

**Embarcadero  
Coalition**

February 26, 2024

Port of San Diego Board of Commissioners,  
Lesley Nisihira,

Subject: Item 1 Special Meeting February 28, 2024

Request: Do Not Adopt the Final Draft PMPU and Do Not Certify the Final Program  
PEIR

175 We want to express our concerns with this Final Program EIR and Final Draft PMPU. This update will create a master plan through the year 2050 and we believe it needs to be changed for the benefit of the environment and the Californians it is intended to serve. The PMPU is an opportunity to improve upon how you manage lands for all Californians - not make it worse.

The updated PMP's goal should be to increase public usage and open the Bay to more public access, while not causing significant negative impacts. Unfortunately, in many areas we do not see this happening. There is a definite shift to revenue generation and serving out-of-state tourists, especially in the Embarcadero. Given that the Port is not a for-profit entity, and with all the new hotels already in development, there is no financial forecast provided to justify that this level of revenue generating overdevelopment is needed to fulfill the Port's maintenance requirements or mission.

176 CEQA is not an exercise to just tick the box to meet State requirements. After two years of the Port working to mitigate categories identified as Significant and Unavoidable in the Draft PEIR, the categories are still listed as Significant and Unavoidable and many are Significant and Unavoidable AFTER mitigation, such as the traffic and noise impacts. The Port has done nothing to mitigate or remedy the underlying issues brought on by excessive development plans, which the Draft PMPU represents and the PEIR evaluated. Only POTENTIAL mitigations for future projects are suggested. This result after years of environmental review would allow much smaller projects with individually lesser impacts to go forward but the cumulative negative impact of the PMPU would not be resolved. The public is not so gullible that they don't see how the Port is avoiding its responsibility to resolve these damaging environmental impacts created by the proposed updated PMP by trying to divide up the projects in order to ignore their cumulative larger affects.

177 Now both of these documents are being presented to the Port for approval to move to the California Coastal Commission for certification.

**The Port Board of Commissioners should NOT ADOPT the Final Draft PMPU and NOT CERTIFY the Final PEIR until substantive changes are made. Changes must be made to the PMPU in response to the significant negative impacts identified in the PEIR.**

177 The vast nature of thousands of pages to review leaves us to focus on the Embarcadero, yet we are concerned about the whole Bay. These comments pertain to Planning District 3: Embarcadero, which is comprised of subdistricts North Embarcadero, Central Embarcadero and South Embarcadero. Therefore, the Embarcadero Coalition supports concerns raised by Southwest Wetlands Interpretive Association's (SWIA's) and San Diego Waterfront Coalition (SDWC).

The Port, in the updated PMP, must answer how it will avoid a long term significant cumulative impact. There are no comments by the Port that commits them to shrinking or eliminating projects that, with mitigation, still don't correct to Less Than Significant impacts.

### **Process Problems with the PEIR - A Fatally Flawed Process**

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1. The Port did the Notice of Preparation for CEQA in 2017, before the PMPU Discussion Draft was even released to the public in April 2019 and 4 years before the Revised Draft was sent to CEQA. We believe a new NOP should have been issued after the Port approved the plan for CEQA. Substantive changes were made to the PMPU between these two documents.
  2. Governmental and public comments for the NOP were not made for the correct plan. Although there are some excellent comments from the early NOP, they didn't address the updated project or the new methodologies, such as the shift to VMT for traffic analysis. As a result, the NOP comments are not focused on the project actually studied for the Draft PMPU.
  3. The 1HWY1 developer released an updated Seaport Project in 2019, which was very different from the 2016 version used for the NOP and the cumulative PEIR. The 1HWY1 developer told downtown residents that he was ready to go forward with a project description in 2020. His 2019 version is much closer to the current version and should have been used for the PEIR if a true cumulative evaluation was intended. An updated NOP would have captured this new version and its significant impacts.
  4. Due to the NOP being conducted in 2017, it appears that items requested by various governmental agencies were not included in the analysis or were treated as obsolete because the project changed between 2017 and 2021. Since an updated NOP was not conducted, it appears many concerns to be addressed in the PEIR were ignored. For instance, the City of San Diego requested the effects of vehicle circulation and congestion related to the PMPU be studied. Instead, the Port responded that congestion is not required under a VMT analysis and "it is not possible to quantify the effectiveness of the recommended mitigation measures because the location, timing, and design of new development allowed under the proposed PMPU is unknown at this time." This answer is non-responsive to the City's mandate under its Climate Action Plan to reduce VMT. The Port is creating the problem that will result in massive traffic issues but absolves itself of its responsibility to be a responsible partner to the City and Californians who live, work and utilize these same streets.

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5. The CEQA Evaluation does not include massive projects like the current Seaport Project in the Central Embarcadero (CE). The PMPU specifically states the CE will remain the same as it is today with the exception of some upkeep, traffic updates and remodeling of one existing restaurant. To state that fundamentally things will remain as they exist today in the CE is completely disingenuous. Either it is going to stay the same or it isn't. This is not a classic "bait and switch" because the Port is telling outright fabrications. The public is well aware that the Central Embarcadero has a huge redevelopment plan in process and not including the 2019 Seaport Project version dramatically underestimates the environmental impacts in the CEQA evaluation.
6. Excluding all the additional projects in Chula Vista and National City did not allow for a correct environmental analysis. Introducing them in only the cumulative section is not sufficient.

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7. There are significant conflicting figures in these documents, which are used to determine environmental impacts. These discrepancies should be a large concern. Specifically, in Vol 2 Table 4.2-12. "New Development Assumed for the Proposed PMPU at Full Buildout and in 2030", PD3 (Embarcadero) lists a total of 850 additional hotel rooms by 2050. In the Final PMPU, the number of additional rooms in PD3 is 1850. The PEIR is off by 1,000 rooms. PD2 has similar problems. The amounts of retail/restaurant and convention/meeting space also vary. Without consistent and reliable figures, there is no confidence in the PEIR findings, especially when the development numbers evaluated are so significantly understated.

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#### **Problems with the mitigation process**

The Port spent two years supposedly mitigating the negative impacts identified by the PEIR. However, it appears the Port only developed some POTENTIAL mitigation suggestions or strategies, but did not address the environmental problems that will result with the buildout of the PMPU. The PMPU is the planning document for all future projects and the PEIR addressed the PMPU problems - not the projects of the future. The mitigations should address what was studied. If mitigation won't change the environmental impact to Less Than Significant, then the PMPU needs to be changed and remedies identified so the negative impacts are rectified.

The PEIR conclusions determined that 60% of the categories evaluated would result in Significant and Unavoidable outcomes WITH mitigation (Aesthetics and Visual Resources, Air Quality and Health Risk, Cultural Resources and Tribal Cultural Resources, Greenhouse Gas Emissions and Climate Change, Hydrology and Water Quality, Noise and Vibration, Public Services and Recreation, Transportation/Circulation/Mobility, Utilities and Service Systems). These categories are the most impactful on a daily basis to the general public. Yet the Port consistently refuses to make any changes to the PMPU based on the PEIR results and repeatedly states, **"unknown at this time, it is not possible to quantify whether and to what extent the recommended mitigation measures would be feasible and effective in abating**

**or reducing the impacts. As a result, Impact-xxx would remain significant and unavoidable.”**

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In addition, the evaluation for categories that were found to be Less than Significant with Mitigation (Biological Resources, Geology and Soils, Hazards and Hazardous Waste Materials, Land Use and Planning, Population and Housing, Sea Level Rise) focused primarily on the impacts from construction and cited the many Federal, State, Local and Port policies that would ensure nothing caused an issue. That is a naïve conclusion, at best. The policies may help reduce incidents but they do not keep them from occurring (Biological Resources, Geology and Soils, Hazards and Hazardous Waste Materials). A recent example is the \$5 million lawsuit the City of San Diego recently filed against a local developer for illegally dumping contaminated soil taken from the current IQHQ/RaDD site into a city landfill while driving its leaking contaminants through City streets and highways. These types of things occur. The review of the State incident database underscores this point. Some of the incidents on Port lands are still open, and the PEIR concedes that all Port lands contain hazardous waste. The increased activities authorized by and allowed under the PMPU will only exacerbate these concerns. Therefore, it is reasonable to conclude that with mitigation, the finding should be SIGNIFICANT for these three categories. This more accurate assessment brings the final conclusions to 60% Significant and Unavoidable with Mitigation plus 20% Significant with Mitigation. Adopting the PMPU and PEIR with 80% of the conclusions Significant and Unavoidable and Significant is absurd. The PMPU creates, and/or adds, to these issues. A less aggressive plan will decrease or alleviate many of the negative impacts.

