* Denotes new letter added 11/23/21

% Denotes new letter added 12/16/21

^ Denotes new letter added 12/30/21

# Denotes translation added 12/8/21

± Denotes new letter added 1/18/22

Agencies

Anna Buzaitis

From: Heather Kramp
Sent: Friday, January 14, 2022 3:31 PM
To: Anna Buzaitis
Subject: FW: National City Bayfront Development

Please see Sandy Vissman's comments below. Thanks!

From: Vissman, Sandy <sandy_vissman@fws.gov>
Sent: Friday, January 14, 2022 2:39 PM
To: Heather Kramp <hkramp@portofsandiego.org>
Subject: National City Bayfront Development

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.

Hi Heather,

Below are staff comments on The DEIR for the National City Bayfront Projects and Plans Amendments. Thank you for your consideration of these comments. Please let me know if you or Anna would like to discuss.

After review of the *Draft Environmental Impact Report for the National City Bayfront Projects and Plans Amendments* (DEIR) we offer the following staff-level comments and recommendations to assist you in the finalization of plans and development of a final Environmental Impact Report (final EIR). Review of the *Chula Vista Bayfront Natural Resources Management Plan*, and incorporation of similar conservation measures into the National City Bayfront Projects and Plans Amendments (Project) and final EIR would help reduce the potential for indirect impacts from anticipated development. Although much of the proposed development associated with the Project will occur within previously disturbed areas, the Project will significantly increase recreational development and activities on land and water adjacent to sensitive habitats at Sweetwater National Wildlife Refuge (Refuge).

Special Status Animal Species

The DEIR does not include a table that depicts special status animal species within the Project area. In the final EIR, please include a table of special status animal species that may be directly or indirectly affected by the Project, including species within the Project footprint, and species that use habitat adjacent to the Project footprint, but may be indirectly affected by the Project. The Project footprint is adjacent to federally listed species habitat, including light-footed Ridgway's rail (*Rallus longirostris levipes;* rail) habitat, western snowy plover (*Charadrius nivosus nivosus;* snowy plover) foraging habitat, and California least tern (*Sternula antillarum browni;* least tern) foraging habitat within the Sweetwater River. The Project footprint is within 500 feet of snowy plover designated Critical Habitat Subunit 55E, the Sweetwater National Wildlife Refuge, D-Street Fill (https://www.govinfo.gov/content/pkg/FR-2012-06-19/pdf/2012-13886.pdf#page=) and within 750 feet of least tern nesting habitat. Increases in boating activity, pedestrian activity, pets, lighting, and noise could affect these adjacent habitats. We recommend that the final EIR acknowledge potential indirect impacts to the least tern and rail associated with: structural changes (e.g. addition of buildings and structures) along the shoreline that create perches for raptors and corvids; potential for disturbance associated with anticipated increased recreational use of the Sweetwater River; and potential for disturbance associated with in-water or shoreline construction activities. We recommend that the final EIR include minimization measures to reduce the potential for impacts to species that inhabit terrestrial and marine habitat adjacent to the Project footprint, including incorporation of design elements and development guidelines that: 1) reduce the potential for raptor and corvid nesting and perching; 2) educate visitors and regulate recreational use in the Sweetwater River mouth; 3) identify construction windows that avoid the avian breeding season, where appropriate.

Access to Refuge

Under existing conditions, Refuge staff are able to access northern portions of the Refuge via an access road along the southeastern edge of the Project area. Please identify this access road in the final EIR with assurance that limited access for Refuge staff will continue.

Section 3.4.1.5 Proposed Use Modifications to National City Aquatic Center and Relocation of Buoys

The Project includes relaxing the existing operational restrictions at the National City Aquatic Center. The Project would expand the allowed uses at the National City Aquatic Center and likely increase the number of people that use the facility. The existing operational restrictions (e.g. limitations on watercraft rentals, etc.) were implemented to protect the adjacent sensitive resources, and we have concerns that the proposed relaxation of the existing operational restrictions (e.g. limitations on class size and requirements for instructors, allowing unsupervised boat rentals) will allow for a significant increase in unsupervised small boats travelling in waters adjacent to sensitive intertidal mudflats that support foraging snowy plovers and other shorebirds and the least tern nesting area. If recommend that existing operational restrictions continue to reduce the potential for unsupervised small boat operators to stray into sensitive habitat areas and disrupt wildlife. If existing operational restrictions are relaxed, as suggested in the DEIR, we recommend that the final EIR identify minimization measures (e.g. extensive public education and outreach, buoys marking in-water buffer around adjacent sensitive habitat, signage, enforcement) to reduce the potential for significant recreational impacts.

The Project also includes moving the existing buoys located south of Pier 32 Marina that delimit the current boundary for watercraft access in the Sweetwater River. The buoys would be moved to allow non-motorized watercraft to access the Sweetwater River to the east side of the San Diego Gas & Electric Company (SDG&E) property and former railroad bridges. These buoys were sited at the existing location to protect sensitive resources, and we are concerned that moving them further upstream in the Sweetwater River will increase the potential for impacts to sensitive wildlife and habitats. We recommend that the existing buoys be retained in their current location in Sweetwater Channel to prevent encroachment into the adjacent refuge. The DEIR notes that the proposed location would still mark the entry into the Refuge, however the shoreline of the Refuge to the east of the existing buoys would have reduced protection with the proposed relocation of the buoys.

Section 3.4.2.3 Parking and Landscaping

We recommend that the 200-foot building setback buffer pertain to all hardscape development, including parking areas. This would preclude the additional 60 additional parking spaces that are currently proposed on a parcel east of the existing marina within the 200-foot building setback buffer.

The Project would incorporate native plantings, non-invasive ornamental plants, and drought-tolerant, low-maintenance plants. Landscaping should be planned to reduce the potential for perching by raptors and corvids that prey upon birds that inhabit the adjacent salt marsh, intertidal habitat and nearby least tern nesting area. For example, shorter stature shrubs or sub-shrubs, rather than taller trees that could provide perches, should be used for landscaping in the Pepper Park and Parcel B-6 areas, as well as other parcels that provide line-of-sight view to the nearby sensitive habitat.

Section 3.4.2.1 Phase 1 Landside Improvements

The project includes construction of modular cabins along the eastern edge of the marina, adjacent to sensitive wetland habitats of Sweetwater National Wildlife Refuge. The DEIR does not identify minimization measures regarding potential incursion into the refuge by pets or people staying in the cabins or hotels, once operational. Given the intensity of development planned as part of the Project and the anticipated increase in recreational use and human activities, we recommend the final EIR identify mechanisms to limit recreational trespass (e.g. fences, signage, park ranger personnel) and pet incursion into the adjacent wetlands.

Waterside Improvements The Project proposes to significantly increase the potential for recreational activity in the mouth of the Sweetwater River by: 1) constructing modular cabins along the jetty on the north bank of the river; 2) constructing and maintaining up to 20 moorings in Sweetwater River Channel; and 3) constructing a 620-foot long floating dock with 30 fingers to accommodate 50 boats. Together, these facilities could significantly increase the level of human activity, lighting, trash, and noise within the river mouth and adjacent to the San Diego National Wildlife

Refuge, and potentially disrupt sensitive wildlife, contribute to increase presence of predators, and impact eelgrass and fisheries. We recommend avoiding these incremental impacts to adjacent habitats by eliminating (as suggested in Alternative 2), or reducing the scale of the proposed waterside improvements. If waterside improvements are implemented, we recommend that in-water construction occur during the months of September-March to avoid the California least tern nesting season, and that project design incorporate fencing, signage, enforcement or other measures to prevent recreational and pet impacts on adjacent sensitive wildlife and habitat. We are interested in further discussion with you regarding means of reducing the scale and potential impacts of proposed waterside improvements to sensitive wildlife and habitat.

Thank you for considering our comments. We look forward to further coordination with you regarding conservation of the sensitive plants and animals that inhabit the Sweetwater River and the Refuge.

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State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

December 22, 2021

Anna Buzaitis
San Diego Unified Port District
3165 Pacific Highway
San Diego, CA 92101
ABuzaiti@portofsandiego.org

Subject: National City Bayfront Projects and Plan Amendment, Draft Environmental Impact Report (DEIR), SCH #2018121054

Dear Ms. Buzaitis:

The California Department of Fish and Wildlife (CDFW) has reviewed the San Diego Unified Port District's DEIR for the Project pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.[1] CDFW provided a comment letter, dated January 21, 2019, on the Notice of Preparation of the DEIR.

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the state. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a **Responsible Agency** under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW may also need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 *et seq.*) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 *et seq.*), the Project Proponent may seek related take authorization as provided by the Fish and Game Code.

[1] CEQA is codified in the California Public Resources Code in section 21000 *et seq*. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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PROJECT DESCRIPTION SUMMARY

Proponent: While the San Diego Unified Port District (District) acts as the Lead Agency under CEQA for the Project, for purposes of this letter, CDFW refers to the District, City of National City (City), GB Capital Holdings (GB Capital), and Pasha Automotive Services (Pasha) collectively as the Project Proponents.

Objective: The Project has both landside and waterside development components; an amendment to the District's Port Master Plan (PMP); amendments to the City's Local Coastal Program (LCP), General Plan, Harbor District Specific Area Plan (HDSAP), Land Use Code (LUC) (Municipal Code Title 18 Zoning), and Bicycle Master Plan.

Specifically, the Project includes the following main components.

- The National City Marina District Balanced Land Use Plan (Balanced Plan) involving changes to land and water use designations in the District's PMP.
- The GB Capital Component, which would include construction and operation of a recreational vehicle (RV) park, modular cabins, dry boat storage, up to four hotels, and an expanded marina, primarily within the District's jurisdiction.
- The Pasha Rail Improvement Component, which would involve construction and operation of a rail connector track and storage track within the District's Jurisdiction.
- The Pasha Road Closures Component, which would result in closure of Tidelands Avenue between Bay Marina Drive and 32nd Street, as well as West 28th Street between Tidelands Avenue and Quay Avenue, within the District's and City's jurisdictions and redesignation of the area to Marine-Related Industrial in the District's PMP.
- The Bayshore Bikeway Component, which would consist of construction and operation of Segment 5 of the Bayshore Bikeway within the District's and City's jurisdictions.
- The City Program – Development Component, which would include construction and operation of hotel, restaurant, retail, and/or a combination of tourist/visitor-serving commercial development north of Bay Marina Drive and the potential closure or narrowing of Bay Marina Drive west of Marina Way to through vehicular traffic within the City's jurisdiction.
- The PMPA Component, which would utilize a PMP Amendment (PMPA) to clarify jurisdictional land use authority, redesignate land uses, and balance commercial and maritime uses.
- The City Program – Plan Amendments Component, which would involve amendments to the City's LCP, General Plan, HDSAP, LUC, and Bicycle Master Plan that would include changes to jurisdictional boundaries; changes to subarea boundaries; and changes to land use, specific plan, and zone designations.

Location: The Project occurs on approximately 77 acres, consisting of approximately 58 landside acres and 19 waterside acres. The Project site is in the southwestern portion of the City, primarily within the District's existing jurisdiction but also partially within the City's existing jurisdiction. The Project area is generally bordered by Paradise Marsh (part of the San Diego Bay National Wildlife Refuge/Sweetwater Marsh Unit) to the east, Sweetwater Channel to the south, the National City Marine Terminal and maritime uses to the west, and Civic Center Drive and commercial and industrial uses to the north.

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Biological Setting and Impact Summary: Various components of the Project would or could potentially have significant temporary and permanent impacts on both marine and terrestrial biological resources and organisms.

Marine Impacts

Construction of the waterside portion of the GB Capital Component, including new moorings, aquaculture, and docks, would include in-water operations, such as pile driving, which would generate increased noise and ground-disturbing activities within the marine community. Impact-hammer and vibratory-hammer pile-driving activities would potentially generate enough underwater noise to injure (Level A Harassment) or alter behavior (Level B Harassment) of green sea turtle (*Chelonia mydas;* federal Endangered Species Act (ESA)- listed threatened), fishes, and marine mammals, including candidate, sensitive, or special-status species, within Sweetwater Channel. Mitigation Measure BIO 7 (MM-BIO-7) in the DEIR would require, prior to construction activities involving impact-hammer and vibratory in-water pile driving, implementation of a marine mammal, fish injury, and green sea turtle monitoring program. For a period of 15 minutes prior to the start of in-water construction, a qualified biologist retained by a Project Proponent (i.e., GB Capital) would monitor around the active pile driving areas to ensure that special-status species were not present. Monitors would also monitor for injured fish and stop construction work if there were an observation of concern. In-water pile driving would begin with soft starts, gradually increasing the force of the pile driving to allow marine mammals, green sea turtles and fishes to flee areas adjacent to pile driving activities. In addition, the Project Proponent would ensure that if in-water construction is performed during the California least tern (least tern; *Sterna antillarum browni*; California Fully Protected Species (FPS); CESA- and ESA- listed endangered) nesting season that turbidity is monitored during in-water construction. If the in-water work area is 20% more turbid than ambient conditions, the Project Proponent would cease work immediately until the turbidity dissipated within the work area. If the turbidity cannot be dissipated within the work area, the Project Proponent would be required to install a silt curtain to control the turbidity during in-water construction.

Operation of the waterside portion of the proposed GB Capital Component would include a vessel dock and new boat slips within Sweetwater Channel, moorings, and aquaculture facilities. The dock structures would shade eelgrass (*Zostera marina;* Magnuson-Stevens Fishery Conservation and Management Act (MSA)- designated essential fish habitat (EFH)) habitat area of particular concern (HAPC) growing along the shoreline. Aquaculture facilities might require the use of floating or suspended containment structures. The proposed expanded marina would increase boating operations and storage. Prior to the start of any in-water construction, the Project Proponent would retain a qualified marine biologist to develop an eelgrass mitigation plan in compliance with the California Eelgrass Mitigation Policy. MM-BIO-12 would that require pre-construction and at least two years of post-construction eelgrass surveys be conducted. MM-BIO-13 would require implementation of regulatory agency-approved mitigation to reduce overwater coverage prior to implementation of the Project.

Terrestrial Impacts

Construction of the landside portion of the proposed Project, particularly the GB Capital Component, Bayshore Bikeway Component, and City Program – Development Component, would require demolition or grading equipment for site preparation, construction cranes for installation of the hotels, and standard construction equipment, such as earth-moving equipment, concrete trucks, forklifts, and pile drivers. Construction would temporarily disrupt the area due to an increase

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in noise levels, truck traffic, and ground-disturbing activities. Some components of the Project would result in permanent impacts to terrestrial habitats and sensitive animal and plant species. The proposed Project includes construction and operation of Segment 5 of the Bayshore Bikeway. The DEIR analyzes three alignments of the Bayshore Bikeway; however, only one alignment will be selected for implementation. Route 3 is currently the preferred alignment according to the DEIR.

Construction of Route 1 or Route 3 could result in indirect or inadvertent impacts resulting in direct mortality of individual estuary seablite (*Suaeda esteroa*: California Native Plant Society (CNPS) Rare Plant Rank 1B.2) plants during construction activities. These impacts would be significant. MM-BIO-1 would ensure that an authorized biologist would be present onsite during construction within or adjacent to suitable habitat for estuary seablite to ensure that avoidance and minimization measures were followed properly.

Construction of Bayshore Bikeway Component Route 1, which could result in the permanent loss of 0.03 acre of coastal salt marsh habitat, has the potential to negatively affect the state-listed Belding's savannah sparrow (*Passerculus sandwichensis beldingi*; CESA-listed endangered), observed in the Project area during site surveys; wandering skipper (*Panoquina errans*); Multiple Species Conservation Plan (MSCP) Covered Species), observed directly adjacent to the Project area; and yellow rail (*Coturnicops noveboracensis*; California Species of Special Concern), which has a moderate potential to occur within the salt marsh habitat in Paradise Marsh. These impacts would be significant without mitigation. If Route 1 were selected as the final alignment for the Bayshore Bikeway Component, and if impacts on salt marsh habitat were anticipated, MM-BIO-2 requires the Project Proponent responsible (i.e., the City or Caltrans) to consult with the CDFW to determine the need to seek an Incidental Take Permit (ITP) through Section 2081 of the Fish and Game Code for potential impacts on Belding's savannah sparrow habitat. Compensatory mitigation would be provided at a minimum of a 1:1 ratio in accordance with the ITP requirements.

The GB Capital Component and the Bayshore Bikeway (Routes 1 and 3) Component of the Project could produce noise-generating impacts resulting from Project construction activities (e.g., grading, site preparation) near salt marsh habitats supporting Belding's savanna sparrow or light-footed Ridgway's rail (*Rallus longirostris levipes*; FPS; CESA- and ESA-listed endangered) could cause nest or chick abandonment. MM-BIO-3 would prohibit construction work from occurring within 300 feet of the marsh during the light-footed Ridgway's rail and Belding's savannah sparrow breeding season (February 15– September 15).

Operation of Bayshore Bikeway Component Route 1 could result in pedestrians or cyclists traveling off-trail, which could result in direct mortality of terrestrial candidate, sensitive, or special-status plant species. MM-BIO-8 would require the Project Proponent to install fencing along the edge of the Route 1 to prevent unauthorized access and trampling into Paradise Marsh.

Bayshore Bikeway Component Route 1 and Route 3 and GB Capital Component could involve removal or trimming of suitable roost trees could directly harm roosting bats, resulting in mortality of common or special-status bat species. These impacts could result in large bat mortality events and would be significant absent mitigation. MM-BIO-6 would require surveys for maternal bat roost sites and avoidance of seasonal impacts.

Construction of the Park Expansion, Pasha Rail Improvement Component, and Roadway Configuration in the Balanced Plan could result in noise-generating impacts near osprey nests could cause nest or chick abandonment. MM-BIO-4 would avoid all noise-generating construction

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activities during the osprey nesting season (January 15–June 15) or provide 500-foot avoidance buffers from any observed active nest.

The Pepper Park Expansion, Roadway Configuration in Balanced Plan, GB Capital Component, and Bayshore Bikeway Component Routes 1 and 3 could result in potential disturbance or destruction of nests protected by the Migratory Bird Treaty Act (MBTA). MM-BIO-5 would require avoidance of all vegetation or noise-generating construction activities during the nesting season (February 15–September 15)), or, if construction could not be avoided during the nesting season, nesting bird surveys would be required, and construction prohibited within a buffer zone around active nests.

Construction of the GB Capital Component and Bayshore Bikeway Component Route 1 or Route 3) would have the potential to remove Diegan coastal sage scrub (including restored and baccharis-dominated forms). The potential reduction in Diegan coastal sage scrub would be significant. MM-BIO-10 would require compensation for permanent impacts on Diegan coastal sage scrub habitats at a minimum 1:1 ratio, with compensation occurring as creation, enhancement, or restoration. The compensation could occur through a combination of one or more of the following: onsite enhancement, re-establishment, or creation; or payment into an agency-approved in-lieu fee, mitigation program, or other approved mitigation provider.

Construction of Bayshore Bikeway Component Route 1 would have the potential to remove coastal salt marsh habitat. If Route 1 were chosen, then MM-BIO-11 requires that, prior to issuance of a Coastal Development Permit, the Project Proponent of Bayshore Bikeway Component would request and participate in stakeholder meetings with applicable regulatory agencies and the District to identify locations within the San Diego region to mitigate impacts on coastal salt marsh habitat. All feasible efforts to avoid impacts on coastal salt marsh would be made during final Project design. If avoidance could not be accomplished, then areas for on-site restoration or enhancement within the Paradise Marsh would be prioritized for the required compensatory mitigation. Typical mitigation ratios for coastal salt marsh habitat are 2:1 to 3:1 depending on site conditions at both the impact site and mitigation site.

Use of reflective building and glass finishes in hotel development associated with the City Program – Development Component might confuse birds in flight, leading to an increase in strikes. This impact would be potentially significant. Where a building would be taller than three stories, MM-BIO-9 would require an ornithologist (retained by the respective Project Proponent and pre-approved by the District and familiar with local species to review building plans to verify that the proposed building has incorporated specific design strategies that qualify for Leadership in Energy and Environmental Design (LEED) credits, as described in the American Bird Conservancy's Bird-Friendly Building Design (Sheppard and Phillips 2015) or an equivalent guide to avoid or reduce the potential for bird strikes.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the District in adequately identifying and/or mitigating the Plan's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. Recommendations may also be included to improve the document.

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I. Mitigation Measure or Alternative and Related Impact Shortcoming

COMMENT #1: Seabird Foraging Habitat Impacts—Sweetwater Channel

CDFW reviewed the DEIR, Appendix H and noted the potential special status seabird species listed that may be present within the proposed waterside Project area of Sweetwater Channel. The State fully protected seabird species that occur or have the potential to forage in the Sweetwater Channel Project area include:

- California least tern
- California brown pelican, (brown pelican), (*Pelecanus occidentalis californicus*; FPS)

Issue: The least tern foraging area near their nesting colony at the D Street Fill location will be significantly impacted by the proposed waterside Project due to loss of foraging open water habitat and loss of eelgrass habitat within Sweetwater Channel. The D Street least tern nesting colony may be one of the most successful nesting sites in California, and the least terns have been observed foraging in Sweetwater Channel (CDFW NOP Letter, Jan. 2019). The least tern is migratory and forages on juvenile or small adult fish in San Diego Bay or offshore near their nesting sites. The nearest suitable foraging site and fish nursery habitat with eelgrass close to the D Street nesting colony is Sweetwater Channel entrance, which is considered a sensitive habitat area for bird foraging.

Specific Impacts: According to the DEIR, permanent seabird foraging impacts will occur due to the proposed in-water Project construction within Sweetwater Channel. This includes permanent large area foraging habitat losses of eelgrass and open shallow water due to overwater structure shading and habitat covering. Other potential permanent impacts include general recreational boating activities, boat moorings, and floating shellfish aquaculture equipment. Temporary foraging impacts may include underwater noise and turbidity due to in-water construction.

Why impacts would occur: Permanent and temporary foraging habitat impacts will occur because least terns currently nest on the least tern nesting colony at the D Street nesting site adjacent to Sweetwater Channel and forage in the channel during the breeding and nesting season, which is typically between April 1st and September 15th. Foraging habitat loss impacts would cause the least terns and other sensitive birds that currently use the Sweetwater Channel, for suitable foraging habitat, to seek other suitable foraging areas further away from nests. This could potentially leave the eggs or chicks vulnerable to predation on the D Street nesting site. Additionally, there will be temporary Sweetwater Channel habitat degradation related to pile driving underwater noise, and turbidity.

Permanent Impacts: The proposed in-water Project developments would shade and cover eelgrass and open shallow water habitat causing expected and potential adverse bird foraging impacts that was not fully analyzed and discussed in the DEIR.

Temporary Impacts: During construction of concrete piles there will be underwater noise and turbidity from pile driving which will cause fish and foraging birds to avoid their usual foraging habitat and may cause adverse impacts related to barotrauma injury or death of fish. This may temporarily cause fish used by least terns to be unavailable or scarce during their critical nesting and chick rearing season.

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Evidence impacts would be significant: Based on recent 2018 eelgrass surveys documented in the DEIR (Appendix H), the Sweetwater Channel eelgrass bed area east of the Pier 32 Marina entrance is historically a persistent eelgrass bed offering high quality foraging habitat for fully protected seabirds and other sensitive birds.

Permanent Impacts: After construction of the overwater boat docks, boat moorings, pier platform, and shellfish aquaculture equipment, open water seabird foraging habitat would be permanently covered. According to the DEIR (Appendix H), the eelgrass shading effects of the proposed overwater structure would be expected to cause permanent losses, and/or degradation, of most if not all the existing and persistent eelgrass habitat. Generally, this is expected to degrade the eelgrass ecosystem and marine biodiversity as discussed in the DEIR (Appendix H) regarding impacts to primary and secondary (fish) productivity and bottom-up trophic level impacts. The local ecosystem level impacts would likely reduce fish needed for least tern foraging habitat on a permanent basis if not replaced within Sweetwater Channel in the near vicinity, which is likely not feasible. Offsite mitigation would likely be necessary, making all Sweetwater Channel habitat losses permanent within the local area. Anthropogenic disturbances and sedimentation from permanent increased boating activity, boat moorings, and shellfish aquaculture operation may cause additional eelgrass losses, and degradation of bird foraging habitat. All impacts combined may permanently and significantly reduce high quality seabird foraging habitat near the D Street least tern nesting colony and may reduce the D Street nesting least tern population.

Temporary Impacts: Generally, fish move away from the source of underwater noise and turbidity during construction, and this is expected to temporarily reduce migratory least tern and resident bird foraging opportunities within the Sweetwater Channel. Underwater noise and fish responses are discussed in detail in the DEIR (Appendix H) regarding barotrauma impacts to fish. During construction of concrete piles, there would be generation of water turbidity from pile driving which is caused by bottom sediment disturbances during construction of any new piles for docks and piers.

Recommended Potentially Feasible Mitigation Measure(s): CDFW recommends the Final EIR include the following to reduce the risk of adverse foraging impacts to fully protected least terns and Brown pelicans:

Mitigation Measure #1: Add the following additional mitigation measure to the Final EIR: To avoid temporary foraging impacts to least terns during their nesting and breeding season, conduct pile driving outside of least tern breeding and nesting season (typically between April 1st and September 15th). If the least tern nesting season cannot be avoided, then CDFW has further recommendations below.

Recommendation #1: Add the following additional in-water construction protection measures to the Final EIR: To further avoid and minimize impacts to fully protected and federal or state endangered species, add a least terns and Brown pelican safety zone monitoring and avoidance plan. Each bird species should have mitigation measures specified that will avoid or minimize in-water construction impacts.

Recommendation #2: To avoid impacts to least tern foraging, marine life, and their habitat, CDFW recommends choosing a feasible Sweetwater Channel waterside development project alternative which will reduce impacts below the level of significant or choose Alternative 2, described in the DEIR, to avoid coverage and shading of open water habitat. The focus for Sweetwater Channel regarding locally sensitive and fully protected birds should include

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avoidance of take and avoidance and minimization of foraging habitat impacts. This would include avoiding and minimizing surface water losses, overwater shading of eelgrass, as well as boating and marina impacts discussed below. Additionally, it is important to avoid and minimize impacts related to live aboard noise, night lighting, and unauthorized boat landings on the bird nesting and Refuge areas. The DEIR identifies Project Alternative 2 as the "no water side development" alternative to avoid all degradation and losses of eelgrass and open water foraging habitat.

COMMENT #2: Pile Driving Impacts and Sound Criteria

Issue: CDFW reviewed Appendix H of the DEIR that analyzed underwater noise and turbidity impacts within the Sweetwater Channel. The proposed waterside Project will generate temporary underwater noise and turbidity from pile driving construction of 79 concrete piles for Sweetwater Channel new boat docks, new pier platform, and for the existing marina expansion. There is potential of significant barotrauma impacts to fish and invertebrates which will occur from the proposed use of impact hammers. CDFW relies on guidance from the Fisheries Hydroacoustic Working Group for setting sound pressure level safety criteria for fish resources, and for pile driving projects. The agreed upon criteria consists of sound pressure levels (SPL) of 206 decibels (dB) peak and 187 dB (or 183 dB for fish less than 2 grams body weight) accumulated sound exposure level (SEL) for all listed fish within a project area. Impacts to marine organisms from underwater sound are influenced by the SELs, SPLs, sound frequency, and depth and distance from the sound output source. CDFW prefers the use of the vibratory hammer for pile driving and recommends against using a dynamic or impact hammer. Additional information on in water sound level criteria can be found at: https://dot.ca.gov/programs/environmental-analysis/biology/hydroacoustics

Specific Impacts: Pile driving has potential significant underwater sound pressure effects to fish, marine mammals and sea turtles as discussed in the DEIR.

Why impacts would occur: During installation of concrete piles, there would be underwater noise created from pile driving which will cause altered foraging behaviors of fish, marine mammals, and sea turtles. Fish may temporarily avoid their usual foraging habitat during pile driving. Adverse fish impacts may occur due to higher levels of sound pressure from impact hammers causing potential barotrauma injury or death of fish.

Evidence impacts would be significant: The biological technical report of the DEIR (Appendix H), indicates pile driving impacts to fish and other marine life are likely to cause at least temporary impacts from lower levels of sound pressure, and in some cases may cause adverse impacts to fish related to elevated levels of sound pressure. No significant impacts to other marine life are expected with implementation of biological monitoring and buffer zones. Additionally, the DEIR states that underwater sound pressure waves could result in fish temporarily avoiding the construction area, and cause mortality of some coastal pelagic fish.

Recommended Potentially Feasible Mitigation Measure(s): CDFW recommends the Final EIR include the following to reduce the risk of adverse impacts from pile driving activities.

Recommendation #3: Additional fish impacts mitigation measures for concrete pile driving activities should be included in the Final EIR to further avoid and minimize direct impacts to marine fish, and indirect fish nursery impacts to Sweetwater Channel and the existing eelgrass ecosystem. A fish protection plan such as a Marine Fish Species Impact Avoidance and Minimization Plan (Plan) for pile construction impacts should be developed. The Plan should

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include, at a minimum, the below stated mitigation measures, and include the use of the guidance from the Fisheries Hydroacoustic Working Group for setting sound pressure level safety criteria for fish resources.

Mitigation Measure #2: Underwater Noise. Feasible underwater noise dampening mitigation measures should be used for pile driving such as noise dampening blocks, air bubble curtains and/or coffer dam methodologies as applicable for concrete pile driving in addition to the proposed Project methods of soft starts and wildlife safety zones (buffers).

Mitigation Measure #3: Underwater Noise. All concrete piles should be driven with a vibratory hammer to the maximum extent feasible. If an impact hammer is required for pile driving, then underwater sound monitoring is recommended. If the hydroacoustic sound levels generated exceed the Interim Criteria for Injury to Fish (peak sound exposure level (SEL) of 206 decibels (dB) and accumulated SEL of 187 dB SEL threshold for fish over 2 grams and 183 dB for fish under 2 grams), (Interim Criteria 2008), then additional sound pressure wave mitigation is recommended to reduce the sound levels below maximum.

Mitigation Measure #4: Turbidity and Sedimentation. The DEIR indicates that the Project Proponent will use silt curtains to minimize turbidity only if turbidity monitoring results indicate a silt curtain is necessary. While we do understand this mitigation measure is somewhat protective to water quality and eelgrass, CDFW recommends that silt curtains be installed prior to, and during all pile driving activities. This mitigation recommendation is more protective for the sensitive Sweetwater Channel and eelgrass habitats that are adjacent to the proposed Project pile driving location for the new dock.

COMMENT #3: Native Eelgrass and Open Water Habitat Impacts

Issue #1: The proposed in-water portion of the Project will have potentially significant indirect impacts from shading of eelgrass cover (1.88 acres), potential eelgrass habitat (3.49 acres), and direct impacts from coverage of an undetermined area of open water habitat within Sweetwater Channel. The indirect loss of 3.49 acres of potential eelgrass habitat was identified, but not discussed in the DEIR as needing compensatory mitigation. The potential eelgrass habitat should be mitigated in addition to the 1.88 acres of eelgrass cover (See eelgrass habitat compensation measures and recommendations below).

Issue #2: The proposed Project may have additional significant adverse Sweetwater Channel soft bottom and eelgrass impacts from temporary in-water construction work, and permanent boating operation impacts for the remaining life of the Project that were not fully addressed in the DEIR.

Issue #3: The proposed Project may have additional significant adverse Sweetwater Channel soft bottom and eelgrass impacts from the proposed shellfish aquaculture facility.

Specific Impacts: As stated in the DEIR, eelgrass observed east of the Pier 32 Marina entrance within Sweetwater Channel during the 2018 eelgrass survey will be shaded and open water habitat will be covered by the proposed waterside Project. The Project Proponent proposes overwater structures to include new boat docks, boat moorings, pier platform, and shellfish aquaculture floating equipment. All overwater structures will cause reduction of open surface water habitat, and shading of channel water, eelgrass cover, potential eelgrass habitat (unvegetated), and soft bottom.

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Additionally, there will be potentially permanent and temporary eelgrass impacts generated from boating and in-water construction. This may include indirect effects such as underwater noise, water turbidity, sedimentation, propellor wash, and boat wakes resulting in bank erosion. Direct effects may include physical soft bottom disturbances such as anchoring, propellor cuts, and pile driving during construction.

Shellfish aquaculture impacts: Shellfish aquaculture may permanently impact eelgrass by increasing sedimentation, turbidity, shading, and accumulation of debris underneath aquaculture equipment.

Why impacts would occur: According to the DEIR impact assessment, all the eelgrass within Sweetwater Channel will be adversely impacted by the proposed Project due to shading, and general boating activities. Eelgrass is a plant that utilizes photosynthesis for growth, and its survival depends on sunlight reaching the bottom of the Sweetwater Channel. The DEIR states there will be an assumed total eelgrass area loss of 1.88 acres based on a 2018 eelgrass survey. Most of the eelgrass exists along the shoreline where the new boat dock would be located with an additional portion of eelgrass found throughout the Sweetwater Channel where the boat moorings and aquaculture facility are proposed. Additionally, there are 3.49 acres of unvegetated, potential eelgrass habitat mapped as seen in Figure 3 of Appendix H, some of which will be permanently impacted due mainly to new overwater structure shading.

Adverse or temporary eelgrass habitat impacts may occur from in-water dock construction, mooring, and increased boating including turbidity, sedimentation, anchor and propellor cuts, and boat wake effects.

Shellfish aquaculture facilities potentially cause impacts to eelgrass growing underneath or adjacent to the facility operations. This may include indirect effects such as sedimentation, turbidity, shading, and accumulation of debris underneath aquaculture equipment all of which could displace or degrade eelgrass habitat.

