvals and the priorities listed above) and may request a reduction of required		

Mitigation Measures	Timing and Methods	Responsible Parties
offsets. If any reduction in offsets is requested by the Mitsubishi Cement Corporation because of the other verifiable actions or activities on tidelands, the Mitsubishi Cement Corporation shall submit a GHG Emission Reduction Report for the District Energy Department's review pursuant to the process specified above in paragraph C(1), and required offsets shall be determined by the District and reduced. 3. Reduction of Emissions through Purchase of Offsets: Subsequent to purchasing GHG emission offsets pursuant to paragraph C(2) above, the Mitsubishi Cement Corporation's future annual purchase of offsets to achieve the GHG emission reductions specified in paragraph B above may be adjusted if the preceding year's throughput is less than 600,000 metric tons (the maximum allowed annual throughput), and/or the annual calls to port are less than 24 (the maximum allowed number of calls; 24 calls at 168 hours per call, or 4,032 annual hours at berth). The District or a District-retained consultant (at the Mitsubishi Cement Corporation cost) shall calculate, using the best available science, the amount of unused GHG reduction offsets based on the actual throughput and/or time at berth. Any unused offsets shall be used for the next year of operation of the Proposed Project and the Mitsubishi Cement Corporation shall purchase offsets in the necessary amounts (required amount less any unused offsets) for the subject year. This procedure shall be repeated on an annual basis. In the event that newly discovered information shows that an offset, previously certified as compliant pursuant to paragraph C(3)(c), does not comply with the requirements of paragraph A(3), Mitsubishi Cement Corporation shall purchase an equivalent amount of replacement offsets that comply with the requirements of paragraph A(3) within 30 days after receiving notice of the noncompliance. After verification of unused and available offsets, unused offsets may replace previously compliant offsets should those offsets subsequently be determined noncompliant with paragraph A(3). At the Mitsubishi Cement Corporation's written request to the District, Mitsubishi Cement Corporation may waive the annual adjustment described above and purchase the required $MTCO_2e$ or MWh offsets on at least an annual basis.		
MM-GHG-7R: **Annual Inventory Submittal and Periodic Technology Review.** A. The Mitsubishi Cement Corporation shall comply with the San Diego Unified Port District's Annual Inventory and Periodic Technology Review Program as follows:	**Timing:** During Project operation: Prior to January 30th of each year of operations, Mitsubishi Cement Corporation shall provide an inventory of all mobile equipment associated with its TAMT operations.	**Implementation:** District, Mitsubishi Cement Corporation Project Proponent

Mitigation Measures	Timing and Methods	Responsible Parties
(A) Prior to January 30th of each year of operations, Mitsubishi Cement Corporation shall provide an inventory of all mobile equipment associated with its TAMT operations that generate criteria pollutants, toxic air contaminants and greenhouse gases. The annual inventory shall identify the year, make, VIN or other identification number, fuel type, and model of the equipment that was used in the previous year, as well as the number of hours of operation for each piece of equipment, including but not limited to heavy-duty drayage and non-drayage trucks, yard equipment, assist and ocean-going tugs, ocean-going vessels, bulk material handling equipment, and any other type of cargo handling equipment. The purpose of the annual inventory is to track emissions and equipment at TAMT and to assist in the District's periodic technological reviews, pursuant to TAMT Redevelopment Plan MM-GHG-7. (B) Within twelve (12) months of commencement of truck loadout activities, Mitsubishi Cement Corporation shall implement a zero emission truck demonstration project at TAMT ("Demonstration Project") which uses zero emission trucks for the transport of cement and cementitious material from its TAMT facility. The Demonstration Project shall operate for a period of not less than twelve (12) months and shall include one or more zero emission trucks. If market conditions require Mitsubishi Cement Corporation to temporarily cease truck loadout operations at TAMT, the 12 months shall be tolled until Mitsubishi Cement Corporation resumes regular truck loadout operations. The Demonstration Project will evaluate the capability of zero emission trucks to transport cement and cementitious materials from Mitsubishi Cement Corporation's TAMT facility, determine the operational logistics of the use of zero emission trucks with increasing deployment, and better inform the District's metrics for determining the feasibility of zero emission trucks. (C) Within three (3) months after completion of the Demonstration Project, Mitsubishi Cement Corporation shall submit a written report to the District which sets forth the data collected during the Demonstration Project and identifies opportunities and barriers for larger deployment of zero emission trucks at Mitsubishi Cement Corporation's TAMT facility. The Demonstration Project is intended to assist the District in its Periodic Technology Review pursuant to TAMT MM-GHG-7 by providing information regarding the feasibility of using zero emission trucks to service Mitsubishi Cement Corporation's operations at TAMT. (D) Within six (6) months after completion of the Demonstration Project, Mitsubishi Cement Corporation shall submit a zero emission truck	Within twelve (12) months of commencement of truck loadout activities, Mitsubishi Cement Corporation shall implement a zero-emission truck demonstration project at TAMT. Within three (3) months after completion of the Demonstration Project, Mitsubishi Cement Corporation shall submit a written report to the District which sets forth the data collected during the Demonstration Project. Within six (6) months after completion of the Demonstration Project, Mitsubishi Cement Corporation shall submit a zero emission truck infrastructure plan to the District. Beginning a year after approval of the Project and continuing each year during the term of the Mitsubishi Cement Corporation's lease with the District, the District shall review the feasibility metrics annually and update them as necessary to reflect current data. **Method:** Complete the District's equipment inventory spreadsheet and work with District staff and/or the local air pollution control district to identify new technologies or other practices for reducing emissions and improving air quality. Mitsubishi Cement Corporation shall implement a zero-emission truck demonstration project at TAMT. Mitsubishi Cement Corporation shall submit data collected during the Demonstration Project. Mitsubishi Cement Corporation shall submit a zero emission truck infrastructure plan to the District.	**Monitoring and Reporting:** District, Mitsubishi Cement Corporation Project Proponent **Verification:** District