The Port plans to move forward regardless of the environmental impacts the Final PMPU would generate if built out as described. The whole point of the Final PEIR was to describe the environmental impacts of the PMPU as though it was a Project, as detailed. However, it appears that the goal is to defeat the CEQA environmental purpose by dividing up the projects so that individually they don't have as large an impact. But the combined projects will likely exceed the terrible outcomes presented in the PEIR list. The PEIR is evaluating the PMPU and it is the PMPU that should be mitigated or remedied first to arrive at acceptable environmental impacts.

### **CEQA**

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The Port's answers to the significant PEIR findings are tone deaf. It gives the appearance that the Port completed the CEQA process in a pro forma manner but it is not concerned with actually addressing and fixing the issues it raised. The Port forgets they created the significant negative outcomes identified in the CEQA process.

The Port has a responsibility to all entities who will be environmentally negatively impacted by all the Port's development unless significant changes are made. Environmentally Significant Impacts are harmful. They have demonstrably negative impacts on the health and welfare of people and wildlife as well as to the earth's systems, such as water and air pollution. They adversely impact climate change. The

181 | impacts are Avoidable if the Port changes its plans to do something with less impact.  
cont. | The impact is only Unavoidable if the Port continues down the mega-development path.

### **Comments on Changing Definitions**

182 | Grandfathering golf courses into the Port district may have made sense when the District was created. Making golf allowable in the future does not. Golfing is not a coastal-related or coastal-dependent activity. Golfing would be the primary purpose a person comes to the Tidelands instead of coming to just enjoy the waterfront. As a result, golf does not meet the necessary requirement for a Tidelands activity.

183 | Don't add "Coastal-enhancing" as an authoritative description of allowable activities. This new definition is not found in any State costal document. It appears the Port is attempting to allow anything a visitor might want to do that will generate income. Will Casinos be the next Port activity after golfing and entertainment venues? The State Lands Commission Preliminary Response to 1HWY1 makes it clear that economic productivity is NOT A FACTOR when analyzing permitted uses under the Public Trust Doctrine. For instance, indoor event centers are not typically consistent with the Public Trust. To be consistent with the Public Trust Doctrine, activities must enhance the Public Trust uses, not the other way around.

### **Specific Comments on the Final PEIR**

#### **Sensitive receptors**

184 | For purposes of this environmental review, it should be noted that there are thousands of sensitive receptors (residents, seniors, children and medically impaired individuals) living within 1,000 ft of Port lands in the City of San Diego (City) neighborhoods of Little Italy, Columbia, Marina and East Village. Specifically for noise evaluation, sensitive receptors live and sleep in the affected areas and thus a lower decibel level must be set for allowable outside noise. Negative environmental impacts must be remedied for the health and welfare of the neighboring communities.

#### **Response to Failed Mitigation Efforts**

185 | Repeatedly the Port states it does not know if their proposed mitigation measures or suggestions will work. It doesn't comment on what actions it will take if they don't work. Will the projects be changed? Reduced? Or otherwise altered until they are at acceptable levels? The Port should not go forward with projects or a PMPU that can't be mitigated or that will cause cumulative significant negative impacts.

#### **Air Quality**

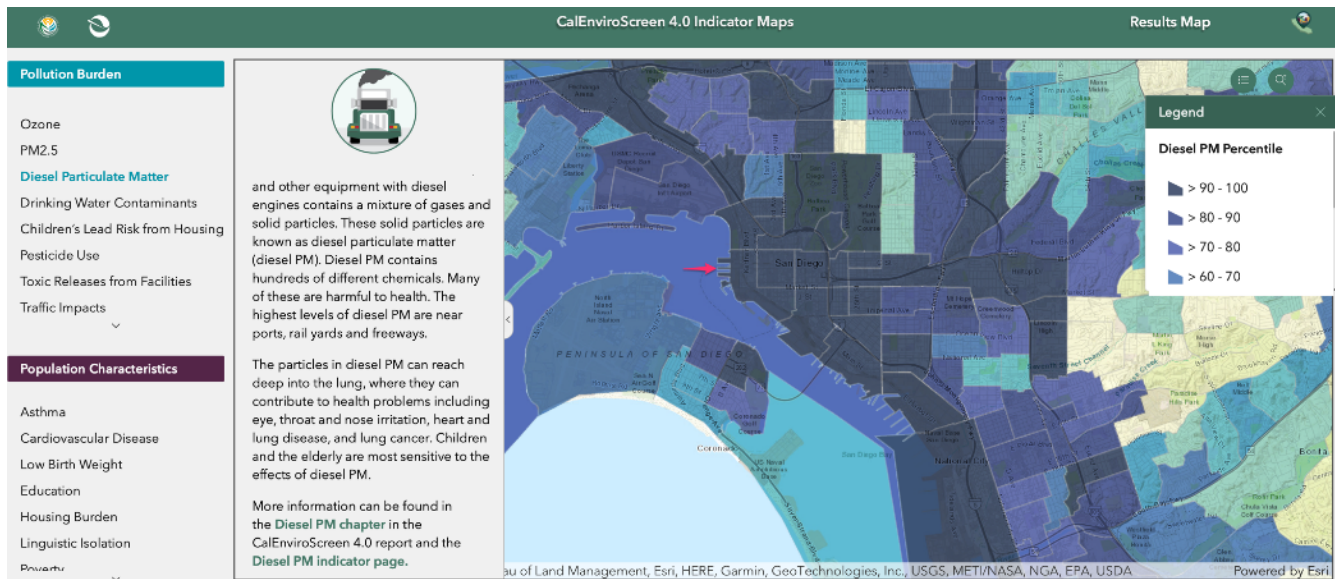
186 | The only environmental issues addressed under this category involved construction and glare. Air quality affects sensitive receptors and, as noted above, there are sensitive receptors adjacent to Port lands yet that issue is not addressed.

Although we applaud the California Air Resources Board (CARB) efforts to identify and reduce the heavy pollution and health affects suffered by Environmental Justice

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Portside Communities, the Port is not addressing those same issues in the Embarcadero. The first pollution analysis the Port did for San Diego County Air Pollution Control District (SDAPCD) and the Portside Communities showed that the pollution in the adjacent communities in South and Central Embarcadero districts (Marina and East Village) were just as bad as Barrio Logan. Yet there is nothing in the PMPU to improve Air Quality with the updated projects or mitigations. The soot levels in the Embarcadero adjacent communities, including the North Embarcadero, are terrible. The PEIR and the development plans ignored all these air quality environmental aspects of being next to the Port.

Below is the CalEnviroScreen for Diesel Particulate Matter (PM). The red arrow is pointing at the Embarcadero. This air quality issue needs to be addressed for construction AND when operational. The Embarcadero is in the greater than 90% level for Diesel PM pollution level.



## Noise

The Final PEIR shows significant negative impacts for noise levels. The North Embarcadero noise study was perfunctory at best. An accurate portrayal of noise levels at various times of day must be performed and analyzed in all the Embarcadero subdistricts, including Port inland locations, as part of the PEIR. Comparing the PEIR Noise analysis to the World Health Organization (WHO) guidelines regarding reducing negative health effects from noise, the PEIR measurements of the existing noise levels BEFORE PMPU buildout already exceeds the WHO recommendations. Therefore, the noise must be reduced and not raised 3dB more, as stated by the Port, before taking action(s) to remediate or mitigate. This is unacceptable, especially considering the Port plans to move Harbor Drive traffic onto Pacific Highway and it notes that adjacent roadways (such as Kettner, G and Market Streets) will be utilized by drivers when this is done. These streets surrounding Port lands in the Embarcadero are overwhelming

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187 | residential. The Port must also remember its hotel guests share the Pacific Highway  
cont. | and Harbor Drive noise with residents. The hotel guests and residents include sensitive  
| receptors.

