



## **Final Draft PMPU and Final PEIR Additional Late Written Comments**

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**From:** Janet Rogers <jsrogers624@gmail.com>  
**Sent:** Monday, January 15, 2024 8:00 AM  
**To:** Lesley Nishihira; Anna Buzaitis  
**Cc:** Susan Simon  
**Subject:** Transportation analysis in Final PIER

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Hi Lesley,,

Is it possible to speak with the consultant about the Transportation Analysis? The SANDAG Activity based Model (ABM) and the switch to VMT is new to all of us and there are a lot of things I don't understand.

I've sent a list of questions to SANDAG's communications person about adjustments SANDAG made for this study but they might not respond, since it isn't their study.

I also have questions about the proposed streetcar from Santa Fe Depot to the Airport. My understanding is that even though light rail (trolley) and streetcars are under the FTA federally, in California they are covered in the Caltrans State Rail plan, but they also operate under rules set by the Public Utilities Commission (PUC). At some point the PUC made a rule that new rail lines cannot cross intersections at grade. That is probably why we aren't seeing streetcars take off in California like they have across the country.

Does the Port have some kind of exemption for at-grade rail to cross all the intersections to the airport? Do they not count since they are only turns, not through intersections, since cars would end up in the water? Have you discussed this streetcar with MTS or SANDAG?

Before rail, the EIR mentions operating a BRT line to the airport. Has that been discussed with MTS, since they operate the 992 bus to the airport?

It is in volume 3 and if you download it then in pdf it starts on page 646

#### **Appendix D**

Port Master Plan Update Transportation Impact Study (TIS) Vehicle Miles Traveled – SB 743 Analysis prepared by Chen Ryan Associates, August 2022

on page 652 in the table it says this

- Implementation of a busway along the south/west side of North Harbor Drive between the Airport (Harbor Island Drive) and Santa Fe Depot (Broadway)
- Support a new express Bus Rapid Transit (BRT) route between the Airport and Santa Fe Depot
- Support of a potential future streetcar line between the Airport and Santa Fe Depot (if ridership warrants), utilizing the right-of-way from the proposed busway along North Harbor Drive.

SANDAG and MTS are going to go to CEQA study soon to look for rail to the airport. The trolley will be added to that study along with the elevated Automated People Mover (APM-which I am fighting). Shouldn't the PORT streetcar be added to that study, unless the PUC rule disqualifies it immediately? We should be looking at three options to the

118 | airport, not 2. Although the trolley makes the most sense to connect the whole system, a streetcar should be the  
cont | second choice, not a huge elevated APM.

119 | I know the Port seemed supportive of the APM to the car rental facility which included a stop at the Port for drop offs.  
SANDAG dropped that section of the proposal at the board meeting. Has the Port taken a position on the APM into  
downtown, since it goes down the middle of Pacific Hwy which the Port splits with the City? It will destroy all our view  
corridors with a 3 story high concrete structure and 10 foot trains on it all the time. The PMPU won't even let tree  
branches extend over the view corridor. SANDAG wants to block them with a structure similar to the infrastructure on  
Genesee to UTC. Have you seen that? The Trolley had to be either above or below grade due to the PUC rule.  
Obviously the condos downtown object to the APM, which would put a billion dollars in property value in the middle of  
a rail yard with trains on sides. The MTS board did not support the APM at their board meeting. They pushed for the  
trolley to be in the study.

Here are my concerns I sent to SANDAG that I would like to discuss with your consultant.

Thanks,  
Janet,

EIR Transprotatioin Study - ABM and VMTquestions

Basic ABM only looks at employees and residents so I think adjustments had to be made since the majority of the Port  
VMT is hotel tourists and visitors to the bay. Technically there are NO RESIDENTS on the Port. The documents I'm  
referring to are here: <https://www.portofsandiego.org/waterfront-development/port-master-plan-update>

121 | How were all the trips included for tourists who stay in the Port Hotels?

122 | How were trips for other people coming to the Port to visit taken into account?

Neither of these groups fit into the employee or resident travel pattern. The employees in the SEAPORT project will  
increase significantly over the number today.