Mitigation Measures	Timing and Methods	Responsible Parties
infrastructure plan ("Infrastructure Plan") to the District. The Infrastructure Plan shall include, at a minimum, the location of needed charging stations and other equipment needs, power requirements for each charging station and any necessary upgrades and other improvements to support the use of zero emission trucks in Mitsubishi Cement Corporation's operations at TAMT. The Infrastructure Plan also shall identify ancillary infrastructure needs related to potential operational changes from incorporating zero emission trucks, including coordination with Mitsubishi Cement Corporation's customers at key locations to service San Diego County and necessary accommodations for drivers and other personnel. The Infrastructure Plan is intended to assist the District in its Periodic Technology Review pursuant to TAMT MM-GHG-7 by providing information regarding the feasibility of using zero emission trucks to service Mitsubishi Cement Corporation's operations at TAMT.		
B. Beginning a year after approval of the Project and continuing each year during the term of the Mitsubishi Cement Corporation's lease with the District, the District shall include in its Periodic Technology Review under TAMT MM-GHG-7 an evaluation of the feasibility of using zero emission trucks for the transport of cement and cementitious material from Mitsubishi Cement Corporation's facility at TAMT ("Annual ZE Truck Feasibility Study"). The District's evaluation of and conclusion regarding feasibility shall be based on the feasibility metrics set forth in Table 1, ZE Truck Feasibility Categories and Metrics, below and shall be made available to the public in an Annual ZE Truck Feasibility Study. The District shall review the feasibility metrics annually and update them as necessary to reflect current data.	The District shall review the feasibility metrics annually and update them as necessary to reflect current data.	

Table 1. ZE Truck Feasibility Categories and Metrics

Feasibility Category	Feasibility Metric
Technical	Range
	Torque
	Payload Capacity
	Refueling Time
	Service and maintenance support
	Ancillary energy requirements

Mitigation Measures			Timing and Methods	Responsible Parties
Economic	Vehicle cost			
	Total Cost of Ownership	w/ incentives		
		w/o incentives		
	Charging infrastructure cost			
Fleet Logistics	Scheduling			
	Truck Assignments			
	% of port trips that ZEVs can meet			
Charging Infrastructure Availability	On-site/depot			
	On-route/opportunity			
	Public (as needed)			
Demonstration Project	Information obtained from the demonstration project.			
Availability of Zero-Emission Trucks	Procurement and delivery availability, including delivery of the trucks to the fleet. * Procurement availability for the full spectrum of potential MCC customers, regardless of size.			
Annual Throughput	Number of trucks to support annual operations			

*"fleet" means customers' trucks traveling to or from the Mitsubishi Cement Corporation's facility at TAMT.