Evidence impacts would be significant: The loss of 1.88 acres of eelgrass cover and 3.49 acres of unvegetated, potential eelgrass was identified in the DEIR and is considered a significant impact by CDFW. Eelgrass is a sensitive and rare habitat that is highly productive as a juvenile fish nursery, and used by adult fish and invertebrates for foraging, spawning, and shelter. Eelgrass beds are also considered a “special aquatic site” and given protections by the Clean Water Act. Additionally, the importance of eelgrass protection and restoration, as well as the ecological benefits of eelgrass, is identified in the California Public Resources Code (PRC §35630). Guidance for eelgrass impact avoidance, minimization, and compensatory mitigation as well as guidance for eelgrass mitigation banking is provided by the California Eelgrass Mitigation Policy (CEMP), (NOAA, 2014). (https://media.fisheries.noaa.gov/dam-migration/cemp_oct_2014_final.pdf).

Shellfish aquaculture facilities floating over eelgrass beds will shade the eelgrass bed below and adjacent areas which may have potentially significant impacts as indicated by the DEIR, (Appendix H). Shellfish aquaculture can have other potentially significant impacts such as generating additional benthic nutrients, eelgrass sedimentation, and equipment debris which may fall to the bottom covering eelgrass and benthic sediments. On the other hand, there can be eelgrass and water quality benefits from shellfish aquaculture.

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Recommended Potentially Feasible Mitigation Measure(s): CDFW recommends incorporating the following mitigation measures and recommendations into the Final EIR to avoid and minimize the impacts to eelgrass habitats, and open water habitat.

Recommendation #4: CDFW recommends an eelgrass and open water habitat Mitigation, Monitoring and Reporting Plan (MMRP) be developed in collaboration with CDFW and other agencies and be included in the Final EIR. CDFW also recommends adding alternatives for in-water project designs which would avoid adverse impacts. CDFW also recommends that comprehensive baseline eelgrass and open water surveys be conducted and the results added to the Final EIR. Additionally, eelgrass and open water habitat mitigation site locations and alternatives should be discussed in the Final EIR. Once final designs are completed, CDFW recommends that the MMRPs and Final EIR include a habitat loss/gain analysis summary table indicating area of habitat losses, and how each loss of eelgrass, potential eelgrass habitat, and open surface water habitat will be mitigated. Prior to finalizing the MMRPs for the proposed in-water Project, a plan for avoiding Eelgrass Shading and Open Water Coverage should be developed and included in the MMRP to identify tentative habitat impact avoidance and minimization measures to be finalized prior to in-water construction.

Recommendation #5: CDFW recommends Project Alternative 2 (no in-water development) be chosen as the proposed Project to avoid the significant habitat impacts of Sweetwater Channel, a habitat area considered sensitive and of high quality by CDFW. If Project Alternative 2 is chosen, this would avoid loss of significant areas of valuable eelgrass and open shallow water habitat due to overwater structure shading and coverage. CDFW has identified this area as sensitive because of the significant area of extant eelgrass and bird foraging habitat used by sensitive birds, some of which are fully protected.

Recommendation #6: The proposed Project will likely have direct and indirect construction and operational eelgrass habitat impacts that may not show up shortly after construction. CDFW recommends at least two or more annual eelgrass monitoring and impact analysis surveys should be conducted.

Recommendation #7: If transplanting of eelgrass is required for eelgrass compensatory mitigation, a Scientific Collecting Permit (SCP) from CDFW will be required prior to harvest and transplanting activities. The SCP may include conditions such as donor bed surveys, limits on number and density of turions collected, methods for collection and transplanting, notification of activities, and reporting requirements. Please visit the CDFW's SCP webpage for more information: https://wildlife.ca.gov/Licensing/Scientific-Collecting.

Mitigation Measure #5: Eelgrass and open water habitat impacts should be avoided, minimized, and unavoidable impacts compensated on site, and in-kind if feasible. The eelgrass MMRP and the Final EIR should include several alternative eelgrass mitigation site locations to compensate for expected losses of eelgrass cover (1.88 acres as of 2018), potential eelgrass habitat (3.49 acres as of 2018), and open water habitat. Actual losses of these habitats should be determined and compensated after construction is complete.

Mitigation Measure #6: The proposed Project should avoid and minimize the area of overwater structure covering open water habitat and shading of eelgrass beds to the maximum extent feasible. Additionally, the MMRP as recommended above, should include, at a minimum, the following mitigation measures:

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- to protect Sweetwater Channel habitats from turbidity and sedimentation effects during bottom disturbing construction activity, install silt curtains around eelgrass beds as feasible. Monitor and mitigate turbidity during construction. Restrict the turbidity plume to the smallest possible area;
- locate overwater structures such as aquaculture equipment, boat moorings, docks and all barge anchoring outside of eelgrass habitat; and,
- boat mooring anchor designs and installation should include methods to avoid anchor chain scouring of the soft bottom and eelgrass over the life of the proposed Project.

COMMENT #4: Impacts from Construction of Bayshore Bike Route #1

Issue: If Route 1 is selected as the final alignment for the Bayshore Bikeway Component, construction could result in impacts to coastal salt marsh habitat and Belding's savannah sparrow.

Specific Impacts: Direct impacts on 0.03 acre of southern coastal salt marsh would potentially occur only if the Bayshore Bikeway Component Route 1 alignment were selected. These impacts would result in the potential for direct take of Belding's savannah sparrow, a California endangered CESA-listed species.

Why impacts would occur: Route 1 would be located at the far eastern edge of the proposed Habitat Buffer, directly adjacent to and above Paradise Marsh. Impacts from this route would occur partially within disturbed areas and native habitats, including coastal sage scrub and coastal salt marsh habitat.

Evidence impacts would be significant: "Endangered species" as defined by CESA means a native species that is in serious danger of becoming extinct throughout all, or a significant portion, of its range due to one or more causes, including loss of habitat or change in habitat (Fish & G. Code § 2062). Impacts to Belding's savannah sparrow habitat would likely require the Project Proponent to seek an Incidental Take Permit (ITP) through Section 2081 of the Fish and Game Code for potential impacts on Belding's savannah sparrow habitat and provide mitigation for habitat loss.

The DEIR suggests that impacts to coastal salt marsh habitat would be achieved through restoration or enhancement. The principal shortcoming of most proposed enhancement projects is that they can often result in a net loss of wetland acreage. Only through the restoration of former wetlands or through the creation of new wetlands can no-net-loss be achieved (California Coastal Commission).

Recommended Potentially Feasible Alternative: CDFW recommends incorporating the following recommendation into the EIR to avoid and minimize the impacts to Belding's savannah sparrow.

Recommendation #8: The DEIR states that Route 3 of the Bayshore Bikeway is currently the preferred route**.** Route 3 would be located primarily within disturbed areas on the eastern edge of the proposed GB Capital Component and within the western side of the proposed Habitat Buffer and would result in minimal impacts to special-status species and sensitive vegetation communities (i.e., coastal salt marsh, Diegan coastal sage scrub). CDFW recommends Route 3 be chosen as the proposed Project to avoid the potential for significant impacts to the endangered Belding's savannah sparrow, wandering skipper, yellow rail, and sensitive habitats.

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General Comments

1. As discussed in CDFW's 2019 NOP comment letter, there are additional water quality and anthropogenic impacts that may be potentially significant and should be analyzed and included in the Final EIR with mitigation measures and monitoring plans proposed. These impacts may be generated from the marina expansion and the new boat docks within Sweetwater Channel. Impacts may include boat propeller wash and wake erosional effects, new lighting on boat docks/moorings, increased debris on channel bottom, and ongoing operational airborne/underwater noise and anthropogenic disturbances to wildlife related to boats moored or docked inside the channel. Additional potentially significant water quality impacts within Sweetwater Channel may include, at a minimum, the following:

    - Changes in circulation.
    - Changes in temperature and dissolved oxygen.
    - Resuspension of suspected sediment pollutants.
    - Long-term reduction in water clarity; and
    - Increased nutrient and toxic pollutant load levels from terrestrial or moored point sources.

2. According to the DEIR, Appendix H, Page 16, it is probable that some eelgrass would remain within the Project area after implementation of the boat dock, moorings, and shellfish aquaculture improvements, and any eelgrass that survives could be deducted from the final mitigation. The Appendix H also suggested any excess eelgrass not needed for mitigation could be maintained in an eelgrass bank as eelgrass credits that could then be sold or used to offset eelgrass impacts from other future projects in San Diego Bay. If the District chooses to propose an eelgrass mitigation bank, CDFW recommends that they consult with CDFW and other applicable agencies on whether this excess eelgrass could be used in a mitigation bank. Additionally, CDFW recommends going through the CDFW mitigation bank process. More information on the CDFW mitigation banking process can be found at: https://wildlife.ca.gov/Conservation/Planning/Banking/Guidelines.

3. The DEIR does not specify a final design or purpose for the proposed aquaculture facility and equipment. The DEIR describes that it will be off-bottom floating containments at the water surface and that the location would be over eelgrass habitat within the Sweetwater Channel. If shellfish aquaculture operation is proposed in the future, then the District should provide complete and detailed information about the final design, locations, purpose, and aquaculture species. Additionally, include marine resources impact avoidance and minimization mitigation measures, and discuss compensatory mitigation. CDFW recommends that the District collaborate early and often with CDFW and other agencies on appropriate designs and locations to avoid and minimize negative impacts to wildlife, and other natural habitats such as eelgrass. Additionally, a CDFW-issued aquaculture registration will be required annually for any future aquaculture operation. More information on the CDFW aquaculture permitting process can be found at: https://permits.aquaculturematters.ca.gov/Permit-Guide.

4. Disturbance of the bottom sediments from dredging and pile construction may redistribute non-native species that compete with native species. This could cause widespread adverse impacts to eelgrass and the marine ecology. The invasive algae *Caulerpa taxifolia* is listed as a federal noxious weed under the U.S. Plant Protection Act and while deemed eradicated in 2006 is monitored for potential future emergence. Another invasive algae species found recently in Newport Bay is *Caulerpa prolifera*, which is also a potential threat to growth and expansion of native eelgrass beds and other native alga. CDFW recommends including a mitigation measure detailing a pre-construction *Caulerpa spp*. survey to identify potential existence of invasive

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Caulerpa spp. If any *Caulerpa spp*. are found, including *Caulerpa prolifera,* the observations should be reported to CDFW and other applicable agencies within 24 hours as described in the Caulerpa Control Protocol. https://www.fisheries.noaa.gov/west-coast/habitat-conservation/aquatic-invasive-species-west-coast.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a data base which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB). The CNNDB field survey form can be found at the following link: http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/CNDDB_FieldSurveyForm.pdf. The completed form can be mailed electronically to CNDDB at the following email address: CNDDB@wildlife.ca.gov. The types of information reported to CNDDB can be found at the following link: http://www.dfg.ca.gov/biogeodata/cnddb/plants_and_animals.asp.

FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying Project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

CONCLUSION

CDFW appreciates the opportunity to comment on the DEIR to assist the District in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to (for terrestrial impacts) Meredith Osborne, Environmental Scientist, at Meredith.Osborne@wildlife.ca.gov or (for marine impacts) Loni Adams, Environmental Scientist, at Loni.Adams@wildlife.ca.gov.

Sincerely,

DocuSigned by:
David Mayer
D700B4520375406...

David Mayer
Environmental Program Manager
South Coast Region

ec: CDFW
David Mayer, San Diego – David.Mayer@wildlife.ca.gov
Eric Wilkins, San Luis Obispo – Eric.Wilkins@wildlife.ca.gov
Jennifer Turner, San Diego – Jennifer.Turner@wildlife.ca.gov
Meredith Osborne, San Diego – Meredith.Osborne@wildlife.ca.gov
Loni Adams, San Diego – Loni.Adams@wildlife.ca.gov
Cindy Hailey, San Diego – Cindy.Hailey@wildlife.ca.gov
State Clearinghouse, Office of Planning and Research – State.Clearinghouse@opr.ca.gov

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References

NOAA (National Oceanic and Atmospheric Administration) Fisheries, West Coast Region. 2014. California Eelgrass Mitigation Policy and Implementing Guidelines.

Fisheries Hydroacoustic Working Group. 2008. Interim Criteria for Injury of Fish Exposed to Pile Driving Operations: Memorandum. Washington: Federal Highway Administration.

California Coastal Commission: Procedural Guidance for the Review of Wetland Projects in California's Coastal Zone, Chapter Two - An Overview of Mitigation Processes and Procedures.

Attachments

A. CDFW Comments and Recommendations

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Attachment A:

CDFW Comments and Recommendations

	Recommendations/Mitigation Measures	Timing	Responsible Party
Mitigation Measure #1	Add the following additional mitigation measure to the Final EIR: To avoid temporary foraging impacts to least terns during their nesting and breeding season, conduct pile driving outside of least tern breeding and nesting season (typically between April 1st and September 15th). If the Least tern nesting season cannot be avoided, then CDFW has further recommendations below.	Prior to release of the EIR	The District
Mitigation Measure #2	Underwater Noise. Feasible underwater noise dampening mitigation measures should be used for pile driving such as noise dampening blocks, air bubble curtains and/or coffer dam methodologies as applicable for concrete pile driving in addition to the proposed Project methods of soft starts and wildlife safety zones (buffers).	During construction	Project Proponent
Mitigation Measure #3	Underwater Noise. All concrete piles should be driven with a vibratory hammer to the maximum extent feasible. If an impact hammer is required for pile driving, then underwater sound monitoring is recommended. If the hydroacoustic sound levels generated exceed the Interim Criteria for Injury to Fish (peak sound exposure level (SEL) of 206 decibels (dB) and accumulated SEL of 187 dB SEL threshold for fish over 2 grams and 183 dB for fish under 2 grams), (Interim Criteria 2008), then additional sound pressure wave mitigation is recommended to reduce the sound levels below maximum.	During construction	Project Proponent
Mitigation Measure #4	Turbidity and Sedimentation. The DEIR indicates that the Project Proponent will use silt curtains to minimize turbidity only if turbidity monitoring results indicate a silt curtain is necessary. While we do understand this mitigation measure is somewhat protective to water quality and eelgrass, CDFW recommends that silt curtains be installed prior to, and during all pile driving activities. This mitigation recommendation is more protective for the sensitive Sweetwater Channel and eelgrass habitats that is adjacent to the proposed Project pile driving location for the new dock.	Prior to construction	Project Proponent

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Mitigation Measure #5	Eelgrass and open water habitat impacts should be avoided, minimized, and unavoidable impacts compensated on site, and in-kind if feasible. The eelgrass MMRP and the Final EIR should include several alternative eelgrass mitigation site locations to compensate for expected losses of eelgrass cover (1.88 acres as of 2018), potential eelgrass habitat (3.49 acres as of 2018), and open water habitat. Actual losses of these habitats should be determined and compensated after construction is complete.	Prior to release of the EIR During/after construction	The District and Project Proponent
Mitigation Measure #6	The proposed Project should avoid and minimize the area of overwater structure covering open water habitat and shading of eelgrass beds to the maximum extent feasible. Additionally, the MMRP as recommended above, should include, at a minimum, the following mitigation measures: • To protect Sweetwater Channel habitats from turbidity and sedimentation effects during bottom disturbing construction activity, install silt curtains around eelgrass beds as feasible. Monitor and mitigate turbidity during construction. Restrict the turbidity plume to the smallest possible area. • Locate overwater structures such as aquaculture equipment, boat moorings, docks and all barge anchoring outside of eelgrass habitat. • Boat mooring anchor designs and installation should include methods to avoid anchor chain scouring of the soft bottom and eelgrass over the life of the proposed Project.	Prior to release of the EIR Before construction	The District and Project Proponent
Recommendation #1	Add the following additional in-water construction protection measures to the Final EIR: To further avoid and minimize impacts to fully protected and federal or state endangered species, add a least terns and Brown pelican safety zone monitoring and avoidance plan. Each bird species should have mitigation measures specified that will avoid or minimize in-water construction impacts.	Prior to release of the EIR	The District
Recommendation #2	To avoid impacts to least tern foraging, marine life, and their habitat, CDFW recommends choosing a feasible Sweetwater Channel waterside development project alternative which will reduce impacts below the level of	Prior to release of the EIR	The District

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	significant or choose Alternative 2, described in the DEIR, to avoid coverage and shading of open water habitat. The focus for Sweetwater Channel regarding locally sensitive and fully protected birds should include avoidance of take and avoidance and minimization of foraging habitat impacts. This would include avoiding and minimizing surface water losses, overwater shading of eelgrass, as well as boating and marina impacts discussed below. Additionally, it is important to avoid and minimize impacts related to live aboard noise, night lighting, and unauthorized boat landings on the bird nesting and Refuge areas. The DEIR identifies Project Alternative 2 as the "no water side development" alternative to avoid all degradation and losses of eelgrass and open water foraging habitat.		
Recommendation #3	Additional fish impacts mitigation measures for concrete pile driving activities should be included in the Final EIR to further avoid and minimize direct impacts to marine fish, and indirect fish nursery impacts to Sweetwater Channel and the existing eelgrass ecosystem. A fish protection plan such as a Marine Fish Species Impact Avoidance and Minimization Plan (Plan) for pile construction impacts should be developed. The Plan should include, at a minimum, the below stated mitigation measures, and include the use of the guidance from the Fisheries Hydroacoustic Working Group for setting sound pressure level safety criteria for fish resources.	Prior to release of the EIR	The District
Recommendation #4	CDFW recommends an eelgrass and open water habitat Mitigation, Monitoring and Reporting Plan (MMRP) be developed in collaboration with CDFW and other agencies and be included in the Final EIR. CDFW also recommends adding alternatives for in-water project designs which would avoid adverse impacts. CDFW also recommends that comprehensive baseline eelgrass and open water surveys be conducted and the results added to the Final EIR. Additionally, eelgrass and open water habitat mitigation site locations and alternatives should be discussed in the Final EIR. Once final designs are completed, CDFW recommends that the MMRPs and Final EIR include a habitat loss/gain analysis summary table indicating area of habitat losses, and how each loss of	Prior to release of the EIR	The District

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	eelgrass, potential eelgrass habitat, and open surface water habitat will be mitigated. Prior to finalizing the MMRPs for the proposed in-water Project, a plan for avoiding Eelgrass Shading and Open Water Coverage should be developed and included in the MMRP to identify tentative habitat impact avoidance and minimization measures to be finalized prior to in-water construction.		
Recommendation #5	CDFW recommends Project Alternative 2 (no in-water development) be chosen as the proposed Project to avoid the significant habitat impacts of Sweetwater Channel, a habitat area considered sensitive and of high quality by CDFW. If Project Alternative 2 is chosen, this would avoid loss of significant areas of valuable eelgrass and open shallow water habitat due to overwater structure shading and coverage. CDFW has identified this area as sensitive because of the significant area of extant eelgrass and bird foraging habitat used by sensitive birds, some of which are fully protected.	Prior to release of the EIR	The District
Recommendation #6	The proposed Project will likely have direct and indirect construction and operational eelgrass habitat impacts that may not show up shortly after construction. CDFW recommends at least two or more annual eelgrass monitoring and impact analysis surveys should be conducted.	After construction	Project Proponent
Recommendation #7	If transplanting of eelgrass is required for eelgrass compensatory mitigation, a Scientific Collecting Permit (SCP) from CDFW will be required prior to harvest and transplanting activities. The SCP may include conditions such as donor bed surveys, limits on number and density of turions collected, methods for collection and transplanting, notification of activities, and reporting requirements. Please visit CDFW's SCP webpage for more information: https://wildlife.ca.gov/Licensing/Scientific-Collecting.	During/after construction	Project Proponent

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Recommendation #8	The DEIR states that Route 3 of the Bayshore Bikeway is currently the preferred route**.** Route 3 would be located primarily within disturbed areas on the eastern edge of the proposed GB Capital Component and within the western side of the proposed Habitat Buffer and would result in minimal impacts to special-status species and sensitive vegetation communities (i.e., coastal salt marsh, Diegan coastal sage scrub). CDFW recommends Route 3 be chosen as the proposed Project to avoid the potential for significant impacts to the endangered Belding's savannah sparrow, wandering skipper, yellow rail, and sensitive habitats.	Prior to release of the EIR	The District and Project Proponent

CALIFORNIA COASTAL COMMISSION
SAN DIEGO DISTRICT OFFICE
7575 METROPOLITAN DRIVE, SUITE 103
SAN DIEGO, CA 92108-4402
VOICE (619) 767-2370
FAX (619) 767-2384

November 23, 2021

Anna Buzaitis
San Diego Unified Port District
P.O. Box 120488
San Diego, CA 92112
(Sent by email)

Re: California Coastal Commission Comments – National City Bayfront Projects & Plan Amendments Draft Environmental Impact Report

Dear Anna Buzaitis:

Coastal Commission (Commissions) staff appreciates the opportunity to review and provide preliminary comments on the National City Bayfront Projects & Plan Amendments Draft Environmental Impact Report (DEIR), dated September 2021, for the proposed project by the San Diego Unified Port District (District), City of National City (City), GB Capital Holdings (GB Capital) and Pasha Automotive Services (Pasha) (collectively, project proponents). The DEIR contains changes to both landside and waterside development components; an amendment to the District's Port Master Plan (PMP); and amendments to the City's Local Coastal Program (LCP), General Plan, Harbor District Specific Area Plan, Land Use Code, and Bicycle Master Plan (collectively, proposed project) on approximately 77 acres, consisting of approximately 58 landside acres and 19 waterside acres within District and City jurisdiction in National City. Specifically, the proposed project includes the following primary components:

- Construction of a recreational vehicle (RV) park, modular cabins, dry boat storage, expanded marina, and up to four hotels.
- Construction of a new rail connector track and storage track.
- Closure of Tidelands Avenue between Bay Marina drive and 32nd Street, as well as West 28th Street between Tidelands Avenue and Quay Avenue, and redesignation of the area from Street to Marine-Related Industrial in the PMP.
- Construction/realignment of the Bayshore Bikeway.
- Construction of a hotel, restaurant, retail, and/or a combination of tourist/visitor-serving commercial development north of Bay Marina Drive and the potential closure or narrowing of Bay Marina Drive west of Marina Way to vehicular traffic.
- Amendments to the District's PMP and City's LCP for changes to land and water use designations to balance commercial and maritime uses.

These projects are located in the Coastal Zone and will be subject to review by the Commission through future amendments to the District's PMP and City's LCP, as well as coastal development permits that will be appealable to the Commission; therefore, consistency with Coastal Act policies should be incorporated into the environmental review. Development located within the District's jurisdiction on public tidelands should also be reviewed for consistency with the Public Trust Doctrine. In addition, the final EIR should evaluate the project's consistency with the District's Maritime Clean Air Strategy (MCAS) and incorporate mitigation measures specific to the MCAS, as well as the District's Climate Action Plan and City's Climate Action Plan to minimize adverse impacts to air quality. Additional and more thorough project review will be provided as part of ongoing environmental review and the future PMP and LCP amendment processes.

Port Master Plan Update

It is unclear why the proposed projects located in the District's jurisdiction were not included in the Port Master Plan update (PMPU), which is also currently undergoing environmental review. These proposed National City projects should be designed to be consistent with the bay-wide policies in the PMPU. Similarly, the PMP amendment for this project should contain detailed project information as well as development standards similar to those proposed in the PMPU for other planning districts, including but not limited to building heights, development setbacks, habitat setbacks, public access provisions, mobility/transit provisions, view corridors, water quality provisions, lower cost visitor-serving overnight accommodation requirements, and mitigation measures to avoid or minimize coastal resource impacts.

Sensitive Habitat

Habitat buffers from the adjacent wildlife refuge should be maximized. To preserve and protect environmentally sensitive areas located in Paradise Marsh, a minimum 100 ft. buffer adjacent to the wetland habitat should be required to protect the ecological function of sensitive wetland habitat. Even low impact uses, such as the Bayshore Bikeway, public access trails and parking, should be located outside the minimum 100 ft. habitat buffer, although these types of uses could be located in the proposed 200 ft. building setback. It is unclear whether the wetland delineation identifies one-parameter wetland habitat (e.g., evidence of one of the three following wetland parameters: wetland hydrology, hydric soils, or hydrophytic vegetation), which is how the Commission identifies wetland habitat. The DEIR should clarify the extent of Commission-jurisdictional wetlands onsite and use the inland extent of Commission-jurisdictional wetlands as the start of the 100 ft. wetland buffer. In addition, lighting adjacent to Paradise Marsh should be avoided or minimized. Finally, given the proximity to the wildlife refuge and Sweetwater Channel, all landscaping should be limited to native, drought-tolerant species.

One of the objectives of the project is to expand aquaculture potential on District tidelands; however, the use of non-native species could adversely impact bay habitats and native populations as a result of the naturalization of non-native species. Therefore, aquaculture projects should be limited to only native species. In addition, aquaculture projects should be

avoided in areas where they would have the potential to directly or indirectly (e.g., shading) impact sensitive species, such as eelgrass.

The waterside improvements have the potential to result in the loss of existing eelgrass habitat due to overwater coverage or shading. As such, alternatives to the expansion of the Pier 32 Marina into Sweetwater Channel should be evaluated to avoid or minimize adverse impacts to eelgrass, an essential fish habitat.

Bayshore Bikeway

Bayshore Bikeway Route 1 would result in the permanent loss of 0.03 acre of coastal salt marsh habitat, which has the potential to adversely impact the state-listed Belding's Savannah sparrow, observed in the project area; therefore, we do not support Route 1 and recommend further analysis of Route 2, given that it has the largest buffer from Paradise Marsh, is least susceptible to future hazards such as flooding associated with projected sea level rise, and is not located directly adjacent to Interstate 5. Route 2 most closely follows the existing Bayshore Bikeway, allowing the public to bicycle as close to the coast as possible; however, please also analyze continuation of the bikeway on Tidelands Avenue from the north to Bay Marina Drive to the south, east to Marina Way, and then south along Marina Way. Alternatively, also analyze whether Cleveland Avenue could be redesigned to accommodate a more direct Route 2 from Civic Center Drive in the north, south on Cleveland Avenue, and connecting with Marina Way. To avoid public access impacts, the closure of the existing Bayshore Bikeway located on Tidelands Avenue and 32nd Street should not be permitted until the alternative alignment is constructed and open to the public.

Environmental Justice

The Commission strongly encourages all local governments or issuing agencies to consider environmental justice in their review of coastal development permits. In 2016, the Coastal Act was amended to include section 30604(h) which states: When acting on a coastal development permit, the issuing agency, or the Commission on appeal, may consider environmental justice, or the equitable distribution of environmental benefits throughout the state. By referring to "the issuing agency," the Legislature's intention was that both the Commission and local governments would use this new authority and consider environmental justice. Since unanimously adopting its first Environmental Justice Policy ("EJ Policy") in 2019, the Commission has been evaluating project proposals for CDPs, LCPs, PMPs, and LCP/PMP amendments for potential impacts that may disproportionately harm underserved communities or exacerbate the longstanding inequities previously overlooked in traditional land use planning analyses. The EJ Policy provides a framework for considering environmental justice concerns in the coastal zone consistent with the Commission's standard of review in Chapter 3 of the Coastal Act. Further, the Executive Summary's Project Objectives for the proposed project states that the project should "incorporate District properties into the PMP that are not currently regulated by the PMP to ensure consistency with the California Coastal Act, Public Trust Doctrine, and Port Act." We recommend that the DEIR include consideration and discussion of environmental justice in its analysis of the project's potential impacts consistent with the Coastal Act and Commission's EJ Policy.

Sea Level Rise (SLR) and Coastal Access

Pepper Park is National City's only park west of Interstate 5 and provides recreational opportunities and access to the coast for visitors and residents. MM-LU-1 and MM-LU-2 analyzes Bayshore Bikeway, Pepper Park expansion, and possible Granger Hall relocation under Near Term SLR through 2030 and 2050 for temporary inundation and provides mitigation measures. However, under MM-LU-3, the same assets are projected to be temporarily and permanently inundated under SLR in 2100. Because the longer-term effects can be difficult to quantify, we appreciate the proposed periodic re-evaluation of the project's mitigation for longer term impacts, as stated under MM-LU-4. However, under the Commission's Sea Level Rise Policy Guidance, "mitigation for unavoidable public resource impacts over the life of the structure" is required. In addition to the periodic re-evaluation, temporary and permanent flooding impacts (through 2100) to coastal resources, particularly coastal access offered by Pepper Park and the bikeway, need to be properly mitigated for. The design of the Pepper Park expansion should account for SLR through 2100 (e.g., a minimum 75-year design life) and include features that will make the park adaptive to future flooding. We encourage the use of the following mitigation measures: implementation of a living shoreline with salt tolerant species, maximization of pervious surfaces, and consideration of additional park area on the landward perimeter of the site to allow for managed retreat.

If Granger Hall is to be relocated to Pepper Park, the same sea level rise analysis and mitigation through 2100 should be evaluated, as well as an analysis of public views. It is also unclear whether Granger Hall would be used as a public or commercial facility; if Granger Hall is relocated to the park, it should be maintained as a public facility and expansion of the public park. However, to maximize open space in Pepper Park, alternative relocation sites for Granger Hall should also be analyzed.

The modular cabins proposed on the jetty on the southern portion of the site adjacent to the Sweetwater Channel would block public views of the coast from the Bayshore Bikeway and would also be susceptible to coastal hazards, including flooding associated with projected sea level rise. Given the potential for coastal resource impacts, these cabins should be removed or relocated to the proposed RV areas. In addition, the cabins proposed on the eastern portion of the site adjacent to Paradise Marsh would block views of the marina from the Bayshore Bikeway and could have indirect impacts (e.g., lighting, noise) on the adjacent wildlife refuge; therefore, cabins in that location should also be evaluated for relocation to the proposed RV areas.

Public access should be maximized on the north-south and east-west public access and view corridors, including maximizing their widths and designing accessways for use by both pedestrians and bicyclists.

The proposed closure of roadways would result in a net decrease of 249 on-street parking spaces currently used by NCMT employees; however, this is proposed to be mitigated by the reconfiguration and restriping of Lot Q on the southwest corner of Bay Marina Drive and Quay Avenue to provide additional parking for employees and offset the loss of 249 parking spaces. According to the DEIR, restriping would provide 590 spaces in Lot Q, which would

accommodate the 574 existing NCMT employees; however, the DEIR should also analyze whether the increased leasehold area would result in additional employees, and whether Lot Q's 590 spaces would provide adequate parking for the projected number of employees, given that NCMT employees' use of public parking adjacent to Pepper Park could adversely impact public coastal access.

Lower-Cost Facilities and Overnight Accommodations

The proposed project, under the GB Capital Component, includes land use changes to allow up to four hotels, up to 135 RV sites and up to 60 modular cabins, yet it is unclear whether any of these will provide lower-cost accommodations. The Commission has the responsibility, pursuant to the public access policies of the Coastal Act, and particularly Section 30213, to ensure that new development projects provide for a range of affordable visitor serving facilities along the coast. The Commission has found that facilities providing lower-cost overnight accommodations are critical to providing equitable coastal access. Moreover, the Commission has found that affordable overnight accommodations are a necessary part of providing public access and recreational opportunities for the many visitors that live further from the coast, particularly for low-income households that will experience a disproportionate barrier to accessing these amenities. While RV sites may be more affordable than high-cost hotel rooms, they may not be lower-cost when the upfront cost to buy or rent an RV is considered. Furthermore, the modular cabins located at the District's existing RV site operated by Sun Outdoors are not lower-cost either and can cost upwards of $200-$300 per night. Please describe how the proposed project will incorporate lower-cost accommodations and visitor serving facilities. We encourage replacing some of the RV sites with tent camping sites, which are inherently lower-cost. Given the number of hotels that are proposed, at least one of the hotels should be a lower-cost product (e.g., hostel), or a minimum of 25% of the rooms in each hotel should be provided as lower-cost.

Thank you again for your consideration of the comments included above. Please note that these comments are preliminary and are not binding; Commission staff will provide additional comments as time allows for a more comprehensive review. Also, please note that these comments have been submitted on the part of staff and the Commission itself would be the ultimate decision-making body. We look forward to continuing our coordination with City and Port staff in a manner that is consistent with the Coastal Act and the Commission's Environmental Justice Policy. If you have any questions, please do not hesitate to contact me at the above office.

Sincerely,

Kanani Leslie
Coastal Program Manager

Cc (copies sent via e-mail):
Karl Schwing, Deputy Director

Deborah Lee, District Manager
Diana Lilly, District Manager
Melody Lasiter, Coastal Program Analyst
Sumi Selvaraj, Environmental Justice Manager
Javier Padilla Reyes, Environmental Justice Analyst

California Department of Transportation

DISTRICT 11
4050 TAYLOR STREET, MS-240
SAN DIEGO, CA 92110
(619) 709-5152 | FAX (619) 688-4299 TTY 711
www.dot.ca.gov

November 17, 2021

11-SD-I-5
PM 9.64
Draft Environmental Impact Report (DEIR)
National City Bayfront Projects SCH 2018121054

Anna Buzaitis
San Diego Unified Port District
Dept. of Planning
3165 Pacific Highway
San Diego, CA 92101

Dear Ms. Buzaitis:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the National City Bayfront Projects located near Interstate 5 (I-5). The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

Safety is one of Caltrans' strategic goals. Caltrans strives to make the year 2050 the first year without a single death or serious injury on California's roads. We are striving for more equitable outcomes for the transportation network's diverse users. To achieve these ambitious goals, we will pursue meaningful collaboration with our partners. We encourage the implementation of new technologies, innovations, and best practices that will enhance the safety on the transportation network. These pursuits are both ambitious and urgent, and their accomplishment involves a focused departure from the status quo as we continue to institutionalize safety in all our work.

Caltrans is committed to prioritizing projects that are equitable and provide meaningful benefits to historically underserved communities, to ultimately improve transportation accessibility and quality of life for people in the communities we serve.

We look forward to working with the Port of San Diego in areas where the Port and Caltrans have joint jurisdiction to improve the transportation network and connections

between various modes of travel, with the goal of improving the experience of those who use the transportation system.

Caltrans has the following comments:

Traffic Analysis
The San Diego Unified Port District as the lead agency for this project, should be in alignment with state policies and state goals on evaluating transportation impacts under CEQA. Please see the following links for reference.