123 | The report says the Central Embarcadero was taken into account in the trips, but the PMPU has the CE staying as it is.  
Were any adjustments made for the proposed Seaport project? For instance the developer told the State Lands  
Commission he expects an average of between 11,000 and 33,000 visitors a day. Is that reflected in the ABM and if so  
how?

124 | How are these numbers reflected in the VMT analysis?

125 | The Port transportation analysis says the impact to District 3 is significant and unavoidable after Mitigation. Is there  
something that shows how significant? Surely there are degrees of significance. Downtown is going to be severely  
impacted with traffic congestion if the Port builds out as much as it has in the plan. I know congestion is not a variable in  
the analysis anymore. So how is the VMT analysis supposed to really communicate to make changes? It comes across as  
all or nothing, significant or not. Significant could be the same amount of traffic but using different streets, like the  
proposal to close Market Street at Harbor Drive, or huge gridlock. What about the study will motivie changes to the plan  
if the analysis is so vague?

126 | There are numbers on the SANDAG maps but I don't know what they mean. Can you please explain?

127 | How is the VMT affected by moving the traffic on Harbor Drive to the city streets? Similar VMT but all the traffic is  
combined onto city streets like Pacific Hwy and Kettner. This is obviously affecting the environment.

128 | Why does the analysis say the mobility hubs reduce VMT when in fact they will induce more people to drive downtown  
instead of changing modes farther out? Why don't the Port Regional and Local Mobility hubs cause more VMT to

128  
cont.

downtown district 3? People should be using hubs outside of downtown for cars. Just moving people around downtown on alternative transportation methods doesn't come close to countering the huge VMT created by driving downtown. Don't more downtown parking lots induce driving into downtown?

129

Does SANDAG have an optimal number of parking spaces for downtown? Are there any guidelines? In general parking demand is shrinking as more people use rideshare and transit, which is why new parking lots have to have the ability to convert to alternative uses. Our concerns though are the huge amount of new traffic proposed by the Seaport Project and the new hotel rooms in the whole Embarcadero. We see them as potentially creating a huge increase in both parking demand and congestion.

130

The Port is acting like their downtown mobility hubs are very significant for VMT, yet they barely connect to any MTS transit. Based on earlier letters from SANDAG and MTS to the Port about the PMPU, the Port mobility hubs do not conform to the Regional Transportation Plan. I don't see that the Port made significant changes to get SANDAG or MTS on board. Has that changed?

131

My reading of the Port EIR for Transportation says that even if the SEAPORT project or the PMPU caused gridlock on Pacific Highway due to increased traffic, the report would still call those impacts "less than significant" since Santa Fe Depot and the Seaport Village transit centers are within 1/2 mile of the Port activities. Am I reading that right? If so, how do you mitigate the traffic problems, if they aren't considered a problem under CEQA and VMT. According to what I read the Port could generate as much traffic as possible and the impact is LTS because of the trolley stops. The only reason I see that the analysis came back significant and unavoidable was due to moving existing traffic from Harbor Drive to the city streets. Is that right or am I missing something?



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**From:** Janet Rogers <jsrogers624@gmail.com>  
**Sent:** Thursday, February 15, 2024 10:30 AM  
**To:** Anna Buzaitis  
**Cc:** Susan Simon; Lesley Nishihira  
**Subject:** Re: SANDAG Documentation on pdf p. 659 of Vol 3 of PMPU Final PEIR  
  
**Categories:** archived

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Thanks Anna,  
This will be a great resource to understand the ABM model.

However, it was stated that SANDAG did a special model for the EIR since your VMT generation is not residential. Where is that information?

I'm interested in general how they coped with your non-employment VMT mainly being people coming to the Port for activities.

Also specifically what did they do for the cumulative version for adding in Seaport? What amount of VMT did they add since the study only used the much smaller 2016 version and not the 2019 version that according to Gaf was ready to go.