C. In the event the District's Periodic Technology Review pursuant to TAMT MM-GHG-7R identifies new technology or other practices that are feasible and are equally or more effective in reducing GHG emissions than the mitigation measures adopted by the District for the Mitsubishi Cement Corporation facility, the District may add, modify or substitute in place of an adopted mitigation measure such new technology or other practices as it becomes commercially available, unless the changes to an adopted measure would cause or contribute to an increase in any of the facility's significant environmental impacts.

Mitigation Measures	Timing and Methods	Responsible Parties
MM-GHG-8R: Exhaust Emissions Reduction Program at the Tenth Avenue Marine Terminal. The San Diego Unified Port District is tasked with developing an incentive program, based on an emission reduction schedule, that incentivizes tenants and/or terminal operators to reduce mobile source emissions above and beyond the requirements identified in the TAMT Final PEIR. San Diego Unified Port District staff is currently developing the Exhaust Emission Reduction Program as part of their Clean Air Plan update, per the direction of the Board of Port Commissioner's in June 2019. Following completion of the Clean Air Plan update, the Project Proponent will be eligible to participate in the updated plan's Exhaust Emission Reduction Program.	**Timing:** Development of the Exhaust Emission Reduction Program as part of the Clean Air Plan update is ongoing. Following completion of the Clean Air Plan update, the Mitsubishi Cement Corporation Project Proponent will be eligible to participate. **Method:** Participate in the updated plan's Exhaust Emission Reduction Program once it has been adopted by the District.	**Implementation:** District, Mitsubishi Cement Corporation Project Proponent **Monitoring and Reporting:** District, Mitsubishi Cement Corporation Project Proponent **Verification:** District
MM-GHG-9R: Use of At-Berth Emission Capture and/or Control System to Reduce Vessel Hoteling Emissions. In lieu of the At-Berth Emission Capture and Control System, the Mitsubishi Cement Corporation shall use electric power through connection with the ship's dry-dock breaker system to reduce Vessel Hoteling Emissions. To attain emission reductions equivalent to or greater than the At-Berth Emission Capture and Control System specified in TAMT Redevelopment Plan MM-GHG-8, OGVs that call at the Mitsubishi Corporation Project facility shall use the shore-to-ship power system at least 50 percent of the time while at berth, not including the necessary 1.5 hours to embark and 1.5 hours to disembark to/from the system. Compliance with the 50 percent shore-to-ship power system requirement shall be calculated based on an annual average. Mitsubishi Cement Corporation shall submit annual reports for each year of Project operations to the San Diego Unified Port District's Planning and Green Port Department on or before January 31 of each year, demonstrating compliance with this environmental control measure for the previous calendar year. If an emergency event (as defined in CARB's At-Berth Regulation, Title 17, CCR Section 93118.3, subsection (c)(14)), prevents Mitsubishi Cement Corporation from achieving the required annual average shore-to-ship power rate (equal to or greater than 50 percent), Mitsubishi Cement Corporation may demonstrate compliance over a 2-year period, so long as Mitsubishi Cement Corporation submits documentation to the San Diego Unified Port District's Planning and Green Port Department which describes the emergency event(s) and explains the basis for Mitsubishi Cement Corporation's inability to demonstrate compliance using an annual average. The San Diego Unified Port District's Planning and Green Port Department shall review the documentation submitted by the Mitsubishi Cement Corporation and, if the San Diego Unified Port District's Planning and Green Port Department determines that Mitsubishi Cement Corporation made sufficient effort to comply with the environmental control, it will notify Mitsubishi Cement Corporation in writing that use of the 2-year average is acceptable. **Please note that Mitsubishi' Cement Corporation's annual dry bulk throughput will not be counted towards the 691,418 metric ton dry bulk trigger that requires use of an At-Berth Emission Capture and Control System because Mitsubishi will be*	**Timing:** During Project operation. Annual reports shall be submitted on or before January 31 each year. **Method:** Use of a shore-to-ship power system at least 50 percent of the time while at berth, not including the necessary 1.5 hours to embark and 1.5 hours to disembark to/from the system. Submit annual reports for each year of Project operations to the San Diego Unified Port District's Planning and Green Port Department.	**Implementation:** Mitsubishi Cement Corporation Project Proponent, District **Monitoring and Reporting:** Mitsubishi Cement Corporation Project Proponent **Verification:** District