December 2018 Technical Advisory on Evaluating Transportation Impacts:
https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf

Governor Office of Planning and Research:
https://opr.ca.gov/ceqa/sb-743/

Tables ES.1, ES.2, and ES.3 in the Transportation Impact Analysis (appendix K) all identify impacts and mitigations to Caltrans facilities, but they are all labeled as "significant and unavoidable". These impacts and mitigations should be included in the DEIR. Please coordinate with Caltrans as to what mitigation measures or other alternatives can be implemented to mitigate project impacts.

If the Bay Marina Drive full closure alternative proceeds the result is a significant increase in the volume of northbound left turns at the I-5 northbound off ramp to Civic Center Drive. The existing left turn AM queuing in synchro is 39 feet and the storage is 90 feet. The queuing increases to 693 feet with the addition of the total Bayfront projects and Bay Marina Drive closure, and further queuing in other scenarios. The queuing for the left turn lane exceeds the storage capacity and would result in a safety concern for a speed differential with stopped vehicles queuing into a through lane. The bridge columns prevent the opportunity to increase left turn lane storage capacity unless there was major bridge reconstruction. Therefore, the Bay Marina Drive closure alternative is not preferred by Caltrans.

At the I-5 southbound off ramp to Bay Marina Drive the existing right turn AM queuing in synchro is 44 feet and the storage is 265 feet. The queuing increases to 275 feet with the addition of the total Bayfront projects. These queuing distances exceed the storage capacity and would result in a safety concern for a speed differential with stopped vehicles queuing into a through lane. Please consider mitigation as this has the potential for a safety impact. Additionally, table ES.1 incorrectly states there is an existing southbound through/right lane, it is a though/left lane.

- Potential mitigation measures are restriping the off-ramp lane configurations and/or adding right turn storage capacity. Mitigation needs to be shown to be effective and will require Caltrans review/approval.

According to appendix L section 3.1 of the DEIR, closure of the Bay Marina Drive would lead to a significant VMT impact due to induced travel associated with the closure. The additional VMT as such would not algin with state policy and goals.

Per appendix L section 3.2, the VMT impact is stated to remain a significant and unavoidable transportation related impact. This VMT impact is not in alignment with state VMT and emissions reduction goals. The project's VMT impacts need to be mitigated down to a level considered less than significant. The project needs to investigate additional methods to address this VMT impact. Some potential solutions to analyze are:

- Reducing the project size.
- Implementing additional VMT reductions.
- Implementing other transportation improvements that would be comparable to fully mitigating the VMT impact.

Complete Streets and Mobility Network

Caltrans views all transportation improvements as opportunities to improve safety, access, and mobility for all travelers in California and recognizes bicycle, pedestrian, and transit modes as integral elements of the transportation network. Caltrans supports improved transit accommodation through the provision of Park and Ride facilities, improved bicycle and pedestrian access and safety improvements, signal prioritization for transit, bus on shoulders, ramp improvements, or other enhancements that promote a complete and integrated transportation network. Early coordination with Caltrans in locations that may affect both Caltrans and other responsible agencies is encouraged.

To reduce greenhouse gas emissions and achieve California's climate change targets, Caltrans is implementing complete streets and climate change policies into State Highway Operations and Protection Program (SHOPP) projects to meet multi-modal mobility needs. There are ongoing Caltrans SHOPP complete streets efforts underway in the vicinity of the project area. A Caltrans SHOPP project in development proposes complete streets and active transportation improvements on Bay Marina Drive/Mile of Cars Way at Interstate 5 (I-5).

Caltrans looks forward to working with the Port of San Diego and other responsible agencies to evaluate this project and other potential complete streets and active transportation SHOPP projects.

Additionally, Caltrans is currently working with the City of National City on its implementation of the Bayshore Bikeway Segment 5 and West 19th Street Greenway projects where they interface with I-5. Caltrans also looks forward to continued coordination on these projects.

Caltrans released the "Contextual Guidance for Bike Facilities" Memorandum in March 2020 to identify the preferred bikeway facility type in areas where bikeway facility installations are planned. Please utilize this guidance memorandum as a tool for selecting the most appropriate bicycle facility type in locations where improvements are proposed in Caltrans' right-of-way. The following is a link to the "Contextual Guidance for Bike Facilities" Memorandum: https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/office-of-smart-mobility-and-climate-change/planning-contextual-guidance-memo-03-11-20-a11y.pdf.

Noise
The applicant must be informed that in accordance with 23 Code of Federal Regulations (CFR) 772, Caltrans is not responsible for existing or future traffic noise impacts associated with the existing configuration of I-5.

Environmental and Long-term Lease
Across Volumes I, II & III of the DEIR document, there is conflicting language about who owns the jetty and Sweetwater Channel east of the high tide line. Please clarify.

The existing leases for the Port's subtidal land are set up as an "in-kind" trade between the Port and Caltrans. This was done to allow Caltrans Environmental Department to develop an eel grass bed on a jetty on the sub-tidal land. If Caltrans and the Port of San Diego re-negotiate the jetty lease into a building lease, then it would no longer be an "in-kind" trade. Please coordinate with Caltrans to explore possible solutions to separating the leases while still preserving the eel grass bed lease.

Caltrans will not consider long term building leases due to challenges in having building structures in state right-of-way (R/W).

The Draft EIR mentions a new dock with slips for 30 boats being constructed on the southside of the jetty. Please coordinate with Caltrans appropriately on the development of this new dock.

Right-of-Way
Any work performed within Caltrans' R/W will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans' R/W prior to construction. As part of the encroachment permit process, the applicant must provide an approved final environmental document, corresponding technical studies, and necessary regulatory and resource agency permits, specifically, CEQA determination or exemption.

If you have any questions, please contact Roger Sanchez at (619) 987-1043 or by email at roger.sanchez-rangel@dot.ca.gov.

Sincerely,

Savannah Speerstra
Acting Branch Chief
Local Development Review

STATE OF CALIFORNIA
GAVIN NEWSOM, *Governor*

PUBLIC UTILITIES COMMISSION
320 WEST 4TH STREET, SUITE 500
LOS ANGELES, CA 90013

October 26, 2021

Anna Buzaitis
San Diego Unified Port District
3165 Pacific Highway
San Diego, CA 92101

Sent by email: abuzaiti@portofsandiego.org

Re: National City Bayfront Projects & Plan Amendments
SCH 2018121054 — *Draft Environmental Impact Report*

Dear Ms. Buzaitis:

The California Public Utilities Commission (Commission/CPUC) has jurisdiction over rail crossings (crossings) in California. CPUC ensures that crossings are safely designed, constructed, and maintained. The Commission's Rail Crossings Engineering Branch (RCEB) is in receipt of the *Draft Environmental Impact Report (DEIR)* for the proposed National City Bayfront Projects & Plan Amendments. The San Diego Unified Port District is the lead agency. The DIER is prepared in compliance with the California Environmental Quality Act (CEQA) per State CEQA Guidelines Section 15125.

The San Diego Port (District), City of National City (City), GB Holdings and Pasha Automotive Services (Pasha) are proposing a project on 77 acres, consisting of approximately 58 landside acres and 19 waterside acres, within the jurisdiction of the District and City. The proposed project is an amendment to the District's Port Master Plan (PMP); amendments to the City's Local Costal Program (LCP), General Plan, Harbor District Specific Plan (HDSAP), Land Use Code (LUC) and Bicycle Master Plan.

Currently, trains that service the surrounding industrial properties, National City Maritime Terminal, and Pasha are owned and operated by BNSF. The project proposes the construction and operation of a rail connector track and storage track within the City's jurisdiction to improve Pasha operations (Pasha Rail Improvement Component). The project also proposes of the construction and operation of Segment 5 of the Bayshore Bikeway within the District's and City's jurisdiction (Bayshore Bikeway Component).

CPUC General Order (G.O.) 88-B establishes criteria for altering existing crossings, including (but not limited to) addition of one track within the existing railroad right-of-way, reconstruction of grade-separated structures, and changes in the type or addition of automatic signaling devices at crossings. The District will be required to submit a G.O. 88-B request for alteration of each existing crossing included in the Project. Requests to alter existing crossings may be approved by RCEB staff, provided completion of request as outlined in G.O. 88-B, Section 5 and consensus among parties.

G.O. 88-B also establishes cases for which the Authority must apply to the Commission for authorization, including construction of new highway-rail or rail-rail crossings. Refer to the CPUC Rules of Practice and Procedure (www.cpuc.ca.gov/rpp/), Rules 3.7–3.11 for new crossing application requirements. You may consult with RCEB staff to determine the need for authorization by G.O. 88-B or by application at each proposed crossing on the corridor.

Minimum vertical and horizontal clearance requirements are outlined in CPUC General Order (G.O.) 26-D, Section 2, Section 3, and Section 4. Clearance between parallel tracks is governed by G.O. 26-D, Section 5.

The National City Bayfront Projects and Plan Amendments – Draft Environmental Impact Report defines the following capital projects that impact rail. RCEB provides the following comments for each improvement.

Pasha Road Closure Component, Connector Track, Storage Track
The Pasha Road Closure Component includes the closure of Tidelands Ave between Bay Marina Drive on the north and West 32nd Street on the south as well as West 28th Street between Quay Ave and Tidelands Ave will also be closed.

The proposed connector track will be located on the southern end of Tidelands Ave between the existing at-grade crossing and West 32nd Street. Accompanying the connector track will be a proposed storage track which will run parallel to the connector track on the north side. The proposed storage track will add approximately 2000 feet of train storage, which can accommodate approximately 18 to 20 railcars.

There are two existing crossings that lie within the boundaries of the proposed Pasha Road Closure Component: 1) 28th Street Near Quay Ave, DOT # 026914Y, 2) Tidelands Ave north of West 32nd Street, DOT # 026127N as well as the proposed connector track and storage track described above.

The two existing crossing and the two proposed tracks which may be an extension of the existing Tidelands Ave crossing will require Commission authorization. This may be accomplished by a G.O. 88-B request. Please contact RCEB to schedule a field diagnostic meeting with all stakeholders at the crossings. The diagnostic team consists of representatives from the railroads, roadway agencies, local government agencies, CPUC, and private stakeholders.

Bayshore Bikeway
Route 1
Route 1 travels along the former railroad ROW to the southern end of the Best Western Marina Gateway Hotel where it turns west to travel along the western side of Marina Way. The route turns east on West 23rd Street and north to McKinley Ave. This proposed route run adjacent to the Bay Marina Dr. railroad crossing, DOT # 026904T.

Route 2
Route 2 travels along the existing alignment for Marina Way from West 32nd Street to the southern end of the Best Western Marina Gateway Hotel where it turns east into the hotel parking lot. The route then turns north between the two buildings on the hotel property, cross Bay Marina Drive, then travel north along Cleveland Ave to West 19th Street. The route then turns west at West 19th Street then north on Tidelands Ave. This proposed route run adjacent to the Bay Marina Dr. railroad crossing, DOT # 026904T and will cross the 19th Street railroad crossing, DOT # 026902E, the 19th Street (E/O Tidelands) railroad crossing, DOT # 029608V, and the Tideland Ave (North of 19th St) railroad crossing, DOT # 026125A.

Route 3
Route 3 travels between the former railroad ROW and existing Marina Way on the southern end, and along McKinley Ave on the northern end. This route travels along the Bay Marina Dr., between marina Way and McKinley Ave., then turns north on McKinley Ave. The southern portion of this route is consistent with the Bayshore Bikeway location identified in the PMP and the City's Harbor

Anna Buzaitis
SCH 2018121054
October 26, 2021

District Specific Area Plan. This proposed route run adjacent to the Bay Marina Dr. railroad crossing, DOT # 026904T.

Any alterations or construction to a crossing will require CPUC authorization. This may be accomplished by a G.O. 88-B request. Please contact RCEB to schedule a field diagnostic meeting with all the stakeholders at the crossing. The diagnostic team consists of representatives from the railroads, roadway agencies, local government agencies, CPUC, and private stakeholders.

Any development adjacent to or near the railroad right-of-way (ROW) should be planned with the safety of the rail corridor in mind. New developments may increase pedestrian or vehicular traffic volumes not only on streets and at intersections, but also at nearby rail crossings. Traffic impact studies should analyze rail crossing safety and potential mitigation measures. Safety improvement measures may include the planning for grade separations or improvements to existing at-grade crossings. Examples of improvements may include but are not limited to: addition or upgrade of crossing warning devices, detectable warning surfaces and edge lines on sidewalks, and pedestrian channelization. Pedestrian and bicycle routes should be designed to clearly prohibit and discourage unauthorized access (trespassing) onto the tracks, except at authorized crossings.

Please continue to keep RCEB informed of the project's development. If you have any questions, comments, or concerns, please do not hesitate to contact me, at (213) 620-6503, or howard.huie@cpuc.ca.gov.

Sincerely,

Howard Huie
Utilities Engineer
Rail Crossings Engineering Branch
Safety and Enforcement Division

CC: State Clearinghouse, state.clearinghouse@opr.ca.gov
Dionisio Martinez, Dionisio.martinez@bnsf.com

November 17, 2021

Anna Buzaitis
Planning Department
Port of San Diego
P.O. Box 120488
San Diego, CA 92112-0448

Re: City of National City Comments on National City Bayfront Projects & Plan Amendments

Dear Ms. Buzaitis,

Introduction:

The City has been working with the Port of San Diego ("Port") for decades to achieve balance in providing recreational and commercial opportunities for its community members; while at the same time striving to minimize the impacts from Port operations. While the Port continues to fund its industrial projects, the Port should, on an annual basis, fund expansion of National City's recreation and commercial assets. Moreover, it has been many years since the Port has studied the impact from its Port operations on our community members and as the Port invests in its maritime facilities, it should also address the ongoing adverse health effects to our community.

The following comments are provided to the Draft Environmental Impact Report (DEIR) related to the Pasha Rail Line modification, the park expansion, the City hotels, the light industrial facilities, and GP Capital's project as described in the DEIR ("Project"). We find that the DEIR is fully compliant with the requirements of the California Environmental Quality Act (CEQA) and we support and appreciate the Port's efforts in making our project come to fruition. The comments below reflect a different point of view than some of the conclusions reached in the DEIR.

The Project provides enhanced revenue to the Port and increased recreational opportunities to the citizens of the state. Many of the Project components offer affordable recreation opportunities not found in other Port membership cities.

Comments:

Project Objectives 1 and 3 call for the maximization of recreational opportunities and economic development within and near the tidelands. Project Objective 3 specifically calls for the maximization of transient occupancy taxes. Both objectives are key to bringing equality to the

National City Bayfront where for years our community has suffered health impacts related to toxic air pollutants that stem from the operation of the National City Marine Terminal. No Port membership city has suffered more respiratory illnesses then National City. Yet, when it comes to economic resource allocation National City receives the least amount of revenue when compared to the revenue the Port receives from its National City leaseholds. Creating new jobs and adding more hotel rooms to National City Bayfront is a significant step towards parity. Toward this end the City will maximize its own property to create new hotel rooms and jobs in its new mixed use development project. Accordingly, when the Port certifies the DEIR it is imperative that the Proposed Project is selected over all other DEIR Alternatives; and that all proposed hotel rooms, both on the City's property and on the GB Capital leasehold, remain as the preferred project. The Port's findings should reflect the purpose and intent of the Projective Objectives and not lightly dismiss the importance of Objectives 1 and 3.

Project Objective 1 states:

> *Further activate the project site by modifying the land uses and their configurations to foster the development of high-quality commercial and recreational uses to maximize employment opportunities,* ***maximize recreational opportunities for visitors, maximize economic development opportunities****, and to improve cargo and transportation efficiencies of maritime industrial uses associated with operations at NCMT.* (Emphasis added).

Project Objective 3 States:

> *Implement cohesive commercial development that is designed to enhance enjoyment of the National City Marina District and surrounding city area, contribute to the area's economic vitality, and generate* ***economic revenue for the City including through increased Transient Occupancy Tax.*** (Emphasis added).

The hotel rooms on City owned property should remain and the No Project Alternative should be dismissed because it fails to meet any of the DEIR's Project Objectives. In addition, the City would be very concerned if the Port selected Alternative 4 which is described in the DEIR as the "Environmentally Superior Alternative." The DEIR Alternative 4 analysis eliminates one of the GB Capital hotels and substantially reduces the number of hotel rooms of the remaining hotels. DEIR Alternative 4 provides for a 50% overall reduction in GB Capital's hotel development plans. The 11 story hotel would be reduced to 6 stories and would only contain 140 rooms; down from 282 rooms; and the 40 room three story hotel would be eliminated. In total, 182 rooms would be eliminated along with their associated TOT revenue. The DEIR claims that this alternative meets all the Project Objectives, but this is clearly not the case. The significant reduction in project scope results in a failure to meet Project Objectives 1 and 3.

A 182 hotel room count reduction fails to meet Objective 3 because it does not generate "economic revenue for the City through the increased Occupancy Tax" and it fails to meet Objective 1 because it does not "maximize recreational opportunities for visitors, or maximize economic development opportunities."

Moreover, Alternative 2 which eliminates any waterside development within the Sweetwater Channel renders the GB Capital dry boat storage facility infeasible. This project component provides an affordable alternative to docking recreational craft in the marina. The proposed Sweetwater Channel finger piers support the use of the dry boat storage by providing the boating community with a temporary location to load and prepare for voyages. Although DEIR Alternative 2 may avoid impacts to Eelgrass and fish habitat, these impacts can be fully mitigated within close proximity to the project.

Alternative 3 eliminates all hotel rooms within the tidelands. This alternative should be rejected because it fails to meet the majority of DEIR Project Objectives.

Park Expansion and Future Uses:

The expansion of Pepper Park is an improvement to existing recreational opportunities along the National City Bayfront. The DEIR would allow future uses such as a wellness center and other similarly related uses to occur with additional environmental review. As the DEIR addresses, parking can be accommodated in a number of ways and the flexible approach called for in the DEIR is an appropriate method in accommodating current and future activities.

Equity:

The Port's Maritime Clean Air Strategy notes that that the National City Marine Terminal generates a total of 36 tons of NOX and 13,894 tons of CO2e by trucks alone each year. No other community in the San Diego region compares. In order to provide healthy recreational activities these toxic air emissions need to be mitigated in the short term. The Port should require that emissions from all Port operations be reduced by 10% per year, starting in 2022 and ending when Port operations achieves a net zero standard. If our community members are afforded greater recreational assets, but are then subject to toxic air pollutants from Port operations, little has been achieved through implementing the proposed project.

The expansion of Pepper Park and the many recreational opportunities proposed in the City's project and the GP Capital project will generate new visitors to the National City Bayfront and create new revenue for both the Port and the City. Parallel to the approval of the Proposed Project, the Port needs to make a meaningful commitment to halting their own toxic air generating operations by implementation of real mitigation measures that actually reduce toxic air pollutants. There is no need to continue to study or defer what we already know.

As stated, the City fully supports the project as proposed. We believe the Port can find based on substantial evidence, that the hotel rooms and recreational amenities are needed to maximize economic development and create new recreational opportunities in a community that has historically lacked these resources. Reducing the number of hotel rooms or other recreational components run counter to the intent of the Balanced Plan.

Infrastructure Payments:

The Port should fund the public enhancements that are included in the Balanced Plan; such as: realignment of roads, expansion of Pepper Park, upgrading of waterlines, street closures, Coastal Sage replacement for the bike path, and wayfinding signage. These infrastructure improvements, like other Port Master Planning efforts, will allow the Port to increase their own revenue by the improvements made to tideland leaseholds. The Port has provided very significant economic resources to other membership cities and the same commitment should apply to National City Balanced Plan improvements.

Preservation of Granger Hall:

The City fully supports relocating Granger Hall to Pepper Park. As addressed in the DEIR, the City will work with the Port to ensure that its location is the least impactful to bay views and will improve public access and use of the Park. Incorporation of this structure into the Park should be viewed as an enhancement to the Park and not as the DEIR suggests a detrimental change to the character of the Park. As the DEIR recommends all impacts can be reduced below a level of insignificance. The City will be using an architect with experience in historic structures, but should not be tied to Secretary of Interior's Professional Qualification standards if there are no local architects that qualify; as required by MM-CUL-1. To place park impacts in the proper context, the Hall is only 3,200 square feet and Pepper Park is currently 338,026 square feet, accordingly it will have minimal impact to the visual resources of Pepper Park. Relocating Granger Hall into Pepper Park will increase park usage not reduce visitors to the park. Therefore, the Port should support the relocation of Granger Hall to Pepper Park.

Conclusion:

We thank the Port of San Diego for moving the Balanced Plan forward. After extensive review we believe the DEIR is ready for certification and fully meets the requirements of CEQA. However, more work is required to implement the Plan and the City is committed to work with the Port in achieving the objectives that the DEIR has articulated.

Sincerely,

Brad Raulston
City Manager

%

CALIFORNIA
NATIONAL CITY
1887
INCORPORATED

December 16, 2021

Anna Buzaitis
Planning Department
Port of San Diego
P.O. Box 120488
San Diego, CA 92101-0448

Re: Inclusion of a Wellness Center-Balanced Plan DEIR Pepper Park

Dear Mrs. Buzaitis,

The City of National City requests that a Wellness Center be incorporated in the Environmental Impact Report (EIR) for the National City Balanced Plan. The recommended location for the Wellness Center would be in Pepper Park and would at this time replace the proposed relocation of Granger Hall which was also planned to be located in Pepper Park.

The purpose of the Wellness Center is to aid those most impacted by Port operations and other waterfront operations. The Wellness Center will primary serve waterfront workers and other maritime personnel by providing a clean air recreational facility for exercise and other wellness programs. The Wellness Center will be made available to all waterfront users throughout the region.

The Wellness Center will be located on the northwestern corner of Pepper Park and will not directly impact waterfront areas along the Sweetwater Channel. The Wellness Center will be approximately 9,000 SF, with an additional 1,000 SF for storage, public restrooms, utilities, and related operational service needs. The approximate height will be 30' at the peak of the Center's vaulted roof. An outdoor garden and raised deck area will comprise another approximately 8,000 SF. These outdoor spaces would be open to the general public as well. The interior spaces will largely be open in order to accommodate various recreational sporting activities. There will be an additional garden area of approximately 3,000 SF for the limited special events that might be held. The Wellness Center building and adjoining spaces will reflect the design quality of the near-by "Aquatic Center" and "Marina 32" buildings.

The number of Wellness Center users is estimated to be approximately 20-100 per day. There will be 40-80 parking spaces provided. Limited special events may attract a greater number of users, but this are more rare events. The facility would be located near transit stops and a great deal of the Center's users are expected to arrive by public transportation. A shuttle service from National City to the waterfront will be the primary

source of public transportation at the 8th and 19th Street trolley stations and busses to the Wellness Center for those taking transit.

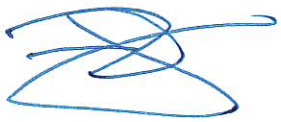
Visual, parking, traffic, biology, and other impacts are all estimated to be less than significant particularly compared to the other proposed uses along the San Diego Bay. The principal reason for these less than significant impacts is because users of the Wellness Center are spread out during the course of a given week and do not typically travel to the Center during peak commuter. Uses would occur early morning, mid-day and late evening and would be concentrated during Monday-Saturday timeframes. Limited special event use would likely occur late evenings and occur on the weekends.

In sum, the inclusion of the Wellness Center in Pepper Park will serve the community of the working waterfront, adjacent National City residents and the general public throughout the San Diego Bay area. The Wellness Center will help those who have been historically exposed to toxic air quality conditions. The Wellness Center will provide users with activities that improve their physical, mental, and social health. It will provide access to a variety of recreational activities, physical training and healthy lifestyles to help offset the inequitable toxic air exposures that many National City residents subjected to.

Although the City of National City still prefers this Wellness Center to be adjacent to the relocated Granger Hall and Music Center, the Wellness Center will replace the Hall for the purposes of the EIR analysis. The City makes this concession due to the ability of the Wellness Center to provide proactive health benefits to a greater number of waterfront users.

We appreciate the Port's willingness to consider this change of incorporating the Wellness Center into the environmental documentation for the Balanced Plan.

Sincerely,



Brad Raulston
City Manager

cc: City of National City Mayor and Councilmembers
Board of Port Commissioners
Port CEO-Joe Stuyvesant
Senior Deputy Counsel-Rebecca Harington

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Donna DeMartino

November 12, 2021

Anna Buzaitis
San Diego Unified Port District
3165 Pacific Hwy
San Diego, CA, 92101

RE: National City Bayfront Project & Plan Amendments (UPD #EIR-2018-232; SCH#2018121054)

Dear Ms. Buzaitis,

I am writing you this letter in response to the Notice of Availability of the Draft Environmental Impact Report (DEIR) for the National City Bayfront Project & Plan Amendments posted online on 9/29/2021.

The Los Angeles – San Diego – San Luis Obispo (LOSSAN) Rail Corridor Agency (Agency) is responsible for the management of the Pacific Surfliner service, which serves approximately three million passengers/year traveling between San Diego, Los Angeles, Santa Barbara and San Luis Obispo. With an anticipated growth in transit users and the upgrades underway for the Pacific Surfliner, a need for a maintenance facility at the southern terminus (San Diego) has become necessary. Expansion of Pacific Surfliner service and the San Diego maintenance facility are both part of the California State Rail Plan. The LOSSAN Agency has partnered with the State to fund this project, which will support servicing and maintenance needs for the Pacific Surfliner, the second busiest intercity passenger rail service in the nation. In order to build this facility, a Mitigation Support Project became required in our coordination with the BNSF Railway Company (BNSF).

The National City Bayfront Project & Plan Project is adjacent to our Mitigation Support Project for building and constructing a permanent maintenance and layover facility in San Diego. We believe that both the Port's project and our Mitigation Support Project also compliment the overall regional vision of SANDAG to provide "*a complete network of fast, convenient, and reliable transit services that connect people from where they live to where they want to go"* under the Transit Leap concept.

Background

The Pacific Surfliner intercity passenger rail service is currently supported by three layover facilities located in the cities of San Diego, Goleta and San Luis Obispo, as well as a primary maintenance and layover facility near downtown Los Angeles (which does not allow for the best utilization of resources and equipment in the center of the corridor). The existing layover facility in San Diego, located at the downtown Santa Fe Depot, can store and service up to four train sets each night. The facilities in both Goleta and San Luis Obispo can only support the storage and servicing of one train set at each location, which are currently operating at capacity. The current Santa Fe Depot is located in a densely developed area of San Diego and is on the National Register of Historic Sites and physically constrained. Therefore, an expansion of the current facility is not feasible. An alternative location is needed to accommodate the service expansion, ridership increase, and enhancement goals of the Pacific Surfliner service to align with the State's vision.

We researched and identified thirteen initial candidate sites in San Diego for the new maintenance facility. Six of those sites were ruled out due to their insufficient size and the remaining seven sites were further studied. After careful consideration of the remaining sites and stakeholder coordination, our team determined that Cesar Chavez Yard Property, owned by BNSF in San Diego, would be the ideal location for a new Pacific Surfliner maintenance and layover facility. The facility would provide for overnight storage facility for maintenance, train servicing, overnight inspection, fueling, and cleaning.

As we began conversations with BNSF about this location, BNSF identified an alternate location in National City (around Tidelands Ave/28th St in National City) to move their automotive facilities at Cesar Chavez Yard, called herein as the Mitigation Support Project. BNSF determined this to be the most efficient location to optimize their automotive operations.

Cezar Chavez Yard

For the Pacific Surfliner, we developed the following conceptual configuration for the ultimate buildout at Cesar Chavez Yard, which will be built in phases. Further studies and preliminary design will be conducted to advance the project and obtain environmental clearance.

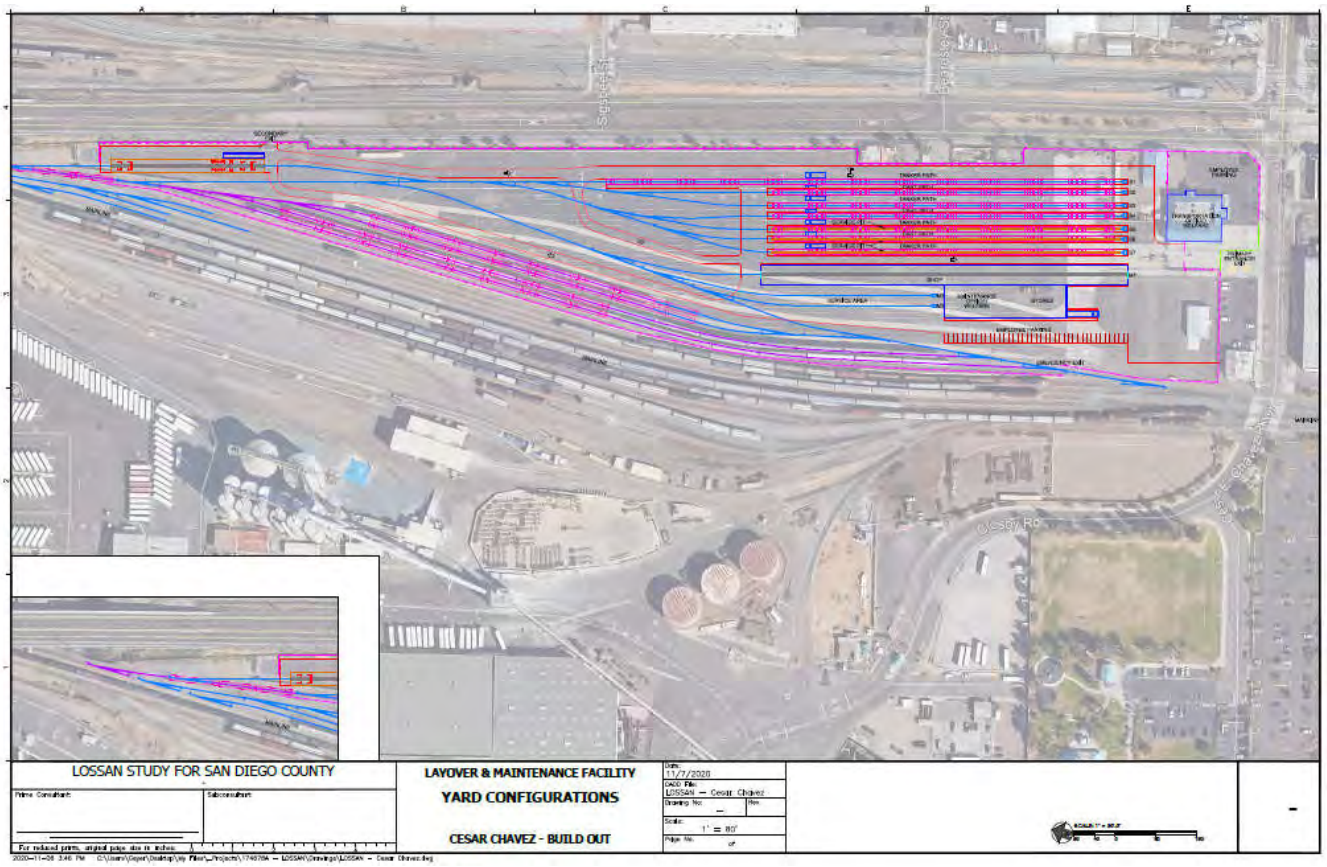


Figure 1 Proposed Cesar Chavez Layover & Maintenance Facility

The above concept is highly conceptual and subject to further refinement as the project develops.

National City

As our team identified the BNSF Cesar Chavez Yard as an ideal location for the Pacific Surfliner maintenance facility in terms of cost and location, it requires relocating BNSF's automotive facilities currently located there. The National City location in the following figure was identified by BNSF as the most efficient location to optimize their automotive operations.

The following concept is highly conceptual and subject to further refinement as the project develops.

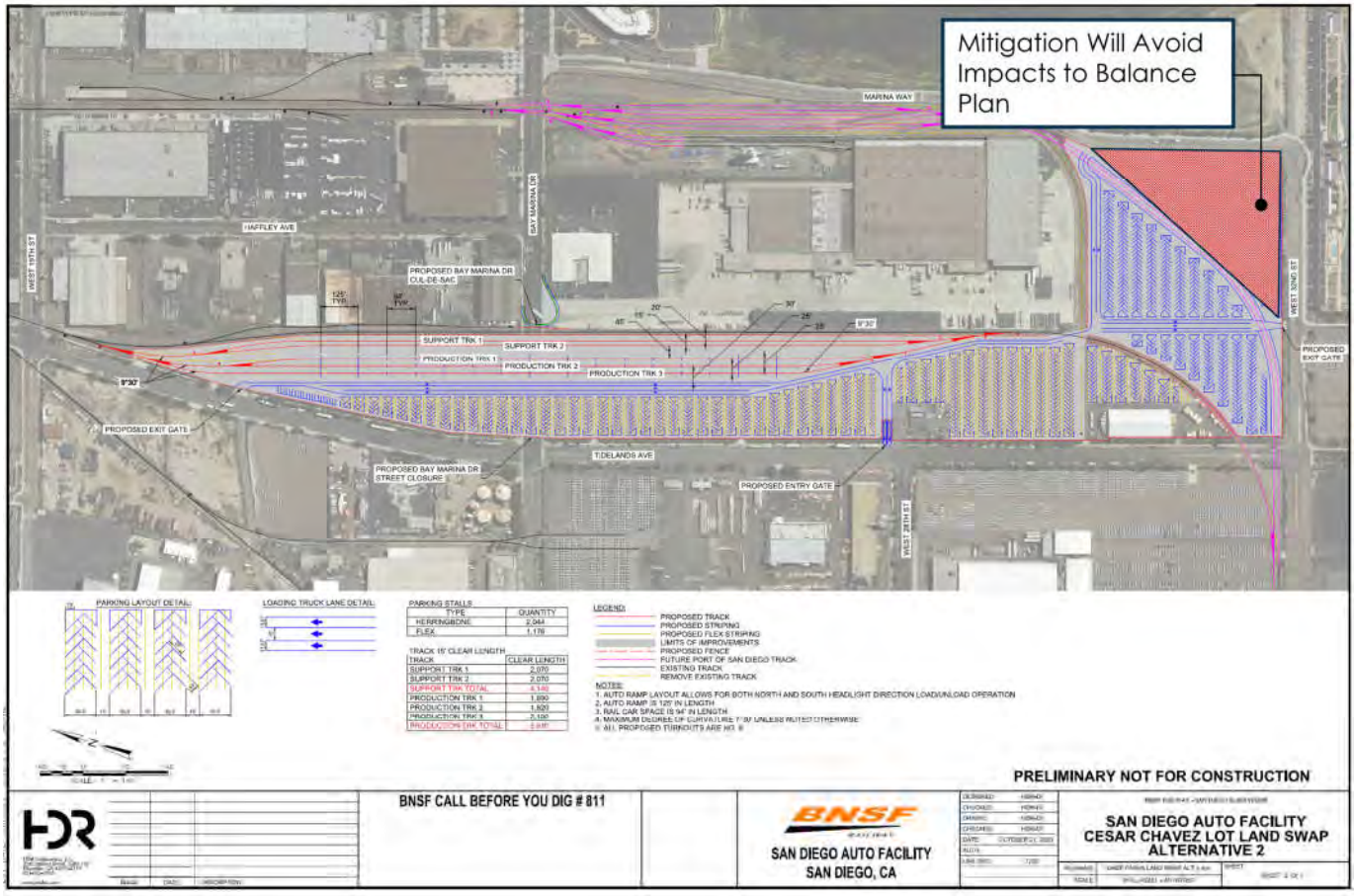


Figure 2 National City Mitigation Project

We would like to comment on the DEIR Section 3.4.4 Pasha Road Closures for the following alternatives:

- Alternative 3 - GB Capital Component Phase 1 Only Alternative
- Alternative 4 - Reduced Development Intensity Alternative

In both alternatives, "*Pasha also proposes the Pasha Road Closures Component, which includes closure of Tidelands Avenue between Bay Marina Drive on the north and 32nd Street on the south, as well as West 28th Street between Quay Avenue and Tidelands Avenue*". We would like for the Port of San Diego to consider our "Mitigation Support Project" by studying the closure of Bay Marina Drive between Tidelands Avenue and Haffley Avenue (as shown in the following figure) as an added component to the overall EIR and traffic analysis. The closure of Bay Marina Drive between Tidelands Avenue and Haffley Avenue will be an essential part of our "Mitigation Support Project" and highlighted in blue in the following figure.

