



September 12, 2022

**VIA ELECTRONIC MAIL**

TRANSPORTATION AND TOXICS  
DIVISION CALIFORNIA AIR  
RESOURCES BOARD 1001 I  
STREET SACRAMENTO, CA 95814  
shorepower@arb.ca.gov

In re: At Berth Terminal and Port Plan

Dear CARB Staff,

Enclosed you will find the terminal and port plan for the following facilities:

- National City Marine Terminal- approximately 130-160 vessel calls annually
- Tenth Avenue Marine Terminal- approximately 90-110 vessel calls annually
- B Street Cruise Ship Terminal- approximately 90-100 vessel calls annually
- Broadway Cruise Ship Terminal- approximately 12-14 vessel calls annually

Noting that the Broadway facility is not currently required to submit a plan due to its low vessel activity as noted above- with some years as low as only 3 vessel calls. While much progress has been made, the largest obstacle has continued to be securing funding. We appreciate any assistance CARB may be able to provide in assisting us and our terminal operators, in order to meet the mutually desired objective.

Thank you,

Port of San Diego

Cc: Angela Condes, CARB; Chris Hamlin-PAS; Sophie Silvestri-PAS; Joe Stuyvesant-POSD; Michael LaFleur- POSD; Joel Valenzuela-POSD; Josefina Khalidy-POSD; Renée Yarmy-POSD

## National City Marine Terminal: Port of San Diego & Pasha Automotive Services At Berth Port Plan

This At Berth Port Plan has been prepared pursuant Section 93130.14(b)(3) of the Airborne Toxic Control Measure for Auxiliary Diesel Engines Operated on Ocean-Going Vessels At Berth in a California Port.

### 1. GENERAL INFORMATION

Port Contact Name: Renee Yarmy

Phone Number:  
(619)455-6782

Email: ryarmy@portofsandiego.org

*Terminals Included in this Plan:*

Name:

Geographic Boundary Coordinates:

National City Marine Terminal	Berths	Latitude	Longitude
	24-1	32.657207	117.118634
	24-2	32.656972	117.121566
	24-3	32.656313	117.122393
	24-4	32.655147	117.122119
	24-5	32.652388	117.121415
	24-10	32.648346	117.116212
	24-11	32.649059	117.113659

### 2. TERMINAL DETAILS

*Terminal details can be found on the subsequent pages.*

#### 2.1. [Name of Terminal Operator – Pasha Automotive Services]

*Identification and description of which strateg(ies) the terminal will use for compliance:*

Pasha Automotive Services (“PAS”) and the Port of San Diego (“Port”) plan to facilitate 3 methods of compliance at the National City Marine Terminal: traditional shore power (cold-ironing), barge based bonnet and an alternative emission control strategy utilizing energy from hydrogen fuel cells for a vessel plug-in.

Nothing in this At Berth Port Plan constitutes an approval of any specific improvement/project. The District will comply with all applicable law when pursuing implementation of the improvements/projects, including, but not limited to, conducting environmental review pursuant to the California Environmental Quality Act (CEQA).

*Equipment purchases and/or construction that are in progress or must still be completed to reduce emissions:*

- Trenching, construction and installation of four (4) Shore Power Outlet (SPO) boxes, plugs and terminal infrastructure to support shore power (cold ironing). Three (3) grants have been submitted to support this effort: 2021 VW Mitigation Trust, Federal RAISE grant, Federal PIDP grant.
- Utilization of hydrogen energy in the form of mobile fuel cells to power a vessel at berth with available technology
- Port of San Diego RFP for a barge-based bonnet to capture emissions for vessel that have not been retrofitted to accept shore power plug-ins to be operational by the compliance start date for roll-on roll-off vessels of January 1, 2025.
- Funding still in process of being obtained for all options

*Schedule for installing equipment and/or any necessary construction projects:*

<u>Project:</u>	<u>Estimated Completion Date:</u>
1. 4 Shore Power SPO boxes	1. 1 SPO Box December 20, 2024, 3 remaining SPO Box(es) December 2030
2. Utilization of H2 power	2. December 30, 2024
3. Barge based bonnet system, also known as an emission capture and control system (ECCS)	3. December 20, 2024

*Division of responsibilities for enacting infrastructure:*

Port:

The Maritime, Planning & Green Port, Government & Civic Relations, and Engineering & Construction Divisions will be responsible for the grant solicitation, design and construction management of the shore power system. Port staff has already submitted grant solicitation, and finalized a study to determine costs, timelines, and funding requirements to pursue shore power. Additionally, the Port released a Request for Proposal (RFP) for a barge-based bonnet capture and control system in October 2021 with the anticipated project start date to design, build, etc. by June of 2022. The Port will own the barge-based bonnet capture and control system and will charge a fee for its use. The shore power system is expected to be used for approximately 20% of the vessel calls (estimated two vessels weekly) and the barged-based bonnet capture and control system is expected to be used for 80% of the remaining vessel calls until additional technologies / shore power systems are installed at NCMT.