Thanks,  
Janet

On Mon, Jan 29, 2024 at 1:16 PM Anna Buzaitis <[abuzaiti@portofsandiego.org](mailto:abuzaiti@portofsandiego.org)> wrote:

Hi Janet,

The SANDAG's VMT Model document (as referenced on pdf page 659 of Volume 3 of the PMPU Final PEIR) is now here: [Appendix T - SANDAG Travel Demand Model and Forecasting Documentation](#)

As explained in the response to comment A7-10 (City of San Diego – PEIR Volume 1 of 4), the SANDAG link referenced in the Transportation Impact Study no longer works. However, SANDAG moved that same documentation to the link above.

Let me know if you have any questions about this.

Thank you,

Anna

**Anna Buzaitis**

Program Director, Planning

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connect: 

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**From:** Janet Rogers <jsrogers624@gmail.com>  
**Sent:** Wednesday, February 14, 2024 10:03 AM  
**To:** Lesley Nishihira; Anna Buzaitis  
**Cc:** Susan Simon  
**Subject:** ROS Reconciliation and Rec Berthing question  
**Attachments:** Port ROS reconciliationREC berthing.xlsx

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Hi Lesley,,

1. This is the reconciliation I've been asking about.

I attached a spreadsheet with a reconciliation for Parks/Plaza and Promenades between the PMP and PMPU. I have the totals for the PMP from table 10, but no breakdown. I have the Park/plaza photo you sent with Park/plaza totals for each sub-district. I have a few other numbers. Since you separated the City Centre in the PMP into 3 sub-districts in the Embarcadero, we want to make sure we understand all the ROS in each section and how the two documents relate.

I haven't put formulas in because I don't know how many additions need to be made.

If you could drop in the missing numbers or items that would be great.

If there is an appendix with this information, please point me in the right direction. I don't see the breakdown in the PMP. The picture is nice but doesn't have numbers.

If there are outstanding mitigations that aren't listed please add or subtract them.

We agree with the PMP separating the Promenade from the Parks since a concrete walkway is great along the waterfront, but it is a different concept than a park.

Green space and concrete should be treated differently. I know plazas are probably concrete too, but this is the breakdown we have. The PMP combined gathering places like parks and plaza as one category, I can live with. Concrete Walkways are different though.

You should have all this information readily available so it should only take a few minutes to fill this out. I expect I'm missing some items.

2 On the second sheet there is a comparison with all the Recreational Boat Berthing. I got this info from the tables in Volume 2.

Does the PMPU Embarcadero number use Gaf's 2016 numbers for CE?

Gaf's new numbers are larger. Do you have the new number with Gaf's updated plan?

Thanks for your help,  
Janet

I converted this from numbers to excel, so I hope it looks ok.



133

This document was exported from Numbers. Each table was converted to an Excel worksheet. All other objects on each Numbers sheet were placed on separate worksheets. Please be aware that formula calculations may differ in Excel.

Numbers Sheet Name	Numbers Table Name	Excel Worksheet Name
Sheet 1		
	Table 1	<a href="#">Sheet 1</a>
Sheet 2		
	Table 1	<a href="#">Sheet 2</a>

Table 1

Reconciliation between PMP and PMPU ROS	PMP	PMPU	difference	notes	
	PMP	PMPU			
<b>North Embarcadeero</b>					
<b>Open Space NE</b>	0.7	0			
<b>Parks/Plaza detail NE</b>					
curvilinear pier at Grape Street -boat dock 12,000 Sq Ft designated as Park/Plaza		0			
Esplanade plaza (Beech, Ash, b street Pier,Broadway Pier)parks) are proposed between the plazas on the esplanade,?					
Oval at Broadway		0			
Navy Pier		3.6		use CC number . eliminate parking	
Lane Field					
plus Lane field extension to B street	0				150 ft *150
Broadway Pier plaza		0			
65 ft in front of Wyndham	0				
<b>Total Parks/Plaza NE</b>		17.1			
<b>Promenade NE</b>				page 60 amp 100 ft wide	min 30ft
<b>Total Parks/ Plaza and Promenade/open space NE</b>		63.33			
<b>Central Embarcadero</b>					
<b>Parks/Plaza detail CE</b>					
Tuna Harbor park	2				
Ruocco Park	3.3				
EM. Marina Park North	9.5				