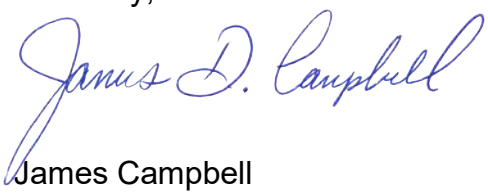
Figure 3 DEIR Proposed Closures and LOSSAN's Preferred Street Closure

We look forward to continuing our discussions together and improving the initial concepts herein to better meet the region's transportation needs.

Our goal as an agency is to best serve the mobility needs of the region by providing the public with reliable, sustainable, and environmentally conscious transportation solutions while valuing the importance of moving goods and services that need to utilize the same rail network. We view our project and the Port's vision as transformative projects for the Southern California region and its long-term sustainability.

Should you have any questions, please feel free to contact me anytime. We look forward to our continued collaboration and partnership.

Sincerely,



James Campbell
Operations Officer
LOSSAN Rail Corridor Agency
600 South Main Street
Orange, CA 92868
714-560-5390

CC:

Donna DeMartino – LOSSAN Rail Corridor Agency,
Ryan Greenway – Caltrans, Division of Rail and Mass Transportation
Danny Veeh– SANDAG, Active Transportation and Rail

Anna Buzaitis

From: Lisa Madsen <Lisa.Madsen@sandag.org>
Sent: Friday, November 12, 2021 4:31 PM
To: Anna Buzaitis
Subject: Public Comment - National City Bayfront Projects & Plan Amendments Environmental Impact Report

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.

Good afternoon,

On behalf of SANDAG, thank you for the opportunity to comment on the San Diego Unified Port District's (Port's) Draft Program Environmental Impact Report for the National City Bayfront Projects and Plan Amendments. SANDAG supports the allocation of land uses to increase efficiency for commercial maritime operations, expand coastal access, and facilitate recreation and active transportation. Consistent with the transportation vision outlined in the San Diego Forward: 2021 Draft Regional Plan, the project's scope and location make it an ideal opportunity to implement mobility hub features and amenities to better connect to high-frequency transit. SANDAG can help to explore innovative mobility solutions such as on-demand shuttles and micromobility that can help reduce vehicle miles traveled (VMT), congestion, and greenhouse gas emissions. To learn more about the mobility hub concept and the Draft Regional Plan, please visit www.sdforward.com.

For any increases in truck VMT, please consider adding zero-emission technology infrastructure in the project to support the future transition of fleets to reflect the goals outlined in the Port's Maritime Clean Air Strategy. Additionally, please collaborate with SANDAG, the Environmental Health Coalition, and the Delivering Zero Emissions Communities Regional Challenge consultants on the San Diego Regional MD/HD ZEV Blueprint regarding zero-emissions vehicles and infrastructure. Furthermore, please collaborate with SANDAG, Imperial County Transportation Commission, and Caltrans on the implementation of the San Diego and Imperial Counties Sustainable Freight Implementation Strategy regarding the identification of regional priorities and implementation of state policies for sustainable freight. Thank you for incorporating measures that aim to reduce vehicle miles traveled (VMT) and promote alternative forms of transportation. SANDAG appreciates integration of Mobility Management Toolbox strategies to help mitigate transportation impacts. Please consider working with SANDAG's iCommute program when developing commuter benefit programs and transportation demand management plans.

SANDAG recommends the creation of buffers or implementation of additional policies and incentives for the reduction of noise and air pollutant emissions from rail, truck, and other goods movement operations in the vicinity of sensitive uses, such as the hotels and recreational areas included in the project. Additionally, we encourage collaboration with SANDAG's Bayshore Bikeway Working Group and Active Transportation Working Group on the implementation of bike facilities. Please continue to collaborate with SANDAG, Caltrans, The City of San Diego, the City of National City, Naval Base San Diego, MTS, and other stakeholders to ensure that the project is in alignment with Harbor Drive 2.0 and minimizing impacts on truck and rail traffic to and from working waterfront facilities.

We look forward to collaborating with the Port on ensuring strategies that prioritize our region. When available, please send any additional documents related to this project to me at lisa.madsen@sandag.org. Lastly, if you have any questions or concerns regarding this email, please don't hesitate to contact me.

Best,
Lisa

Lisa Madsen (she/her/hers)
Senior Regional Planner

619.595.1432 office
401 B Street, Suite 800, San Diego, CA 92101

SWEETWATER AUTHORITY
505 GARRETT AVENUE
POST OFFICE BOX 2328
CHULA VISTA, CALIFORNIA 91912-2328
(619) 420-1413
FAX (619) 425-7469
www.sweetwater.org

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November 16, 2021

Anna Buzaitis
Program Manager, Planning and Green Port
San Diego Unified Port District
3165 Pacific Highway
San Diego, CA 92101

Subject: National City Bayfront Projects and Plan Amendments – Draft Environmental Impact Report
SWA File: (Dev) NC Bayfront

Dear Ms. Buzaitis:

Thank you for providing Sweetwater Authority (Authority) with a copy of the Notice of Availability of Draft Environmental Impact Report (EIR) for the National City Bayfront Projects and Plan Amendments (Project) prepared by the San Diego Unified Port District (SDUPD). Based on the Authority's review, the following comments are provided.

Water Supply Assessment, Water Demands, and Supplies

Based on its 2015 Urban Water Management Plan (UWMP), the Authority prepared a Water Supply Assessment (WSA) for the Project, as it was described in the Notice of Intent made publicly available in early 2019. On June 9, 2021, the Authority adopted an updated 2020 UWMP which shows lesser water demands in the Authority's service area through the year 2045 when compared to the 2015 UWMP and WSA for the Project through the year 2040. Calculated water demands for the 2020 UWMP were developed based on a per capita unit demand and population forecast assuming that water use may increase from its current level of 75 gallons per capita per day (gpcd) to 90 gpcd over the 25-year planning horizon to reflect some rebound of post-drought residential usage and the planned increase in commercial and industrial developable land use.

The WSA for the Project illustrates anticipated Project water demands of 100.8 acre-feet per year from 2025 through 2040 and would be expected to remain the same from 2040 through 2045 as the Project would be completely built out before that period. Based on water demands calculated for the 2020 UWMP, the anticipated water demands for the Project represent approximately 0.4 to 0.5 percent of the Authority's service area demands from 2025 through 2045. Even though anticipated water supplies through 2045 indicated in the 2020 UWMP are less than what is presented in the 2015 UWMP and WSA for the Project through 2040, the decrease

in anticipated water supplies is not expected to impact the Project as the Authority has sufficient water supplies through 2045 to meet anticipated Project water demands, even during single and multiple dry year scenarios, as analyzed in the 2020 UWMP. Therefore, an updated WSA for the Project is not required. The Draft EIR for the Project should rely on water demands and supplies shown in the 2020 UWMP instead of the outdated water demands and supplies shown in the 2015 UWMP and WSA for the Project. A copy of the Authority's 2020 UWMP can be found on the Authority's website at https://www.sweetwater.org/160/Public-Documents.

Water Supply Assessment and Fire Flows

The WSA prepared by the Authority is already an attachment to the Draft EIR (Volume V, Appendix N). Even though projections show that the Authority would have sufficient water supplies to meet the demands of the Project, a fire flow analyses conducted by the Authority reveals that the current water distribution system has limitations in meeting some of the fire flow demands indicated in the SDUPD's original documents. For example, the fire flow demands provide 6,250 gallons per minute (gpm) for a commercial and tourist development for a150-room hotel, a restaurant, and retail space (Project No. 1 as described in the WSA), and 7,250 gpm for an 81-room hotel (Project No. 3 Phase 2 as described in the WSA), both at 20 pounds per square inch for four (4) hours plus maximum day demands. These demands on the Authority's distribution system would not be met through the existing distribution water main, a 12-inch PVC pipeline in the vicinity of these two projects. In order to meet the flow demands for these two projects, the water main would need to be upgraded to 16-inch PVC pipelines. SDUPD has developed the following mitigation measure in order to reduce this fire-flow related impact ("Impact-Util-2") to levels less than significant:

> ***"MM-UTIL-3: Upsize the Existing Bay Marina Drive Pipeline and Install New Pipeline Along the Proposed Road Realignment to Meet Project Fire Flow Demands (GB Capital Component and City Program – Development Component).*** *Prior to occupancy and operation of the proposed City Program – Development Component or the four-story 81-room hotel to be operated under Phase 2 of the GB Capital Component, whichever occurs first, the project proponent for that project component (Payee) shall upsize the existing 12-inch PVC pipeline on Bay Marina Drive between the intersection of Harrison Avenue and Cleveland Avenue to a 16-inch PVC pipeline. In addition, the Payee shall install demands of the project. Therefore, potential impacts are considered to be significant."*

Public Utilities and Water Distribution System Improvements

It is industry standard to make any necessary water improvements, including upgrades to provide the necessary fire flows before construction and during the initial phases of a project, *i.e. during the street improvements phase*. Deferring this essential water distribution improvement after the construction phase is not acceptable to the Authority and not likely to be approved by the fire authority having jurisdiction. Furthermore, constructing buildings without the appropriate fire flows for protection may be a risk to the community. The Authority requests that the language on MM-UTIL-3 be revised to reflect that any upsizing of the 12-inch PVC pipeline shall occur during the street improvements phase of the Project and before building construction begins.

Additionally, the Draft EIR shows two figures (4.14-1 and 4.14-2) that delineate the water utilities improvements necessary to accommodate the discussed fire flows. The Authority would like to include in the record that these two figures were prepared by a third party, and not by the Authority, and a more detailed analysis must be conducted in close coordination with Authority engineering staff as the distribution main segment lengths and supporting appurtenances that would need to be replaced as result of this Project may not match what is shown in Figures 4.14-1 and 4.14-2.

Public Utilities and Water Utilities Right-of-Way

There are multiple distribution water mains, service laterals, and water appurtenances located within the Project site. To minimize the potential for conflicts between water facilities and designated public spaces within the Project, the Authority requests that water facilities located within the Project areas be relocated to roads such as within the realigned Marina Way, and away from planned development areas and environmental buffers (i.e. sensitive habitat, restored habitat, wetlands, or jurisdictional waters). Note that the relocation of existing and new Authority facilities to serve the project would be subject to Sweetwater Authority Rates and Rules, Design Standards, and Standard Specifications for the Construction of Water Facilities, all of which can be found on the Authority's website. The Authority requests early coordination with its development review staff regarding relocation of facilities in order to avoid Project impacts and/or delays.

Water Utilities and Hazardous Materials

For water mains and other underground water supply facilities that are proposed to be installed within areas where hazardous materials or contaminated soils exist or may exist, the Authority requests that the Project proponents complete additional

hazardous materials analysis on a case-by-case basis to evaluate existing and any new data regarding contaminants of concern, and that Project proponents retain a qualified consultant to make recommendations on pipe materials. Recommendations should be based on Sweetwater Authority Design Standards and should consider both pipe location and location of any hazardous or contaminated materials that may occur on-site.

General Comments (Volume I)

Section 4.14.2.1 Wastewater reads, *"…the volume of wastewater collected from the Sweetwater Authority (SWA) service area was 10,522 acre-feet per year (AFY)*". Note that Sweetwater Authority is not a wastewater agency and does not collect wastewater, thus this statement needs to be revised.

Section 9.4.14 Section 4.14, Utilities and Service Systems needs a reference to the 2019 Water Supply Assessment (WSA) prepared by the Authority for this specific project. Additionally, a reference to the 2020 Urban Water Management Plan (UWMP) should also be included in the text as demands and supplies shown in the WSA are now outdated.

Please continue to include the Authority on the Project's distribution list. If you have any questions, please contact Jason Mettler at (619) 409-6755, or jmettler@sweetwater.org.

Sincerely,

SWEETWATER AUTHORITY

Ron R. Mosher, P.E.
Director of Engineering

RRM:IM:jg

cc: Erick Del Bosque, Sweetwater Authority
Chris Bauer, Sweetwater Authority
Jason Mettler, Sweetwater Authority
Israel Marquez, Sweetwater Authority

Organizations and Businesses

ENVIRONMENTAL HEALTH COALITION | 40 YEARS
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November 12, 2021

Anna Buzaitis
Program Manager
Planning
Port of San Diego
3165 Pacific Hwy
San Diego, CA 92101

Via: abuzaiti@portofsandiego.org

RE: EHC Comments – Balanced Plan Draft Environmental Impact Report

Dear Anna Buzaitis:

Environmental Health Coalition (EHC) has been actively involved in the Balanced Plan project and appreciates the opportunity to provide comments on the Draft Environmental Impact Report (DEIR). The Balanced Plan is a large, complicated project and EHC appreciates the work that the Port has done thus far; however, EHC would like to raise some significant issues, which are summarized below and subsequently explained in more detail as necessary.

EHC's High-Level Summary of Comments:

- **Pepper Park**. Access to the park and the park itself need to be further mitigated to ensure access while accounting for the worst sea level rise (SLR) projections in 2100. The DEIR shows much of the pedestrian access to the park, and the park itself being inundated in the future. The park expansion cannot count as a "win" for the community if access, and the park itself, will be significantly limited due to future inundations. This is not equitable particularly since it is anticipated that the park will experience the worst flooding relative to all components of the project. This issue is further compounded as Granger Hall is still considered an option for the Pepper Park expansion despite the structure's aesthetic impacts, its likelihood of being flooded in the future, its considerable costs to relocate it to the park, and significant opposition from local residents who have long advocated for more green space (vs. buildings) in the park.

- **Executive Order N-79-20**. The DEIR did not (but must) analyze Governor Newsom's Executive Order N-79-20[1], established in 2020, to transition drayage

[1] https://www.gov.ca.gov/wp-content/uploads/2020/09/9.23.20-EO-N-79-20-Climate.pdf

trucks to zero emission vehicles (ZEV) by 2035.

- **Final Maritime Clean Air Strategy (MCAS)**. The MCAS contains policies and strategies to address public health and air quality that must be disclosed, analyzed, and incorporated into the EIR.

- **Final AB 617 Community Emissions Reduction Program (CERP)**. The CERP contain policies and strategies to address public health and air quality that should be disclosed, analyzed and incorporated into the EIR.

- **California Coastal Commissioner Environmental Justice Policy.** The DEIR must analyze the California Coastal Commission's Environmental Justice policy[2].

EHC's Detailed Comments:

1. **Section 4.1 Aesthetics**
    a. EHC agrees that the relocation of Granger Hall could result in a significant impact to the visual quality of Pepper Park and the surrounding waterfront area because of the size and location of the building. However, this impact has not been adequately disclosed, analyzed and/or mitigated because of the limited information with respect to the proposed view/public access corridors and the range of potential/optional locations for Granger Hall. For example, what is the specific extent of the various view corridors and how would the range of sites for Granger Hall potentially impact these views and visual quality of the park? The redesign of the park should undergo its own subsequent planning process vs trying to address only certain park amenities in the Balanced Plan EIR. Granger Hall should be removed as an optional element for Pepper Park not only because of its potential aesthetic impacts but also for other reasons discussed in this letter (e.g., flooding, significant community opposition to adding this building to the park etc.).

2. **Section 4.2 Air Quality and Health Risk and Section 4.6 Greenhouse Gas Emissions and Climate Change**
    a. EHC agrees that the contribution of project-related emissions is considered significant. In 2020, Governor Newsom established Executive Order N-79-20 to transition drayage trucks to zero emission vehicles (ZEV) by 2035. The Governor's Executive Order could help to significantly reduce the air quality impacts with the proposed project but it was not disclosed and/or analyzed in the DEIR and should have been; therefore, it must now be addressed in the EIR.
    b. The EIR needs to include a consistency analysis and mitigation measure(s) to address the Port's Final MCAS that was approved by the Port Board on 10/12/21. EHC believes that the EIR must require an analysis of the MCAS and offers the following justification for this:
        i. The release of a draft EIR does not freeze applicable rules, policies, or regulations. The CEQA Guidelines are amended from time to time and, pursuant to the CEQA Guidelines Section 15007, they apply

[2] https://documents.coastal.ca.gov/assets/env-justice/CCC_EJ_Policy_FINAL.pdf

prospectively only. “If a document meets the content requirements in effect when the document is set out for public review, the document shall not need to be revised to conform to any new content requirements in guideline amendments taking effect before the document is finally approved.” (14 Cal. Code Regs. § 15007(c)). However, this dictates the CEQA procedural and substantive requirements applicable to EIRs – it does not foreclose application of new agency regulations or policies during the CEQA review process. Indeed, CEQA itself contemplates new information of importance after the release of a draft EIR and mandates recirculation in certain circumstances. (Pub. Res. Code §21092.1; Laurel Heights Improvement Ass'n v Regents of Univ. of Cal. (1993) 6 C4th 1112, 1130).

ii. In California, unless a tentative map or development agreement are approved, vested rights are not acquired until a building permit is issued and substantial investment is made. (Avco Community Developers, Inc. v. South Coast Regional Com. (1976) 17 Cal.3d 785, 797; Gov. Code, §§ 65864–65869.5 [development agreement]; Gov. Code, §§ 66498.1–66498.9 [vesting tentative map]). To find otherwise would cause serious impairment of the government's right to control land use policy. (Id.). Thus, government agencies may generally apply new laws retroactively when such an intent is apparent. “Absent equitable estoppel, upon which the judicial vested rights doctrine is based, a governmental agency may change requirements late into the development process in spite of the property owner's expenditure of substantial sums.” (Davidson v. County of San Diego (1996) 49 Cal.App.4th 639, 646). Local ordinances may also confer vested rights earlier than available under the judicial doctrine. (Id.). However, the Port has no such local regulation. Because no vested rights apply absent the aforementioned circumstances, the MCAS applies to any projects not yet approved. Therefore, the Port has an obligation to provide an MCAS consistency analysis in its CEQA documents to reflect a good faith effort at full disclosure.

iii. The Port describes the MCAS as a planning and policy document aimed at reducing environmental impacts:

    1. In 2019, the Board of Port Commissioners (Board) adopted a resolution authorizing Port staff to update the Port’s 2007 Clean Air Program to align with State programs, develop District-related strategies, and identify projects that would reduce emissions and improve air quality. This update has evolved into the proposed project, the Maritime Clean Air Strategy (MCAS), which is a planning document that identifies long and near-term goals and policies, and identifies potentially feasible strategies and measures, to help reduce emissions while promoting maritime operations. (CEQA and Coastal Determinations And Notice Of Approval, MCAS, October 12, 2021[3]).

iv. The MCAS itself notes that Portside Community residents continue to suffer a disproportionate burden of environmental afflictions, including

[3] https://pantheonstorage.blob.core.windows.net/ceqa/2021-0120_Maritime_Clean_Air_Strategy_Final_Cat_Det.pdf

air pollution, and more needs to be done to reduce these impacts. (MCAS, p. S-1). As a policy document to guide future decision-making, and as the successor to the Port's Clean Air Program[4], the MCAS intended to address physical environmental impacts and provide potential solutions that inform project alternatives and mitigation measures. Inconsistency with the MCAS will likely result in significant environmental impacts by frustrating the Port's ability to meet its health impact, air quality, and greenhouse gas reduction goals. Merely assessing a project's compliance with state goals will not reveal such impacts because the MCAS goes beyond state requirements. Therefore, there is no legal or policy justification for omitting such an analysis of the MCAS here.

3. **Section 4.8 Hydrology and Water Quality**
    a. Please explain how seawater intrusion, as a result of the projected SLR, may exacerbate groundwater pollution issues within the project area.
4. **Section 4.9 Land Use and Planning**
    a. The DEIR did not, and must, analyze the California Coastal Commission's Environmental Justice policy[5].
    b. MM-LU-1 to MM-LU-3 should account for SLR through 2100 (vs 2050).
    c. MM-LU-2 (and the "project description") should be revised to remove the potential relocation of Granger Hall to Pepper Park because of the significant risk of future flooding issues. Impacts LU-1 to LU-3 explain that Pepper Park and its expansion (inclusive of the potential relocation of Granger Hall) could be temporarily inundated in 2030 and 2050 and temporarily or permanently inundated by 2100. Therefore, continuing to include the option of relocating Granger Hall to Pepper Park could place this historical building in a new location that would be temporarily inundated in 2030 and 2050 and temporarily or permanently inundated by 2100.
    d. MM-LU-2 should be revised to require that Pepper Park, and the multi-modal connections to it, be designed to ensure public access even while accounting for SLR through 2100 (vs 2050) otherwise utilization of National City's only park west of I-5 will be further diminished as a result of future flooding.
    e. MM-LU-4 and MM-LU-5 should be revised to account for SLR through 2100 (vs monitoring and proposing strategies every 5 to 10 years to address SLR 2100 flooding projections). MM-LU-4 and LU-5 are attempting to monitor the SLR 2100 projections (every 5 to 10 years) and then propose strategies to address flooding and inundation in the future. The DEIR already discloses the projected flooding and inundation impacts in 2100 and, therefore, should include measures to address those impacts now vs developing a program to monitor and develop new strategies in the future.

5. **Section 5 Cumulative Impacts**
    a. The cumulative analysis, similarly to the AQ and GHG sections, must address and analyze Executive Order N-79-20, the Final MCAS and the Final AB 617 CERP.

[4] Notably, the Port routinely provided a Clean Air Program consistency analysis in its CEQA documents. (*See*, TAMT Redevelopment Plan and Demolition and Initial Rail Component EIR).
[5] https://documents.coastal.ca.gov/assets/env-justice/CCC_EJ_Policy_FINAL.pdf

Sincerely,

Danny Serrano, AICP
Campaign Director

GB CAPITAL HOLDINGS, LLC

November 16, 2021

Anna Buzaitis
Planning Dept.
Port of San Diego
P.O. Box 120488
San Diego, CA 92112-0448

Re: GB Capital Holdings Comments on National City Bayfront Projects & Plan Amendments

Dear Mrs. Buzaitis,

The following provides our comments to the above referenced Draft Environmental Impact Report (DEIR) related to GB Capital Holdings' project as described in the DEIR. We find that the DEIR is fully compliant within the requirements of the California Environmental Quality Act (CEQA), we support and appreciate the Port's efforts in making our project come to fruition. The comments below reflect a different point of view than the conclusions reached in the DEIR and not to its conformance with CEQA.

The GB Capital Project provides enhanced revenue to the Port and increases recreational opportunities to the citizens of the state. National City has very little Bayfront land and access therefore, it is paramount to maximize the land use. Many of our project components offer affordable recreational opportunities not found in other Port membership cities. In sum, the project includes a new RV camping facility, dry boat storage, future hotel rooms, bay access, enhanced mooring and dockage, improved bikeways and protects the surrounding environmental resources.

GB Capital's major concern is with Alternative 4 of the DEIR which is described as the 'Environmentally Superior Alternative'. The DEIR Alternative 4 analysis eliminates one of GB Capital hotels and substantially reduces the hotel room count for the remaining hotels. The DEIR Alternative 4 analysis provides for a 50% overall reduction in GB Capital's hotel development plans.

4980 N. Harbor Drive
Suite 200
San Diego, CA 92106
p: 619.688.9217
f: 480.247.5663

office@gbcapitalholdings.com

GB CAPITAL HOLDINGS, LLC

Our 11-story hotel would be reduced to 6 stories and would contain 140 rooms; down from 282 rooms. The 40 room 3-story hotel would be eliminated entirely. In total, 182 rooms would be eliminated along with their associated TOT revenue. The DEIR claims that this alternative meets all the Project Objectives, but this is not the case. The significant reduction in project scope result in a failure to meet Project Objectives 1 and 3.

Project Objective 1 States;

> *Further activate the project site by modifying the land uses and their configurations to foster the development of high-quality commercial and recreational uses to maximize employment opportunities,* ***maximize recreational opportunities for visitors, maximize economic development opportunities,*** *and to improve cargo and transportation efficiencies of maritime industrial uses associated with operations at NCMT.*

Project Objective 3 States:

> *Implement cohesive commercial development that is designed to enhance enjoyment of the National City Marina District and surrounding city area, contribute to the area's economic vitality, and generate* ***economic revenue for the City including through increased Transient Occupancy Tax.***

A 182 hotel room count reduction fails to meet Objective 3 because it does not generate the economic revenue for the City through increased Occupancy Tax. It fails to meet Objective 1 because it does not maximize recreational opportunities for visitors or maximize economic development opportunities.

A reduction of 182 hotel rooms is highly likely to render the hotel project infeasible. These hotels require a precise inventory of rooms to become economically viable. A 50% reduction is highly unlikely to produce enough revenue to pay for construction and would result in over a 50% reduction in operating income. The decrease in hotel rooms directly leads to a significant decrease in revenue to the Port and to the City.

4980 N. Harbor Drive
Suite 200
San Diego, CA 92106
p: 619.688.9217
f: 480.247.5663

office@gbcapitalholdings.com

GB CAPITAL HOLDINGS, LLC

GB Capital is also concerned with Alternative 2 – No Waterside Development in Sweetwater Channel Alternative. The lack of development within the channel would have adverse effects on the development of a dry boat storage. The development within the channel allows a location for the dry boat storage vessels to be stored as they are launched and retrieved for the boaters use. This alternative would not meet Project Objective 1 and 2 as it fails to produce an economically viable project and does not maximize recreational opportunities for visitors. The Port should support the project as proposed.

The Port should make a finding that Alternative 1 fails to meet Project Objectives 1 and 2 because the alternative analysis fails to produce an economically viable project. Instead, the Port should support the project as proposed.

In Chapter 3, pg. 3-14 through 3.4.1.4 GB Capital will have to remove the southwest portion of its current leasehold in order to provide for the expansion of Pepper Park. We are agreeable to this point provided that the expanded park development allows for dry boat storage and travel upon the drive path.

We suggest that the parking lot remain in its current configuration and be maintained as park parking and that the drive path be used for vehicles traveling to and from the dry boat storage. Dry boat storage is a lower cost alternative than mooring a boat in the marina. It provides the community with the opportunity to gain access to the bay without the expense of docking at a marina. The dry boat storage facility increases recreational access to the bay which is one of the principal goals of the California Coastal Act and is consistent with the recreational goals set out in the Port's Master Plan.

This increase of park use can be adequately parked as the DEIR finds that the park is in need of 23 additional parking spaces. Should there be a need for additional parking, the Port should consider using "flex parking." We would like to work with the Port to find the appropriate location for flex parking that would meet the need of visitors, users of the dry boat storage, along with the other project elements. For example, additional parking at the marina may be utilized for events at the park by providing parking machines. The Amphitheater,

4980 N. Harbor Drive
Suite 200
San Diego, CA 92106
p: 619.688.9217
f: 480.247.5663

office@gbcapitalholdings.com

GB CAPITAL HOLDINGS, LLC

Granger Hall, or any type of event center in the area may increase the need for parking on an interim basis.

Chapter 3, pg. 3-14 / 3.4.1.5 –

The proposed modifications to the Aquatic Center may require an increase in admission fees. We recommend that any increase does not result in impacting visitor access to the Center. We suggest that some type of application be available for a certain percentage of disadvantaged community members so they can participate in the Center's activities. This is one small step toward social equity.

Chapter 4, pg. 4.1-19

We believe that the visual impacts have been overstated. Particularly, KOP2 which overstates the visual impacts to the Sweetwater Channel. The siting of our improvements maintains these visual view corridors. Many of our public users will have access to our decks which will help mitigate view impacts.

Chapter 4, pg. 4.1-39

MM-AES-1 Calls for construction screened fencing to be installed for cabins or dock work in the water. Although the work may be completed at the same time, there should be an exception that if only water work is complete, that no fencing or screening should be required. Regardless of the fencing the water will be below the fencing and jetty. If the water work is taking place inside the marina, the fence will not block the view of the construction. If the work is taking place in the channel, it will be below the jetty and therefore fencing will not screen the work.

Chapter 4, pg. 4.2-44

MM-AQ-5 Tier 3 and 4 construction equipment on the marina side is a concern. We suggest that the 200-mile rule be implemented in both Tier 3 and 4. This should also apply to the landside. If a piece of equipment is not available or the duration of the use of the equipment is under a particular threshold then the tiering standards should not apply.

Chapter 4, pg. 4.2-45

MM-AQ-6 calls for the staggering of projects to reduce emissions. The example given is the GB Project and the moving of Granger Hall. Revenue generating projects should take priority over tax funded projects. A delay in

4980 N. Harbor Drive
Suite 200
San Diego, CA 92106
p: 619.688.9217
f: 480.247.5663

office@gbcapitalholdings.com

GB CAPITAL HOLDINGS, LLC

generating revenue causes fees to the municipalities to be delayed and compromises the Project Objectives from being carried out to their fullest.

Chapter 4, pg. 4.3-61

Figure 4.3-6 shows the extent of Eelgrass within the Sweetwater Channel. GB Capital's method of installing mooring systems is a modification to the typical way installation occurs. Our method creates a smaller footprint and eliminates the chain from dragging along the seabed. This change would reduce the effects, coverage, and damage caused by mooring. MM-BIO 12.

Chapter 4. pg. 4.3-64

MM-BIO-11 Compensatory Mitigation for Impacts on Coastal Sage Scrub. When Marina Way was installed the B-2 parcel was grubbed and graded removing all vegetation from the site. At one point, vehicles from NCMT were parked on the lot, irrigation was put on the bank and the bank was planted. The area was always slated as a commercially developable site.

Chapter 4. pg. 4.3-67

Overwater coverage - The existing marina was created from a vacant lot then bay water was released into the basin. Mitigation for any Eelgrass impact may be achieved within the marina basin itself and the water created. Water coverage from this build is to be used for shading in marina and channel.

Chapter 4, pg. 4.5-1

GB Capital would like to explore using solar or wind energy by placing these alternative energy sources on top of the boat storage facility. These items may need to extend above the 65' build envelope. Currently it is our understanding that there is not a height restriction within this area of development. If there is a restriction, this EIR and new zoning could allow it.

Chapter 4, pg. 4.5-12

The DEIR states that energy use during the operation amounts to an additional 95 vessels for the project. Credit should be allocated for energy savings as these boats are not being towed to and from the water from inland locations. A principal benefit of dry storage is that it prevents bottom paint and topside cleaning on a regular basis in the Bay and any spills are contained within the landside facility which is better equipped to handle any environmental disturbance.

4980 N. Harbor Drive
Suite 200
San Diego, CA 92106
p: 619.688.9217
f: 480.247.5663

office@gbcapitalholdings.com

GB CAPITAL HOLDINGS, LLC

Chapter 4, pg. 4.5-12
"Effects of the project on energy resources MM-GHG-6 and MM-GHG-7 would require project proponents to incorporate renewable energy and /or the purchase of an equivalent of GHG offsets at the time of future design."

GB Capital would like the ability to bank GHG credits in advance.

Chapter 4, pg. 4.6-36
We believe it is important to try to recycle whenever possible, this would include water resources. We would like to include a water tank above the plane of the Dry Boat storage or as a standalone unit that could also act as a marque for the Area. Penetrations above 65' in this area were not contemplated nor a stand-alone unit. Accommodation should be allowed for such beneficial uses.

Chapter 4, pg. 4.6-38
It is important to note that our project will use electric forklifts for moving boats and other equipment in the dry boat storage facility. Electric forklifts reduce toxic air emissions and decrease noise. The lifts are so quite that a white noise generator is used to notify pedestrians that the forklifts are operational and are moving.

Chapter 4, pg. 4.6-39
"The required reduction **may** be reduced by the District based on the actual amount of development and activities associated with that development and the other adjustments provisions specified below." We believe the "may" should be a "shall upon request and verification".

This would allow the possibility of GHG credits to be banked if generated for the project. They could then be utilized for future development are placed into a cap-and-trade program for sale as they will be expensive to produce, and this would create a way for the developer to recover part of their cost while still mitigating the project.

