



Maritime Clean Air Strategy

Community Conversation Q&A

April 7, 2021

portofsandiego.org

MCAS Community Conversation Q&A

Port of San Diego

April 7, 2021

1. **How does the MCAS relate to the Port's other planning efforts, such as the Port Master Plan Update and the Climate Action Plan?**

The Port's MCAS, Climate Action Plan and Port Master Plan Update (PMPU) all seek to accomplish different objectives by concentrating on different activities, geographic areas, and timelines, as further described below.

The MCAS is both a guidance and policy document that will direct the Port's efforts to holistically address and expand improvements to air quality and public health through sustainable development of the maritime and goods movement industry. The MCAS will identify, prioritize, and ultimately support implementation of a wide range of maritime emission reduction initiatives at the Port and in collaboration with its partners. Moreover, the MCAS will align and support regional emission reduction efforts that are being advanced as part of the Portside Environmental Justice Neighborhoods (Portside Community) pursuant to Assembly Bill 617 Community Emission Reduction Plan (AB 617 CERP).

Based on an updated 2019 air emission inventory, the MCAS provides information on current and forthcoming regulatory requirements, information on zero and near-zero emission technologies, as well as options for lowering freight-related emissions with high-level cost estimates. It identifies near-term (2026) and mid-term (2031) aspirational goals and objectives for the Port to work towards in partnership with a broad range of stakeholders (e.g., tenants, terminal operators, industry, public agencies, etc.). The MCAS focuses primarily on reducing localized air pollutants (such as diesel particulate matter and nitrous oxides) to reduce the Port's contribution to health impacts that have been disproportionately borne by residents and workers in the nearby AB 617 Portside Community, which includes the neighborhoods of Barrio Logan, Logan Heights, Sherman Heights, and West National City. By focusing on the maritime and goods movements industry, the MCAS seeks to clarify expectations for maritime- and freight-related businesses that do and want to do business at the Port. Finally, the MCAS is intended to help strengthen the Port's competitiveness when trying to secure federal, State, and/or local grants to implement emission reduction projects because many of the goals and objectives exceed current regulatory requirements.

The Port's Climate Action Plan (CAP) seeks to provide strategies in alignment with the State's 2030 and 2050 greenhouse gas emission (GHG) reduction targets by focusing on all types of activities that occur throughout Port tidelands. In addition to identifying mobile source emission reduction strategies (such as vessel speed reduction and zero/near zero equipment), the CAP identifies strategies for all types of land uses that occur on the tidelands (such as hotels, parks, restaurants/retail, etc.), by addressing energy efficiency, energy conservation, water

conservation, and waste reduction. The CAP identifies strategies that focus solely on reducing carbon dioxide equivalent (CO₂e) emissions, more commonly referred to GHGs. The Port's CAP is a guiding policy document, but applicable strategies can become mandatory when they are incorporated into a project-specific environmental document and/or coastal development permit. Through the discretionary approval process, many project applicants incorporate CAP-related strategies into their project as required mitigation measures or conditions of approval, to demonstrate that the project is reducing greenhouse gas emissions to the maximum extent practicable, as required by the California Environmental Quality Act (CEQA).

Finally, the Port's Master Plan governs the water and land use on the tidelands that the Port manages as a trustee, in accordance with the Public Trust Doctrine (Common Law) Port Act (1962) and the California Coastal Act (1976). Beginning in 2013, the Port began its first comprehensive update to the Port Master Plan (PMPU) to modernize methods for water and land use planning. The PMPU is a regulatory document that has a long-term plan horizon of 2050. Updating the Port's Master Plan is a legislative action, that requires approval by the Board of Port Commissioners, as well as the approval by the California Coastal Commission.

2. Why doesn't the Port require all large ships coming here to use the Port's shore power system while docked here?

The Port of San Diego has been a leader on the West Coast as it relates to shore power operations and has encouraged shore powering prior to regulatory requirements. There are two important components related to effective use of shore power:

- First, there must be land side infrastructure which, though costly, the Port currently has some available infrastructure – the Port currently has one shore power connection at the Tenth Avenue Marine Terminal, and one connection at the cruise ship terminals, with one additional connection recently approved by the Board of Port Commissioners – and is currently seeking funding for additional infrastructure.
- Second, the ships must retrofit their vessels to be capable of connecting or plugging in to shore power. Currently, regulations require passenger, container, and refrigerated vessels to be plugged in about 70% of the time. The amended regulation increases that compliance to 100% and will also require Roll-on Roll-off ships (e.g. auto carriers) to plug in by 2025. Many of the vessels that visit San Diego do not come regularly and may only visit our Port once a year or once every few years. As such, it makes it difficult for some vessel carriers to retrofit their vessels to only meet a single call. However, the Port continues to move towards furthering shore powering efforts.