Mitigation Measures	Timing and Methods	Responsible Parties
relying on a shore-to-ship power system. However, the 691,418 metric ton dry bulk trigger would apply to other dry bulk tenants that do not have shore-power capabilities.		
MM-GHG-10: Modernization of Delivery Truck Fleet. No less than 90 percent of the trucks loading cement or cementitious material at the Mitsubishi Cement Corporation facility shall be equipped with an engine that meets one of the following requirements: 1) Is no more than 5 years old, based on engine model year ("5-Year Engine") for each operational year; 2) Has been designed or retrofitted to comply with Federal and State on-road heavy-duty engine emissions standards (e.g., EPA 2010 engine emission standards or successor rules or regulations for on-road heavy duty diesel engines) for a 5-Year Engine ("Emission equivalent Engine"); or 3) Uses alternative engine technology or fuels demonstrated to produce emissions no greater than a 5-Year Engine ("Alternative Equivalent Engine"), including zero emission vehicles powered by electric batteries or hydrogen fuel cells. The remaining 10 percent of the trucks shall comply with all applicable Federal and State heavy-duty on-road truck regulations. In addition, all trucks loading cement or cementitious materials at the Mitsubishi Cement Corporation facility shall be registered and be in compliance with the CARB Truck and Bus Regulation. Confirming that Mitsubishi Cement Corporation's 90 percent requirement for a Modernized Truck Fleet shall be determined on a calendar year basis. Mitsubishi Cement Corporation shall submit documentation of compliance, showing the following information, to the San Diego Unified Port District's Planning and Green Port Department on an annual basis by January 31 following each year of operation: 1) Truck vehicle identification number (VIN), 2) Engine model year, 3) Annual truck trips, and 4) If nondiesel technology, manufacturer engine standards.	**Timing:** During Project operation. Documentation of compliance shall be submitted annually by January 31 of each year. **Method:** Equip 90 percent of trucks loading cement or cementitious material with either a 5-Year Engine, an Emission equivalent Engine, or an Alternative Equivalent Engine. The remaining 10 percent of trucks shall comply with federal and state regulations. Submit documentation of compliance following each year of operation to the San Diego Unified Port District's Planning and Green Port Department.	**Implementation:** Mitsubishi Cement Corporation Project Proponent, District **Monitoring and Reporting:** Mitsubishi Cement Corporation Project Proponent **Verification:** District
Hazards and Hazardous Materials		
MM-HAZ-1R: Compliance with Burn Ash Soil Management Plan. Prior to approval of the Project grading plans and the commencement of any construction activities that would disturb the soil, the Mitsubishi Cement Corporation Project Proponent and the contractor (collectively "Contractor") shall demonstrate compliance with the Burn Ash Management Plan – Tenth Avenue Marine Terminal, San Diego, California, prepared by Tetra Tech, Inc., June 30, 2017. Specifically, the Contractor shall demonstrate compliance with the following	**Timing:** Prior to approval of Project grading plans and construction and during construction. **Method:** Demonstrate compliance with the Burn Ash Management Plan – Tenth Avenue Marine Terminal, San Diego, California, prepared by Tetra Tech, Inc., June 30, 2017.	**Implementation:** District or Mitsubishi Cement Corporation Project Proponent, Construction Manager, and General Contractor **Monitoring and Reporting:** Qualified agent, approved by the District,

Mitigation Measures	Timing and Methods	Responsible Parties
specific requirements of the Burn Ash Management Plan including, but not limited to, the following. • *Conduct Soil Testing.* The Contractor shall comply with the excavated soil management techniques specified in the Burn Ash Management Plan. The Contractor shall follow the soil sampling protocol and soil sampling objectives, and shall comply with the soil characterization methodology identified within the Burn Ash Management Plan. • *Prepare and Implement a Community Health and Safety Plan.* The Contractor shall develop and implement a Project specific Community Health and Safety Plan that addresses the chemical constituents of concern for the Project site. The guidelines of the Health and Safety Plan shall be in accordance with the County of San Diego's Department of Environmental Health's Site Assessment and Mitigation Manual (2017) and Environmental Protection Agency. The Health and Safety Plan shall include detailed plans on air monitoring and other appropriate construction means and methods to minimize the public's and site workers' exposure to the chemical constituents. The contractor shall utilize a Certified Industrial Hygienist with significant experience with chemicals of concern on the Project site to approve the Health and Safety Plan and actively monitor compliance with the Health and Safety Plan during construction activities. • *Complete Soil Disposal.* Any soil disturbed by construction activities shall be profiled and disposed of in accordance with California Code of Regulations, Title 22, Division 4.5 requirements. If soils are determined to be appropriate for reuse, they may be exported or used as fill material. If soils are determined to be hazardous and not suitable for reuse, they shall be disposed of at a regulated Class I landfill. Soils shall be transported in accordance with the Burn Ash Management Plan. Soils to be loaded into trucks for offsite disposal at a Class I landfill shall be moistened with a water spray or mist for dust control in accordance with Section 5.6, Dust Control, of the Burn Ash Management Plan. If dust is visible, positive means shall be applied immediately to prevent airborne dust. Care shall be used to minimize the amount of water applied to soils that may contain elevated concentrations of contaminants. 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.		Mitsubishi Cement Corporation Project Proponent **Verification:** District
MM-HAZ-2: Implement Engineering Controls and Best Management Practices during Construction. Prior to construction, a site-specific Health and Safety Plan shall be prepared by the contractor and approved by a licensed California Certified Industrial Hygienist. The Health and Safety Plan shall be prepared per the requirements of 29 Code of Federal Regulations 1910.120 and	**Timing:** Prior to the issuance of construction permits and during construction. **Method:** Implement engineering controls and BMPs.	**Implementation:** Mitsubishi Cement Corporation Project Proponent, Construction Manager, and General Contractor