This concept is important to our project as it is phased.

4980 N. Harbor Drive
Suite 200
San Diego, CA 92106
p: 619.688.9217
f: 480.247.5663

office@gbcapitalholdings.com

GB CAPITAL HOLDINGS, LLC

Chapter 4, pg. 4.6-49

Parking control, via paid parking, can eliminate VMT for several parties. It may assist with shared parking that will be crucial to utilization of the Amphitheater if and when one is built at the park. Additionally, it may reduce the parking demand for all projects.

An MTS route is needed from trolley station to the park and to Pasha. How do we get MTS to accommodate as part of the SANDAG planning?

Chapter 4, pg. 4.6-49

EB3 calls for the project to achieve LEED Silver certification. We recommend that language be change to "or equivalent". An example is the 'Living Building Challenge' which exceeds these standards.

Chapter 4, pg. 4.7-49

MM-HAZ-7 Marina Way shall not contain traffic calming devices. If boat storage is to occur, traffic calming devices such as speed bumps or roundabouts could not be installed in the path of travel for the lift. Furthermore, the curb on the west side of Marina Way would be required to be less than rolled to allow the forklift with a vessel to travel to and from the dry stack. This modification may provide additional assistance to emergency vehicles transiting the area.

Chapter 4, pg. 4.8-35

In-Water Operations – An additional 95 vessels are noted as an impact. Gray and Black water discharges, vessel washing, bottom cleaning, and maintenance are listed.

We believe that it is important to recognize that dry boat storage acts as a BMP to prevent the threats listed above while providing more opportunity for the public to participate in boating. In creating the additional capacity landside, the project will assist in controlling pricing within the Bay making boating more affordable by producing inventory.

The boat launching service would ensure that vessels grey and black water tanks are pumped as needed. Vessels would not be stored in the water for long durations, this would reduce or eliminate the need for in-water cleaning. This would allow a boater more choices of what paint, if any, to put

4980 N. Harbor Drive
Suite 200
San Diego, CA 92106
p: 619.688.9217
f: 480.247.5663

office@gbcapitalholdings.com

GB CAPITAL HOLDINGS, LLC

on the bottom of their vessel. It allows staff to monitor the vessel bottoms and make recommendations that support protecting the environment. Vessels would be washed in the vessel storage facility that would have proper BMPs to prevent contaminants from entering the Bay. Failure of watertight seals in vessels would reduce the chance of a vessel sinking as it would be stored out of the water where it could not sink and create discharges. Light maintenance normally preformed in a slip could now be conducted within the storage facility. These choices could be an option for the existing boaters at the facility as well.

The dry boat storage facilities also have the ability to manage storm water run-off for the area, preventing run off into the Bay by creating retention basins under the vessel storage racks.

The marina currently is Clean Marina certified and management is engaged with this program at a board level. This program includes BMPs and SOPs that are provided to the boaters, vendors, and staff.

Beyond this project, Pier 32 Marina is currently evaluating alternative options to address unwanted discharges into our Bay. These programs would be applicable to any development that may be approved. These options include adding a mobile pump out cart to the facility or adding sewer pumping hydrants that would be accessible from each slip. Vessel bottom cleaning as a mandatory service that would be provided by the marina by its employees.

The bottom cleaning program would allow the marina to have direct engagement with boaters when bottom paint needs to be replaced. During these conversations, alternative and environmentally conscious paints will be discussed. Replacement of paint can be required in a timely fashion, which would allow the paint to work as designed, rather than to be scrubbed off. This will allow the underside of the vessel to be inspected on a normal basis and the management of the marina would be notified for action regarding deferred maintenance that could cause a vessel to sink and create a significant discharge in the basin.

Chapter 4, pg. 4.10-3

MM-NOI-5 Hotels required to soundproof from rail noise and dry boat storage. The dry boat storage will act as a sound barrier. For public safety

4980 N. Harbor Drive
Suite 200
San Diego, CA 92106
p: 619.688.9217
f: 480.247.5663

office@gbcapitalholdings.com

GB CAPITAL HOLDINGS, LLC

purposes, forklifts require a noise generator to warn others that it is moving. As identified, rail operations are the largest source of noise generation.

Chapter 4, pg. 4.10-3

MM-NOI-8 We do not believe that the dry boat storage is a significant noise factor and should be reconsidered as such. Boat storage noises are not the same as a front-end loader. The electric lifts that would be utilized generate very little noise. In fact, they are required to have a noise generator on board to notify others in the vicinity of their operation that they are moving to address safety concerns.

Chapter 4, pg. 4.10-3

MM-NOI-9 We agree that the Amphitheater shall should be directed away from sensitive receptors. A sound engineer should be engaged in the design so that noise is limited. This would be similar criteria that is being implemented to private developers of hotels, RV park, dry boat storage, and rail lines. Receptors should be mitigated in some fashion other than coordination.

Examples could include: An allotment of tickets, pointing stages towards marine terminal, participation payment in noise reduction or sound proofing in other parts of the development, and maximum dBA thresholds and monitoring.

Chapter 4. pg 4.10-20

Table 4.10-4 Speaks about Vibration Damage Criteria. If Granger Hall is to be placed in Pepper Park, it should be sited so that driving pile for the hotel site at Pepper Park does not affect the "Extremely fragile historic buildings, ruins, ancient monuments". Siting too near to the hotel site could create additional costs that make the hotel unfeasible to construct.

Chapter 4, pg. 4.13
Parking-General Comments:

Support MTS line from trolley to marine terminal, park, and marina. Appears that it could be valuable for access for the entire development.

4980 N. Harbor Drive
Suite 200
San Diego, CA 92106
p: 619.688.9217
f: 480.247.5663

office@gbcapitalholdings.com

GB CAPITAL HOLDINGS, LLC

Our intent would be to have a paid parking option on our property to assist with both management of parking availability and to assist our neighbors with overflow parking.

An average boater utilizes their boat 9-12 times per year. The current facility can comfortably reduce parking requirements. Based on this data, the dry boat storage parking ratios should also be reduced. As an example, Point Loma Marina parking requirements have been calculated at 1 to .6.

Chapter 4, pg. 4.14-1

MM-UTIL-3 Insufficient water line – currently 12" upgrade to 16". We recommend that the 12" line remain, but create a loop that will deliver the same capacity

Chapter 4, pg. 4.13-15

Table 4.14-6 GB Capital seems to be indicated on the chart twice. It should be listed once.

We appreciate the Port's commitment to carry forward the GB Capital Holdings, The Pasha Group, and National City's projects. We believe the DEIR adequately reflects the project components. We believe we can aid the Port in making the necessary findings to certify EIR and select our proposed project as the project that fully meets the Port's objectives.

Sincerely,

Greg Boeh
Chief Operating Officer

4980 N. Harbor Drive
Suite 200
San Diego, CA 92106
p: 619.688.9217
f: 480.247.5663

office@gbcapitalholdings.com

LOZEAU DRURY LLP
T 510.836.4200
F 510.836.4205
1939 Harrison Street, Ste. 150
Oakland, CA 94612
www.lozeaudrury.com
richard@lozeaudrury.com

Via Email

November 16, 2021

Anna Buzaitis, Program Manager
Planning Department
San Diego Unified Port District
3165 Pacific Highway
San Diego, CA 92101
abuzaiti@portofsandiego.org

Re: Comment on Draft Environmental Impact Report, National City Bayfront Projects and Plan Amendments (EIR-2018-232; SCH 2018121054)

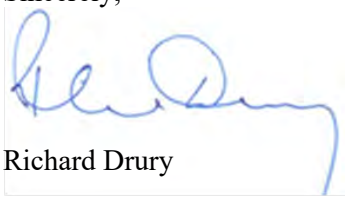
Dear Ms. Buzaitis:

I am writing on behalf of Supporters Alliance for Environmental Responsibility ("SAFER") regarding the Draft Environmental Impact Report ("DEIR") prepared for the project known as National City Bayfront Projects and Plan Amendments (EIR-2018-232; SCH 2018121054), including all actions related or referring to changes to land and water use designations in the District's Port Master Plan, and amendments to the City's Local Coastal Program, General Plan, Harbor District Specific Area Plan, Land Use (Zoning) Code, and Bicycle Master Plan that would include changes to jurisdictional and subarea boundaries, and land use, specific plan, and zone designations in the City of National City ("Project").

After reviewing the DEIR, we conclude that the DEIR fails as an informational document and fails to impose all feasible mitigation measures to reduce the Project's impacts. SAFER requests that the Planning Department address these shortcomings in a revised draft environmental impact report ("RDEIR") and recirculate the RDEIR prior to considering approvals for the Project.

We reserve the right to supplement these comments during review of the Final EIR for the Project and at public hearings concerning the Project. *Galante Vineyards v. Monterey Peninsula Water Management Dist*., 60 Cal. App. 4th 1109, 1121 (1997).

Sincerely,



Richard Drury

San Diego County Archaeological Society, Inc.

Environmental Review Committee

14 November 2021

To: Ms. Anna Buzaitis
Planning Department
San Diego Unified Port District
P.O. Box 120488
San Diego, California 92112-0488

Subject: Draft Environmental Impact Report
National City Bayfront Projects and Plan Amendments

Dear Ms. Buzaitis:

I have reviewed the cultural resources aspects of the subject DEIR on behalf of this committee of the San Diego County Archaeological Society.

Based on the information contained in the DEIR and its Appendix I, we agree with the cultural resources impact analysis and mitigation measures as presented.

SDCAS appreciates the opportunity to participate in the Port District's public review of this project's environmental documents.

Sincerely,

James W. Royle, Jr., Chairperson
Environmental Review Committee

cc: ICF
SDCAS President
File

Save Our Heritage Organisation
Protecting San Diego's architectural and cultural heritage since 1969

Wednesday, November 17, 2021

Port of San Diego
Attn: Anna Buzaitis, Planning Department
P.O. Box 120488
San Diego, CA 92112-0488

Re: National City Bayfront Projects draft EIR comments (UPD # EIR-2018-232, SCH# 2018121054)

Ms. Buzaitis,

Save Our Heritage Organisation (SOHO) has reviewed the draft Environmental Impact Report for the National City Bayfront Projects and Plan Amendment (UPD # EIR-2018-232, SCH# 2018121054), and supports Alternative Four, the Reduced Development Intensity Alternative, which is the environmentally superior option. However, SOHO's primary concerns are related to historical resources and include avoiding any negative impacts to the Coronado Railroad, Granger Music Hall, and the National City Santa Fe Depot.

In the past, SOHO has entered litigation to protect the Coronado Railroad. The previous Bayshore Bikeway litigation dragged on for almost ten years and hindered the completion of this important bikeway when it could have been resolved quickly had the resource been fairly evaluated. As a result, the agency lost in court and had to treat the railroad as historic. SOHO remains dedicated to preserving this linear resource for future generations.

The National City Depot previously and still has future plans to restore the line and run museum equipment for excursions between National City and the Salt Works. Due to the foregoing and other considerations, SOHO opposes Route One (1) of the Bayshore Bikeway options.

Listed on the City of San Diego's Register of Historical Resources and detailed within the attached Coronado Railroad report (prepared in December 2003 by Legacy 106, Inc for SOHO), the Coronado Railroad "Belt Line" linear resource is significant under Criterion A as a special element of San Diego for its contribution to community history and the cultural landscape. Significant under Criterion C as well, the Belt Line embodies distinctive characteristics of railroad construction including the ties, rails and trestles. Imperial Beach and Chula Vista have also avoided impacts to this important historical resource and, working with these jurisdictions, SOHO has ensured the Belt Line's preservation. Consistent with these three communities, SOHO finds the Coronado Belt Line railway is additionally significant to National City as a special element of community history, contributing to the cultural landscape, and as a linear transportation resource. Due to the significance of this resource, SOHO opposes Route One (1) of the Bayshore Bikeway, which would have a detrimental impact on this linear resource. However, SOHO could support either Route Two (2) or Three (3) with changes to ensure the retention and preservation of the Coronado Belt Line railway.

City of San Diego Register of Historical Resources, Coronado Belt Line:
https://sandiego.cfwebtools.com/search.cfm?local=true&res_id=15430&local_id=1&display=resource&key_id=1008

SOHO is pleased to support the long-awaited relocation of Irving Gill's Granger Music Hall to Pepper Park and appreciates no changes are proposed for the National City Santa Fe Depot parcel. Both resources are listed on the

National Register of Historical Places and strongly contribute to project objectives 4 and 11, to increase recreational opportunities, maximize tourism, and integrate art, culture and history into the project. Granger Hall is an exemplary historical resource and should become a focal point of Pepper Park, which would support tourism, increased public access and recreational opportunity. SOHO supports relocating the hall with mitigation to include restoration of this unique music venue and project consistency with the Secretary of the Interior's Standards.

In support of the environmentally superior Alternative Four, the Reduced Development Intensity Alternative lessons environmental impacts, meets the various project objectives and is consistent with the District's Climate Action Plan. SOHO opposes Route One (1) of the Bayshore Bikeway due to impacts to the Coronado Belt Line railway and we are committed to preserving this historic resource. Last, SOHO strongly supports relocating Granger Hall to Pepper Park which will support tourism, access and preservation.

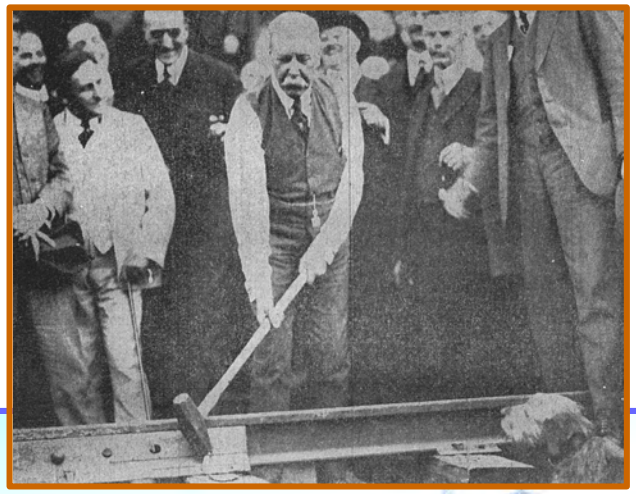
Thank you for the opportunity to comment,

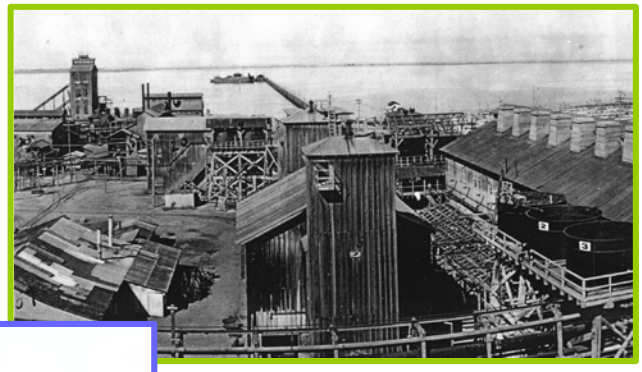
Bruce Coons
Executive Director

Amie Hayes
Senior Historic Resources Specialist

CORONADO RAILROAD

City of San Diego / Metropolitan Transit Development Board
(LDR 40-0378)





SAVE OUR HERITAGE ORGANISATION
SOHO
FOUNDED 1969

December 2003

REBUTTAL

CORONADO RAILROAD

City of San Diego / Metropolitan Transit Development Board
(LDR 40-0378)

Historical Resources Board
Staff Recommendation
Dated October 14, 2003

Considering the Designation of a Segment of the Coronado Belt Line as a Historical Resource Site for the City of San Diego

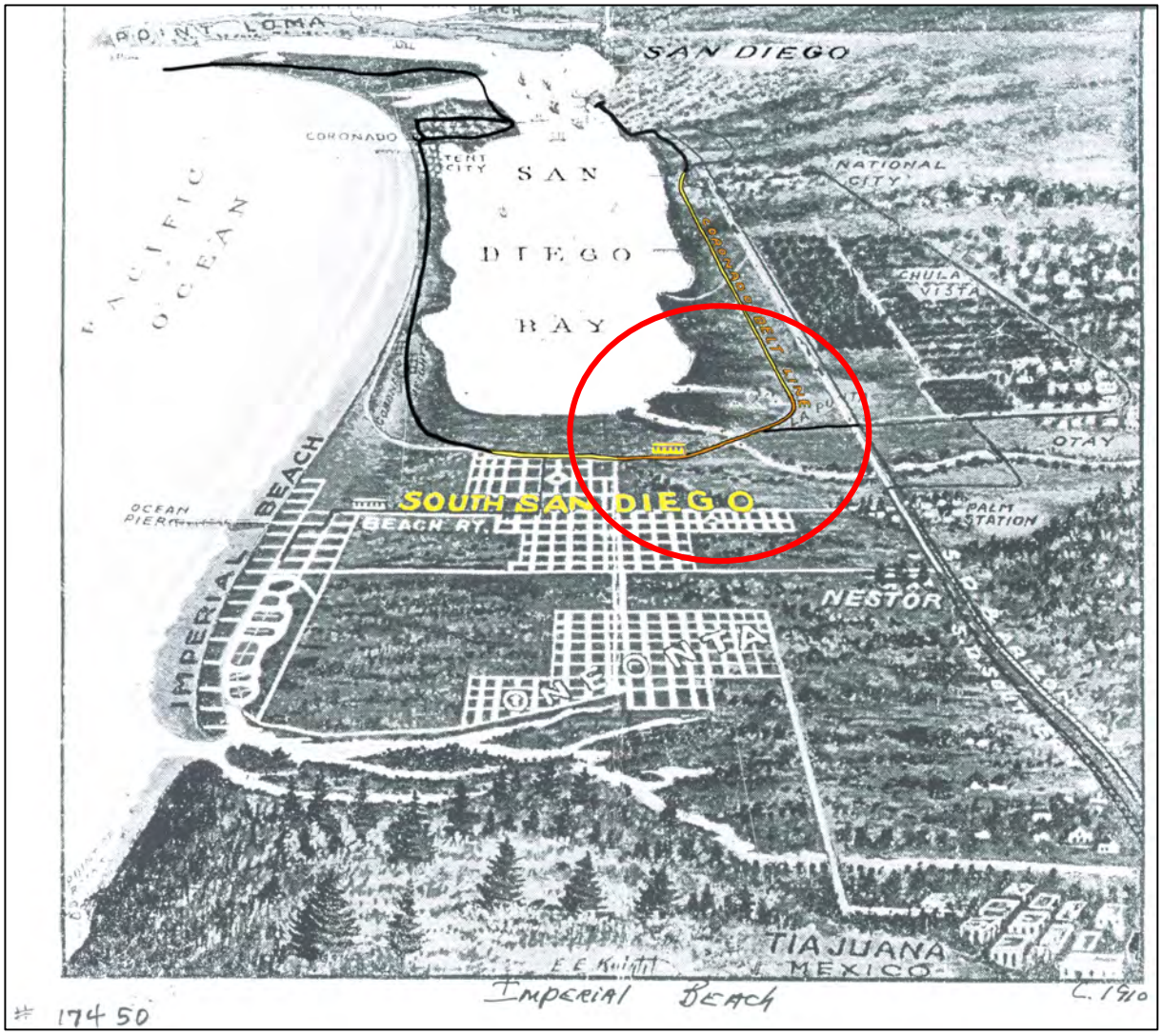
DECEMBER 19, 2003

Prepared by

Ronald V. May, RPA
Legacy 106, Inc.
P.O. Box 15967
San Diego, CA 92175
Phone: (619) 269-3924
www.legacy106.com

For

Save Our Heritage Organisation
2476 San Diego Avenue
San Diego CA 92110
Phone: (619) 297-9327
Fax: (619) 291-3576



San Diego Historical Society

Introduction

The City of San Diego Historical Resources Board (HRB) is considering an application from the City of San Diego / Metropolitan Transit Development Board (MTDB) to list the 7.5 mile intact portion of the Coronado Railroad, once part of the greater 20.3 mile Coronado Belt Line, to the City's Historic Resources Register as a Historic Landmark. This application comes to the Board's review because it is associated with the proposed Bayshore Bikeway project that would modify a segment of the Coronado Railroad, which is more than 50 years old and is regulated under San Diego Municipal Code Section 143.0212.

Save Our Heritage Organisation (SOHO) submits that the Coronado Railroad and Right-of-Way contain cultural resources that clearly meet Criteria a, b, and c for local, City of San Diego HRB Landmark designation.

MTDB has authorized SOHO to state that they do not oppose listing of this resource as an Historical Landmark.

SOHO has participated actively in every level of review of this resource to date. The many stakeholders interested in the Coronado Railroad have demonstrated competing priorities that have engendered many opportunities for coordination and cooperation. The fact that there are differing professional opinions does not diminish the historical value of the resource.

The evaluation of historical significance for the Coronado Railroad has not yet been considered at the "local level" under City of San Diego criteria for Historic Landmark Designation, which is under the HRB's jurisdiction. At this level, the board will now review new information not available to previous reviewers for the State or National Registers. The local level of review by the City of San Diego HRB is distinct from California State Register and National Register level reviews, because those Registers hold loftier standards for acceptance to their lists.

Determinations of significance at the local level are by necessity more flexible because their primary focus is relevance to the community's history, rather than statewide or national historical contexts. At this review level local jurisdictions exercise more discretion to decide what is important to the individual community's sense of identity and to Landmark those resources accordingly.

The HRB is concerned only with the determination of historical significance of the Coronado Railroad and whether or not it qualifies for designation to the City of San Diego's list of Historic Landmarks. By law, the Bayshore Bikeway Project is speculative and not a factor in the Board's determination of significance of the historic resource in question. Nor is any other potential project, development, discretionary action or intended use of the property relevant to the Board's determination of historical importance and listing to the local register.

SOHO maintains that the remaining 7.5 mile portion of the Coronado Railroad is historically important at the City of San Diego, local level under three Historic Resources Board criteria.

This report provides new information to explain why the Coronado Railroad is important to the City of San Diego under Criterion a, as a San Diego Industrial Archaeology Landscape and Linear Resource within a Geographic District; under Criterion b, for its association with three Historically Significant Persons: Elisha S. Babcock, Hampton L. Story, and John D. Spreckels; and also under Criterion c, Architecture, as the best surviving example of a short line railroad that embodies the distinctive characteristics of the style, type, period and method of construction within the 1888-1953 period of significance of short line interurban passenger and freight railroads connected to the City of San Diego.

While SOHO believes that Coronado Railroad is significant under all of these criteria, the Historical Resources Board need only find the resource significant under any one of these criteria to list it as a City of San Diego Historic Landmark. We urge the Historic Resources Board to carefully consider this new information and compelling arguments, vote yes on the designation, and add the Coronado Railroad to San Diego's list of Historic Landmarks.

SOHO urges the Historic Resources Board's Staff to recommend designation of the Coronado Railroad as a San Diego Historical Landmark under Criteria a, b, and c for the following reasons:

Criterion a – Cultural Landscape and Archaeological Site.

Resources are those sites exemplifying or reflecting special elements of the city's, community's or a neighborhood's historical, archaeological, cultural, social, economic, political, aesthetic, engineering, landscaping or architectural development.

SOHO submits the Coronado Railroad is a local San Diego industrial archaeology landscape and linear resource within a geographic district that had continuous use from 1888 through 1953. As such, it reflects special elements of San Diego's tourism and business development.

The best guidance to aid the HRB to evaluate the Coronado Railroad as a local San Diego industrial archaeology landscape and linear resource under Criterion a can be found in *General Guidelines for Identifying and Evaluating Historic Landscapes* (Environmental Program, California Department of Transportation, Sacramento, California, February 1999) (Herein references as General Guidelines 1999).*

This is new information that was not considered in the preliminary HRB Staff Report and must be considered by the HRB to evaluate the Coronado Railroad under Criterion a for local San Diego eligibility.

The California Department of Transportation routinely evaluates roads, highways, and rail lines for historical significance. This document provides historic preservation technical assistance that can help define local historic value under Criterion "a."

The Coronado Railroad is a linear transportation resource with archaeological historic landscape parameters. It measures 30-feet wide by 7.5 miles long and represents a continuous use time span from 1888 to 1953. The associated structural, natural, and archaeological landscape features outside the boundary also contribute to interpretation of this linear transportation resource.

*Additional References that support evaluation of the Coronado Railroad as an **industrial archaeology landscape and linear resource** include: Robert Z. Melnick, 1984, *Cultural Landscapes: Rural Historic Districts in the National Park System*. Washington, D.C.; Naomi F. Miller and Kathryn Louise Gleason, 1994, *The Archaeology of Garden and Field*, Philadelphia: University of Pennsylvania; Patricia M. O'Donnell, "The Treatment of Historic Landscapes," *Historic Preservation Forum* (May/June 1993) 36-45; Marilou Reilly, 1993 "Historic Transportation Corridors: A New and Dynamic Element of Historic Preservation: *CRM*, National Park Service, Volume 16, No. 11; William Brewster Snow, ed. 1959 "The Highway and Landscape" New Brunswick, New Jersey: Rutgers University Press; U.S. Department of the Interior, "Guidelines for Identifying, Evaluating and Registering America's Historic Battlefields," *National Register Bulletin* 40.

The Coronado Railroad includes six different corporate identities over the 1888 to 1953 time frame and forms a "geographical archaeological district" of contributing historic resources that include San Diego Chinese ethnic history, San Diego Bay history, San Diego military history, San Diego business history, San Diego tourist industry history, and San Diego railway history. **In addition, the 7.5 mile segment of the Coronado Railroad is the best surviving example of a portion of one of San Diego's short line railroads.**

Archaeology. The Coronado Railroad cuts through at least one prehistoric shell midden archaeological site and may contain or be directly associated with Chinese railroad workers' camps associated with the 1888 installation of rail line ballast rocks.

Native American Archaeology Significance. Preliminary field examination by SOHO members revealed at least one railway cut through an unrecorded, extensive prehistoric archaeological shell midden that extends off the right-of-way into the surrounding landscape. Protection for the prehistoric site should be included in the historic landmarking process. Other prehistoric archaeological sites may lie within the right-of-way and could be interpreted.

Chinese Railroad Labor Significance. Additionally, historical newspaper accounts in the *San Diego Union* reported Chinese work crews ranging from sixty to 150 men who worked to haul-in and install crushed rock ballast to support the rail lines and ties. Based on railroad construction history across the American west, Chinese work crews lived in the field near their construction projects and this is the basis for proposing that Chinese work camps exist in the surrounding historic landscape.

Chinese labor built much of the railroad in the American West, as well as portions of the Coronado Railroad. Babcock and Story hired crews of Chinese laborers to clear brush on Coronado for construction. A barge carried thirty Chinese with "tents and full camping outfits" and the crew increased to fifty by the end of the week and "the tents, camps and brush fires and other signs of activity on the Peninsula give it quite an animated appearance" (*San Diego Union* December 8, 10, 30, 1885).

The *San Diego Union* on June 12, 1888 reported that a work force of 60 Chinese laborers installed the rock ballast for the Coronado Railroad (*San Diego Union* June 12, 1888), which was five days after the final rail spike had been driven (*San Diego Union* June 6, 1888). The location of the Chinese work camps would be archaeological in nature and outside the right-of-way, but the barge that brought the workers probably came from labor broker Ah Quin's establishment in the Stingaree District of San Diego. The work crew probably moved to railroad camp work sites, close to the Coronado Railroad. Several particularly good locations of the rail ballast in the marshlands would be suitable for experiencing a sense and feel for the role of Chinese labor on the Coronado Railroad. They must have been skilled workers, as a *San Diego Union* article in 1895 commented, "the road ballasted to such a nicety that the cars glide almost noiselessly."

Industrial Archaeology Landscape.

The following General Guidelines definitions are useful to evaluate the Coronado Railroad nomination in terms of its Cultural Landscape under Criteria a:

(1) period of landscape significance
(2) landscape continuing use
(3) landscape integrity vs. condition
(4) level of landscape significance
(5) landscape integrity

Each of these elements of significance are discussed below to better interpret the ways Coronado Railroad is important under Criteria a.

Today, the formerly toll-collecting Coronado Bridge serves San Diego's greater highway transportation network in much the same way as the Coronado Railroad has done from 1888-1953. Photo by Bruce Coons.

(1) Period of Landscape Significance: General Guidelines: "*The period of significance begins with the date of the earliest important land use or activity of which tangible characteristics remain today. It ends with the date when the important events, activities, or construction ended. Continuous use or association does not justify extending a period of significance beyond the time when the property made its historically important contributions. If a specific closing date cannot be identified, 50 years ago can be used as the end date for the period of significance.*

Care should be taken in assigning a period of significance because it becomes the benchmark for measuring whether changes are part of the property's history or whether they constitute a loss of integrity" (General Guidelines 1999:11).

SOHO objects to the HRB Staff Report focus on the 1888-1908 period and disregard of the whole record of the 1888-1953 period of historic landscape significance in its entirety because it fails to fairly consider the railroad's continuing use during the entire 1888 to 1953 period when it was a continuous working landscape and element of a greater transportation network.

SOHO believes that the HRB should define the Coronado Railroad's period of significance to the City of San Diego as 1888-1953 and recognize that the changes to the line within that time frame are a part of the property's history. The criteria to address this are clearly spelled out in the General Guidelines, which Stephen R. Wee did not consult for his evaluation to the California Register (Stephen R. Wee, 2002, "Review of Findings on California Register Eligibility: The Coronado Railroad, San Diego, California"). At the City of San Diego local level it is important to recognize the broader 1888-1953 historic context and cultural landscape of the entire Coronado Railroad within a greater transportation system rather than focus narrowly on the 1888-1908 period because the 7.5 mile portion of the Coronado Railroad represents the best surviving example of San Diego's original short lines railroads which provided important and reliable San Diego business delivery to points of service exactly where it was needed.

The period of significance encompasses the freight and commuter needs of the agricultural and industrial vendors, manufacturers, and passengers living, working, and conducting business between the endpoints of San Diego and Coronado as well as destinations en route such as North Island Rockwell Field and Navy Station, Zuniga Jetty and Fort Pio Pico, Tent City, Coronado Heights, South San Diego, Western Salt Works, Hercules Powder Company, the Rohr Aircraft Plant and businesses and homes in San Diego, as well as thru traffic to destinations outside San Diego. This period of significance spans 1888-1953.

The continuous uses and activities of the Coronado Railroad as a viable and evolving resource involved the following corporate identities which had their own individual and overlapping periods of significance to San Diego's local history:

Coronado Belt Line (passenger and freight) (1888-1908)
National City & Otay Railroad (1887-1908)
San Diego Southern (merged Coronado Belt Line with National City & Otay Railroad) (1908-1912)
San Diego & South Eastern (1912-1917)
San Diego & Arizona (1907-1933)
San Diego & Arizona Eastern (1933-1953)
All corporate railroad identities (private passenger car service to Coronado) (1888-1953)

The Coronado Railroad also had individual periods of overlapping significance important to San Diego's local history for service it provided to the following:

San Diego business and industry freight rail deliveries (1888-1953)
Zuniga Jetty Construction and Sweetwater Quarry delivery & tours (1893-1918)
La Punta Salt Works and Western Salt Works (1907-present)
U.S. Army and Navy North Island (1915-1953)
Hercules Powder Company (1917-1919)
Rohr Aircraft Company and Consolidated Vultee aircraft production (1940-1953)

The Coronado Railroad had six different corporate identities that used the same historic archaeological landscape between the 1888 – 1953 period of significance. Within the General Guidelines, it is clear that the Coronado Railroad's changes are part its history, rather than a loss of integrity. Moreover, the Secretary of the Interior's Standards allow for in-kind replacement of artifacts like rail lines, ties, ballast, and parts of trestles during the continuous historic context. Removed rails and ties within a right-of-way do not eliminate historic value and can be reconstructed as long as the right-of-way is protected by MTDB.

In truth, it is the evolution of the landscape surrounding the Coronado Railroad through continued use from the San Diego business community's development of Coronado as a destination resort, Coronado and South San Diego as housing communities, construction of Zuniga Jetty for San Diego Harbor protection, development of U.S. Army Rockwell Field and U.S. Navy North Island as an extension of San Diego's aircraft industry, as a link in transcontinental shipping of agricultural crops and salt, for critical role of rail transport for the World War I potash/acetone industry, and the World War II / Korea aircraft Industry that contribute to proper evaluation of the Coronado Railroad to San Diego's local history right through 1953.

(2) Landscape Continuing Use: "*Change is often an inescapable part of a landscape. Natural processes may bring changes from plant growth, death, or succession; weathering; erosion; or soil deposits from flooding. The functioning and maintenance of properties in a landscape can also bring changes: new technologies, painting, road work, fence repair, and basic activities of a working property can have cumulative effects on a landscape's appearance. The effect of continuing use on integrity depends to a substantial degree on the historic context, which should indicate the extent of integrity that can be reasonably expected.*

A working landscape in which significant characteristics survive may maintain relative integrity despite some losses, when comparative properties in the same context are altered. For example, a mining landscape still being worked may retain integrity if modern extraction methods and character are similar to those practiced historically, important physical elements remain, and comparable properties are less intact. Similarly, working transportation facilities can retain integrity if physical features essential to the property remain. A resurfaced road that has been slightly widened may retain integrity if its original guard rails, retaining walls, bridges, and alignment remain. An operating railroad can be expected to have had its rails and ties replaced periodically, and an abandoned railroad to have both ties and rails removed, but a railroad line might retain integrity if the roadbed, associated features, alignment, and setting are intact" (underlines added) (General Guidelines 1999:13).

There is no question that continuing freight use of the Coronado Railway landscape by each of the corporations leading up to the San Diego & Arizona Eastern Railroad for these purposes would result in maintenance, repair, replacement, and installation of new track, trestles, and drainage culverts, or that buildings such as passenger stations would vanish over time. Because SOHO submits the Coronado Railroad history in its entirety up to 1953, the changed artifacts are contributors to the whole historical record.