Two vessels represent an estimated 20-25% of the vessel calls on average to NCMT annually, whereas the remaining vessel visits are most often one-time to two-time visitors to NCMT representing an estimated average of 65% of vessel calls to the terminal. There are a handful of vessels that visit the terminal three to six times a year representing approximately 11-15% of the vessel calls.

Terminal Operator:

PAS may provide an alternative solution to vessels at berth (H2 power), if operationally and commercially feasible.

PAS Executive and Operations Management will be responsible for implementation and operation of the infrastructure.

**Terminal Operator approval of responsibilities:**

The responsible officer of Pasha Automotive Services at the National City Marine Terminal confirms by signing below that he/she has reviewed the division of responsibilities set forth in Section 2.1 of this At Berth Port Plan and agrees to them under penalty of perjury.

Name: Chris Hamlin

Title: Senior Vice President

Signature: *Chris Hamlin*

Date: Aug 29, 2022

**3. PORT-SPECIFIC BERTHING RESTRICTIONS**

[write "none" if there are none; otherwise:]

Terminal:	Berthing Restriction:
1. NCMT	1. Structural repairs required for 24-1, 24-2, 24-3, 24-11 to support trenching 2. Draft Restrictions of 35 ft. for all berths 3. South bay access is limited to 200ft height restriction at the Coronado bridge to access berths

**4. SIGNATURES**

*The Port's responsible officer confirms by signing below that he/she has reviewed the division of responsibilities between the Port and the Terminal Operators that are identified in this At Berth Port Plan and agrees to them under penalty of perjury. The Port does not make any representations or attestations about the accuracy, feasibility, or legality of any of the Terminal Operators' proposed compliance strategies set forth in this At Berth Port Plan.*

Name: Mike LaFleur

Title: Vice President, Maritime

Signature: *Michael LaFleur*

Date: Sep 7, 2022

## Tenth Avenue Marine Terminal: Port of San Diego At Berth Port Plan

This At Berth Port Plan has been prepared pursuant Section 93130.14(b)(3) of the Airborne Toxic Control Measure for Auxiliary Diesel Engines Operated on Ocean-Going Vessels At Berth in a California Port.

### 1. GENERAL INFORMATION

Port Contact Name: Renee Yarmy

Phone Number:  
(619)455-6782

Email: ryarmy@portofsandiego.org

#### *Terminals Included in this Plan:*

<u>Name:</u>	<u>Geographic Boundary Coordinates:</u>		
	Berths	Latitude	Longitude
Tenth Avenue Marine Terminal	10-1	32.701096	117.158468
	10-2	32.701096	117.160036
	10-3	32.699796	117.159864
	10-4	32.698315	117.157845
	10-5	32.697972	117.157395
	10-6	32.696618	117.155419
	10-7	32.696527	117.153538
	10-8	32.697015	117.15239
Crosby Street Pier*	N/A	32.696667	117.150833

\*While Crosby Pier is not part of the At-Berth Terminal Plan requirement, the District is interested in ensuring CARB understanding of initiative.

### 2. TERMINAL DETAILS

*Terminal details can be found on the subsequent pages.*

#### *2.1. [Name of Terminal Operator – Pasha Automotive Services]*

*Identification and description of which strateg(ies) the terminal will use for compliance:*

The Port of San Diego (“Port”) plans to facilitate compliance at the Tenth Avenue Marine Terminal with: traditional shore power (cold-ironing).

Nothing in this At Berth Port Plan constitutes an approval of any specific improvement/project. The District will comply with all applicable law when pursuing implementation of the improvements/projects, including, but not limited to, conducting environmental review pursuant to the California Environmental Quality Act (CEQA).

*Equipment purchases and/or construction that are in progress or must still be completed to reduce emissions:*

- All trenching, construction and installation of one (1) shore power SPO boxes, plugs and terminal infrastructure to support shore power (cold ironing) was completed in 2014.

- A shore power and battery storage system to support Crowley's forthcoming electric tugboat project has been initiated and is currently in the planning phase. The energy system will be designed to ensure the optimal capacity of the battery energy storage system with a 3 MWh of battery storage for quick charging and for peak shaving of the electric power load and save on electricity bills. The charging site for the E-Tug will require 480 volts at 1200 amps being supplied from the grid transformer. The project is estimated to be complete in June 2023.