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

Total Parks/Plaza CE			17.4			
Total Promenade CE						
<b>Total Parks/ Plaza and Promenade CE</b>				4		
<b>South Embarcadero</b>						
<b>Parks/Plaza detail SE</b>						
Rooftop P/P		0 6.3?		6.3		
EM. Marina Park South						
<b>Total Parks /plaza SE</b>			22.6			
<b>Total Promenade SE</b>						
<b>Total P/P/P SE</b>						
<b>Total Open Space</b>		0.7	0			
<b>Total Parks/Plaza</b>		49.9	57.1	7.2		
<b>Total Promenade</b>		7.6				
<b>Total Parks/ Plaza and Promenade</b>		58.2				
<b>GIS ADJ</b>						

Initial PARK/PLAZA acreage commitment in current PMP  
Increase from amendments/mitigations  
Decrease from completed projects  
Decrease from completed mitigations  
=Remaining commitments  
Compare to Draft PMPU Recreation Open Space and make adjustments as/if needed

Table 1

REC Boat Berthing -Acres	acresPMP	PMPU		
Shelter Island	103.28	103.74	0.46	
Harbor Island	90.5	98.9	8.4	
Embarcadero	28.88	76.52	47.64	Is this 76.52 acres from 2016 or now? 2024 number is bigger
Coronado	21.66	26.48	4.82	
Silver Strand	37.84	26.53	11.31	
Total	282.16	332.17	72.63	

133



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**From:** Lesley Nishihira  
**Sent:** Wednesday, February 21, 2024 4:33 PM  
**To:** Port Master Plan Update  
**Subject:** FW: Notice of Completion - Final Draft Port Master Plan Update  
**Attachments:** Response to Comment I97 (Raymond Richardson).pdf

**Lesley Nishihira, AICP**

Assistant Vice President

3165 Pacific Highway, San Diego, CA 92101  
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**From:** Sharon Cloward <sharon@sdworkingwaterfront.com>  
**Sent:** Friday, February 16, 2024 1:54 PM  
**To:** Rebecca Harrington <rharrington@portofsandiego.org>; Thomas A. Russell <trussell@portofsandiego.org>; Lesley Nishihira <lnishihi@portofsandiego.org>; Jason Giffen <jgiffen@portofsandiego.org>; Randa Coniglio <rconiglio@portofsandiego.org>  
**Subject:** FW: Notice of Completion - Final Draft Port Master Plan Update

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Provided for your information... see below

Respectfully,  
Sharon



"Association  
of port  
tenants and  
waterfront  
workers"

**Sharon  
Cloward**  
President

619-246-1916  
[Sharon@sdworkingwaterfront.com](mailto:Sharon@sdworkingwaterfront.com)  
2390 shelter island drive, suite  
210, san diego, ca 92106

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**From:** [dwood8@cox.net](mailto:dwood8@cox.net) <[dwood8@cox.net](mailto:dwood8@cox.net)>

**Sent:** Friday, February 16, 2024 10:14 AM

**To:** [dwood8@cox.net](mailto:dwood8@cox.net)

**Subject:** FW: Notice of Completion - Final Draft Port Master Plan Update

134 The port staff responds to many of the comments it has received regarding the PMPU by labeling the comments as being “policy related” instead of Environmental concerns, as though the port plans or actions mentioned in the comments have zero environmental impacts. According to port staff, public concerns about public access or scenic viewsheds to the bay are merely “policy concerns” despite the fact that these two issues are clearly addressed in CEQA and the California Coastal Act. All parties reviewing public comments and the ports response should keep this in mind.

135 In this case, the commentor expresses concerns about a previous promise by the port to build a ferry landing park on the Coronado bayfront contained in a 1984 PMP amendment, which has never been carried out. The port staff’s response is that the PMPU covers a 30 year planning horizon and that during that time the port *might* build such a park. This tactic is similar to the promise by the port that it would build a veterans park on Navy Pier, a promise that took more than 20 years for the port to begin to fulfill.