As San Diego & Arizona Eastern Railroad superintendent William B. Barker explained during his October 7, 1962 presentation to the Women's Regional Planning Club as part of a KGB Radio Station broadcast, explaining that a railroad is never really finished:

> "especially if it is serving a growing industrial area such as San Diego. We're constantly adding new spur tracks for industry, occasionally removing a few; always improving our equipment and right-of-way." (SDHS Subject Files, Transportation, Railroads #1, 1962).

SOHO believes people can stand in the Coronado Railroad right-of-way holding historical photographs and experience a sense and feel for those historical periods that are so important to San Diego history. In fact, this has been done for many years, including tourist train rides up until a few years ago. This working transportation resource retains its integrity because the physical features essential to the property remain on this 7.5 mile segment.

(3) Landscape Integrity vs. Condition; "*Both integrity and condition must be addressed. Integrity is lost when a landscape's important features are removed or altered, or when intrusions disrupt the landscape. Integrity can be maintained despite weathering or deterioration as long as essential physical features remain, although the condition could be poor.*

For example, fences, watering troughs, and spatial arrangements may be intact in an abandoned overgrown pasture. Haul roads, camp sites, and stumps with springboard holes may identify a logged property despite a vigorous second growth of trees. A neglected garden could have both high integrity and poor condition. Similarly, landscapes containing ruins, rundown buildings, or abandoned roads that have deteriorated in place could possess integrity, while better maintained areas still in use may have undergone substantial changes that could destroy integrity" (General Guidelines 1999:14).

One criticism of the Coronado Railroad has focused on the alleged loss of integrity due to removed rails, ties, cleansing of the ballast, repairs, and installation of 1940s-50s concrete culverts. These criticisms focused on the 1880s San Diego Boom Era and virtually ignored the subsequent historical periods up to the end of the Korean War in 1953.

SOHO rejects this argument because the Secretary of the Interior's Standards clearly allows for in kind replacement of railroad components, such as those documented by Wee on the rails, ties, cleaning of ballast, and replacement of trestle parts. SOHO reiterates that part of the nomination needs to include World War I, II, and Korean War era history associated with San Diego businesses along the rail right-of-way and surrounding landscape.

Caltrans' General Guidelines (1999) clearly show that the missing rail ties in the segment from Imperial Beach to Naval Station North Island are acceptable for historic landscape considerations because the Right of Way, roadbed, alignment, and associated features are intact (MTDB retains the right-of-way for future restoration of the rails) and can be reconstructed.

This is part of the railroad's continuing use, rather than a loss of integrity. For local San Diego qualification under Criterion "a," these General Guidelines (1999) are directly relevant new information as they relieve previous concerns about integrity and period of significance.

SOHO also emphasizes the surviving older rail ties, such as the 1899 Carnegie rail, are concentrated in the marshland environment of the 7.5 mile segment that is nominated for historic landmark status. These artifacts contribute to the historical value of this site as an industrial archaeology landscape linear feature.

(4) Level of Landscape Significance: "*A landscape associated with the development of a state highway could be significant at the state level, but if that landscape's primary significance is its effect on the growth of a local community, the property should be found significant at the local level*" (General Guidelines 1999:12).

The 7.5-mile segment of intact track is the best-preserved segment to provide a sense of the landscape. This segment of the Coronado Railroad landscape represents the wholesale and retail deliveries and passenger service to between destinations between the City of San Diego and Coronado that contributed to the greater economic growth of the area. Portions of the industrial archaeology landscape linear resource are directly associated with other industrial landscapes that help interpret the greater historic context for the Coronado Railroad as a short line that contributed to the growth of the City of San Diego.

Historical Context of the Importance of the Development of Short Line Railroads in San Diego.

SOHO disagrees with Wee's finding that the Coronado Belt Line (1888-1908) was not important because there were two other short lines and he believed economic success or failure of the rail companies should be the sole basis for determining historical significance.

The 7.5 mile portion of the Coronado Railroad is the best surviving example of the three short lines in San Diego and none of them have been landmarked by the City of San Diego. Historic designation would preserve one good example for the future.

All of the San Diego, Pacific Beach, and La Jolla Railway are gone. Nearly all of the San Diego & Cuyamaca Railway was destroyed by the 1916 Flood and has since been reconstructed with modern rails, ties, and equipment as the Metropolitan Transit District trolley.

For the State Level of review, critics ignored the economic boon the Coronado Railway facilitated to private client business companies in San Diego by transporting locally milled wood, locally made brick and tile, locally quarried rip-rap boulders for the Zuniga Jetty, locally produced clothing, locally grown food crops and butchered meats, wholesale and retail goods, and the thousands of tourists who stayed in San Diego hotels during the "dividend season." Great fortunes were made by San Diego private businesses, especially during real estate development in Coronado, Tent City, and Coronado Heights.

For San Diego businesses, the Coronado Railroad helped them be immensely profitable, even though the railroad entities themselves made small profits. In fact, researchers such as Geroge W. Hilton and John F. Due in their book *The Electric Interurban Railways in America*, find that this was the story of short line railroads across the nation. The economic potentials and realities were not lost on any of the San Diego entrepreneurs involved in the railroad.

Babcock, Story*, and Spreckels knew exactly what they were doing. That is why the railroads were part of a profitable integrated network of companies that offered a suite of interrelated services to their customers. One need only look at an example of the San Diego City Directory for 1887-1888 to see this:

> **STOREY H. L.** (Blackmer & Co.), president San Diego and Coronado Ferry Co., vice-president First National Bank, vice-president Coronado Beach Co., president Coronado Railroad Co., vice-president San Diego and Coronado Transfer Co., president San Diego Street Car Co., vice-president San Diego and Coronado Water co., res 1263 First. (*various documents change spelling from Story to Storey)

In terms of freight delivery, many of the San Diego businesses that shipped and received products on the Coronado Railroad were economically successful in part because of the reliable freight transportation this line provided. In a January 1, 1918 *San Diego Union* article entitled "Railroad Gives Aid to Ranchers Along its Line: Service of Experts Given to Assist in Increasing Yield of San Diego County Fields," author Winfield Barkley explains the railroad's strategy:

RAILROAD GIVES AID TO RANCHERS ALONG ITS LINE

Service of Experts Given to Assist in Increasing Yield of San Diego County Fields.

By WINFIELD BARKLEY

In the good old antediluvian days, when a railway wanted business it gave secret rebates and there were preferred shippers on all sides. Both the shippers and the railways welcomed the state railway commission, for the rebate had become a Frankenstein which threatened the lives of them both.

> "The San Diego & South Eastern Railway has transportation to sell and its management is frankly handling every effort to sell all the transportation possible. First, it is trying to get all the freight to be had in the country tributary to its lines; second, it is trying to get the present shippers to produce more tonnage; third, it is trying to build up the country and thus get additional shippers. Just a matter of business, pure and simple."

The article explains further that they had

> "Doubled the passenger service, even running trains at a loss, figuring that well served prosperous communities would bring more people to live there, and every additional person means additional freight to be hauled."

The Railroad's transportation strategy as it related to San Diego military is illustrated by this enlightening point:

> At present, the San Diego & South Eastern Railway is co-operating with the county horticultural commission and the county farm bureau in a study of the needs of the army and navy units stationed in and about San Diego, hoping to work out a comprehensive plan whereby all the vegetable and garden truck shall be supplied by our back country. The railway, recognizing

> the need of large amounts of fertilizer on our farms, has gone to the railway commission and asked for a commodity rate on manure of 40 cents as compared with 65 cents on other lines in the state. This commodity rate barely covers the cost of hauling; but the showing was made that the railway must assist the farmers to fertilize their land, and that the increased tonnage from highly fertilized crops would, eventually, reimburse the railroad. Not a single car of manure from the thousands of head of stock at the Camp Kearny remount station should go out of the county."

With the above points in mind, it is clear that the rail companies accepted lower economic returns on fares and freight hauling as part of their overall business strategy within the economics of all of their interrelated business resources. The fact that this line remained and was in continual use during its period of significance when so many other short lines were abandoned demonstrates it was viable and had local importance. Rather than focus on the corporate success of the rail lines, the 1888-1953 period of landscape significance reflects a bigger picture when San Diego businesses profited using the railroads as a vehicle for delivering their products during various historical theme periods.

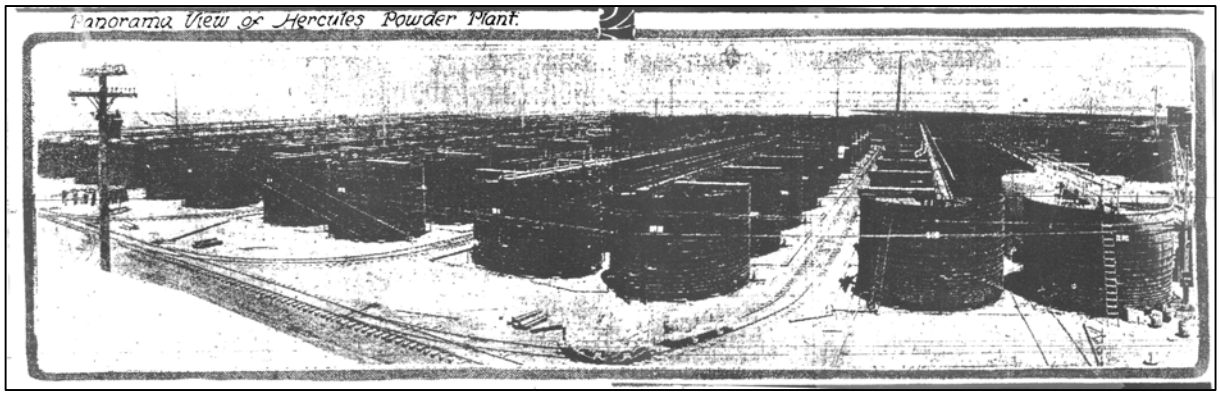
In essence, the Coronado Railroad was a tool to enable great fortunes to be made by people in San Diego and to enhance the overall profitability of the many communities it served. Within the network of their integrated enterprises these powerful San Diego visionaries and their networks of business enterprises made enormous profits, as did the businesses they served, even if the railroad itself didn't. Therefore, it is more appropriate to judge the Coronado Railroad's profitability within the greater context of the transportation business network as one part of an empire of companies that provided interrelated services.

Significance of the Coronado Railroad as it Relates to the Continuous Growth of the Community.

While the quotes above address many aspects of the way the railroad met the needs of San Diego's vast agricultural communities, there were other industries serviced along the Coronado Railroad that made it important to San Diego's local history:

Hercules Powder Plant, Rohr Aircraft Plant, and La Punta/Western Salt Works. During the period of landscape significance, each of the above corporate identities were associated with the Coronado Railroad which transported products sold in an interdependent relationship by San Diego businesses to clients in Coronado and Coronado businesses to clients in San Diego, as well as to the United States government representatives at North Island and back into the greater San Diego community and beyond.

San Diego businesses operated at various points along the railroad to extract raw materials and component products for industries in San Diego. In two of these businesses, the Salt Works and Hercules Powder Plant, the location of the plant to the resource, salt and kelp, to the railroad were paramount to their success. At these locations, it is possible to look out over the landscape and San Diego Bay and enjoy a sense and feel for those industries that shipped their products along the Coronado Railroad and helped contribute to San Diego's growth.



January 1, 1917, *San Diego Union*

Hercules Powder Plant.

The following **new** information needs to be considered by the HRB to evaluate local San Diego significance of the Hercules Powder Plant and the transportation of its products by the Coronado Railroad in relation to its importance while it was in use. This new information shows that by the time American troops were fighting in the trenches of Europe, a significant portion of the potash used in making gunpowder for their bullets and artillery and Cordite explosives came from this Pacific Coast industry. Across San Diego Bay at the foot of "F" Street, Swift and Company also processed kelp into potash for the war effort. The choice of location for this plant had a direct relationship to the Coronado Railroad.

Hercules Plant is Doing Patriotic Duty In Work of Research

DEVELOPMENT of the infant industry of extracting potash and other products from kelp has been rapid. During the year just closed, the second in the life of this young but highly important industry, giant strides have been made, and today the great plant of the Hercules Company in San Diego harbor is quite a valuable adjunct of the national government. And with all this growth, this new source of wealth for the country is only at the threshold.

With war cutting off the exportation from Germany of the potash always supplied by that country, the United States had to look elsewhere for its source of supply. The great kelp beds of the Pacific coast are being drawn on to fill the vital need.

The Hercules company is spending money with lavish hands to supply the government with the material so greatly needed in the manufacture of explosives. The operation of the plant is declared by its management to be a patriotic duty rather than an investment. The company never will realize in financial returns the money being put into the work. A corps of sixty chemists work steadily in the vast laboratories of the plant, experimenting in search of the many valuable chemicals hidden in the once-despised seaweed. And their efforts are being steadily rewarded.

In addition to potash, the principal product of kelp, other valued chemicals are being extracted. Material needed in some of the most effective explosives used by the Allied governments in their battle for democracy are now being made at this plant.

Carefully Guarded

Full-page newspaper accounts in the *San Diego Union* on January 1, 1917 and 1918 demonstrate the importance of the Hercules Powder Plant to San Diego's history, but also as a serious concern of national security in World War I:

"The Hercules plant is the most extensive industrial enterprise on the Pacific Coast in recent years. It has arisen upon an ideal location, consisting of thirty acres of fine tidelands, only a short distance from the city proper. When the Hercules representatives first came to San Diego about a year ago, they obtained their site from the state (sic) harbor commissioners and at once went to work. Publicity was shunned, they asked no financial backing from the city or county – they wanted no advertising…it was stated at the start, however, that no explosives would be manufactured here. (January 1, 1917).

The January 1, 1917 "48th Annual Edition" of the *San Diego Union* story headlined with "Kelp, World's Newest Industry Centered in San Diego." Three articles surrounded photographs of the kelp harvester, panorama view of Hercules Powder Plant, a bird's eye view looking down at more than 200 large redwood tanks, and a photograph of "First Car – Potash From Kelp 60,000 Pounds Hercules Powder Co. – Potash, Cal."

When war broke out in Europe in 1914, America's German source for potash terminated creating a crisis for this vital ingredient to make explosives, as well as other products. Prices would soar from $25 a ton in 1916 to $500 a ton in 1918. Scientist David M. Balch had patented a process of breaking down ocean kelp into potash and acetone in 1904 (*San Diego Union* January 1, 1917), and was eager to market his patents to private industry. For years, this met with little success until Washington found its dependence on Germany's sources threatened and then eliminated.

Peacetime use of potash for glass, soap, matches, drugs, high-octane gasoline, and black powder stimulated the Department of War to seek out new domestic American sources for potash to produce war munitions. W.C. Crandall reported the Department of Agriculture's 1911-1912 exploration and mapping of Pacific Coast populations of kelp suitable for harvesting and processing into potash. They selected a series of kelp beds between San Diego and Cedros Islands over a 91.36 square mile area and estimated to contain 17,000,000 tons (Ibid).

high boots, oilskins and sou'-
ter hat is indeed a picturesque
racter. His task is a man's job,
ught with danger. Perched upon
giant "hay-maker," with his
w; he cuts through the kelp fields
the worst of weather, sleeping at
ht in his wind-tossed cabin To
ew operations when the day has
ned. Great lighters carry the
wn kelp into the bay, where it is
osited at the factories. The kelp
ners are a happy, cheerful lot.
there never will be an "off year"
he kelp crop and the paymaster
er fails to make his monthly
nds. One of the great Swift kelp
vesters was driven ashore by a
rm not long ago and wrecked, but
crew escaped. A greater har-
ter is being constructed to
e its place.

at Industrial Enterprise

The Hercules plant is the most
ensive industrial enterprise estab-
ed on the Pacific coast in recent
rs. It has arisen upon an ideal
ation, consisting of thirty acres of
tidelands only a short distance
m the city proper. When Her-
s representatives first came to
Diego about a year ago, they
ained their site from the state
harbor commissioners and at once
went to work. Publicity was
shunned. They asked no financial
backing from city or county—they
wanted no advertising. It was stat-
ed at the start, however, that no ex-
plosives would be manufactured
here. The company still insists that
it is not its intention to make explo-
sives in San Diego. Products are
being shipped for this purpose to the
company's mills elsewhere.

The capacity of the Hercules plant
is 2000 tons daily. Nearly 1100 men
are employed, 100 in the marine de-
partment. The smallest wage paid
is 25 cents an hour and in addition,
a bonus system of pay has been es-
tablished. A bonus of 20 per cent
is paid to men who have been in
the employ of the concern more
than two weeks. A common laborer
receiving 25 cents an hour, draws
under this system $2.40 per day in-
stead of $2. Much expert help is
employed and large salaries are paid
to chemists and skilled machinists.

The Hercules plant is operated
much on the plan of a sugar refin-
ery. The kelp is not treated by dry-
ing, as in the Swift plant on the San
Diego waterfront, but through chem-
ical processes.

The plant at present consists of
ten large buildings, many smaller
ones, more than 200 large tanks, a
2000-foot wharf and other improve-
ments. The machinery was espe-
cially constructed for the work. The
power-house is one of the largest
on the Pacific coast.

The capacity of the reapers now
in use by the Hercules people is
1000 tons a day. There are four har-
vesters, eight lighters, four tugs and
a score of small boats. Kelp is cut
six feet below the surface and
churned into a half-liquid mass as it
is deposited into the lighters. On
the wharf the kelp is sucked through
pipes into immense vats 2000 feet
away. Practically all of the work
is done automatically. Conveyors
run underground through the com-
pany's yards, conveying the kelp in
its various forms from one building
to another.

A fully equipped floating machine
shop is being completed which will
remain without the harbor to look
after the repair work on the har-
vesters. This will eliminate the ne-
cessity of bringing in the cutters
when damaged.

The long rows of digesting tanks,
200 in all, are a wonderful sight in

(Continued on Page 6, Col. 3)

During this period, Hercules Powder Plant produced much of the potash and acetone used to produce

gunpowder and cordite during World War I (www.awrr.com/sfdiesels.html) . The potash shipped from San Diego was vital to World War I and a major San Diego industry.

The banners on the lead article read, “Kelp Reduction An Important Industrial Enterprise” and “Extraction of Potash From Weed is Aid to Nation” and a lead article read, “Hercules Plant is Doing Patriotic Duty in Work of Research.” The size of these newspaper stories underscores the high level of historical importance this industry had to San Diego. Hercules Powder Company used three harvester boats, named *Hercules*, *Kenvil*, and *Bacchus* and harvested 24-hours a day, seven days a week that docked on their 2,000 foot pier. The harvesters traveled as far south as Cedros Island, Mexico and as far north as San Nicolas Island (*San Diego Union* January 1, 1918).

The industrial plant site included multi-story, board and batten buildings serviced by water and fuel lines and railroad spurs from the Coronado Railroad. They reported a team of sixty chemists worked steadily to learn of new applications of the kelp. The “Hercules Company is spending money with lavish hands to supply the government with the material so greatly needed in the manufacture of explosives.” Military production also included medicines needed for combat hospitals. Harry T. Martin reported that the $75,000 monthly payroll in 1917 for the Hercules Powder Plant was one of the largest in California at the time and by 1918, it increased to $100,000 a month for 900 employees. State regulation went to California Fish & Game, while Scripps Institute of Oceanography supervised kelp research (*San Diego Union* January 1, 1917).

While critics have dismissed the Hercules Powder Plant as a minor industry and stated that “it would be difficult to argue that the Coronado Railroad’s forms a basis for listing on the California Register” (Wee 2002:16), this information clearly demonstrates that the shipment of potash out of San Diego from the Hercules Powder Plant in South San Diego via the Coronado Railroad was a vital transportation link to supplying essential materials for the war effort in WW I. Potash may have been one of San Diego’s greatest contributions to World War I history. Furthermore, the $100,000 monthly payroll for 900 employees played a significant historical role in the history of San Diego’s economy in the 1916-1919 era.

Looking North West toward Gunpowder Point. Photo by Bruce Coons.

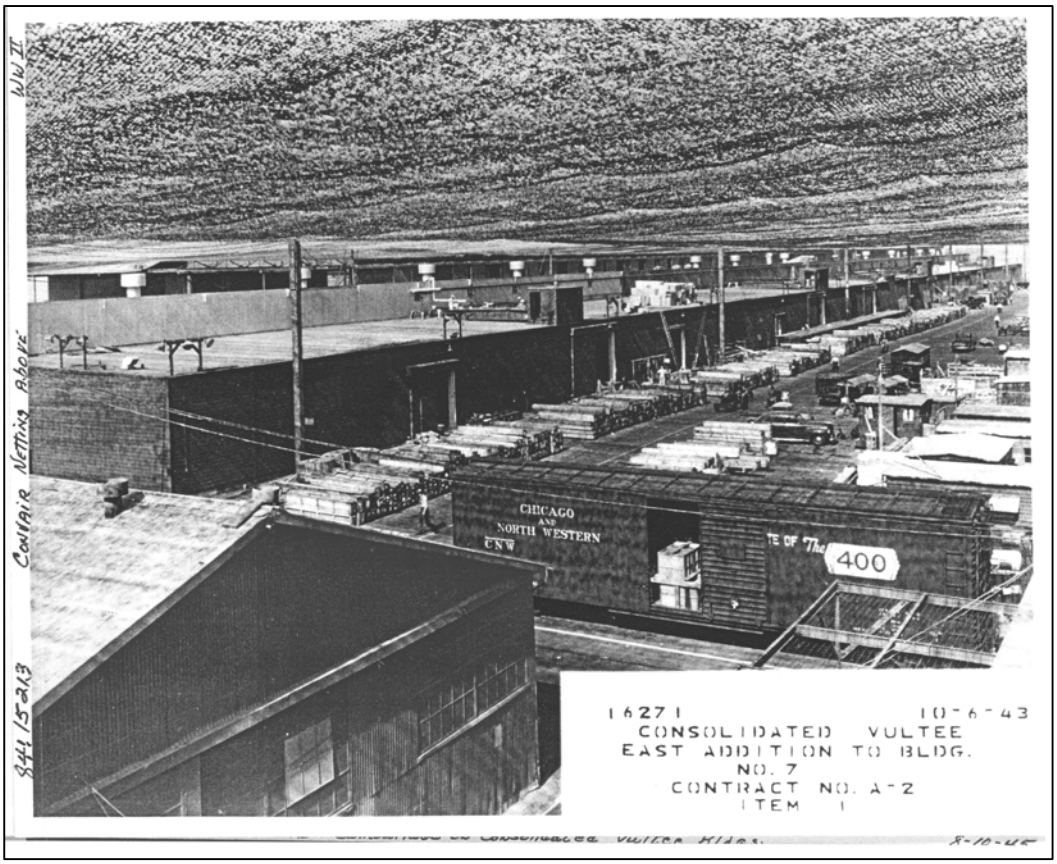
The primary basis for dismissing this enormous operation was that the buildings and spur lines have been removed. Because the roadbed, alignment, and setting are intact, SOHO believes the Coronado Railroad’s association with the Hercules Powder Plant site retains its integrity. The ability to convey its significance as a cultural landscape is demonstrated by the Chula Vista Nature Interpretive Center wilderness interpretive area’s use of signed trails and docent led tours.

It should also be noted that the abandonment of the Hercules Powder Plant left a significant impact on the local environment that can be seen and learned from today. According to a web site by Jack Innis in February 1994, docents "point out the tens-of-thousands of bricks from the abandoned gunpowder plant, a silted-up canal and railroad tracks." (www.sdearthtimes.com/et0294/et0294s5.html) This is also part of the continuing landscape associated with the view of the Hercules Powder Plant from the Coronado Railroad.

This new information demonstrates that the Hercules Powder Plant is a significant historic component that contributes to understanding the Coronado Railroad industrial archaeology linear landscape.

World War I Aviation Rail Shipping. In addition to transporting vital potash to gunpowder plants elsewhere in California during World War I, the Coronado Railroad also linked North Island Army and Navy fields with San Diego in 1918. The War Department approved a contract in 1918 to build thirteen miles of Coronado Railroad track to be linked to the San Diego & Arizona Railroad to transport bombs, munitions, aircraft and other military supplies to San Diego and the following day Coronado granted permission for extension of those lines to the San Diego & Arizona Railroad (*San Diego Union* March 5, 6,1918). Those rail lines were extremely active during World War II, Korea and the Viet Nam War hauling bombs, ammunition, fuel, and dead war heroes to San Diego. To this day, Coronado Railroad lines exist and are used for short haul movement of military supplies within North Island Naval Air Station.

Rohr Aircraft Company.



San Diego Historical Society

Rohr Aircraft Company is an excellent example is the role the San Diego & Arizona Eastern played along the Coronado Railway between Chula Vista and San Diego during World War II for San Diego aircraft production.

The War Preparedness Act of 1935 required the War Department to direct war industries to segregate aircraft engine parts factories to prevent enemy bombers from destroying all industrial machinery at one location. As such, war planners in 1940 directed Edmund Price of Rohr Aircraft Company of San Diego to build the Chula Vista plant to create aircraft exhaust manifolds and nacelles, load 2,400 per flat car, and train them on the Coronado Railroad to San Diego for assembly at Rohr and Consolidated Vultee Aircraft to make B-24 Liberator bombers and Navy PBY patrol aircraft. After World War II ended, Rohr continued making aircraft parts for the Korean War. Rohr shipped 50,000 railroad cars of aircraft parts to San Diego plants between 1940 and 1953. These federal defense contracts were enormously important to San Diego's economy and wartime history, as they fueled the largest influx of people into the city and forever changed the history of San Diego in the mid 20th century.

Accordingly, Rohr built the auxiliary Chula Vista plant adjacent to the railroad and transported products to Consolidated Vultee Aircraft Corporation plants in San Diego for B-24 bomber and PB4Y Navy patrol planes in San Diego.
http://www.heritageresearch.com/databasewwiiindustry.htm (click on California).

View from Rohr, looking North West. Photo by Bruce Coons.

The railway right-of-way associated with 1940s-1950s vintage rails, ties, and other artifacts is adjacent to a parking lot where the Rohr plant is located, even though a guard building has compromised some of the surrounding landscape.

View from Rohr, looking South. Photo by Bruce Coons.

SOHO believes that the integrity of the historic landscape relating to the Rohr Aircraft Plant is preserved within the Coronado Railroad's continuous industrial landscape with surviving significant characteristics that maintain their relative integrity despite some losses. The ability to visualize this period of time from the Coronado Railroad is preserved and can be easily interpreted.

La Punta and Western Salt Works.

Western Salt Works, 1934. San Diego Historical Society.

View of Coronado Railroad track and trestle looking North towards the Salt ponds in South San Diego. Photo by Bruce Coons.

The Coronado Railroad has transported railroad cars of salt from South San Diego Bay since 1888 and continues to the present time; an existing freight-feeder for San Diego & Arizona Eastern still ships salt to San Diego and beyond (A.T. Coons and F.E. Harris, 1938, *Salt, Bromine, Calcium Chloride, and Iodine Minerals Yearbook*, Washington, D.C.: United States Government Printing Office, pp. 1270-1275).

Graham Babcock and Elisha S. Babcock began mining salt there from 1902-1911 and formed the Western Salt Company in 1914 and operated it until Henry Fenton bought the operation in 1922. It operated and shipped salt by rail until 2002 (Frank Reihle, 1952, *Henry Fenton, Typical American*, San Diego: Laura E. Fenton, private printing, pp. 68-71). The Port District terminated rail delivery from the Salt Works without consulting MTDB in the process.

As early as 1871, the adjacent La Punta Salt Works mined salt and in 1901 Klauber-Waggenheim collected salt for packaging in their San Diego plant for wholesale and retail sale. (Elliott W. Wallace, 1883, *History of San Bernardino and San Diego Counties* 1965 Reproduction, Riverside, California" Riverside Museum Press, p. 187; William E. Ver Planc, 1958, "Salt in California," *Division of Mines Bulletin 175*, San Francisco: Department of Natural Resources, pp. 9, 107).

During World War I, Western Salt Works produced 5% of the salt in California and today it is the only viable commercial salt operation west of the Great Salt Lake in Utah.

National Register eligible Narrow Gauge Rail Crossing of the Coronado Railroad at the Salt Works. Photo by Bruce Coons.

The narrow gauge railroad used by the Western Salt Works crosses the Coronado Railroad. This narrow gauge track and the Western Salt Works are eligible for the National Register of Historic Places.

(5) Landscape Integrity: "*Integrity is the ability of a property to convey its significance. The seven aspects of integrity are location, design, setting, materials, workmanship, feeling and association. To retain historic integrity, a property will always possess several and usually most, of these aspects, and essential physical features must be present. Examine integrity against essential physical features that were present during the historic period, and estimate the percentage of the historic landscape that is intact. Document any intrusions or missing elements. Note the relative importance of elements that have changed, keeping in mind that landscapes are necessarily dynamic in character*" (General Guidelines 1999:12)

The location, feeling, and association of the view of the natural landscape of San Diego Bay from the Coronado Railroad's tracks remains spectacular.

Even though Coronado's Tent City, historic rail cars, the Hercules Powder Plant, and Rohr Aircraft Plant are now gone, visitors can stand in the railroad right of way with a handful of historic photographs or view the interpretive and educational programs at the Chula Vista South Bay Preserve and experience a sense and feel for the historical eras in San Diego history. The same can be said for standing in the rail right-of-way at the Western Salt Works, or even by the parking lot where the old Rohr Aircraft Plant exists.

While the Wee report documented intrusions, missing elements, and equipment changes right up to the 1950s, more than 80% of the Coronado Railroad, including artifacts from the San Diego & Arizona Eastern Railroad, exist in the 7.5 mile surviving portion.

Landscape Integrity in a Greater Context - Golden Spike National Historic Site Integrity Analogy.

SOHO believes public interpretation is more than possible because the San Diego Railway Museum ran tourist excursions down the line, SOHO organized walking tours, and the City of Chula Vista has developed walking trails with signs interpreting the Hercules Powder Plant.

To better understand how the Coronado Railroad landscape site can be interpreted, it is helpful to look outside San Diego to another analogy to understand measures of acceptable interpretation. The Golden Spike National Historic Site is a National Register site that interprets the merging of the connecting point of the East and West transcontinental railroads. None of the historical 1869 buildings exist at the Golden Spike today. It is essentially a vacant landscape that must be interpreted by brochures and maps to guide visitors to the former workers' tent city, earthworks, road cuts, and other topographic features created by the railroad workers.

In fact, more rail, tie, and trestle artifacts and features of the Coronado Railroad exist in the 7.5-mile industrial archaeology landscape linear feature than survives at the Golden Spike. Since the Golden Spike National Historic Site lacks buildings, rail lines or ties, the missing artifacts to the Coronado Railroad in some areas is clearly not a significant issue as long as the landscape has relatively good integrity.

This is compelling evidence that the Coronado Railroad's integrity remains intact even though the City of Coronado removed rail and ties on the south and City of San Diego removed rail features north of National City. The same can be said for removal of the Hercules Powder Company, some of the Rohr Aircraft Company buildings at their locations along the Coronado Railway, and the prehistoric shell midden.

Prehistoric Archaeological Site Landscape Integrity. The existence of at least one prehistoric archaeological shell midden in at least one railroad cut south of National City demonstrates a high degree of landscape integrity of the natural landscape surrounding the Coronado Railroad right-of-way.

Rohr Aircraft Plant and Railroad Landscape Integrity. SOHO believes the 1940s Coronado Railroad / San Diego Arizona & Eastern Railroad tracks, trestles, and culverts at the former Rohr Aircraft Factory retain more than 80% of their landscape integrity and the 1950s changes of removed buildings and spurs do not adversely affect the location, design, setting, materials and workmanship of the Rohr Aircraft Plant landscape integrity.

Wee conducted a detailed field examination of the historic landscape and documented a "**landing ramp for sea planes**" (PBY produced by Consolidated Vultee in San Diego and taxied down San Diego Bay to the Rohr Plant), two **rail spur lines**, and noted the San Diego & Arizona Eastern operated on the Coronado railway landscape (Wee 2002: 16-20).
Wee critiqued this portion of the rail line and concluded for State Register level of review that the Rohr plant did not make an important contribution to America's war effort (Wee 2002:17). SOHO, however, believes this is not factually correct and also that it was important to San Diego's history under local level criteria.

SOHO believes that the Coronado Railroad's association with Rohr and Consolidated Vultee was clearly important at the local level because it transported critical airplane parts between Rohr and Consolidated Vultee. To meet Department of War and War Preparedness Act requirements, Rohr selected the Chula Vista location adjacent to the rail line to facilitate delivery of the engine manifolds. Rohr and Consolidated Vultee produced more than 10,000 bombers that were vital to fighting World War II.

Rohr's production of parts for the B-24 bombers and PBY search planes played a significant role in World War II and Rohr was a major San Diego employment center and local San Diego industry.

Clearly, the in kind replacement of rails, ties, and portions of trestles during the 1940s was important to the maintenance of the lines during wartime in San Diego and should be considered part of the property's history and not a loss of integrity.

View from the Coronado Railroad track beside the current bike path, looking West to the Beach and Strand. Photo by Bruce Coons.

Criteria a Conclusion.

For the many reasons stated above, the Coronado Railroad's industrial archaeology landscape is important to San Diego's local history and it retains its overall landscape integrity in its period of significance, continuing use, integrity vs. condition, and level of landscape significance. It also is important as an industrial archaeology landscape and linear resource for its association with Native American archaeology and Chinese contributions to local railroad construction, as well as associations with important San Diego industries that include the Rohr Aircraft Plant, the Hercules Powder Plant, and the Western Salt Works.