3. Along with speed and at-berth regulations, will the Port consider bringing electric charging or hydrogen infrastructure?

The Port is open to considering all potential opportunities to reduce emissions and will review each potential opportunity presented.

4. Is there an objective to add solar power charging stations as a top priority?

Port staff are currently identifying locations that would be good for both electric vehicle supply equipment charging and solar power charging.

5. What are plans for EV charging stations and DC fast chargers for electric vehicles on Port property?

The Port currently has seven public EV charging stations in Port-managed parking lots on the bayfront – two at Shelter Island, two at Spanish Landing, and three at Hilton Bayfront. We also have a Solar EV Arc charger in the Port’s Administration Building parking lot for public use. We are also working with SDG&E to install 26 more EV chargers at three sites this year – eight at the Convention Center, seven in Embarcadero Marina Park South, and 11 in Pepper Park in National City. By the end of 2021, 34 chargers will be installed at seven sites.

6. When will the Port reduce pollution as soon as possible? What are the most recent deadlines for doing this? Regarding trucks and machinery for example, when will the Port build charging stations for electric vehicles, and when will the Port look for funding to get this done?

a. When will the Port reduce pollution as soon as possible?

The Port has a history of making improvements to reduce pollution for many years and continues to do so. Examples of the wide variety of projects include: shore power at the cruise terminal; 27 additional public-facing EV car chargers; conversion of Port fleet trucks from diesel to biodiesel; four Port-owned solar power projects; and even installing an energy efficient microgrid at the Tenth Avenue Marine Terminal. Additionally, the MCAS builds on efforts underway and includes additional new strategies to improve air quality and public health through sustainable development of the maritime and goods movement industry.

b. What are the most recent deadlines for doing this?

The Port’s most recent efforts are the three EV charging sites that are currently under construction.

c. Regarding trucks and machinery for example, when will the Port build charging stations for electric vehicles

The Port has charging in place for the Port fleet’s first new electric trucks and is working with SDG&E for future growth. In addition, the Port installed nine charging stations for forklifts at B-Street Cruise Terminal and the Port purchased one light duty electric vehicle and one hybrid vehicle for Harbor Police Administrative staff in 2019

d. When will the Port looking for funding to get this done?

The Port is looking for funding through many channels including local, state and federal grants. It should be noted, grants are competitive and are not always awarded. However, it is anticipated that completion of the MCAS will improve the Port’s competitiveness in securing future grant awards. Additionally, the Port continues to support and assist tenants with their grants that have paid for many zero-emission trucks and equipment.

- 7. You mentioned as part of the goals and strategies may be SDG&E's collaboration. May you explain more on how they will collaborate, unlike no other, by reducing emissions in heavy duty trucks. Perhaps, reaching 30% Zero emission Vehicles by 2023?**

The State has ambitious goals for electric vehicle (EV) growth, but installing the infrastructure for EV charging in a public place is an expensive undertaking. SDG&E is working with the Port at different sites to install the connections, wiring, and necessary electric gear to improve access.

- 8. What is the Port's schedule for converting all Port trucks and vehicles to electric trucks and vehicles?**

The Port's goal is to have all cars and light duty trucks converted by 2030. The medium and heavy-duty trucks may take longer due to cost and availability. The schedule could be moved up as funding is identified and secured, or as purchase prices improve.

- 9. When does the Port plan on requiring all private trucks using Port facilities to be converted to electric engines? When will this process begin, and when will it be finished?**

The Port may not make a requirement. The Port is working with tenants and truckers to help them acquire electric trucks that are cost effective and put in place the charging systems that are required.

- 10. How is this plan reducing emissions for commercial vessels such as the Hornblower? / When will the Port establish a policy/lease agreement that only clean energy ferry services are allowed on the bay?**

All current ferry activity in San Diego Bay is classified as short run ferry service, which travels routes less than three nautical miles. CARB is in the process of updating the commercial harbor craft rule to include additional vessel categories and require Tier 3 or Tier 4 engines with a diesel particulate filter (DPF) for all vessels below 600 kW, which includes excursion boats and ferries. Further, all in-use and new short-run ferries will need to be zero emission by 2026. The Commercial Harbor Craft (CHC) Goal and CHC Objective 2 in the MCAS support CARB's proposed amendment:

- a. CHC Goal: Reduce emissions from Harbor Craft by advancing emerging zero emission technologies through 2031; and
- b. CHC Objective 2: Advance the State's goals for commercial harbor craft by supporting short-run ferry operators with implementing zero emission ferries for all existing and new vessels and routes.