188 | Compounding the negative noise findings, the egregious amount of noise from traffic  
| the Seaport Project is projecting with 7-9 years of construction plus 11,000-33,000  
visitors a day when operational will create massive amounts of traffic and traffic noise.  
Even the developer says the Seaport Project will cause gridlock if traffic issues are not  
addressed. For these reasons the 2019 Seaport Project should have been included in  
the PEIR. The full environmental noise impact of the Port's plans were not evaluated  
due to potential piecemealing.

189 | According to the PEIR, the proposed PMPU's incremental contribution to cumulative  
noise and vibration impacts **would remain cumulatively considerable**. The Port's  
potential mitigation, MN-Noi-6 and MN-Noi-7, state that if the project causes traffic to  
double, they might do something. The study says "Mitigation measures **MM-NOI-6** and  
**MM-NOI-7** would reduce traffic noise levels to the extent possible, but impacts may  
remain significant and unavoidable at some locations." Neither of these mitigation  
measures are acceptable. The Port is either creating, or adding to, existing conditions  
that are already below acceptable standards. This cannot be left as an unmitigable  
finding. Alter the PMPU to bring development and rerouting plans into Less than  
Significant findings.

190 | **Transportation Analysis**  
The transportation study states the impact in Planning Districts 2 (Harbor Island) and 3  
(Embarcadero) will be significant and unavoidable AFTER MITIGATION. Yet we don't  
see any intent to make changes to the plan to achieve a less than significant VMT  
impact. Since mitigation won't work, the plan needs to be altered, otherwise the Port is  
creating more VMT. This is against the Port's and City's Climate Action Plans, the goals  
of the Port Maritime Clean Air Strategy (MCAS), as well as being incompatible with  
State goals.

191 | As bad as the transportation analysis resulting VMT is, we know it is vastly  
underestimated by design. The Seaport Project developer submission to the State  
Lands Commission states that he expects the equivalent of 11,000 to 33,000 visitors  
per day. This number is not reflected in the impact to PD3 since the smaller 2016  
version of Seaport was used with far fewer hotel rooms, attractions, boats and buildout.  
The Embarcadero hotel rooms, without the CE, are underestimated in the PEIR by at  
least 1,000. All of this affects the accuracy of the VMT calculation.

192 | The PEIR states that their proposed mitigations aren't going to fix the problem and they  
do not propose a solution. These substantial findings are in opposition to the intent of  
CEQA. The majority of additional emissions will be in the City of San Diego which has  
legal requirements to reduce emissions and VMT. The City specifically asked the Port  
that the transportation impact study provide appropriate measures to avoid, minimize,

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cont. | or mitigate Port Master Plan impacts expected along and at any intersections and other  
locations which will be impacted by the reassignment of existing traffic. However, it  
appears the Port did not provide this impacting information and instead, appears to be  
purposefully and knowingly undermining the City's efforts.

### **GHG**

193 | Despite the enumeration of a variety of major potential issues identified in the proposed  
PMPU, the PEIR stated the following: "The District is required to focus on the reduction  
of GHG emissions associated with vehicle miles traveled and traffic congestion is no  
longer considered a significant environmental impact under CEQA". Without these  
items factored in, the "Impact Determination and Mitigation" section (Vol 2, p.4.14-77)  
states, "Implementation of the proposed PMPU would conflict with or be inconsistent  
with State CEQA Guidelines Section 15064.3 subdivision.

### **Aesthetics and Visual impact**

We stand by our concerns about the negative aesthetics and visual impacts caused by  
the excessive number of hotels/buildings, boat berthing in the Embarcadero and their  
negative affect on a visitors Bay experience.

194 | In regards to the North Embarcadero, the view corridor down Pacific Highway toward  
the San Diego County Administration Building must be safeguarded from becoming a  
wall of hotels and hotel podiums during buildout. Unfortunately, the community has very  
limited trust in the visual analysis provided by the Port due to the facts that the Lane  
Field hotels look nothing like what was proposed and that the C Street view corridor is a  
hotel entrance, which dissuades people from entering.

Light pollution is another concern. The liquor store at Pacific Highway and C Street is  
an example of how the Port doesn't remedy even obvious negative environmental  
impacts on their lands. The huge white neon lights are bright advertising for the liquor  
store but terrible for the residential properties across the street.

The Port promised that operating functions like deliveries for the Lane Field hotels  
would happen in the garages and not destroy the ambience of the neighborhood.  
Instead, Pacific Highway, which is supposed to be a grand boulevard, is treated like the  
Port's back alley.

### **Piecemealing**

195 | The 1HWY1 Developer told downtown residents that he was ready to provide a Project  
description and go forward with a CEQA evaluation in 2020. There was no reason to  
separate the Seaport Project from the PMPU for the CEQA evaluation. The Seaport  
Project unveiled in 2019 was much larger and very different from the original plan in  
2016. Instead, Port staff did not include the 2019 project in the PMPU and proceeded to  
separate the two. The PMPU cumulative CEQA evaluation uses the 2016 original out-  
of-date Seaport Project, which was in the 2017 NOP. The Port purposely misleads the  
community, the California Coastal Commission and the CEQA consultants, by using an



195 cont. | out-of-date much smaller version of the project, which minimizes the environmental  
impacts, which is why CEQA does not allow piecemealing. Therefore, we do not believe  
the cumulative analysis is valid.

### **Addressing the Final PEIR: Summary**

As steward of this public land, the Port has a moral and ethical responsibility to the public. It shouldn't approach CEQA in bad faith, looking for any and all off-ramps for avoiding areas that are likely to be problematic. This causes the public to not trust the Port.

196 | Negative impacts affecting pollutions from car emissions, noise, air quality, etc have to be adequately addressed. Each category needs changes until the impact can be deemed Less than Significant. If mitigation isn't sufficient, such as identified with the Transportation analysis, then the Port needs to change the plan. While there are "potential" mitigation measures mentioned, not one of them mentions altering the plan to correct the identified issue(s) or reduce them to Less than Significant. The goal is not to just identify significant impacts. They must be remediated or mitigated. If they can't be remediated, change the plan until they reach an appropriate level of mitigation.

Unfortunately, some Port mitigations for environmental impacts have been ignored without consequence or remedy. There is not much confidence when the Port openly says the mitigations may not work. It begs the question of why approve the PMPU? Who will hold the Port accountable for ignoring the negative environmental impacts in the projects it later develops and then ignores after they are built?

### **Final Draft PMPU**

We re-submit our January 10, 2022 letter, as attachment (1) since we don't agree with many of the responses provided by Port Staff. We appreciate their responses but we don't believe their arguments are persuasive on many of the identified issues.

197 | There are a few changes we saw that effect our earlier letter. The Navy Pier is now scheduled to become a park with a large parking lot, and the closure of Market Street at Harbor Drive was removed since it isn't in the Port's jurisdiction. Staff did change the building standard along Pacific Hwy in the North Embarcadero to say the setback is a "minimum" of 25ft.

There are some numerical changes in the North Embarcadero between Ash and B Street that we appreciate, such as lowering the podium heights from 65ft to 55ft. However, these heights are arbitrary. The Revised Draft had the podium heights at 30ft north of Ash and 40ft south of Ash. We believe 30ft is sufficient for use. There is no need for tall podiums and podiums should not take up the whole block. A City Wall is the wrong design concept for the Port, which supposedly supports open access not walling people off block after block with hotels and associated podiums.