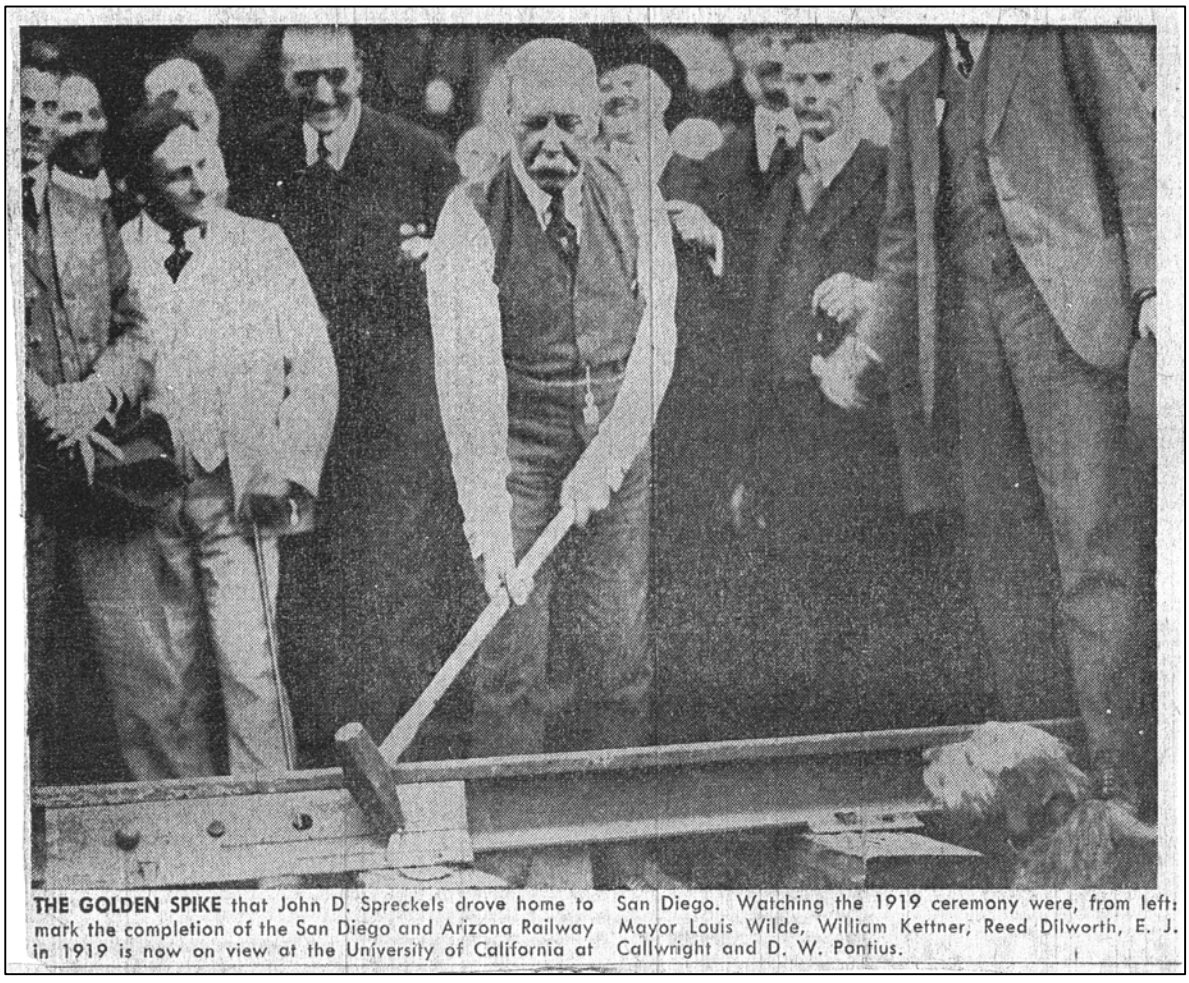
In addition, the Coronado Railroad is important for its role as one of San Diego's short line railroads, where it served as part of a sophisticated network of integrated transportation

services that met essential passenger and freight transportation needs for the businesses and passengers it serviced. Nationwide, these short lines are becoming a rare sight as they disappear from our communities as artifacts of the continuum of change of industries, economies, and political necessities.

Criterion b – Historical Person. *Resources are those identified with persons or events significant in local, state or national history.*

The Coronado Railroad is directly associated with three persons who have been previously identified by the City of San Diego, Historic Resources Board as significant in local San Diego history. These three important persons were Elisha Babcock, Hampton L. Story, and John D. Spreckels, who acquired the right-of-way, arranged financing, built the facilities, and rode the rails for their business interests.

John D. Spreckels



THE GOLDEN SPIKE that John D. Spreckels drove home to mark the completion of the San Diego and Arizona Railway in 1919 is now on view at the University of California at San Diego. Watching the 1919 ceremony were, from left: Mayor Louis Wilde, William Kettner, Reed Dilworth, E. J. Callwright and D. W. Pontius.

Of the three men, John D. Spreckels is probably the most important San Diego businessman to be directly associated with the Coronado Railroad.

In fact, Spreckels' contributions to San Diego's development were extraordinary. He is directly associated with the railroad as owner, operator, and passenger, and at times he traveled the line between the Hotel del Coronado, San Diego, and points beyond in his private rail car.

Born August 16, 1853 in Charleston, South Carolina, his family moved to New York and then San Francisco. He grew up there and studied at Oakland College then in Hanover, Germany before returning to graduate in chemistry and mechanical engineering at the Polytechnic College in 1872 (San Diego Historical Society Biographical Files). He began his career working for his father, Claus Spreckels, Sr. and managed the Hawaiian sugar shipping enterprise in 1880. After marrying Lillie Siebein in Hoboken, New Jersey, they and their four children moved to Hawaii, then San Francisco, and then San Diego in 1887. He built the D Street wharf to enhance sugar shipments and invested in coal bunkers and when San Diego's building boom crashed in 1889, Spreckels rushed in to acquire control of San Diego, forming one of the most impressive business empires in San Diego's history

Over-extended upon completion of the hotel and railroad, Story sold his 5,407 shares of the Coronado Beach Company and all subsidiary companies to fellow board member John D. Spreckels for $511,050.00 in 1889 (*San Diego Union* July 27, 1889). Spreckels then joined Babcock and Collett as partners in the enterprise. In 1902, a meeting of the Coronado Beach Company listed E.S. Babcock as president, John D. Spreckels as vice president, William Clayton as treasurer, A.E. Babcock and T. Hinde as directors. By 1903, Spreckels became president with Babcock as vice president (*San Diego Union* February 20, 1903).

This added the Coronado Railroad to an empire that would read like a laundry list of integrated services throughout San Diego and beyond. These interests included the San Diego Electric Railway, Western Sugar Refining Company, Pajaro Valley Railroad Company, San Diego and Arizona Railway Company, the Coronado Water Company, the San Diego and Coronado Ferry Company, the San Diego and Coronado Transfer Company, the Hotel del Coronado, Otay Water Company, Belmont Park in Mission Beach, the Union Tribune Publishing Company, and the Oceanic Steamship Company.

Notice to Shippers

Effective January 1, 1918, the San Diego & South Eastern Railway and the San Diego & Arizona Railway freight stations will be consolidated under the name of the San Diego & Arizona Railway Company.

The present San Diego & Arizona freight station at Twenty-sixth street will be discontinued. Freight shipments for stations on either line will be delivered to and received from freight depot at Thirteenth and N streets, San Diego.

(Signed) D. W. PONTIUS,
General Manager,
San Diego & Arizona Railway Co.

San Diego Union, January 1, 1918

Like an octopus, Spreckels' business tentacles spread out all over the City of San Diego with his San Diego Electric Railway opening up new land for trolley suburbs beyond the traditional city limits. He owned the *San Diego Union* newspaper and the *San Francisco Call* and moved his family permanently to San Diego after the 1906 earthquake to a mansion on Coronado in 1908. He reorganized the Coronado Railroad by adding new railroads and renaming it the San Diego & Arizona Railway. He built Belmont Park in Mission Beach and extended rail lines to Ocean Beach, Mission Beach and La Jolla and promoted special deals for businessmen to make noon-time round trips. Incredibly, this list only touches on the widespread business interests within his empire.

A biography of John D. Spreckels provided by the United States Genealogy Network states:

> In 1887 the Spreckels Brothers Commercial Company established in San Diego the largest coal depots, warehouses and wharves anywhere along the coast, the coal capacity being fifteen thousand tons. Mr. Spreckels holds much of the stock in the Coronado Beach and Hotel Company, which has one of the finest properties of the kind in the world. He is the owner of the street railway and ferry system of San Diego, and is connected with many other enterprises. He is president and active manager of the Olympia Salt Water Company, which has placed a system of water mains under the city, conveying salt water from the pumping station on the beach to the Lurline Baths in the heart of the city; in the building numerous small baths are maintained and an immense swimming tank is kept filled with salt water.
>
> He is president of the Beaver Hill Coal Company, supplying coal to San Francisco from the mines in Oregon; was one of the founders and builders and now a director of the San Francisco and San Joaquin Valley Railroad, which is one of the most important enterprises undertaken for the local development of California; is manager of the extensive real estate holdings of the Spreckels family in San Francisco, comprising some of the finest office and business buildings in the United States; is owner and publisher of the San Francisco *Call*, one of the most successful and profitable newspaper properties in the west; is president of the Western Sugar Refining Company; president of the Western Beet Sugar Company; president of the Pajaro Valley Railroad Company and the Coronado Beach Company; is also interested in the Hutchinson Sugar Plantations Company and the Hakalan Plantation Company of Hawaii; and many other concerns.

www.usgennet.org/usa/ca/state1/biographies/jdspreckels.html

Train carrying passengers to Tent City via the Coronado Railroad. San Diego Historical Society.

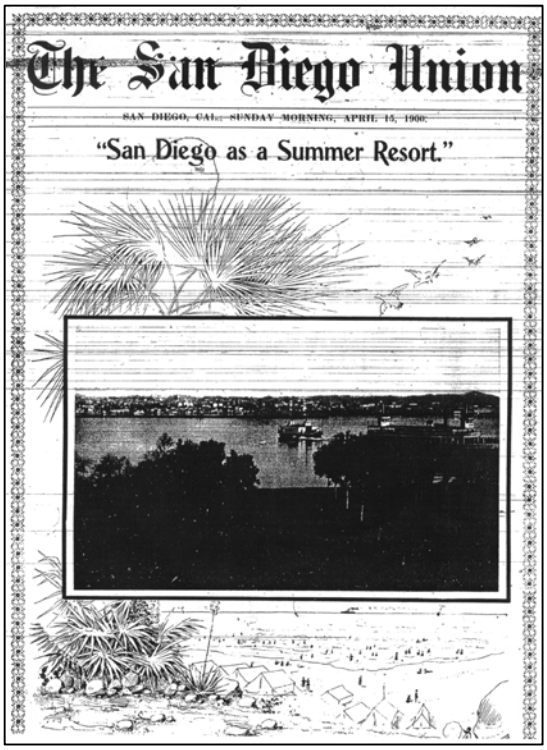
Spreckels control of San Diego business continued until his death in 1926. From 1889 to his death he was unquestionably one of the most significant historical figures in the development of San Diego in his time.

Under his ownership, the Coronado Railroad experienced much of its heyday with passenger service along its route, as can be seen in this c. 1907 photograph of visitors flocking to and from the amusements at Tent City.

Spreckels and Babcock coordinated with San Diego hoteliers to prepare for upper class, wealthy Eastern and Midwestern businessmen who sold-off stock dividends in early January and arrived with their families between January 19th and 21st of each year (*San Diego Union* January 16, 1897).

As many as 60,000 "dividenders" arrived with their families to fill the San Diego hotels, hop the Coronado Railroad, and tour the beach resort and its amenities and amusements, connect with tours to visit the streets of old Mexico, the Sweetwater Quarry and Dam, Mission Cliffs Gardens and partake of Southern California's many other points of interest.

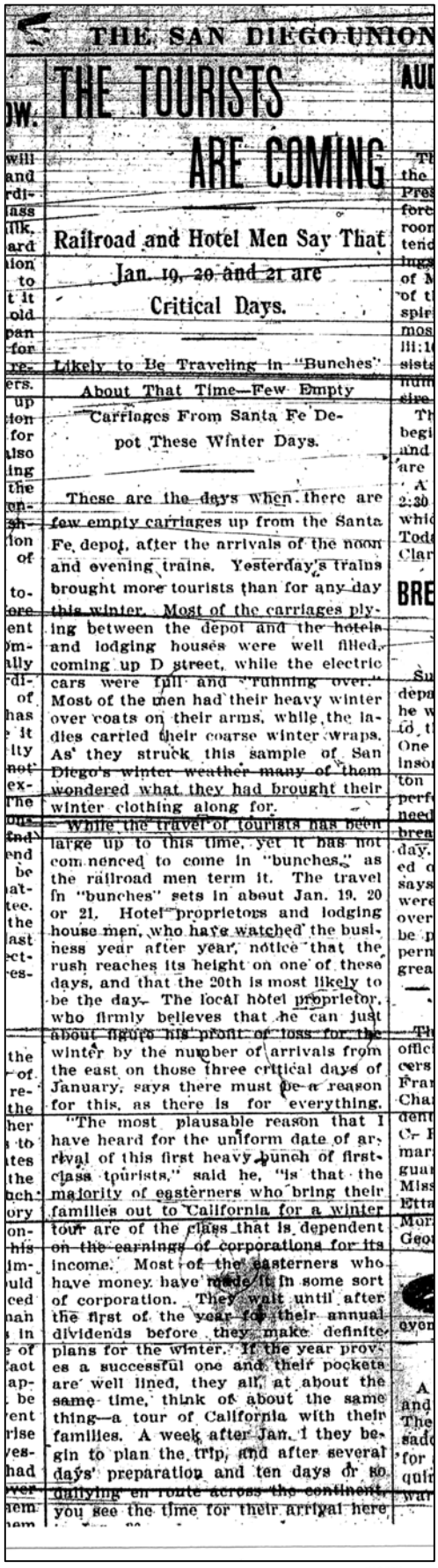
Many of those tourists who either could not afford the Hotel Del Coronado for month-long visits or preferred to stay elsewhere booked hotel and apartment rooms in and around San Diego and frequented local businesses. To better meet this need, the Coronado Beach Company purchased the Josephine and Oxford Hotels at a Sheriff's sale (*San Diego Union* June 17, 1890). All of San Diego benefited from its reputation as a highly desirable Winter Resort. The development of San Diego's attractions as a Summer Resort also meant big business year around, as evidenced by this *San Diego Union* supplement to the April 15, 1900 edition.



The San Diego Union

SAN DIEGO, CAL., SUNDAY MORNING, APRIL 15, 1900.

"San Diego as a Summer Resort."



THE SAN DIEGO UNION

THE TOURISTS ARE COMING

Railroad and Hotel Men Say That Jan. 19, 20 and 21 are Critical Days.

Likely to Be Traveling in "Bunches" About That Time—Few Empty Carriages From Santa Fe Depot These Winter Days.

These are the days when there are few empty carriages up from the Santa Fe depot, after the arrivals of the noon and evening trains. Yesterday's trains brought more tourists than for any day this winter. Most of the carriages plying between the depot and the hotels and lodging houses were well filled, coming up D street, while the electric cars were full and "running over." Most of the men had their heavy winter over coats on their arms, while the ladies carried their coarse winter wraps. As they struck this sample of San Diego's winter weather many of them wondered what they had brought their winter clothing along for.

While the travel of tourists has been large up to this time, yet it has not commenced to come in "bunches," as the railroad men term it. The travel in "bunches" sets in about Jan. 19, 20 or 21. Hotel proprietors and lodging house men, who have watched the business year after year, notice that the rush reaches its height on one of these days, and that the 20th is most likely to be the day. The local hotel proprietor, who firmly believes that he can just about figure his profit or loss for the winter by the number of arrivals from the east on those three critical days of January, says there must be a reason for this, as there is for everything.

"The most plausable reason that I have heard for the uniform date of arrival of this first heavy bunch of first-class tourists," said he, "is that the majority of easterners who bring their families out to California for a winter tour are of the class that is dependent on the earnings of corporations for its income. Most of the easterners who have money have made it in some sort of corporation. They wait until after the first of the year for their annual dividends before they make definite plans for the winter. If the year proves a successful one and their pockets are well lined, they all, at about the same time, think of about the same thing—a tour of California with their families. A week after Jan. 1 they begin to plan the trip, and after several days' preparation and ten days or so dallying en route across the continent, you see the time for their arrival here

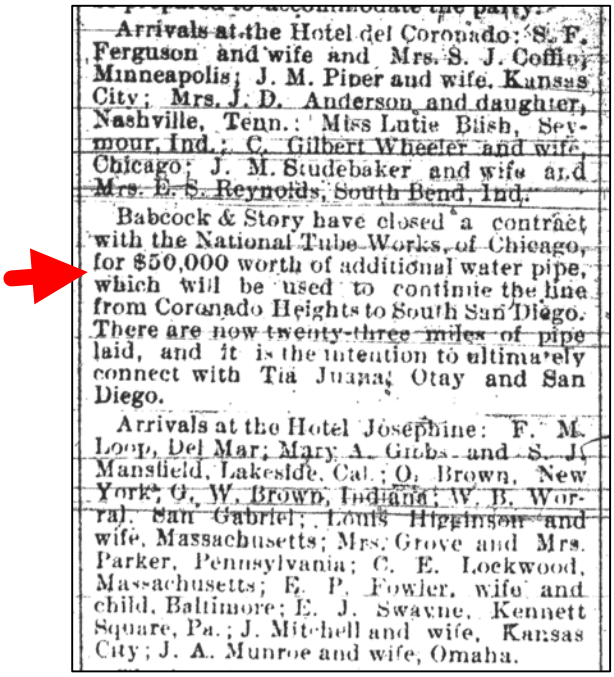
Elisha S. Babcock and Hampton L. Story


E. S. BABCOCK.

Elisha Spurr Babcock wintered in San Diego in 1884 to recuperate from tuberculosis (San Diego Historical Society, Biographical Files). A 34-year old civil engineer and former railroad investor from Evansville, Indiana, he bought six lots in Block 12 of the Bay View Homestead Addition Street (*San Diego Union* February 3, 1884).

By 1885, he built a residence on Nob Hill at 7th and "A" (*San Diego Union* January 8, April 8, May 26, June 27,1885). He then acquired a pleasure yacht (*San Diego Union* September 15, 1885). His trips around "The San Diego Peninsula," as Coronado and North Island were known in 1884, caught his eye as a promising hunting and fishing site. According to often-repeated lore, his friend and shipmate one day, Hampton L. Story, agreed to journey over in a small boat to explore the place.

Babcock achieved the top of the social ladder in San Diego and Coronado in 1900, when he bought the very first custom ordered "electrical carriage" (automobile) and drove it around town (*San Diego Union* July 27, 1900). In 1901, he formed the 50-member hunting and fishing club on Lots 1-3 of the Jamul Ranch, which he later sold to the California Mountain Water Company in 1897 (*San Diego Union* October 18, 1901, February 6, 1897).


Arrivals at the Hotel del Coronado: S. F. Ferguson and wife and Mrs. S. J. Coffin, Minneapolis; J. M. Piper and wife, Kansas City; Mrs. J. D. Anderson and daughter, Nashville, Tenn.; Miss Lutie Bush, Seymour, Ind.; C. Gilbert Wheeler and wife, Chicago; J. M. Studebaker and wife and Mrs. E. S. Reynolds, South Bend, Ind.

Babcock & Story have closed a contract with the National Tube Works, of Chicago, for $50,000 worth of additional water pipe, which will be used to continue the line from Coronado Heights to South San Diego. There are now twenty-three miles of pipe laid, and it is the intention to ultimately connect with Tia Juana, Otay and San Diego.

Arrivals at the Hotel Josephine: F. M. Loop, Del Mar; Mary A. Gibbs and S. J. Mansfield, Lakeside, Cal.; O. Brown, New York; O. W. Brown, Indiana; W. B. Worral, San Gabriel; Louis Higginson and wife, Massachusetts; Mrs. Grove and Mrs. Parker, Pennsylvania; C. E. Lockwood, Massachusetts; E. P. Fowler, wife and child, Baltimore; E. J. Swayne, Kennett Square, Pa.; J. Mitchell and wife, Kansas City; J. A. Munroe and wife, Omaha.

Although he sold his interests to Spreckels and assumed a position as an employee, he continued his involvement with other enterprises and businesses in Coronado and San Diego, as he had been doing all along. He hired San Diego architect C.W. Houts to design and built a 10-room cottage on a 237-foot wide lot directly across from the Hotel Del Coronado in 1900 (*San Diego Union* September 16, 1900).

First Rail in Coronado. Babcock and Story obtained right-of-way from Orange Avenue in Coronado all the way around San Diego Bay and up the eastern side to 5th and "L" Streets in San Diego between 1885 and 1886 to build the Coronado Railroad. After grading the streets, Babcock and Story ordered rail lines and a "50-foot excursion car" to transport workers, guests and business people around Coronado (*San Diego Union* March 3, 1886). By the end of August, Conductor Harry Stewart drove several hundred passengers on each trip from the ferry landing to the Hotel Del Coronado (*San Diego Union* August 20, 1886).

They also purchased 23-miles of pipes to provide water to service the resort. The bark U.S.S. *William McGilvery* delivered steel rails on April 21, 1888 for railroad construction (*San Diego Union* April 21, 22, 1888).

Nineteen years after the famous Golden Spike linked the East and West rail lines in Utah on May 7, 1869, Babcock and Storey completed the Coronado Railroad from San Diego to Coronado in 1888. During the 1885 to 1894 period, Coronado was as much a suburb of the City of San Diego as Ocean Beach, Pacific Beach, and La Jolla. Babcock and Story built a fabulously successful destination resort and paid hundreds of thousands of dollars to San Diego businesses to purchase equipment, supplies, and hire workers to carry off the project.

Funding and Fares. Initial funding for the Coronado Railroad came from a portion of $500,000 raised by Babcock from San Diego financial institutions (*San Diego Union* July 4, 1888). Babcock and Story, along with their business associates, routinely traveled the Coronado Rail and switched to other rails going to points north to San Francisco, San Pasqual, Escondido, and Los Angeles and from their homes in San Diego (*San Diego Union* April 14, April 27, October 23, November 4, November 9, 1890). Round trip fares were set for the Coronado Railroad as $0.20 per day (*San Diego Union* July 18, 1886). The Coronado Beach Company built a round house and acquitted eight flat cars to be used by the Coronado Railroad for hauling lumber, coal, and other vital bulk materials to and from Coronado (*San Diego Union* July 6, 8, 1886).

Coronado Beach Company, Mexican Memorial Adobe. The Coronado Beach Company maintained offices in San Diego from 1885 until 1887 and continued conducting business in San Diego through its entire existence. The commemorative Mexican adobe building built for tourist interest became the office of the Coronado Beach Company (*San Diego Union* May 12, 1887). Babcock and Story hired a large work force of Mexican laborers for that project. The building was 3-stories and had general offices (*San Diego Union* October 27, 1887). Across Orange Street, they built a horse stable for office workers (*San Diego Union* August 11, 1887).

Infrastructure for Housing. San Diego businesses profited greatly from the retail sale of grading equipment, pipe trenching and laying equipment, water pipe, lumber, concrete, wall tile, hardware and trim and plumbing for the entire development of Coronado between 1885 and 1894. By February of 1888, Babcock and Story purchased $50,000 worth of water pipe from the National Tube Works of Chicago and installed pipes to extend water from Russian Spring at Coronado Heights to connect up with their 23-miles of pipe between San Diego, Tijuana, South San Diego, and Otay (*San Diego Union* February 10, 1888). They also formed the Coronado Beach Lumber Company to act as middleman between San Diego lumber companies and local residents. One of the first orders came from famous San Diego horticulturalist Kate O. Sessions to build a residence and flower hot house on Block 252 (*San Diego Union* February 10, 1888).

San Diego Agriculture For Hotel Guests. The Coronado Railroad transported bulk deliveries of meat, vegetables, and grain products to the Hotel Del Coronado and other hotels for kitchen service to guests. To service the Hotel Del Coronado with vegetables, the Coronado Beach Company purchased farmland in the San Pasqual Valley of San Diego (*San Diego Union* December 10, 1887). The farm produced vegetables, poultry, and livestock for the restaurants.

Coronado Fruit Package Company. The City of San Diego received thousands of agricultural fruit packing boxes delivered on the Coronado Railroad. Spreckels appointed E.S. Babcock, Jr. to manage the company and supervise its 75 employees (*San Diego Union* February 8, July 14, 26, August 11, 21, 28, September 1, 8, 11, 22, 27, October 26, November 24, December 22, 1888). A machine shop turned logs into box parts that were assembled by the factory workers, loaded on to pallets, and shipped by rail to lemon, orange, cherry, and other fruit packaging plants around San Diego City and County and National City. The company shipped 120,000 5-pound berry and 25-pound apricot boxes by Coronado Railroad in June of 1889 (*San Diego Union* June 18, 1889). In addition to hauling fruit boxes, the Coronado Railroad carried agricultural products in bulk to San Diego markets. A good example can be found in a *San Diego Union* article on September 6, 1890 which noted that G.D. Clark was shipping 30-tons of barley from South San Diego by the Coronado Railroad.

Tourism and Entertainment. Thousands of San Diego residents and business merchants directly enjoyed San Diego and Coronado by traveling back and forth on the Coronado Railroad for tourism and entertainment. Babcock and Story developed Coronado into a high quality destination amusement resort in 1887 to lure clientele into San Diego. Attractions included beautiful Spring gardens, concerts on Sunday afternoons by the City Guard Band, polo, hunting, yachting, swimming, dancing, gambling, and thousands of San Diegans traveled by ferry and train to Coronado (*San Diego Union* April 26, 1887). To commemorate Mexican history in San Diego, the Coronado Beach Company erected an adobe house for visitors (*San Diego Union* June 2, 1887). To keep order, the City of San Diego assigned two police officers to Coronado, but they found the class of clientele peaceful (*San Diego Union* May 18, 1887). At the one-year anniversary party, Story delivered a speech on the history of the Coronado Beach Company and the bark U.S.S. *Theobald* sailed by with "all its flags out yesterday in honor of anniversary day of Coronado" *(San Diego Union* November 13, 1887). For the July 4th celebration in 1891, Coronado Beach Company retained T.J. Fischer to design and built an Asian-style band stand and flag pole on Orange Avenue (*San Diego Union* July 7, 1891). The Hotel Del Coronado built a wrought iron pier out into the ocean, which became popular with rod and reel fishermen at the turn of the century (*San Diego Union* October 19, 1900).

Hotel Del Coronado. San Diego lumber companies, carpenters, construction men, hardware companies, and landscape nurseries were directly associated with the Hotel Del Coronado during grading and construction and shipped their materials on the Coronado Railroad. The crown jewel in Babcock and Story's plan was the Hotel Del Coronado. They selected a site on the south edge of North Island, directly on top of a prehistoric archaeology shell midden (photographs at the Hotel Del Coronado Museum show construction cuts through a 10-foot deep shell midden). They developed credit from San Diego banks and purchased building material from San Diego suppliers and began receiving orders for lumber, concrete, steel and other materials by ferry, developed water delivery infrastructure, and commenced construction of the Coronado Railroad between 1885 and 1888. They then advertised San Diego and Coronado as a destination resort in New York, Chicago and began negotiating with the Santa Fe Railroad to promote his interests (*San Diego Union* September 9, 13, 14 1890).

Tent City. During Summer months, the more adventurous tourists and San Diego residents began pitching private tents and camping for weekends on the beach south of the Hotel Del Coronado. By 1900, as president of the Coronado Beach Company, Babcock worked out a deal with the Santa Fe Railway Company to plan for large summer crowds. Both these companies worked together to hire crews to level the beach south of the hotel and between the Coronado Railway lines. The Santa Fe Railroad collaborated with the Coronado Beach Company to sell tickets and then wire the Coronado Beach Company to reserve for the guests (*San Diego Union* April 15, 1900). Groceries, sundries, and liquor were ordered from San Diego businesses and delivered by rail to be available for the tourists when they arrived.

Tent City, 1920. Note Chinese restaurant in upper right. San Diego Historical Society.

Spreckels improved the dance pavilion, theaters, and casino to keep the guests and San Diego visitors entertained from June through September. By 1903, the tents ranged from simple canvass empty structures to wood frame, canvass-sided, palm-thatch roof, cottages furnished with cots, dressers, mirrors, toiletry and rented for $5.00 a month. That same year, telephone lines were extended from San Diego and telephones made available in Tent City. Although Babcock ordered fifty more tents by the end of Summer in 1903, he retired from the Coronado Beach Company (*San Diego Union* July 28, August 30, 1903) and focused his efforts on other enterprises such as the Western Salt Works. Tent City continued to exist until 1936, when the State of California demolished the community to build a highway through Coronado to North Island Naval Station.

Chinese Labor in 1885. Babcock and Story arranged for fifty Chinese laborers from San Diego on December 8, 1885 and two days later "a gang of about thirty Chinamen were towed over yesterday morning in a barge to the peninsula with tents, and full camping outfits" to clear and level the land (*San Diego Union* December 8, 10, 1885). By the end of December, "the tents, camps and brush fires, and other signs of activity on the Peninsula, give it quite the animated appearance" (*San Diego Union* December 30, 1885) Lumber arrived and carpenters built a boarding house for the non-Chinese work crew (*San Diego Union* December 1, 1885).

Landscaping. San Diego botanist James Orcutt was directly associated with the Hotel Del Coronado during its early years. Orcutt is famous in the biology science world for identifying numerous distinct botanical species that bear his name. Orcutt's papers are preserved at the San Diego Historical Society. Babcock and Story hired a landscape engineer to create an attractive and artistic landscape design and then hired internationally important Orcutt to select trees, shrubs, and flowering plants for the landscaping (*San Diego Union* December 8, 1885; *San Diego Union* January 29, 1886). Perry's Mill of San Diego built two large water tanks to supply the work parties (*San Diego Union* December 13, 1885). Water wells were drilled at Russian Spring to supply the tanks (*San Diego Union* January 6, 1886). Orcutt planted 275 orange trees at what was then known as "Coronado Beach" (*San Diego Union* February 25, 1886). A week later, he added camphor, tea and coconut trees and the following week, walnut trees (*San Diego Union* March 5, 13, 1886). Near mid 1887, Orcutt planted four-foot tall palm trees between the orange trees along Orange Avenue (*San Diego Union* April 6, 1887). Gardens and open areas were festooned in colorful spring flowers and citizens from all over San Diego visited to see the wonders (*San Diego Union* April 26, 1887). For a beautification program in 1889, the Coronado Beach Company gave away marguerite plants to form borders around all the houses in the community (*San Diego Union* April 18, 1889). All during his association with the Hotel Del Coronado, Orcutt traveled back and forth with tree specimens on both the ferry and Coronado Railroad. He commuted from Chollas Valley in San Diego. He remains famous for his scientific contributions to the botanical world.

Coronado Beach Company Land Auctions to San Diego Speculators. The Coronado Railroad transported thousands of real estate land speculators between San Diego and Coronado. Once Babcock and Story got the resort operating, it took on a life of its own. They sold shares to investors from San Diego and Los Angeles and auctioned land to raise $400,000 a month to be reinvested and completed the Coronado Hotel on February 19, 1888 (*San Diego Union* February 19, 1888), which achieved National Register listing on May 24, 1977 (Letter from Cecil D. Andrus to Lionel Van Deerlin, May 24, 1977, Hotel Del Coronado).

Acquisition of San Diego Peninsula. Babcock and Story found the hunting and fishing to be a great restorative and returned to the County of San Diego's Recorder's Office to learn who owned the land (*San Diego Union* August 11, 1885). The earliest record indicates attorneys Archibald C. Peachy, Frederick Billings, and William H. Aspinwall filed a Spanish land grant claim with the Federal courts, but the City of San Diego challenged arguing that under the 1852 Treaty of Guadalupe Hidalgo, the property was included with the Pueblo lands surveyed by Santiago Arguello and Thomas Aguirre and filed with Mexican authorities in 1843 (*San Diego Weekly* September 22, 1870).

Aspinwall sold his interest to the Texas Pacific Railroad Company for $60,000 in 1871 and it was bonded to the Thomas F. Scott & Company in 1872 (*San Diego Union* May 19, 1872), which defaulted back to Aspinwall. Peachy, Billings, and Aspinwall sold their interests to Charles F. Holly for $110,850 in 1872 (*San Diego Union* August 27, 1872). Holly lost the land for delinquent mortgage payments due to his alleged "death" and Aspinwall, Peachy, Billings took back 1,046.5 acres and Col. George W. Granniss also bought a share (*San Diego Union* February 28, March 2, 1873). In a strange twist of law, Granniss of Halleck, Peachy, & Billings filed a suit based on the Peachy-Aspinwall Grant to prevent the City of San Diego from seizing the land for back taxes and the City Attorney opined the City of San Diego had no grounds for levying taxes (*San Diego Union* January 21, April 10, 1877). Then, a syndicate out of Omaha, Nebraska and Milton Santee announced they purchased 4,185 acres of the Peninsula for $105,000 (*San Diego Union* June 26, 27, 28, 1885). The July 5, 1885 *San Diego Union* corrected the cost as $110,000.