- 11. You have referred to the Port as its own special district. It appears as if the Port intends to be a bit more ambitious in making recommendations with regards to future requirements of emission reductions. If a tenant with a commercial harbor craft exceeds pending CARB requirements, will the Port consider incentivizing tenants for advancing emission reductions?**

Yes, the Port is doing this today through in-kind support to facilitate the new project. This includes a cross-departmental team that meets regularly to help the project move through the various

environmental and permitting issues to avoid unnecessary delays. We also work with other entities such as SDG&E to assist with complex electrification issues.

12. Will the Port consider offering incentives to existing tenants who consider projects that offset emissions?

The Port is open to exploring incentives for projects that assist in reducing emissions.

13. What technologies are being considered to monitor air quality? Will the community have access to the data in real time?

APCD has several air monitoring stations dispersed throughout the community to collect data on various pollutants to inform community exposure to air pollution. As part of the AB 617 Program, APCD has installed and is operating new, real-time (i.e. continuous) black carbon (a surrogate for diesel particulate matter) analyzers at several locations in the Portside Community. These include TAMT, Chicano Park, Sherman Elementary School, and Oceanview Blvd. at I-15. A link to the air monitoring data can be found [here](#) starting on page 64 of the draft CERP.

14. When you reduce GHGs, are there usually co-benefits in reductions of the other pollutants that you mentioned?

Yes. Reducing exhaust emissions from trucks, vessels, cargo handling equipment and rail result in less ozone or smog (e.g., criteria pollutant), less diesel particulate matter (e.g., toxic air contaminant), as well as less carbon dioxide (e.g., greenhouse gas emissions). These are the co-benefits of emission reduction efforts. Zero emission vehicles and equipment eliminate locally generated criteria pollutants and toxic air contaminants, but still result in some greenhouse gas emissions because the electricity provided by the grid is still partially derived from fossil fuels. However, in 2018, Senate Bill 100 (SB 100, de Leon) accelerated California's Renewable Portfolio Standard (RPS) Program, which now requires 60% of the State's electricity retail sales to come from carbon neutral sources by 2030 and 100% to come from carbon neutral sources by 2045.

15. Will MCAS be more stringent than CARB for Commercial Harbor Craft to accomplish the Port's own agenda?

CARB sets the long-term requirements for all types of Commercial Harbor Craft (CHC). These rules are currently in development. As with the truck rules, the Port will work with CHC owners to identify cost-effective pathways and pilots to help the industry meet the State's standard prior to full implementation.

16. It seems disappointing that staff seems to be saying that the Port will take the initiative to pursue particular projects only in order to comply with existing or pending state regulations and requirements. Can the next MCAS include a list of specific actions the Port is taking that go beyond simply complying with current and pending state laws and regulations. What is the Port going to do above and beyond what is required by law?

The Port has accomplished many projects and has many more underway that go beyond the focus of the MCAS and CARB requirements. Some examples of the Port's diversity of environmental projects include:

- Eight existing electric vehicle (EV) chargers at our public bayfront parks and at our Port Administration Building, with 28 more coming online at three other sites soon;
- Four solar/photovoltaic (PV) systems at the Port Administration Building, the Port's General Services Building in National City, the B Street Cruise Ship Terminal and the Broadway Pavilion. The solar systems are used to help offset the energy load associated with facility usage;
- Installation of a microgrid at the Tenth Avenue Marine Terminal, powered by solar/PV with battery storage for resiliency (exploring additional sites for microgrids as well);
- Facilitation of a wave-to-energy project; and
- Wetlands projects with numerous environmental benefits including carbon sequestration.

These are just a few of the Port's numerous projects. Additionally, the MCAS does include some a variety of objectives that strive to be implemented ahead of state requirements. Additionally, the Port completed a Discussion Draft of the MCAS as a means to receive feedback from the public and staff acknowledges the commenter's request to do more to go beyond compliance.

17. The fact that so many of the deadlines for planned efforts don't call on the Port achieving its goals by 2030. Does the Port staff plan to move those deadlines forward if and when technology is developed that allows the Port to move more quickly on specific measurable goals?

The Port will reassess the goals and objectives identified in the MCAS, in light of public comment and new information on the state of technology which may alter schedule for implementation.

18. Diesel Particulate Matter Emissions are high in San Diego. Are emissions from other goods movement sources outside of the Port addressed in the MCAS?