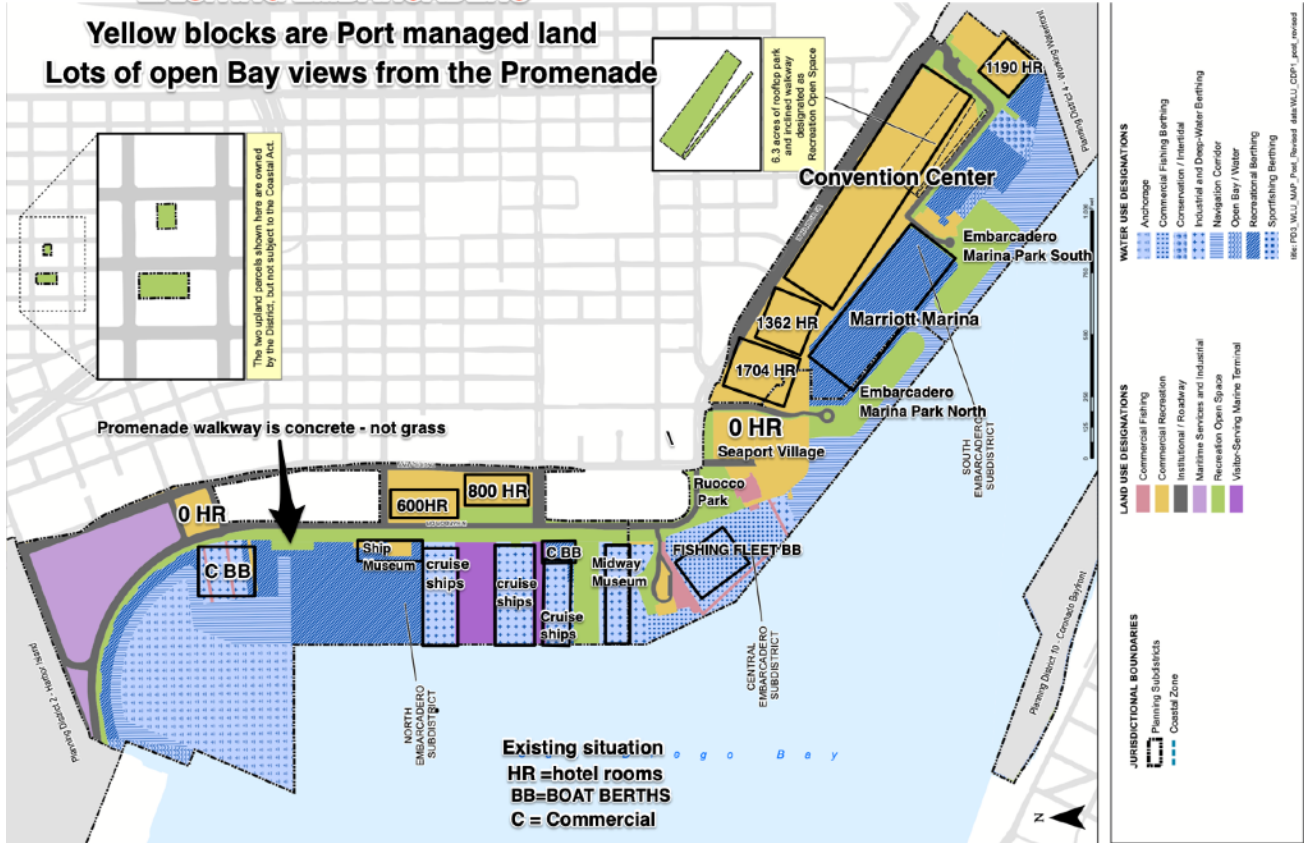
198 We remind the Port that the PMPU buildout in the Embarcadero and many other Planning Districts is focused on out-of-state tourist-serving needs and not development for the many visiting and local Californians who use it on a recurring basis. According to the San Diego Tourism Authority, Californians comprise about 2-3% of the people in the downtown hotels. For every 1,000 downtown hotel users, only 20-30 people are from California, which means about 970-980 of every 1,000 hotel visitors in the Embarcadero are from out-of-state. Therefore, the Port is not meeting its mission when it focuses so much of the public land on the out-of-state visitors. Development should be for the Californians who actually use the Bay intensely throughout the year, with activities that everyone can enjoy. Stop catering to out-of-state tourists with huge hotels on every block and piece of land in the Embarcadero in contradiction to the Public Trust Doctrine.

199 We used the Port's map (below) to show the existing conditions in the North Embarcadero and what the buildout for the proposed PMPU and current Seaport Project would create. All of the dark yellow area is the Port managed land that isn't Recreation Open Space. After the buildout, other than the narrow walkway along the edge of the waterfront and streets, where is the public access or open areas either on land or water?

200 **Recreation Open Space (ROS)**  
Although the Port says the new PMPU will replace the PMP so they don't have to be consistent with it, we believe the current PMP has legal status with certain commitments that need to continue. For example, the Port combining Parks/Plaza with Promenades is disturbing. We are concerned that new Recreation Open Space designation will allow for the conversion to more concrete walkways and concrete plazas as there will be no way to determine how much space is green park area and how much is concrete. These different categories are not fungible. On the Port's slides below, the green ROS designation does not necessarily indicate "green" areas. The Promenade and walkways are mostly concrete and not grassy/plant areas. The limited park areas, like the Lane Field Park, are also in green. With all of these areas identified as "green", the map highlights the complication and misunderstanding resulting from combining these very different public functions under ROS. Combining functions could result in the Port removing green space and replacing it with concrete. For a year we have repeatedly asked for a reconciliation, with the breakdown of each of the parks, plazas and promenades, to allow for a comparison between the current PMP and the proposed PMPU. This is the only way to determine what will change and by what amount. We have not received this detailed information. We don't want the PMPU to be a vehicle to reduce Parks and Green space because there are no specific measurements for the land dedicated to them. It will be impossible for the public and California Coastal Commission to track. As an example, the Oval Park at the Broadway Landing was to be 5.7 acres. That park didn't happen. Our understanding is that the Lane Field Park was partial mitigation for the loss of the Oval Park and we don't see the remainder of the mitigation. Without a proper reconciliation including all additions, subtractions and mitigations, it is not clear if the Port is fulfilling its legal obligations.

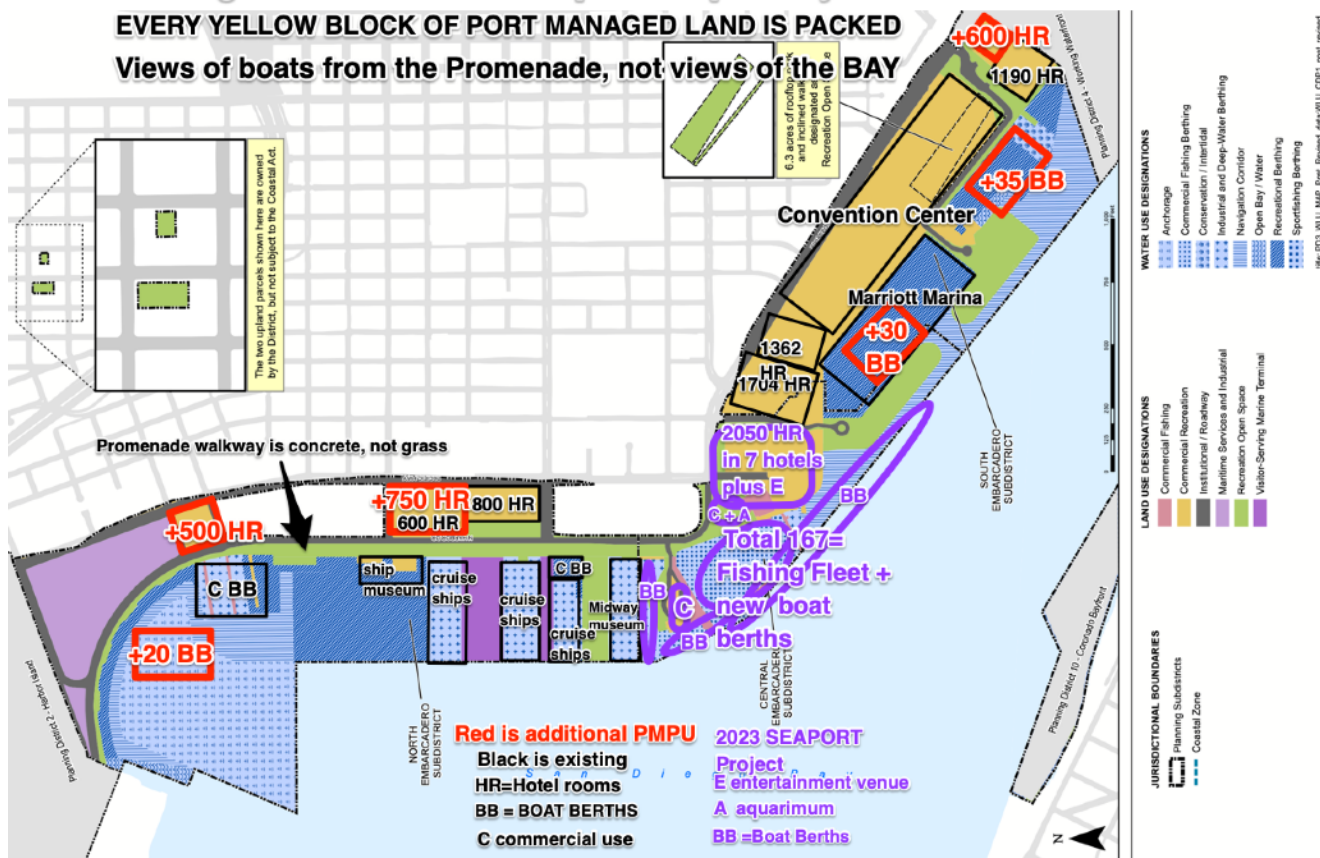
## EXISTING EMBARCADERO

Yellow blocks are Port managed land  
Lots of open Bay views from the Promenade



## Existing Embarcadero +PMPU Impact +Seaport Project

EVERY YELLOW BLOCK OF PORT MANAGED LAND IS PACKED  
Views of boats from the Promenade, not views of the BAY