136 This points out the need for oversight agencies like the Coastal Commission to include deadlines when they consider approving Port initiatives like the PMPU with conditions with clear calendar deadline and the promise of significant sanctions or daily fines if the port fails to carry out those conditions. The Port has demonstrated that it cannot be trusted to carry out vague commitments that are not time-bound.

DW

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**From:** Dennis Campbell <[dcampbell@portofsandiego.org](mailto:dcampbell@portofsandiego.org)>

**Sent:** Thursday, February 15, 2024 3:42 PM

**To:** Dennis Campbell <[dcampbell@portofsandiego.org](mailto:dcampbell@portofsandiego.org)>

**Subject:** RE: Notice of Completion - Final Draft Port Master Plan Update

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**From:** Dennis Campbell

**Sent:** Thursday, February 15, 2024 3:19 PM

**To:** Dennis Campbell <[dcampbell@portofsandiego.org](mailto:dcampbell@portofsandiego.org)>

**Subject:** FW: Notice of Completion - Final Draft Port Master Plan Update

Good afternoon,

In addition to the “responses to comments” that were included in the Final Program EIR [to the Port Master Plan Update] published on December 6, 2023 (see below email), the following response (referred to as Comment I97-5) is also added to respond to an attachment to Comment Letter I97 (from Raymond Richardson), which was unintentionally omitted from the published Final Program EIR. That attachment, which is referred to as Comment I97-5, follows Page 2-837 (pdf page 849) of Volume 1 of the Final Program EIR, which is available here:

[pantheonstorage.blob.core.windows.net/ceqa/20231206 SD Port Final PEIR V1.pdf](https://pantheonstorage.blob.core.windows.net/ceqa/20231206%20SD%20Port%20Final%20PEIR%20V1.pdf). The San Diego Unified Port District’s response to Comment I97-5 is as follows:

**Response to Comment I97-5**

This comment letter provided comments related to the PMPU, prior to the public review period of the Draft PEIR, and does not raise any environmental issues requiring a response pursuant to CEQA. The District further notes that the previous comments attached to the letter predate the release of the PMPU Draft PEIR. (See *Sierra Club v. City of Orange* (2008) 163 Cal.App.4th 523, 538 [Comments submitted before the release of the Draft EIR did not constitute comments on the adequacy of that document].) Please note that with the exception of the following topics, none of the comments from this City comment letter are repeated in the January 6, 2022, City of Coronado public review comment letter: mobility hubs, water-based transfer points, micromobility, and parking rates. The District responses to those similar topics are found starting at page 2-175 of the Final PEIR, Volume 1 of 4. Specifically, please see responses A6-2 to A6-3 and A6-9 (mobility hubs), A6-4 (water-based transfer points), A6-5 (micromobility), and A6-8 (parking rates). The remainder of the comments do not change the conclusions of the Program Environmental Impact Report and therefore, do not need responses.

The previously-published response to Comment Letter I97, as well as the attachment related to the above Response to Comment I97-5, is attached to this email; and the Response to Comment I97-5 will be added to the Errata to the Final Program EIR, which will be published with the staff report for the Special Board of Port Commissioners' (Board) meeting scheduled for February 28, 2024. When available, a link to that Errata to the Final Program EIR, as well as the staff report for the February 28, 2024 Board meeting, will be added to the PMPU webpage:

[www.portofsandiego.org/pmpu](http://www.portofsandiego.org/pmpu). As a reminder, the comment letters regarding the Draft Program EIR for the Port Master Plan Update, and the San Diego Unified Port District's responses to those comments, are provided in Volume 1, Chapter 2 of the Final Program EIR, which is available at the following link: [pantheonstorage.blob.core.windows.net/ceqa/20231206 SD Port Final PEIR V1.pdf](https://pantheonstorage.blob.core.windows.net/ceqa/20231206%20SD%20Port%20Final%20PEIR%20V1.pdf) [scroll to pdf page 13] The other 3 volumes of the Final Program EIR are also available on the PMPU webpage ([www.portofsandiego.org/pmpu](http://www.portofsandiego.org/pmpu)).