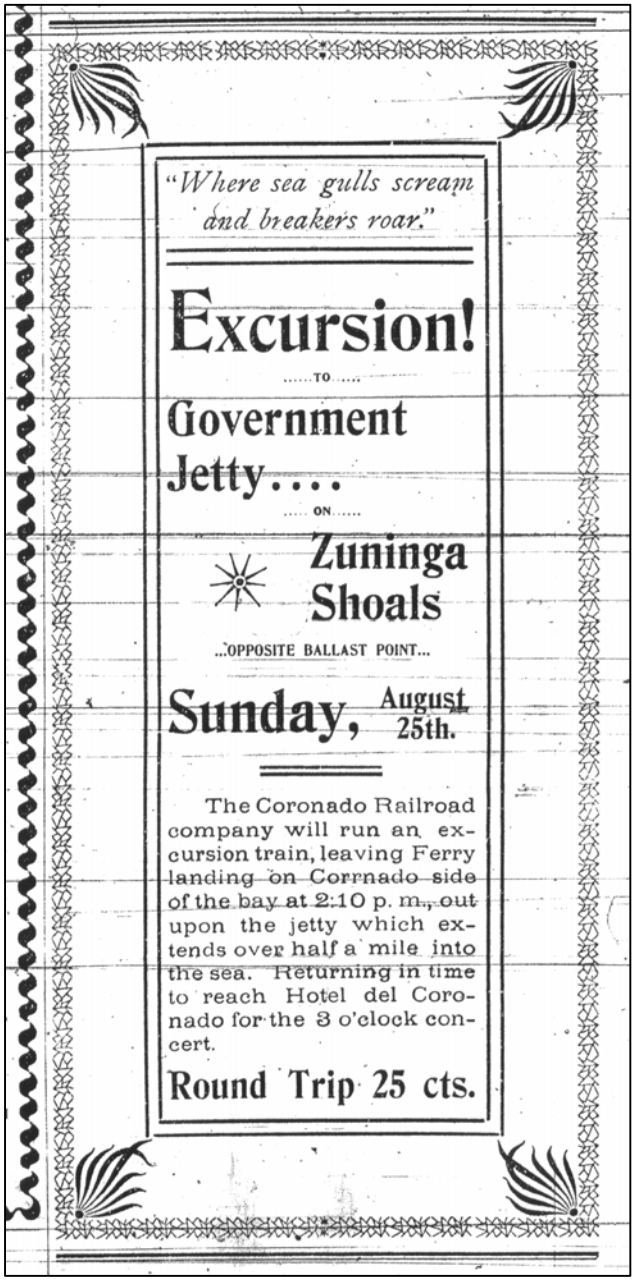
Due to Holly's alleged death, the State Board of Equalization attempted to assess the sale at $10.00 an acre to the syndicate, which caused the sale to collapse (*San Diego Union* July 26, 29, 1885). At the Board of Equalization hearing, realtor Daniel Choate testified that 2,000 acres were worthless and the remaining 2,185 were worth $50.00 an acre ($10,925). To everyone's astonishment, Holly turned up alive and well in a New Jersey saloon and legal proceedings for back mortgage payments were filed by Col. Granniss (*San Diego Union* August 9, 1885). The syndicate left San Diego and Holly quitclaimed to the new purchasers (*San Diego Union* September 5, 1885).

As the drama of Holly's death and resurrection and quitclaim, Col. Granniss' mortgage foreclosure, the Board of Equalization fiasco, and the syndicate's withdrawal, Babcock and Story visited the Peninsula and decided to raise capital to buy it (*San Diego Union* August 4, 1885). They sold shares to Josephus Collett of Terra Haute, Indiana and Heber Ingle of Evansville, Indiana for $27,500.00 to raise capital for the purchase and joined with Jacob Gruendike to acquire the land for $110,000 (*San Diego Union* July 11, November 22, December 20, 1885).

Real Estate Auctions. By the end of November in 1886, Babcock, Story, and Gruendike had sold $100,000 worth of lots (*San Diego Union* November 12, 13, 14, 16, 17, 1886). The real estate sales and tourist attractions drew more than 5,000 people a day, many of whom returned to San Diego in the evenings. After New Years, Babcock and Story had built a lumber-planing mill, lights for the Coronado Gas & Electric Light Company, and were well into construction of the Hotel Del Coronado (*San Diego Union* January 19, 1887). By spring of 1887, the City of San Diego recorded Coronado as the "Second Ward" and began levying taxes on sold lots at $1.50 per $100 of assessed value (*San Diego Union* May 24, October 19,1887). By December, Babcock, Story and Gruendike had laid out survey lines for subdivision of Coronado Heights, about five miles southeast of the Hotel Del Coronado (*San Diego Union* December 18, 1887). Two years later, Coronado Beach Company installed five fire hydrants along Orange Avenue (*San Diego Union* January 1, 1889). In 1891, the Coronado Beach Company issued pamphlets expounding on the benefits of living in Coronado (*San Diego Union* July 4, 1891).

San Diego Business Benefits. San Diego businesses profited from developing Coronado, as most of the building materials, contractors, and labor came from San Diego. Even the 250 tons of English steel ordered for the rails went through a San Diego broker. In all likelihood, the San Diego Chinese labor broker Ah Quin recruited the Chinese laborers from the San Diego Chinese community who cleared Coronado brush, helped Orcutt landscape around the Coronado Hotel, worked as employees of the hotel and installed the Coronado Railroad ballast stones (*San Diego Union* June 14, 1888).

Mexico Ties and Lumber Mills. Babcock and Story also planned to build a Mexican rail and negotiated with British engineer Randall H. Pye to extend their rail as far south as San Quintin, Baja California (*San Diego Union* November 28, 1890). Among the San Diego businesses to profit from construction materials shipped on the Coronado Railroad was West Coast Lumber Company, owned by C.J. Fox (*San Diego Union* July 26, 1893). Fox later shipped raw logs to the Coronado Lumber Company planing mill.


"Where sea gulls scream and breakers roar."

Excursion!

.....TO.....

Government Jetty....

.....ON.....

Zuninga Shoals

...OPPOSITE BALLAST POINT...

Sunday, August 25th.

The Coronado Railroad company will run an excursion train, leaving Ferry landing on Cornado side of the bay at 2:10 p. m., out upon the jetty which extends over half a mile into the sea. Returning in time to reach Hotel del Coronado for the 3 o'clock concert.

Round Trip 25 cts.

Coronado Railroad Final Spike and Inauguration. Nearly all of San Diego turned out for the ceremony of driving the final spike and inauguration of the Coronado Railroad. Inauguration of the Coronado Railroad for its link between National City and San Diego occurred January 30, 1888, according to an article in the *San Diego Union.* Spreckels was on hand for the final spike to be driven on June 7, 1888. In spite of the formal ceremonies, sixty Chinese rail workers were putting the final touches on ballast stone installation a week later (*San Diego Union* June 12, 1888). The first runs around San Diego Bay occurred two days later with excursions and fanfare (*San Diego Union* June 14, 1888).

Quarry Stone and the Zuniga Jetty. Perhaps one of the most important jobs for the Coronado Railroad was to transport hundreds of tons of enormous boulders to be hauled on a special spur across North Island Naval Station to U.S. Army Fort Pio Pico to build Zuniga Jetty at the mouth of San Diego Harbor (*San Diego Union* May 9, 1892).

The United States Army Corps of Engineers built a special pier over 600-feet out from shore to transport special cars loaded with the boulders, then dump them into the ocean. The boulders came all the way from the Sweetwater Quarry in Spring Valley by the San Diego & Arizona Railroad, then to the Coronado Railroad and out to Zuniga by a Baldwin locomotive (*San Diego Union* June 15, 1899; October 8, 1903, *San Diego Union* – figure below).

SWEETWATER QUARRY OPENED YESTERDAY

WORK OF GETTING OUT ROCK FOR THE JETTY COMMENCED WITH A LARGE FORCE.

Many Hundred Tons Ready for Loading at the Foster Quarry—Most of the Work of Preparation Is Completed.

Work was commenced yesterday at Sweetwater quarry in getting out rock for the extension of the jetty according to the contract now held by A. E. Babcock. The contract is a large one and the making of the preparations for the work is about as big a piece of work as the work itself. Indeed it is quite possible that the building of the jetty will take no longer than have the many pieces of work which go to make up the preparations for the actual jetty building.

There have been two quarries to open up and get ready for work, there have been three lines of railroad to overlook and put in condition for heavy travel, there have been two pieces of railroad track to lay, there has been railroad and quarry equipment to purchase and construct and there has been an ocean trestle a mile long to build and supply with a track.

A large portion of the preparatory work has been completed but there have been many delays in first one portion of the preparation and then in another but all are approaching completion and when the work of construction is actually commenced it will be rushed along with a speed that will make comparatively short work of the big job.

The Foster quarry has been opened for several days and hundreds of tons of the rock is now ready for loading on the flat cars. The three railroads have been thoroughly inspected and the bridges strengthened where deemed necessary or advisable; the extension of the Cuyamaca railroad to the new quarry has been completed and the extension off the Coronado railroad on Seventh street to avoid the long haul down to the ferry landing on the Coronado side of the bay has been finished all save the placing of the crossing at the intersection of Seventh street and Orange avenue; the additional railroad equipment has been purchased though not all of the flat cars that are wanted have been delivered and the building of the long ocean trestle has been going on steadily until it is now out some 400 or 500 feet beyond wher it would have been possible to commence the delivery of the rock from it if everything else had been ready.

The time for the dumping of the first rock into the ocean is near at hand and it is quite likely that all of the rest of the preparations will be finished at the same time and all of the vexations put out of the way at once. The contractor is feeling quite well pleased with the progress of preparations and the government representatives is about as well satisfied though he is like the rest anxious to see the rock being dumped into the water.

This project was vital to America's use of San Diego Harbor for international shipping and deep draft Navy shipping to defend the harbor and City of San Diego.

Criteria b Conclusion.

SOHO submits that the direct association of Babcock, Story, and Spreckels with the 7.5-mile long industrial archaeology landscape linear resource of the Coronado Railroad meets Criterion b to qualify it as a Historic Landmark.

Criterion c – Architecture. *Resources are those that embody the distinctive characteristics of a style, type, period or method of construction or is a valuable example of the use of indigenous materials or craftsmanship.*

The Coronado Railroad architecture embodies distinctive characteristics as the best surviving example of a Short Line railroad in San Diego, especially along the 7.5-mile section proposed for City of San Diego historic landmark status. The City of San Diego has not yet landmarked any railroad architecture, so this is the first opportunity to preserve one good example of short line railroad architecture.

Secretary of the Interior's Standards and Guidelines for Preservation Projects

The following is an analysis of how the Coronado Railroad meets the Secretary of the Interior's Standards and Guidelines for Preservation Projects (39 C.F.R. 67) and ten rehabilitation standards:

1. **Use of property as originally intended.** The Coronado Railroad was in continuous use until the early 1950s during its historical period of significance and this 7.5-mile section continued to be used by the San Diego Railway Museum until July 2003.

2. **The character will be retained.** The 30-foot by 7.5 mile right-of-way retains its historic character as an industrial archaeology landscape linear resource. MTDB does not intend to allow a bikeway in the Right-of-Way. Photographs show weeds have grown up between the rail tracks and ties. In an unauthorized action, the Immigration and Naturalization Service removed a portion of one trestle (to be repaired soon), and portions of the rails have been partially covered by road fill. The physical appearance of the Coronado Railroad fits into the surrounding cultural landscape, as shown on photographs in this rebuttal. Walking the railroad tracks evokes a strong sense of historical place, especially in the marshlands where the oldest rail ties go back to 1899-1920s and the landscape has not significantly changed. The Coronado Railroad retains more railroad architecture and artifacts than the Golden Spike Historic Landmark, which requires a stretch of the imagination to envision the missing rails, buildings, and workers' camps.

3. **Preservation of the integrity of the structures and setting.** The railroad ballast, rails, ties, and artifacts from the 1888-1953-time period retain approximately 95% of their historic integrity and the setting is higher. This analysis has shown that the 7.5-mile segment of the Coronado Railroad with contributing sites retains high degrees of integrity. Interpretive points at Gunpowder Point, Rohr Aircraft Plant, Western Salt Works, and the marshlands can provide a strong sense of history by viewing and with historic photographs and other methods of interpretation. Although modern cars park in the parking lot and a modern guard shack by a transmission line are visible from the rail at Rohr, the original saw tooth aircraft factory buildings are clearly visible.
   The integrity of Gunpowder Point is sufficient that Chula Vista has included interpretive signs along nature trails.
   The marshland integrity is close to 100% for the full range 1888-1953 period.

The MTDB has instructed the INS to replace the pieces of the railroad trestle and this should be done in accordance with the Secretary of the Interior's Standards for Rehabilitation of Historic Properties.

4. **Architectural status in its own right.** Historical changes to the Coronado Railroad between 1888 and 1953 have attained architectural status in their own right. Those changes of rails, ties, and replacement pieces of trestles are at least 45-years old and contributing elements to understanding the history of World War II and Korean War Rohr Aircraft Plant and War Department strategies for disbursement of aircraft part production and rail transport to Naval Air Station North Island and aircraft plants in San Diego. During World War II, most of the engine manifolds were shipped by rail to Consolidated Vultee for B-24 bomber and PBY aircraft assembly, but jet aircraft parts were shipped to Rohr, Convair, and other plants through the end of the Korean War. The changed railroad equipment and architecture from 1940 through 1953 have attained local San Diego architectural status in their own right.

5. **Rhythm and height.** The rails, ties, and ballast along the entire Coronado Railroad right-of-way have retained the rhythm and height that existed during the 1888-1953 historical time period. Nothing has been built on that right-of-way to break up this rhythm and height. From vantage points addressed in this rebuttal, viewsheds out toward the Western Salt Works, Gunpowder Point, Rohr Aircraft Plant, marshlands, and San Diego Bay demonstrate this effect.

6. **Repair rather than replacement of deteriorated features.** During the historical 1888-1953 period, railroad trestles and tracks were repaired by in-kind replacement of similar parts and not replaced by inappropriate materials. When compared to the Right-of-Way from other short lines that now have concrete ties and ballast, the Coronado Railroad still retains the historical materials in higher degrees. MTDB will work with INS to repair the portion of the trestle removed for illegal immigrant surveillance and SOHO is available to work with MTDB to ensure repair is consistent with the Secretary of the Interior's Standards.

7. **Integrity.** The Coronado Railroad retains 100% of the right-of-way for the 30-foot by 7.5-mile segment of industrial archaeology landscape linear feature proposed for City of San Diego, Historic Landmark status. Loss of integrity is estimated at 5%, which is primarily INS removal of trestle parts and partial paving over of rails. Within the historic time period and contributing landscape features that span through World Wars I , II and Korea, changes to rails, ties, trestles, and addition of concrete culverts and channels contribute to understanding different historic contexts and uses. Thus, the issue of historic integrity for each of the contributing landscape features (Gunpowder Point, Rohr Aircraft Plant, Western Salt Works) within the whole linear feature assume a different meaning than presented in the HRB Staff's initial report. Change throughout the continuous use period is part of the history of railroads, as stated by Superintendent Barker in his 1962 interview. Even the removal of original rails and ties in San Diego in 1919 and 1980s removal of rail and ties between Imperial Beach and Coronado is not a significant loss of integrity when evaluating the nomination as an industrial archaeology landscape linear feature under the General Guidelines of 1999.

8. **Archaeology.** The entire Coronado Railroad 7.5-mile segment under consideration for historic landmark status must be evaluated as an archaeology landscape feature. By nature of archaeology, not all the parts are going to be present. Archaeological ruins, scattered remains of industrial factories, and portions or railroad tracks are not the same as historic architectural evaluation of standing buildings that may, for example, have had wood windows replaced with aluminum. Typically, the federal regulations require archaeological resources to be able to contribute to one or more on-going scientific research questions. Landscape archaeology differs somewhat in that the resource needs to convey interpretation of prehistoric or historic cultural periods or themes. In this instance, sufficient trestles, railroad tracks, ballast rock, culverts, and associated features exist along the right-of-way to convey interpretation of the various historic contexts such as construction of the railroad by Chinese and other workers in 1888, the Western Salt Works, Hercules Powder Plant, and Rohr Aircraft Plant which provide context for interpretation. There remains high potential for Chinese railroad worker camps to be located outside the Right-of-Way in the landscape to either side of the rails, especially in the marshlands. Moreover, investigation is needed in the unevaluated prehistoric archaeology shell midden that is visible along the line south of National City

9. **New Additions.** No new additions to the railroad have occurred since 1953, although concrete water conveyance features are documented as late as 1959. Given the 1940 to 1953 wartime historic contributing time period, changes in the late 1950s do not detract significantly from the historic landscape.

10. **Non-conforming additions.** There are no non-conforming additions to the Coronado Railroad in the 30-foot by 7.5-mile right-of-way.

Conclusion of Historical Significance

This rebuttal to the HRB Staff report differs from typical historic landmark nominations in that it corrects mis-information and contributes new information that has not been submitted into the public record. The most relevant new information is the General Guidelines developed as a result of National Park Service policies concerning historic landscapes published in 1999, and not available when Alex Bevil wrote the original report.

Evaluation of linear resources such as the Coronado Railroad under these General Guidelines presents entirely new perspectives on industrial archaeology landscapes beyond the urban core or suburban City of San Diego. Additionally, SOHO corrected research criticisms by conducting fresh research into primary sources such as the *San Diego Union* to provide more information to substantiate the historical significance documented in this rebuttal.

The 1940 War Department policy to disburse aircraft manufacturing plants to keep enemy bombers from destroying all aircraft production plants is new information that was not raised previously. In addition, field inspection by SOHO revealed a previously undisclosed prehistoric archaeological site in a portion of the railroad earthen cut south of National City, which is new information. Finally, new primary information concerning possible Chinese construction camps associated with the Coronado Railroad needs to be considered.

All these interpretive industrial archaeology landscapes and archaeology sites along the Coronado Railroad contribute to the historic significance of the resource to San Diego.

For these reasons and the whole record presented in this report, SOHO recommends that the HRB designate the Coronado Railroad as a City of San Diego, Historic Landmark under:

Criterion a — Cultural Landscape and Archaeological Site. Industrial archaeology landscape linear resource; railroad industrial archaeology, prehistoric shell midden, and Chinese working camps in the landscape viewshed;

View from the Coronado Railroad looking northwest towards Gunpowder Point and Point Loma. Photo by Bruce Coons.

Criterion b — Historical Person. Association with important historical persons; John D. Spreckels, Hampton L. Story, and Elisha Babcock;

Criterion c — Architecture. Historic landscape continuous use 1888-1953 railroad architecture and contributing elements.

[#] Denotes that translation was added on 12/8/21

Individuals

Anna Buzaitis

From: Adriana Covarrubias <adricovarrubias9@gmail.com>
Sent: Wednesday, November 17, 2021 2:43 PM
To: Anna Buzaitis
Attachments: IMG_3687.jpg

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.

Mi opinión como miembro de la comunidad.

Mi nombre es Adriana Medina y yo soy parte de la comunidad de National City, a mí en lo personal me emociona mucho la ampliación del Pepper Park porque tendremos más espacio para más actividades recreativas como áreas de agua para los niños, más juegos, así toda la comunidad podrá disfrutar de más espacios recreativos que pueden incluir eventos con música comida etc. Otro aspecto que me gusta es que se mejorarían los accesos para llegar al parque porque necesitamos poder llegar no solamente en carro. Yo creo que agregar un edificio como Granger Hall no rompería con la petición de la comunidad de tener espacios abiertos, por eso no estoy de acuerdo con eso.
Además de las áreas recreativas nos gustaría que este proyecto tome en cuenta el MCAS y el CERP documentos que apoyan la idea de mejorar la calidad de aire de nuestra comunidad. Gracias.

English Translation of 11/17/21 Letter from Adriana Medina

Mi opinión como miembro de la comunidad.	My opinion as a member of the community.
Mi nombre es Adriana Medina y yo soy parte de la comunidad de National City, a mí en lo personal me emociona mucho la ampliación del Pepper Park porque tendremos más espacio para más actividades recreativas como áreas de agua para los niños, más juegos, así toda la comunidad podrá disfrutar de más espacios recreativos que pueden incluir eventos con música, comida, etc. Otro aspecto que me gusta es que se mejorarían los accesos para llegar al parque porque necesitamos poder llegar no solamente en carro. Yo creo que agregar un edificio como Granger Hall no rompería con la petición de la comunidad de tener espacios abiertos, por eso no estoy de acuerdo con eso. Además de las áreas recreativas nos gustaría que este proyecto tome en cuenta el MCAS y el CERP documentos que apoyan la idea de mejorar la calidad de aire de nuestra comunidad. Gracias.	My name is Adriana Medina and I am part of the National City community, I am personally very excited about the expansion of Pepper Park because we will have more space for more recreational activities such as water areas for children, more games, so the whole community can enjoy more recreational spaces that can include events with music, food, etc. Another aspect that I like is that it would improve the access to get to the park because we need to be able to get there not only by car. I believe that adding a building like Granger Hall would not break with the community's request for open space, so I don't agree with that. In addition to recreational areas we would like this project to take into consideration the MCAS and CERP documents that support the idea of improving the air quality of our community. Thank you.

Anna Buzaitis

From: Monserrat Hernandez <monserrath@environmentalhealth.org>
Sent: Wednesday, November 17, 2021 11:20 AM
To: Anna Buzaitis
Subject: Pepper park comment/Balanced plan

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I am Monserrat Hernandez Community Organizer from Environmental Health Coalition and I'm sending this comment on behalf of Carmen Gaxiola a community resident from National City.

Mi nombre es Carmen Gaxiola tengo más de 20 años viviendo en National City. Mis comentarios son acerca del Balanced Plan y la expansión del Pepper Park.
En nuestra comunidad hemos pedido que haya más espacios recreacionales y al aire libre para que nuestros hijos y nietos disfruten del único parque que tenemos frente a la bahía en National City. No nos gustaría que pusieran ningún edificio como el Granger Hall , porque quitaría espacio designado para áreas verdes.
También pedimos que tomen en cuenta el MCAS y el CERP para este proyecto porque hemos luchado para tener menos tóxicos, sobre todo de los camiones de diésel que pasan cerca a nuestra comunidad.

MONSERRAT HERNANDEZ COMMUNITY ORGANIZER/NATIONAL CITY
Environmental Health Coalition
2727 Hoover Avenue, Suite 202, National City, CA 91950
Office (619) 474-0220 ext.114
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English Translation of 11/17/21 Letter from Carmen Gaxiola

Mi nombre es Carmen Gaxiola tengo más de 20 años viviendo en National City. Mis comentarios son acerca del Balanced Plan y la expansión del Pepper Park. En nuestra comunidad hemos pedido que haya más espacios recreacionales y al aire libre para que nuestros hijos y nietos disfruten del único parque que tenemos frente a la bahía en National City. No nos gustaría que pusieran ningún edificio como el Granger Hall, porque quitaría espacio designado para áreas verdes. También pedimos que tomen en cuenta el MCAS y el CERP para este proyecto porque hemos luchado para tener menos tóxicos, sobre todo de los camiones de diésel que pasan cerca a nuestra comunidad.	My name is Carmen Gaxiola and I have lived in National City for over 20 years. My comments are about the Balanced Plan and the expansion of Pepper Park. In our community we have been asking for more recreational and outdoor spaces for our children and grandchildren to enjoy the only bay-front park we have in National City. We would not like to see any buildings like Granger Hall put up because it would take away space designated for green areas. We also ask that you take MCAS and CERP into consideration for this project because we have fought to have less toxic elements, especially from the diesel trucks that pass close to our community.

Anna Buzaitis

From: Conchita Villanueva <conchitav93@gmail.com>
Sent: Wednesday, November 17, 2021 1:33 PM
To: Anna Buzaitis

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Soy Maria C. Villanueva voluntaria de la EHC por 14 años y he luchado por tener un mejor ambiente para la comunidad de Nacional City, y también por tener más áreas verdes, por eso le pido al puerto que con el proyecto del Balanced Plan no vayan a poner un Edificio como el Granger Hall, porque esto no ayudaría a tener más espacios al aire libre donde las familias se puedan reunir para disfrutar de la vista frente a la bahía. Necesitamos más áreas verdes en nuestra comunidad.
Quiero que incluyan en sus estudios medio ambientales los documentos como el MCAS y CERP para que se tome en cuenta la calidad del aire y poder tener en el futuro un medio ambiente mas limpio.

Sent from my iPhone

English Translation of 11/17/21 Letter from Maria C. Villanueva

Soy Maria C. Villanueva voluntaria de la EHC por 14 años y he luchado por tener un mejor ambiente para la comunidad de Nacional City, y también por tener más áreas verdes, por eso le pido al puerto que con el proyecto del Balanced Plan no vayan a poner un Edificio como el Granger Hall, porque esto no ayudaría a tener más espacios al aire libre donde las familias se puedan reunir para disfrutar de la vista frente a la bahía. Necesitamos más áreas verdes en nuestra comunidad. Quiero que incluyan en sus estudios medio ambientales los documentos como el MCAS y CERP para que se tome en cuenta la calidad del aire y poder tener en el futuro un medio ambiente mas limpio.	I am Maria C. Villanueva, an EHC volunteer for 14 years and I have fought for a better environment for the community of National City, and also to have more green areas, that is why I ask the Port that with the Balanced Plan project that they do not put a building like the Granger Hall, because this would not help to have more outdoor spaces where families can gather to enjoy the view in front of the bay. We need more green areas in our community. I want you to include in your environmental studies documents such as MCAS and CERP so that air quality is taken into account and thus we can have a cleaner environment in the future.

November 16, 2021

Port of San Diego

Good afternoon, my name is Karla Nava I'm a resident of National City. I have been involved in many ways to maintain and obtain more green areas in our community. I recently found out that the expansion of Pepper Park might be compromised with the construction of Granger Hall something that was not part of the original project, since what the community needs is more outdoor places especially after the pandemic hit us and our community is craving for fresh air. Building Granger Hall would also require more parking spaces thus reducing the outdoor space even more so I was hoping you would reconsider and stick to the original plan. I was also hoping if you can take into consideration the MCAS and CERP documents since they focus on having better air quality for our community.

Thank you for your time and consideration.

Karla Nava

Anna Buzaitis

From: Monserrat Hernandez <monserrath@environmentalhealth.org>
Sent: Wednesday, November 17, 2021 11:18 AM
To: Anna Buzaitis
Subject: Pepper Park comment/Balanced Plan

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I am Monserrat Hernandez Community Organizer from Environmental Health Coalition and I'm sending this comment on behalf of Lorena Chavez a community resident from National City.

Mi nombre es Lorena Chávez y vivo en la comunidad de Old Town National City como residente de esta comunidad he participado en la petición para tener más áreas verdes. Para Pepper park pedimos que se agrandara mas este parque para tener un área recreacional más grande para las familias de Nacional City, así como tener un acceso peatonal o en bicicleta seguro para llegar al parque. Mi comentario es que agregar un Edificio a este espacio abierto no sería buena idea ya que quitaría parte del espacio que ya se ganó con los 2.5 acres que se van agregar al parque.
Les pido que consideren también ajustar este proyecto a los documentos del MCAS y el CERP que se acaban de aprobar para que podamos tener un aire más limpio.

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English Translation of 11/17/21 Letter from Lorena Chavez

Mi nombre es Lorena Chávez y vivo en la comunidad de Old Town National City como residente de esta comunidad he participado en la petición para tener más áreas verdes. Para Pepper park pedimos que se agrandara mas este parque para tener un área recreacional más grande para las familias de Nacional City, así como tener un acceso peatonal o en bicicleta seguro para llegar al parque. Mi comentario es que agregar un Edificio a este espacio abierto no sería buena idea ya que quitaría parte del espacio que ya se ganó con los 2.5 acres que se van agregar al parque. Les pido que consideren también ajustar este proyecto a los documentos del MCAS y el CERP que se acaban de aprobar para que podamos tener un aire más limpio.	My name is Lorena Chávez and I live in the community of Old Town in National City and as a resident of this community I have participated in the petition for more green areas. For Pepper park we asked to enlarge this park to have a larger recreational area for the families of National City, as well as to have a safe pedestrian or bicycle access to get to the park. My comment is that adding a building to this open space would not be a good idea as it would take away some of the space already gained from the 2.5 acres being added to the park. I ask that you also consider bringing this project in line with the MCAS and CERP documents that were just approved so that we can have cleaner air.

Anna Buzaitis

From: Monserrat Hernandez <monserrath@environmentalhealth.org>
Sent: Wednesday, November 17, 2021 11:15 AM
To: Anna Buzaitis
Subject: Pepper park comment/ Balanced plan

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I am Monserrat Hernandez Community Organizer from Environmental Health Coalition and I'm sending this comment on behalf of Margarita Garcia a community resident from National City.

Mi nombre es Margarita Garcia soy residente del Old Town de National City, mis comentarios son acerca del proyecto del Balanced plan y sobre todo lo relacionado con Pepper Park.
Quiero pedir al puerto que el parque sea un espacio al aire libre y recreativo para que tenga acceso la comunidad, no queremos ningún edificio como el Granger Hall porque nosotros siempre hemos querido un parque con espacios abiertos para la comunidad.
También les pido que tomen en cuenta el MCAS y el CERP que son dos documentos que se acaban de aprobar para reducir las emisiones toxicas y por lo cuales la comunidad también trabajamos para que fueran aprobados.

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English Translation of 11/17/21 Letter from Margarita Garcia

Mi nombre es Margarita Garcia soy residente del Old Town de National City, mis comentarios son acerca del proyecto del Balanced plan y sobre todo lo relacionado con Pepper Park. Quiero pedir al puerto que el parque sea un espacio al aire libre y recreativo para que tenga acceso la comunidad, no queremos ningún edificio como el Granger Hall porque nosotros siempre hemos querido un parque con espacios abiertos para la comunidad. También les pido que tomen en cuenta el MCAS y el CERP que son dos documentos que se acaban de aprobar para reducir las emisiones toxicas y por lo cuales la comunidad también trabajamos para que fueran aprobados.	My name is Margarita García, I am a resident of Old Town in National City, my comments are about the Balanced plan project and everything related to Pepper Park. I want to ask the Port that the park be an open air and recreational space for the community to have access, we don't want any building like Granger Hall because we have always wanted a park with open spaces for the community. I also ask you to take into consideration the MCAS and CERP which are two documents that have just been approved to reduce toxic emissions and which the community also worked to get approved.

Anna Buzaitis

From: Margarita Moreno <morenomargarita15@yahoo.com>
Sent: Wednesday, November 17, 2021 2:04 PM
To: Anna Buzaitis

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Mi nombre es Margarita Moreno soy residente de National City y estoy muy involucrada en mi comunidad gracias a mi participación con EHC y me gustaría dar mi opinión sobre Pepper Park que es el único parque que tenemos frente a la bahía. Hace algún tiempo el puerto nos otorgó 2.5 acres de expanción para este parque para beneficio de la comunidad y estoy enterada de que quieren quitarnos parte de este espacio para poner el edificio de Granger Hall y también se ocuparían más espacios para estacionamientos y nosotros como parte de la comunidad hemos abogado por más espacios abiertos con diferentes amenidades, también que haya una buena conexión al parque para poder llegar caminando o en bicicleta o bien transporte público porque hoy día solo se puede llegar en carro ya que caminando es muy peligroso y no es seguro para la comunidad. También queremos que se ajusten a los documentos del CERP y del MCAS. Quisiera que tomaran en cuenta estos documentos y hagan los ajustes pertinentes para reducir los riesgos de contaminantes tóxicos en nuestra comunidad.

English Translation of 11/17/21 Letter from Margarita Moreno

Mi nombre es Margarita Moreno soy residente de National City y estoy muy involucrada en mi comunidad gracias a mi participación con EHC y me gustaría dar mi opinión sobre Pepper Park que es el único parque que tenemos frente a la bahía. Hace algún tiempo el puerto nos otorgó 2.5 acres de expanción para este parque para beneficio de la comunidad y estoy enterada de que quieren quitarnos parte de este espacio para poner el edificio de Granger Hall y también se ocuparían más espacios para estacionamientos y nosotros como parte de la comunidad hemos abogado por más espacios abiertos con diferentes amenidades, también que haya una buena conexión al parque para poder llegar caminando o en bicicleta o bien transporte público porque hoy día solo se puede llegar en carro ya que caminando es muy peligroso y no es seguro para la comunidad. También queremos que se ajusten a los documentos del CERP y del MCAS. Quisiera que tomaran en cuenta estos documentos y hagan los ajustes pertinentes para reducir los riesgos de contaminantes tóxicos en nuestra comunidad.	My name is Margarita Moreno, I am a resident of National City and I am very involved in my community thanks to my participation with EHC, and I would like to give my opinion about Pepper Park which is the only park we have in front of the bay. Some time ago the Port granted us 2.5 acres of expansion for this park for the benefit of the community and I am aware that they want to take away part of this space to put the Granger Hall building and also they would take more spaces for parking, and we as part of the community have advocated for more open spaces with different amenities, also that there is a good connection to the park to be able to walk or bike or use public transportation because today you can only get there by car because walking is very dangerous and it is not safe for the community. We also want them to comply with the CERP and MCAS documents and I would like them to take these documents into account and make the necessary adjustments to reduce the risks of toxic pollutants in our community.

Anna Buzaitis

From: Silvia Calzada <silviamcalzada@gmail.com>
Sent: Monday, November 15, 2021 3:33 PM
To: Anna Buzaitis
Subject: Comments: National City Marina District Balanced Land Use Plan

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Atten: Anna Buzaitis, Program Manager
Port of San Diego's Planning Department

Re: National City Bayfront Project: the National City Marina District Balanced Land Use Plan (Balanced Plan)

- Comment -

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Good afternoon Ms./Mrs. Anna Buzaitis and/or Board of Port Commissioners,

My name is Silvia Calzada, I have been a resident in the City of National City for more than 25 years, and a Member of the AB617 Community Steering Committee, the MCAS, CERP and Land-use Subcommittees.

Today, I write to you requesting the Port of Commissioners to consider two of the following recommendations for the National City Marina District Balanced Land Use Plan (Balanced Plan):

1. Update and implement recent approved CERP and MCAS measures into this balanced plan; air quality improvement initiative at the Port of San Diego
2. Addition of Green, open spaces and exclude the Granger Music Hall as an option in this particular land

One important element which needs to be addressed is the implementation of the new approved CERP and MCAS measures into the Balanced Plan. Recently, these measures were approved by the Port of San Diego but the balance plan has not been updated with such measures. Please disclose, analyze and incorporate these measures to support the mission in the reduction of emissions at our portside in National City.
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Another element which needs to be addressed is the importance of green, open spaces in land-use planning for this particular project. During the development of the CERP, community members requested more green, open spaces. These green, open spaces not only provide significant environmental, economic, and social benefits but it will also increase air quality and attract people to visit the area. The expansion of 2.5 acres is an opportunity to fulfill this demand but the relocation of Granger Music Hall to this particular land, will not. Granger Music Hall is a historical landmark in the City of National City which deserves a special place of its own but not at Pepper Park.

Please consider these recommendations in your decision-making for the Bayfront project of Pepper Park. Thank you for your attention and interest in purifying our Portside Communities.