## ROS – Parks

201 In San Diego's Downtown Community Plan (DCP), Chapter 4-Parks, the Port, County and City combine documents to describe downtown. According to the documents when written, the DCP was already substantially low in park space. With SANDAG's population estimates, this number will only be exacerbated. The Port should be providing more, not less, ROS and green space to help satisfy the needs of Californians. Where better to put it than by the water on land that will always be classified as public. The State Lands Commission states the public land should be built out to attract Californians to the water for coastal related activities. Parks do that.

The DCP also states that the largest waterfront parks—the Embarcadero Marina Parks North and South on Port property—are isolated and not conveniently accessible on foot. That is why Ruocco Park, which is easily accessible, needs to stay in the Central Embarcadero in its current location and new parkland needs to be developed in the North Embarcadero. The Embarcadero's already have numerous hotels and other visitor serving amenities, so more street level green space is needed to balance development and uses.

## Views and view corridors

The State Lands Commission response to the 1HWY1 project stated that connectivity with the waterfront should be paramount and design features should promote public access to the waterfront and views of the ocean from **various vantage points** to encourage connectivity to the water. We strongly agree.

202 The PMPU statement that the CE would remain the same as today was a calculated misrepresentation meant to pave the way for anticipated development while trying not to call attention to it. If things were remaining the same as today, WHY DID THE PORT PMPU ELIMINATE SOME EXISTING CE SCENIC VISTA AREAS by capturing only the few that would remain following redevelopment of almost the entirety of the CE? The current street level driver and pedestrian views of Tuna Harbor and the Bay from the corner of Harbor Drive and Pacific Highway have been reduced in the PMPU to the view only from the concrete walkway adjacent to the water and Tuna Harbor (no more Ruocco Park in this location which allows the current view). The Tuna Harbor and Bay views while on the G Street Mole have been replaced by only the Bay view from the water side (back) of the Fish Market Restaurant on the G Street Mole (due to the anticipated development which will block the only remaining street level water view of Tuna Harbor and the Bay). Also, the existing street level driver and pedestrian view of Tuna Harbor and the Bay from Harbor Drive (also blocked by the new building). It is UNFATHOMABLE that the PMPU would facilitate development that leads to NO street level driver/pedestrian views from the G Street Mole without going around or atop of development that is blocking the water. This is especially egregious considering it is land surrounded on three sides by water!

Commissioners say that we don't have inland views of the water now, like in Seaport Village, so we won't miss them. That is backwards thinking. We do have inland views

from Ruocco Park and we would desperately miss them. That is exactly why the choice should be to create more openness and inland water views rather than tell us we aren't going to miss them if the Port makes it harder to see the Bay, and only leave us with a few street view corridors. When an opportunity arises to make positive changes to improve access and views for the public, the Port should leap at it instead of leaping at more dollars.

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In response to our objection to only having inland street view corridors, the Port states "the commenter has not demonstrated why the provision of street view corridors as identified in the PMPU does not maximize views to and from the Bay, nor has the commenter provided examples of what would satisfy their concerns." It is clear that the main problem with street view corridors is that you need to be in a car or standing in the middle of the street to appreciate them. The Port shouldn't encourage drivers to look at the water when they should be focused on the road. Similarly, street view corridors are NOT pedestrian friendly as they still require a middle of the street vantage point to enjoy the view. The middle of the street is not a safe vantage point for pedestrians. What do we want? We want more parks and green space all along the Embarcadero. We want views of the Bay from the inland locations that are not primarily car-centric. We don't want more failed view corridor attempts like C Street between the two Lane Field hotels that looks and functions as a private property entranceway.

The Port managed lands are much deeper than the waterside promenade. We should be able to see the Bay from inland positions too and not only when adjacent to it. Embrace opportunities to expand ROS and water views where and when possible. The termination of the 1220 Pacific Highway lease presents an ideal opportunity to add at least some of this location as ROS and potentially water views in the North Embarcadero, especially since the location wasn't revenue generating. Do not develop an almost continuous wall of tall buildings. We stand with the City in its July 2019 letter recommending that PMPU Block D be made active Recreation Open Space. While the Port quotes its economic guidelines, it fails to show need for more and more development. The addition of big hotels throughout the Port district, such as the Chula Vista project, are projecting huge increases to Port revenue. Port lands are a limited resource meant to be used in a very judicious manner. No entity is ever satisfied with the amount of money it has. What will the Port do when it no longer has usable land to develop and wrecked forever the biggest draw to the Bay – its beautiful surroundings, human scale approachability and accessibility from a variety of distances for a variety of uses.

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Failing the designation of some portion of Block D to become ROS, alternate coastal related activities and uses other than more hotels/restaurants/retail could include: a museum about Coastal Native Americans with a garden for coastal edible plants; celebrate the San Diego region's binational setting, natural resources, history, culture, and arts; an incubator and interactive facility about the Blue Economy; an opportunity to become part of the World Design Capital with art works and interactive art opportunities using water based themes; or a garden focusing on native coastal plants or coastal



203 | agriculture with informational signs and opportunities with volunteer garden speakers  
cont. | and activities. Do not make a wall of hotels from Broadway to Ash Street.

204 | The current Seaport Village demonstrates that a relatively small investment can reap large financial returns as evidenced from the fact it had its most successful year EVER in 2023. It doesn't have to be a huge development to be fiscally impactful. Lower scale/height/density/bulk development can be a successful strategy. Adopt development standards that create income but also leave the land open to various views and public access. The City's Mission Bay standards limit hotel development to no more than 25% of the land. If the Port used that standard in each Planning District, there would be income for maintenance and improvements AND the bayside would be easily accessible and usable for Californians. Similarly, Bayside berthing standards must be set or there will not be anything but a "sea of boats" all along the waterfront further diminishing the waterfront experience. Under the PMPU, the Embarcadero and other Districts are slated to receive a hugely disproportionate level of enormous scale development and sacrificing ROS to accommodate it. How is this possible when Coronado, for example, is programmed to NOT HAVE ANY DEVELOPMENT and they have a considerable amount of ROS. Coronado is a tourist destination, too.

205 | Our position is also inconsistent with the California Coastal Act that states in Section 30251 "Scenic and visual qualities" that "The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views **to and along** the ocean and scenic coastal areas..."