At the February 28, 2024, Board meeting, Port District staff will request the Board conduct a public hearing and take the following actions related to the Port Master Plan Update:

- a) Certify the Final Program EIR (including an Errata), adopt Findings of Fact and a Statement of Overriding Considerations, adopt Mitigation Monitoring and Reporting Program, and direct filing of the Notice of Determination
- b) Approve the draft Port Master Plan Amendment (titled "Final Draft Port Master Plan Update") and direct filing with the California Coastal Commission for Certification

The Board meeting will begin at 10:00 a.m. at the District Administration Building located at 3165 Pacific Highway, San Diego, California 92101. The public is welcome to attend in person, or watch via livestream on the Granicus Agenda & Meeting Link and/or the Microsoft Teams Meeting Link on the District's website at <https://www.portofsandiego.org/about-port-san-diego/board-meetings>. For additional information on the Board meeting and how you can participate, please visit the above webpage. You can also contact the Office of the District Clerk at [PublicRecords@portofsandiego.org](mailto:PublicRecords@portofsandiego.org) or (619) 686-6206 for additional assistance.

For questions, please contact Lesley Nishihira at (619) 686-6469 or via email at [lnishihi@portofsandiego.org](mailto:lnishihi@portofsandiego.org) or Dennis Campbell at (619) 686-7218 or via email at [dcampbell@portofsandiego.org](mailto:dcampbell@portofsandiego.org).

Best Wishes,

**Dennis Campbell, AICP**

Program Manager, Planning

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

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**From:** Dennis Campbell  
**Sent:** Wednesday, December 6, 2023 5:53 PM  
**To:** Dennis Campbell <[dcampbell@portofsandiego.org](mailto:dcampbell@portofsandiego.org)>  
**Subject:** Notice of Completion - Final Draft Port Master Plan Update

Hello,

The San Diego Unified Port District (Port District) has published a "Notice of Completion and Public Hearing" for the Final Draft Port Master Plan Update (PMPU) and has also made the associated Final Program Environmental Impact Report (Final PEIR) available to the public. The Notice is attached to this email and both the PMPU and the Final PEIR may be accessed at [www.portofsandiego.org/pmpu](http://www.portofsandiego.org/pmpu). In addition, next week, the Port District will hold two virtual meetings to provide the public and interested parties with an update on the PMPU and the next steps for the PMPU. These virtual meetings will be held on the following days/times:

- Tuesday, December 12: 6:00 P.M. start, VIRTUAL Meeting #1
  - RSVP and get meeting link here: <https://forms.office.com/r/HyQBkxCd8u>; and
- Thursday, December 14: 1:00 P.M. start, VIRTUAL Meeting #2
  - RSVP and get meeting link here: <https://forms.office.com/r/ytkPeW8sb0>

Port District staff will include the comments and feedback received at these virtual meetings during the presentation to the Board of Port Commissioners, at a Special Board meeting scheduled for February 28, 2024. A time for this meeting has not yet been determined.

For questions, please contact Lesley Nishihira at (619) 686-6469 or via email at [lnishihi@portofsandiego.org](mailto:lnishihi@portofsandiego.org) or Dennis Campbell at (619) 686-7218 or via email at [dcampbell@portofsandiego.org](mailto:dcampbell@portofsandiego.org).

Best Wishes,

**Dennis Campbell, AICP**  
Program Manager, Planning

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**From:** Janet Rogers <jsrogers624@gmail.com>  
**Sent:** Saturday, February 17, 2024 5:35 PM  
**To:** Lesley Nishihira; Anna Buzaitis; Susan Simon  
**Subject:** VMT PD3

**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.

I finally found Appendix A and B for traffic. You have appendices all over the place.

First, appendix A is useless. Columns of numbers with these titles

Appendix A for the traffic analysis

**mgra lu\_type\_id lu\_code amount**

I know the mgra's that go with CE but they tell me nothing.

This is not supposed to be a guessing game and the public should not need a degree in planning or traffic analysis to make sense of the presentation.