**Schedule for installing equipment and/or any necessary construction projects:**

Project:	Estimated Completion Date:
1. Shore power and Battery Storage (E-Tug)	1. June 2023
2. N/A	2. N/A
3. N/A	3. N/A

**Division of responsibilities for enacting infrastructure:****Port/Operator:**

The Port has served as the operator for the berths associated for shore power at the TAMT. This facility already meets the compliance requirements for the vessels covered under the regulation, and no further infrastructure is required at this time. On average, the vessels required to comply with the regulation represent an estimated 45% of vessel calls to TAMT. The remaining vessels are not covered under the regulation and are often one-time visitors to TAMT annually.

*Crowley Tugs has submitted a project proposal, which is currently under review by Port staff.*

**Terminal Operator approval of responsibilities:**

*The responsible officer of the Port of San Diego at the Tenth Avenue Marine Terminal confirms by signing below that he/she has reviewed the division of responsibilities set forth in Section 2.1 of this At Berth Port Plan and agrees to them under penalty of perjury.*

Name: Mike LaFleur

Title: Vice President, Maritime

Signature:

Date: Aug 25, 2022

*Michael LaFleur***3. PORT-SPECIFIC BERTHING RESTRICTIONS**

[write "none" if there are none; otherwise:]

Terminal:	Berthing Restriction:
1. TAMT	1. Draft of 30ft at 10-1 and 10-2 2. Draft of 42 ft at 10-3 through 10-8 3. Draft of 23 ft at Crosby Pier

**4. SIGNATURES**

*The Port's responsible officer confirms by signing below that he/she has reviewed the division of responsibilities between the Port and the Terminal Operators that are identified in this At Berth Port Plan and agrees to them under penalty of perjury. The Port does not make any representations or attestations about the accuracy, feasibility, or legality of any of the Terminal Operators' proposed compliance strategies set forth in this At Berth Port Plan.*

Name: Mike LaFleur

Title: Vice President, Maritime

Signature:

Date: Aug 25, 2022

*Michael LaFleur*

## B Street Cruise Ship Terminal: Port of San Diego At Berth Port Plan

This At Berth Port Plan has been prepared pursuant Section 93130.14(b)(3) of the Airborne Toxic Control Measure for Auxiliary Diesel Engines Operated on Ocean-Going Vessels At Berth in a California Port.

1. GENERAL INFORMATION			
Port Contact Name: Renee Yarmy			
Phone Number: (619)455-6782	Email: ryarmy@portofsandiego.org		
<i>Terminals Included in this Plan:</i>			
<u>Name:</u>	<u>Geographic Boundary Coordinates:</u>		
B Street Cruise Ship Terminal	Berths	Latitude	Longitude
	B-1	32.717977	117.173792
	B-2	32.717941	117.175803
	B-3	32.717426	117.176694
	B-4	32.716853	117.174126
	B-5	32.716862	117.176353

2. TERMINAL DETAILS
<i>Terminal details can be found on the subsequent pages.</i>
<b>2.1. [Name of Terminal Operator – San Diego Unified Port District]</b>
<i>Identification and description of which strateg(ies) the terminal will use for compliance:</i>
<p>The Port of San Diego (“Port”) plans to facilitate compliance at the B Street Cruise Ship Terminal with traditional shore power (cold-ironing). On average, all vessels required to comply with at-berth regulations represent an estimated 90% or more of vessel calls to the B Street Terminal. The remaining estimated 10% of vessel calls are vessel and terminal incident events.</p> <p>Nothing in this At Berth Port Plan constitutes an approval of any specific improvement/project. The District will comply with all applicable law when pursuing implementation of the improvements/projects, including, but not limited to, conducting environmental review pursuant to the California Environmental Quality Act (CEQA).</p>
<i>Equipment purchases and/or construction that are in progress or must still be completed to reduce emissions:</i>
<p>As part of the Cruise Ship Cold Ironing Phase 2 Project, the following work remains:</p> <ul style="list-style-type: none"> <li>- Receive second shore power transformer.</li> <li>- Installation of second shore power transformer.</li> <li>- Testing and commissioning of new installation.</li> </ul>

*Schedule for installing equipment and/or any necessary construction projects:*

<u>Project:</u>	<u>Estimated Completion Date:</u>
1. Cruise Ship Cold Ironing Phase 2 Project	1. September 2022
2. N/A	2. N/A
3. N/A	3. N/A

*Terminal Operator approval of responsibilities:*

The responsible officer of the Port of San Diego at the B. St Cruise Ship Terminal confirms by signing below that he/she has reviewed the division of responsibilities set forth in Section 2.1 of this At Berth Port Plan and agrees to them under penalty of perjury.