The Port's MCAS does not include diesel emissions outside of the Port's jurisdiction, like freeways, railways, or other offsite sources of emissions. The MCAS is based on an updated 2019 emissions inventory based on trucks, vessels, equipment, and other sources that are the result of the land and water uses that are located within the Port's jurisdiction. As such, it identifies potential projects, programs, and/or strategies that the Port can help implement and/or accelerate, that will result in reduced emissions.

However, the Port is working closely with the San Diego Air Pollution Control District (SDAPCD) with developing the AB 617 Community Emission Reduction Plan (CERP). The AB 617 CERP will include emissions data (including DPM), from sources and activities beyond the Port's jurisdiction, including freeways and emissions that occur within the neighborhoods of Barrio Logan, Logan Heights, Sherman Heights, and west National City.

19. Is the Port including wind power as part of the planning and strategies?

Yes. As part of its commitment to reducing GHG emissions, the Port is considering renewable energy solutions, such as wind and solar.

20. Will all MCAS goals and objectives include specific numeric reductions and timelines, including emission reductions for health improvements?

The goals and objectives of the MCAS have been drafted to be as specific as possible at this point in time. However, due to a variety of factors, some goals and objectives for certain emission sources are more specific and detailed than others. For example, because the Port has full operational control over its own fleet, the short-term and long-term goals and objectives in the MCAS are specific and timebound. In other instances, the State has established clear goals to transition drayage trucks and cargo handling equipment (where feasible*), to zero emissions by 2035. The State has also adopted regulation to require shore-power for certain types of ocean-going vessels by 2025. By acknowledging the State's forthcoming regulations and/or requirements, the Port is able to specify how it plans to work with tenants, businesses, equipment owners, trucking companies, and others to meet and/or exceed those that have been identified by the State. Finally, there are other emissions sources that are not owned, operated or regulated by the Port, in which the forthcoming requirements at the federal, State, and/or local air pollution control district are less certain. For example, it is less clear when and/or how these agencies will regulate rail, shipyards, and some commercial harbor craft. As such, the MCAS goals and objectives for these sources have been written more broadly, to ensure that the Port continue to monitor forthcoming regulatory requirements, while still providing the opportunity for the Port to partner on emission reduction projects as they become available.

Additionally, several comments to date have encouraged staff to include additional information on public health and to include a health risk (or cancer risk) reduction goal. In response, Port staff will be adding a Public Health chapter to the MCAS that summarizes the common pollutants and health problems associated with air pollution. It will also explain how the CalEnviro Screen 3.0 mapping application and how health risk assessments (or HRAs) can be used to help evaluate public health. Staff's proposed revisions to the MCAS Discussion Draft will commit the Port to conduct an updated health risk assessment during the Summer of 2021 for its Tenth Avenue Marine Terminal (TAMT) and National City Marine Terminal (NCMT), based on 2019 activity and data. Based on the existing emission levels at each marine cargo terminal, by October 2021, Port staff will identify an aspirational cancer risk reduction target for 2026 and 2031 in consultation with industry and community stakeholders. This information will feed into the Portside Community's cumulative cancer reduction goal that CARB and APCD staff has committed to complete by February 2022 in the AB 617 CERP.

21. Has the Port considered reconstituting and expanding the scope of its Citizens Advisory Committee to include oversight of the Port's implementation of its Maritime Clean Air Strategy?

As part of the Community Air Protection Program (AB 617), the San Diego Air Pollution Control District (SDAPCD) formed the Portside Community Steering Committee to help identify emission reduction strategies. The AB 617 Steering is comprised of 28 members, half of which are local community residents and the other half include a mix of representatives from public agencies, non-governmental organizations, and industry. The AB 617 Steering Committee and several

subcommittees helped guide development of the MCAS Discussion Draft. The Port plans to stay actively engaged in the AB 617 Portside Steering Committee and will issue regular progress reports and status updates as various emission reduction projects and programs get implemented . All Steering Committee meetings are open to the public. Agendas, notes and other information is available [here](#). The Port will also keep the Port's Environmental Advisory Committee (EAC) apprised of emission reduction efforts.

22. Have there been any voluntary efforts by the DOD/Navy to assist the Port in meeting objectives/goals in the MCAS?

The Navy has been an active participant on the AB617 Steering Committee, the governing body for CARB and APCD's CERP effort. The CERP is the result of a community driven process to reduce emissions and resulting health impacts in local communities, such as the Portside Community, by soliciting stakeholder participation to identify goals and implementation efforts to meet such goals. The MCAS is a complementary effort to the CERP, with the MCAS focusing on Port operations within and adjacent to the Portside Community, whereas the CERP focuses on the Portside Community as a whole, which of course includes the Navy. The Port and the Navy do have a working relationship where both agencies collaborate closely on a number of environmental initiatives.