206 | **Density**  
Port commissioner's have stated that the Embarcadero should have tall buildings because Downtown does. These statements are used to justify large scale and dense development on its lands. To the contrary, we don't need another downtown next to downtown. We need open spaces and relief from density. Using the Port's logic, New York's Central Park would be all high-rises in order for it to be "consistent with the surrounding environment". That is not only bad land use policy, but downright silly and not worthy of people responsible for protecting our interests and managing our lands. In fact, urban planners cite the NEED for open space especially when an area is densely built. They don't call for more tall buildings and more density. The Port's own consultant advised the Port that they needed to increase parks and open green space from the current 8% to 20%- 25%. Instead the PMPU proposes more dense development

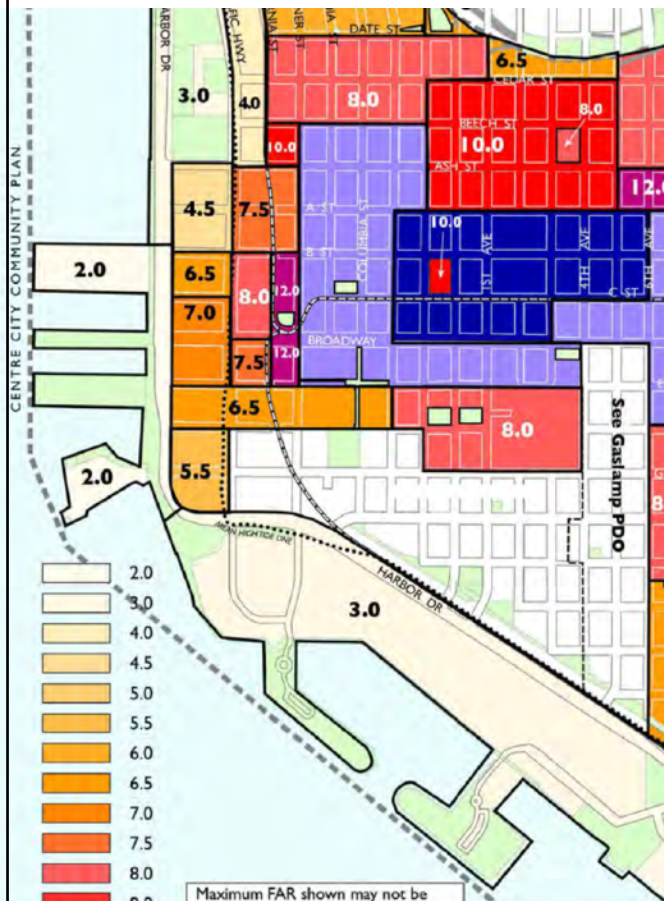
207 | Additionally, the PMPU does not provide a measurement to calculate density, which is needed for consistency and comparison. The Port needs to keep the Floor Area Ratio (FAR) measurements for the North Embarcadero. FAR is mentioned in the PMP Center City sub-district, North Embarcadero Visionary Plan (NEVP) and the City Downtown Community Plan (DCP). and should be retained for the PMPU.

208 | Both the NEVP and DCP show that the Port blocks between Ash and B Streets are restricted to a FAR of 4.5. That guideline should be retained as should the FAR of 3.0 in

the Central and South Embarcadero. We realize that the Port may not want to be restricted by density guidelines, but we believe they should be restricted. This ratio is a necessary and accepted **standard** used to guide development and is in use by the City of San Diego.

DCP Figure 3-12 Maximum FAR with bonuses below

208  
cont.



CHAPTER • FOUR

### NEVP FAR

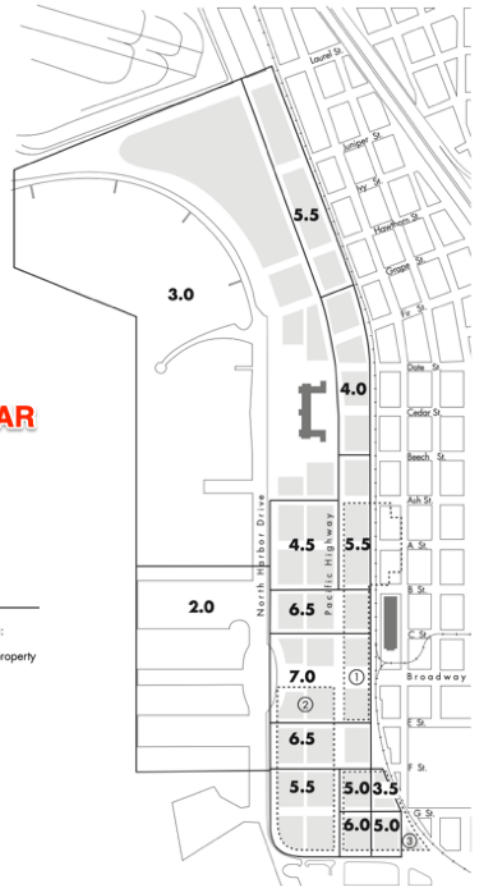
#### Notes:

FARs may vary from those cited for the following areas (see text):

- ① Catellus Santa Fe Depot property
- ② Navy Broadway Complex
- ③ Marina District

0 100 500 1000  
Scale: Associates, Inc. 1998

Figure 4.4  
Floor Area Ratios



NORTH EMBARCADERO ALLIANCE

### Missing building standards

We understand the PMPU is a programmatic document and not a project document (although the Port refers to the PMPU as a Project throughout the PMPU) and staff say that specific projects won't be listed and will have their own PEIR but several anticipated projects ARE listed in the PMPU (p.270-281) and should have more specific building standards. They include expansion of the Convention Center; modification or replacement of the Cruise Ship Terminal and facilities; modifying or expanding the Grape Street Piers; reconfiguring North Harbor Drive; developing Mobility Hubs and their locations; developing up to three water transfer points and their locations; developing "Window to the Bay Pier". The areas of redevelopment between Ash and B Street in the North Embarcadero have detailed descriptions of setbacks, setbacks,

209

209 building heights, building base heights and diagrams depicting each of these. Why isn't  
cont. this level of description available for all the Districts and Subdistricts intended to be  
developed under the PMPU?

### **Mobility Hubs**

210 We reiterate that the Port should incorporate the mobility hubs in the Regional  
Transportation Plan and not plan to create their own mobility hubs that aren't connected  
to SANDAG's/MTS plan. Metropolitan Transit System (MTS) told the Port that they  
need to use the Regional Transit Plan mobility hubs. Do not create mobility hubs that  
are unique to the Port and that don't conform to government area definitions for mobility  
hubs. These so-called mobility hubs, primarily parking lots, will induce people to travel  
all the way downtown before changing to a different mode of travel. That idea is  
contrary to the Climate Action Plan and increases VMT. The ancillary uses for the  
mobility hubs, like bike racks and Uber drop off points, make sense for moving around  
the Embarcadero. Outside of the small number of spaces needed for hotels, additional  
parking spaces should not be allowed. The way to decrease VMT is to have people  
transfer to alternative transportation modes BEFORE coming downtown. If the Port isn't  
doing that, then they are failing to reduce VMT caused by their development. The Final  
PEIR bears this statement out. The Local Mobility Hub description states, "**Local  
Gateway Mobility Hubs are intended to both draw visitors to Tidelands** and act as  
a connection point for visitors who are already traversing Tidelands using other modes  
of transportation." Having a parking lot to draw visitors to the Bay is increasing VMT.

### **Port Mitigations and Commitments aren't trustworthy**

211 Although we would like to say all will be well because the Port will mitigate the  
problems inherent in their PMPU, that hasn't been our experience. We believe the  
underlying problems identified by the Final PEIR for the Final PMPU need to be  
resolved so that weak or non-existent mitigation efforts aren't relied upon. The Port has  
not demonstrated they properly manage or mitigate their entrusted public lands for  
Californian's use and access.

212 Mitigation to allow people access to views on the deck of the Midway Museum, the  
Intercontinental Hotel viewing area, the barge at Coasterra or the second story viewing  
deck at Brigantine all lack signage and are all so obscure and secretive that only a few  
well-informed residents know about them. Insisting on access by asking doesn't  
always ensure access. That is not the essence of public access or successful mitigation  
efforts.

These examples of lack of public access to public spaces has been going on for  
YEARS. Any further statements by the Port of utilizing prime waterside land for  
development and the public receiving "offsets" for their diminished waterfront  
experience should not be considered or allowed. If simple access to views is too hard  
to implement, how can we entrust the Port to mitigate harmful effects to our health and  
welfare brought on by their development, when they mainly answer that they will decide  
later when they have more information?

### **Underground parking**

213 We stand by our comment that any new parking spaces in the Embarcadero should be below ground. The County Administration building, Intercontinental Hotel, Navy/IQHQ facility and the Seaport Project either have below grade or are planning below grade parking. Let's not commit additional public lands to parking.

### **B Street closing**

214 We still agree with the City that B Street should be a pedestrian and bike thoroughfare and not used for cars or a staging site for trucks and buses for cruise ships. In April 2024, there are 20 cruise ships scheduled on 17 different days. This season is reduced due to Disney opening new routes in Australia, so next and subsequent years numbers will be higher. This Plan would equate to B Street being closed to support the cruise ships on more than half the days in April – and this is a reduced schedule year. That is not the proper intent for land nor good land use policy. Piers are for staging cruise ship needs, which are conducted using oversized commercial vehicles and away from the public, not streets which are used for public circulation.