Mitigation Measures	Timing and Methods	Responsible Parties
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.		**Monitoring and Reporting:** Qualified agent, approved by the District, Mitsubishi Cement Corporation Project Proponent **Verification:** District
Noise and Vibration		
MM-NOI -2: Initiate and Maintain a Complaint and Response Tracking Program. Prior to the commencement of operations of the TAMT plan, the District shall designate a noise disturbance coordinator. The coordinator will be responsible for responding to complaints regarding noise from project operations, will investigate the cause of the complaint, and will ensure that reasonable measures are implemented to correct the problem, where feasible. A contact telephone number for the noise disturbance coordinator will be conspicuously posted at the main entrance to the project site and in other reasonable locations, as appropriate, to ensure the contact information is easily obtained. This measure shall be implemented in combination with MM-NOI 1, which provides several examples of what type of noise attenuation measures may be feasible. The goal of this measure is to provide additional information regarding the sources of loud noises and to assist in the design and implementation of measures to reduce the noise to a level that would be at or below the applicable noise standards for the land use experiencing the excessive noise.	**Timing:** Prior to commencement of operations of the TAMT Plan. **Method:** The District is in the process of implementing MM NOI-2. The District has designated a noise disturbance coordinator to receive complaints regarding noise on the terminal via the existing TAMT Truck Hotline. In addition, the District is in the process of posting signage at the TAMT main entrance containing contact information to facilitate and aid in public concerns related to noise complaints.	**Implementation:** District **Monitoring and Reporting:** District **Verification:** District

Mitigation Measures	Timing and Methods	Responsible Parties
Transportation, Circulation, and Parking		
MM-TRA-3R: Widen the Segment of 28th Street between Boston Avenue and National Avenue to a Four-Lane Major Arterial Classification Consistent with the Barrio Logan Public Facilities Financing Plan. The District currently has an established program to track the number of trucks that enter and exit the terminal each year associated with TAMT operations. Prior to generating an additional 161 new daily truck trips, the District shall pay a fair-share contribution (STC would be responsible for 2.8%) of the cost to widen the roadway segment of 28th Street between Boston Avenue and National Avenue to a Four-Lane Major Arterial classification. The improvement is identified within the Barrio Logan Public Facilities Financing Plan, and therefore would be paid to the City of San Diego in accordance with Section 142.0640 of the San Diego Municipal Code. Payment of the District's fair share shall be completed prior to reaching 161 new daily truck trips. In order to ensure the significant impact does not occur before the District has paid its fair share to the City, the District shall initiate payment once approximately 150 new daily truck trips are reached under the proposed project. The trigger will be determined by the District by examining the ADT over a 1-month timeframe and comparing the ADT to the baseline of 93 daily trucks generating 186 trips per day (33,349 trucks per year divided by 360 days multiplied by 2 trips for each truck) and 935 daily employee trips (315 existing employees multiplied by 3 trips per day). At the District's discretion, the District may seek reimbursement from tenants that would contribute new daily trips in proportion to their contribution.	**Timing:** Prior to generating an additional number of new daily truck trips as indicated in the measure. **Method:** The District shall pay a fair-share contribution of the cost to widen the roadway segment as indicated in the measure.	**Implementation:** District **Monitoring and Reporting:** District **Verification:** District, City of San Diego
MM-TRA-4: Westbound Right-Turn Overlap Phase at Norman Scott Road/32nd Street/ Wabash Boulevard Intersection. The San Diego Unified Port District currently has an established program to track the number of trucks that enter and exit the terminal each year associated with TAMT operations. Prior to generating an additional 195 new daily trips, the San Diego Unified Port District shall coordinate with the California Department of Transportation to determine the San Diego Unified Port District's fair share payment to fund the addition of a westbound right-turn overlap phase to the intersection of Norman Scott Road/32nd Street/Wabash Boulevard, a California Department of Transportation–controlled intersection, to improve the delay caused by the proposed project. This would reduce the delay associated with the project by 20.8 seconds during the AM peak hour and by 19.9 seconds during the PM peak hour compared to unmitigated conditions, and would effectively reduce delay at this intersection to below current levels. (Note, for the STC Alternative, this mitigation measure would reduce the unmitigated delay associated with this alternative by 19.4 seconds during the AM peak hour and by 19.3 seconds during the PM peak hour.) In order to ensure the significant impact does not occur before the San Diego Unified Port District has paid its fair share to the California Department of Transportation, the San Diego Unified Port District shall initiate payment once approximately 150 new daily trips	**Timing:** Prior to generating an additional number of new daily trips as indicated in the measure. **Method:** The District shall coordinate with Caltrans to determine the District's fair share payment to fund the addition of a westbound right-turn overlap phase.	**Implementation:** District **Monitoring and Reporting:** District **Verification:** District, Caltrans