Name: Mike LaFleur

Title: Vice President, Maritime

Signature: *Michael LaFleur*

Date: Aug 25, 2022

*Broadway Cruise Ship Terminal*

### 3. PORT-SPECIFIC BERTHING RESTRICTIONS

[write "none" if there are none; otherwise:]

<u>Terminal:</u>	<u>Berthing Restriction:</u>
1. B St. Cruise Ship Terminal	1. Draft of 32 feet

*At Berth Port Plan*

### 4. SIGNATURES

*The Port's responsible officer confirms by signing below that he/she has reviewed the division of responsibilities between the Port and the Terminal Operators that are identified in this At Berth Port Plan and agrees to them under penalty of perjury. The Port does not make any representations or attestations about the accuracy, feasibility, or legality of any of the Terminal Operators' proposed compliance strategies set forth in this At Berth Port Plan.*

Name: Mike LaFleur

Title: Vice President, Maritime

Signature: *Michael LaFleur*

Date: Aug 25, 2022



## Broadway Cruise Ship Terminal: Port of San Diego At Berth Port Plan

This At Berth Port Plan has been prepared pursuant Section 93130.14(b)(3) of the Airborne Toxic Control Measure for Auxiliary Diesel Engines Operated on Ocean-Going Vessels At Berth in a California Port.

1. GENERAL INFORMATION			
Port Contact Name: Renee Yarmy			
Phone Number: (619)455-6782	Email: ryarmy@portofsandiego.org		
<i>Terminals Included in this Plan:</i>			
<u>Name:</u>	<u>Geographic Boundary Coordinates:</u>		
Broadway Cruise Ship Terminal	Berths	Latitude	Longitude
	BDWY-1	32.715892	117.173977
	BDWY-2	32.715901	117.175894
	BDWY-3	32.715495	117.176299

2. TERMINAL DETAILS	
<i>Terminal details can be found on the subsequent pages.</i>	
<b>2.1. [Name of Terminal Operator – San Diego Unified Port District]</b>	
<i>Identification and description of which strateg(ies) the terminal will use for compliance:</i>	
<p>The Port of San Diego (“Port”) plans to facilitate compliance at the Broadway Cruise Ship Terminal with traditional shore power (cold-ironing). Noting that this facility does not currently meet the number of required visits annually to fall under the regulation.</p> <p>Nothing in this At Berth Port Plan constitutes an approval of any specific improvement/project. The District will comply with all applicable law when pursuing implementation of the improvements/projects, including, but not limited to, conducting environmental review pursuant to the California Environmental Quality Act (CEQA).</p>	
<i>Equipment purchases and/or construction that are in progress or must still be completed to reduce emissions:</i>	
<ul style="list-style-type: none"> <li>- N/A as facility already has shore power capabilities</li> </ul>	
<i>Schedule for installing equipment and/or any necessary construction projects:</i>	
<u>Project:</u>	<u>Estimated Completion Date:</u>
1. N/A	1. N/A
2. N/A	2. N/A
3. N/A	3. N/A
<i>Division of responsibilities for enacting infrastructure:</i>	
<u>Port/Operator:</u>	
<p>The Port serves as the operator for the berths associated for shore power at the Broadway Cruise Ship Terminal. This facility already meets the compliance requirements; however, the facility does not have sufficient calls per year under the new regulatory threshold, starting January 1, 2023.</p>	

**Terminal Operator approval of responsibilities:**

The responsible officer of the Port of San Diego at the Broadway Cruise Ship Terminal confirms by signing below that he/she has reviewed the division of responsibilities set forth in Section 2.1 of this At Berth Port Plan and agrees to them under penalty of perjury.

Name: Mike LaFleur

Title: Vice President, Maritime

Signature: *Michael LaFleur*

Date: Aug 25, 2022

**3. PORT-SPECIFIC BERTHING RESTRICTIONS**

[write "none" if there are none; otherwise:]

**Terminal:**

1. Broadway Cruise Ship Terminal

**Berthing Restriction:**

1. Draft of 32 feet

**4. SIGNATURES**

The Port's responsible officer confirms by signing below that he/she has reviewed the division of responsibilities between the Port and the Terminal Operators that are identified in this At Berth Port Plan and agrees to them under penalty of perjury. The Port does not make any representations or attestations about the accuracy, feasibility, or legality of any of the Terminal Operators' proposed compliance strategies set forth in this At Berth Port Plan.

Name: Mike LaFleur

Title: Vice President, Maritime

Signature: *Michael LaFleur*

Date: Aug 25, 2022