### **Quantity versus Quality**

215 More is not always better, and in this instance, more is extremely detrimental. The PMPU often mentions not diminishing the “waterfront experience”. That is exactly what too much development along the water does. It obstructs the water, reduces air flow, increases air pollution, increases noise levels, negatively impacts the visual aesthetics of the area and induces loads of traffic in areas that are not capable of handling it. To arrive at Port lands in the Embarcadero by car, the primary routes all go through Downtown, including residential areas, some parts of which are only one lane in either direction. The Port is not demonstrating concern for the negative impacts the PMPU will inflict on its surrounding area when they fail to adjust the PMPU to decrease these damaging outcomes. Instead, they want to press on with the same PMPU and possibly hope for a better outcome. But hope is not a strategy, and the PMPU requires a strategy, not just suggestions.

Just because the VMT analysis doesn't require a PEIR analysis for congestion, it doesn't mean congestion won't be a problem. The Port should not be allowed to knowingly induce massive amounts of traffic onto the Embarcadero and adjacent jurisdictions and then abrogate all responsibility for the gridlock and angst it inflicts on the City, its employees, and its residents when it was a completely predictable outcome prior to buildout. This is especially true when one considers that vehicle traffic flow problems will be exacerbated by Trolley and railroad crossing gates being down more frequently due to planned increases in rail service. A small taste of Port related congestion was observed in December, 2023 during the annual Parade of Ships. Harbor Drive at both Kettner and Pacific Highway were in almost total gridlock due to the high volume of cars looking to get onto Port lands to view the ships while contending with the Trolley, trains and length of the traffic signal lights.

Again, the PMPU is an opportunity to make access and use of the Bay better for all Californians, not worse.

216

Again, we request the Port Board of Commissioners to NOT ADOPT the Final Draft PMPU and NOT CERTIFY the Final PEIR until substantive changes are made. Changes must be made to the PMPU in response to the significant negative impacts identified in the PEIR.

**We agree with the State Lands Commission:**

“It is important that the project maximize access to public trust lands and creates coastal recreational opportunities for all people. All aspects of the proposed project, should be designed and programmed in furtherance of this goal.”

We want the Port Master Plan that guides all future projects to meet this same criteria.

Sincerely,

Janet Rogers and Susan Simon

Attachment

1. Embarcadero Coalition Letter to Port of San Diego Commissioners/ JAN22





February 26, 2024

Ms. Randa Coniglio  
President & Chief Executive Officer  
Ms. Lesley Nishihira, Director of Planning  
Port of San Diego  
3165 Pacific Highway  
San Diego, CA 92101

[rconiglio@portofsandiego.org](mailto:rconiglio@portofsandiego.org)

[pmpu@portofsandiego.org](mailto:pmpu@portofsandiego.org)

Dear Ms. Coniglio and Ms. Nishihira:

On behalf of The Grande North at Santa Fe Place Homeowners 'Association, we wish to extend our thanks and appreciation to the Port of San Diego Commissioners and Staff for its efforts in developing an updated Master Plan for the State of California's public coastal lands currently under your stewardship. We feel confident in stating that the primary objective has always been to preserve physical and visual accessibility and availability of these limited public lands to the entire public spectrum, and not just for those who are wealthy enough to afford such access. Clearly, sufficient revenue must be generated to properly care for these lands, however excessive dense development will never cure the negative environmental and public use impacts such plans would create if the balance between revenue generation and true public use is not diligently sought. Unfortunately, under the Final PEIR and Final Draft PMPU it is our opinion such balance has solidly and detrimentally shifted towards revenue generation and created significantly negative environmental impacts in the Embarcadero.

To address this inequitable shift in focus, we are respectfully requesting that The Port take the following steps.

First and most importantly, we strongly urge that you include in the PMPU the original purpose statement from page 59 of the current Port Master Plan ("PMP"), referencing The North Embarcadero Alliance Visionary Plan for the northeast section of the Embarcadero, which states, "[The Port Master Plan] proposes to revitalize San Diego's downtown waterfront through a concept for public improvements and by guiding development to optimize property values, public access opportunities and priority waterfront and water-dependent uses." By continuing to include this original language as a guiding principle, the goals of providing uses and amenities that serve all Californians, including local and regional communities and tourists, the preservation of public access, views and open space amenities, and enhanced connections between the Embarcadero and all adjacent neighborhoods and districts, may more appropriately be met.

Just as is the Coastal Commission, we too are very concerned over the glaring omission of development guidelines for the area's most seriously impacted by the new Master Plan, i.e., the



219 Central Embarcadero (including Seaport Village), South Embarcadero, Chula Vista and National City districts. It is our opinion this omission is equivalent to giving carte blanche to private developers to ignore all or any of the necessary development standards set forth in the Final Draft PMPU.

For the above reasons, we respectfully request that the Port reject approving the Final PEIR and Final Draft PMPU.

220 1) Until development guidelines are created and included for those future projects, the Coastal Commission's review and future EIRs would merely be expensive and futile exercises because the true extent of the PMPU's reach cannot be known without additional information that has been properly vetted by the public for whose benefit all of this is being done.

221 2) Until the Port amends the Final Draft PMPU to remedy the significant and unavoidable environmental impacts identified in the Final PEIR, the development guidelines and lack of effective mitigations do not protect the environment or the health and welfare of the thousands of residents and sensitive receptors who live within 1,000 feet of the Port.

222 Finally, we urge the Port to rethink its positions and amend language to comport with the notions of safe and readily available public pedestrian pathways and, reduction of noise, pollution and traffic congestion on Pacific Highway, by addressing and mandating underground parking, green and open space, and height/set-back restrictions, including the elimination of whole-block podiums for the expansion or construction of new hotels. As currently proposed, these public impact guidelines will cause significant degradation of public access opportunities and optimization of property values, all in contravention to other stated design goals, environmental guidelines and to the desires of the City of San Diego and the public at large.

223 The North Embarcadero is such an important part of the Port region, and its needs are both unique and extremely environmentally sensitive. Rather than rush this Final draft PMPU through the final stages, we would prefer the Port take the time necessary to ensure that the PMPU reflects the most environmentally beneficial, and inclusive guidelines established in the original PMP so that we may continue to help realize the People of the State of California's positive vision for the future development of our most valuable shared public asset.

Respectfully Submitted,

Douglas Tibbits

President

The Grande North at Santa Fe Place Homeowners Association  
1205 Pacific Highway  
San Diego, CA 92101  
619-238-8117

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**From:** bixlu1942@gmail.com  
**Sent:** Monday, February 26, 2024 12:23 PM  
**To:** PublicRecords  
**Cc:** jsrogers624@gmail.com  
**Subject:** Final Port Master Plan Update and Final Program 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.

Dear Port of San Diego Commissioners:

As a resident of the Marina District and a member of the Embarcadero Coalition I ask you to not adopt the Final Draft PMPU or certify the Final PEIR.

The Coalition has already documented and detailed several excellent reasons for their rejection so I will not repeat them here, but will only say that I endorse their arguments whole heartedly.

I would add, however, my objections to the broader proposals which the draft PMPU and PEIR will ultimately support. In the past two years we have had two major sewer backups in the downtown, the latest of which impacted not only well-established condos but also newly constructed buildings in the RADD complex. Proposals to add even more density to the Seaport Village area (in the form of hotels, a 30+story observation tower, a concert venue, etc., will put further strain on an infrastructure that already lacks adequate capacity. The City of San Diego has recently begun to confront publicly it's multi-billion dollar deficit in infrastructure funding. Adding greater burdens in terms of need for fresh water, waste-water removal, electrical supply, etc. makes no sense.

In a related manner, the added parking and traffic density also pose a major threat. Existing plans already call for diverting vehicular traffic from North Harbor Drive onto Pacific Coast Highway. Kettner Blvd. is physically restricted and cannot handle additional traffic. With the developer of the Seaport project predicting 10,000 to 30,000 visitors per day, one can only imagine the impact on area traffic—not just on passenger cars, but what about ambulances which must reach residents in local buildings? As a former Deputy Commissioner of Transportation in New York City and a parking/transportation consultant for nearly 20 years, I think you are making a major mistake.

I know you may say that these are separate matters, and you are only dealing with overall planning within the Port area, but you cannot stick your head in the sand. Different governmental bodies cannot approve individual plans and projects and then absolve themselves of the combined impact of what they have done. You have to take responsibility for your actions and how they will contribute to the larger future of the City.