Mitigation Measures	Timing and Methods	Responsible Parties
are reached under the proposed project. The trigger will be determined by the San Diego Unified Port District by examining the average daily trips over a 1-month timeframe and comparing the average daily trips to the baseline of 93 daily trucks generating 186 trips per day (33,349 trucks per year divided by 360 days multiplied by 2 trips for each truck) and 935 daily employee trips (315 existing employees multiplied by 3 trips per day). At the San Diego Unified Port District's discretion, the San Diego Unified Port District may seek reimbursement from tenants that would contribute new daily trips in proportion to their contribution.		
MM-TRA-5: District Shall Inform All TAMT Workers to Park at the TAMT Facility or at an Authorized Offsite Parking Lot or Parking Garage. All TAMT workers, employees, and contractors are prohibited from using on-street parking or from parking at the neighboring Cesar Chavez Park. If no parking is available on the project site, the District's marine terminal supervisors shall inform all dock workers that they shall park within a parking garage or surface parking lot.	**Timing:** During Project operation. **Method:** Inform all dock workers to park within a parking garage or surface parking lot.	**Implementation:** District **Monitoring and Reporting:** District **Verification:** District
MM-C-TRA-1R: Construct Managed Lanes on I-5 and I-15. SANDAG currently has plans to construct two managed lanes (one in each direction) on I-5 between I-15 and Palomar Street by the year 2030 as well as two additional multi-purpose lanes and two managed lanes on SR-15 between I-5 and SR-94 by the year 2050. The District shall coordinate with SANDAG and Caltrans to determine the TAMT Plan's fair share contribution. Because this mitigation measure is far into the future, the exact amount will need to be determined at a future date and prior to the TAMT Plan's contribution to the affected freeway mainline sections reaching 0.005 change in V/C ratio. The following fair-share percentages under the STC Alternative scenario per affected freeway facility, should serve as guidance to the amount the District should pay toward a program or plan for the aforementioned freeway facility improvements to be constructed. • I-5 northbound between SR-94 & Imperial Avenue: 5 percent of the total cost for improvements to this segment. • I-5 northbound between SR-15 & Main Street: 6 percent of the total cost for improvements at this segment. • SR-15 southbound between Market Street & Ocean View Boulevard: 11 percent of the total cost for improvements to this segment. If a fair share funding program has been identified, the District shall determine if the Mitsubishi Cement Corporation Project Proponent shall provide a fair share contribution.	**Timing:** Prior to the TAMT Plan's contribution to the affected freeway mainline segments reaching a change in V/C ratio as indicated in the measure. **Method:** The District shall coordinate with SANDAG and Caltrans to determine the District's fair share contribution to construct managed lanes on I-5 and SR-15. The District will determine if the Mitsubishi Cement Corporation Project Proponent will be required to provide a fair share contribution once a fair share funding program has been identified.	**Implementation:** District **Monitoring and Reporting:** District, Caltrans **Verification:** District