Regards,

Joseph Spencer

700 West Harbor Dr, #407

San Diego, CA 92101

917.751.8615

26 Feb.2024

Letter to Port regarding Final Master Plan Update and Final EIR

Dear Port of San Diego Commissioners,

We have reviewed the Final Port Master Plan Update (Final PMPU) and the associated Final Program Environmental Impact Report (Final PEIR) documents provided by the San Diego Unified Port District. Based on this review and understanding of the applicable laws and standards, as residents of California and members of the Embarcadero Coalition we ask you to not adopt the Final Draft PMPU or certify the Final PEIR. WE STRONGLY OPPOSE the adoption of the Final Draft PMPU and the certification of its Final PEIR for the following reasons:

1. The Port has completely misled the community, the Coastal Commission and the CEQA process about the PEIR by removing the redevelopment of the Central Embarcadero (CE) from the PMPU and stating that the CE will "...remain the same as it is today...", then using the old obsolete version for the cumulative analysis. That is totally wrong since the project was initiated in 2016 and a newer version was available in 2019. Everyone knows this statement is completely false and it is shocking the Port has the nerve to continue its promulgation.
2. The impacts of the Port's real intention for the Central Embarcadero development will be extremely damaging to the environment. Based on the current Project Description for the CE, some rough projections of environmental damage include:
  - a. Per the Port's selected developer, 1HWY1, the proposed 2,739,831 SF of new built area would lead to almost 22,000 metric tons of new carbon added to the atmosphere each year based on the UC Berkeley Climate Cool Network calculators. Over 50 years this would equate to over a million metric tons of CO2.
  - b. The EC Project Description includes 2,250 parking spaces. If the spaces turn over throughout the day considering stores and restaurants could be open 12 hours, and assuming a reasonable driving distance for Californians (as opposed to out-of-state visitors per the Public Trust Doctrine), the vehicle miles driven to and from this destination could easily produce over 90 metric tons of CO2 per day, or almost 33,000 metric tons per year.
  - c. The CE Project Description includes 158 new boat slips. Using projections from a recent scientific study, this could easily add almost 100 metric tons of carbon per year to the atmosphere.
  - d. According to the US EPA, marinas also pose other serious environmental impacts including significant amounts of copper leaching from anti-fouling paint from boat hulls, fuel spills and leaks, and waste dumping. The PMPU and PEIR only indicates the Port would "encourage" less environmentally damaging hull coatings, encourage "best practices" in fueling, and provide waste dump stations, but provides no strategy for enforcement.
  - e. Based on these rough estimates, the carbon footprint of the CE Project could easily exceed 55,000 metric tons per year, something totally contradictory to all local, regional, and state goals, in addition to all the potential urban runoff and other pollutants created by all the development.
3. The View Corridors and Vistas diagrammed in the Embarcadero Planning District section of the PMPU are highly misleading. The below existing View Corridors and Vistas must be preserved per 4.2.2 of the PMPU. The PMPU must be updated to acknowledge these specific existing View Corridors and Vistas:



Attachment A to  
Agenda Related Materials to File No. 2024-0049

- 229
- a. Good View Corridors at the corners of E and F streets and Pacific Highway
  - b. Fantastic View Vista at the corner of Pacific Highway and West Harbor Drive which will be totally destroyed by the proposed marina and other highly dense development
  - c. Good View Corridor on Kettner Blvd well into Seaport Village but before Embarcadero Marina Park North
  - d. Amazing View Vistas from Embarcadero Marina Park North
  - e. Great View Corridor from the pedestrian passage between the Manchester Grand Hyatt and the Marriott Marquis
  - f. The View Vistas at the Balboa Lawn Landing Area should be shown starting at Convention Way rather than at the water's edge as currently indicated.
- 230
4. The PMPU pays lip service to safety, but adding all the boat slips will certainly create safety hazards. Based on recent watercraft fatalities in both San Diego Bay and Mission Bay, it is unconscionable for the Port to advocate for more watercrafts in the Bay.
- 231
5. The Coastal Zone Act Section 30116 defines Sensitive Coastal Resource Areas that must be protected from development. Seaport Village within the CE Planning District meets several criteria and should be so designated and receive appropriate development protections. The PMPU does not acknowledge this special status which should be revised. The criteria met by Seaport Village for this status includes:
- a. Areas possessing significant recreational value
  - b. Highly scenic areas
  - c. Special communities or neighborhoods which are significant visitor destination areas
- 232
6. Based on recent sewer backups in the Marina District in January 2023 and two more in February 2024, the San Diego sewer infrastructure could not possibly handle any more development loads. It would be a crime to allow the Port to plan any more development until the San Diego sewer problems that would serve these areas is completely resolved.
- 233
7. Change the plans in the Embarcadero to center on activities that draw Californians to the Bay as per the Port's mission and State requirements, instead of creating a wall of hotels to mainly attract out-of-state visitors.
- a. Only 2-3% of the visitors in Downtown hotels are Californians
  - b. Coastal-dependent activities attract Californians to the Bay, not more hotels
- 234
8. Adhere to the building density in the Embarcadero stated in the FAR standards the Port agreed to in the PMP, NEVP and amendments
- a. Specifically, a FAR of 4.5 between Ash and B Streets and 3.0 in the Central and South Embarcadero.
- 235
9. PMPU Building standards in the Embarcadero should include that all new parking facilities will be underground, the same as other local developments.
- 236
10. Don't combine Parks/Plaza with Promenades/Walkways for Recreation Open space (ROS). Green space and places to congregate are not fungible with walkways.
- 237
11. The Port needs to supply a reconciliation of the current PMP Parks/Plaza and Promenade broken down by Embarcadero sub-districts and specific location to clarify what is proposed in these public spaces and to discern if there is a loss of park space or conversion of green space to concrete walkways.
- 238
12. While graphics supplied in the PMPU show winding swaths of green throughout the Embarcadero, it is misleading to the public and possibly the California Coastal Commission. Most of the green areas are concrete walkways and plazas but not grassy areas. Bushes and trees in concrete plazas do not make these areas green either as the plantings are secondary to the purpose of the concrete (ticket and retail sale kiosks, entrance/exit to the B St Terminal, restaurants, new Navy Pier with a ton of parking in it). The two classifications need to be

Attachment A to  
Agenda Related Materials to File No. 2024-0049

238 | differentiated in a meaningful way to truly demonstrate the low level of green space in the  
Embarcadero.

239 | 13. Reject the new "Coastal-enhancing" definition since it is not an allowed term based on State  
requirements.

240 | 14. Coastal land should not be used for events centers, golfing activities, or casinos if that is another  
revenue generating activity the Port might consider.

241 | 15. Create detailed building standards in the Central and South Embarcadero or be held to today's  
development levels (current height, scale, bulk, number of hotel rooms) once the PMPU is  
certified by the California Coastal Commission.  
a. Create building standards for the Central Embarcadero or stay with the current situation  
as stated in the PMPU, which has buildings far apart and no taller than 45 feet. Don't  
misrepresent your intentions. While the Port says the Seaport Project will have to meet  
the building standards in the new PMPU (once approved to become the new PMP),  
there are no building standards (except 45' building height) listed in the PMPU that  
remotely reflect the level of development proposed by the Seaport Project. The PMPU  
should be setting the standards for the Seaport Project, not letting the developer set  
them and trying to facilitate whichever version of overkill is decided via Port Master Plan  
amendment.  
b. There are detailed building standards in the North Embarcadero and in other Planning  
Districts yet there are none in the South Embarcadero. Again, the PMPU should be  
setting the standards for development, not letting developers decide them. The public  
needs to be part of the process.

242 | We appreciate the Port's efforts and need to update the current PMP. As a Californians, we want a  
better Port and more reasons to participate in the beauty of the Bay, but a solid wall of hotels and other  
development won't do that.

Due to these issues and many others sent in by the Embarcadero Coalition, please reject both the Final  
Draft PMPU and the Final PEIR and direct staff to remedy the flaws and negative environmental issues  
identified and make the necessary changes to the PMPU.

Sincerely,

Mark Ranyak and Sandy Kate  
700 W Harbor Dr  
Unit 905  
San Diego, CA 92101