Here is the final table for Appendix B

**PMPU VMT Growth  
By Planning District**

PD#	Use	Net Growth	Units	Trip Rate	Net ADT from Base	Net Total ADT from Base	Ave Trip Length (Miles)	Net VMT from Base	PMPU Total VMT
PD 2	Hotel	4,000	Rooms	7	28,000				
	Retial	69,426	SF	18	1,250				
	Resturant	69,426	SF	32	2,222	34,437	9.83	338,439	429,844
	Stand alone								
	Retail	115,441	SF	18	2,078				
	Slips	222	Slips	4	888				
PD 3	Hotel	2,863	Rooms	7	20,041				
	Retial	50,445	SF	18	908				
	Resturant	50,445	SF	32	1,614	22,858	8.56	195,755	608,838
	Stand alone								
	Retail	16,373	SF	18	295				
PD 8	Regional	17,204	SF	40	688	688	8.62	5,933	10,062
PD 9	No Change					0	12.31	0	93,185
PD 10	No Change					0	9.11	0	182,249

Looking at PD3- I agree that what is being planned is SU after mitigation without this. Common sense.

Where did the 608,838 number come from? It just pops up.

I can follow what is going on to get the 195,755 for comparison, but this is laughable. They are really converting the # of SF for restaurants and retail plus the number of hotel rooms into the number of trips generated? And they all get multiplied by 8.56 miles. I imagine UTC mall is higher for trips and all the empty strip malls are way lower. How do they come up with the Port conversions? Are they somehow in Appendix A? Is this PMPU plus 2016 CE?

137

Our hotels are two miles from the airport. This correlation is like scholars in the middle ages trying to figure out how many angels dance on the head of a pin. We pay consultants big bucks to play games like this.

Janet

**From:** Abby Rosenthal <abby5679@yahoo.com>  
**Sent:** Tuesday, February 20, 2024 5:10 PM  
**To:** Dennis Campbell; Lesley Nishihira  
**Subject:** 2nd Request — Quick Question from 1205 Pacific Hwy Resident on 12th Floor

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 Dennis and Lesley,

Thanks for the information about the SD Port Master Plan.

Question:

Can you please tell me what is in the works for the old Navy Building? - the one whose lease was just shortened, and now the Navy has to vacate?

It is important for my future plans that I know what to expect to happen to that site - i.e. high rise? how many stories?

That's it.

Thanks in advance for your quick response to my question.

Abby

Abby Rosenthal  
CPA  
1205 Pacific Highway Resident  
Unit 1201

138

February 21, 2023

**San Diego Waterfront Coalition Comments on San Diego Unified Port District final draft Port Master Plan Update and Program Environmental Impact Report**

The San Diego Waterfront Coalition is a consortium of local urban planning and environmental organizations who share concerns with planning for downtown San Diego's waterfront. Over time, membership has included groups like Citizen's Coordinate for Century 3, the San Diego Chapter of the Sierra Club and the San Diego League of Women Voters, among others.

**General**

139

The San Diego Unified Port District's (port or port's) proposed "final" draft Port Master Plan Update (PMPU) and related draft program environmental impact report (PEIR) are profoundly deficient. Perhaps the most astonishing of these deficiencies is the report's acknowledged omission of proposed changes to sections of the North and Central Embarcadero that will undoubtedly result in a new bayfront far different from that reflected in this proposed final draft PMPU and PEIR.

140

The fact that port staff has solicited additional public comments on these documents through 2/28/24 seems to infer that the port is still open to additional changes in the "final" PMPU and PEIR based on that additional public input. Assuming that is the case, we will treat these two documents as "final drafts" and have prepared comments suggesting significant improvements to this version of the documents that might make them more likely to pass muster at the California Coastal Commission (CCC) and the courts. While these comments are limited to the North, Central and South Embarcadero planning subdistricts, we also support and endorse comments submitted by the Southwest Interpretive Association (SWIA). We also share many of the concerns reflected in comments filed by the Embarcadero Coalition.

141

Scanning parties' written comments on the Draft PMPU/EIR and port planning staff's responses to them, we are concerned that in too many instances, port staff



141 dismisses many of the comments it has received by labeling the comments as “policy related” instead of environmental concerns, as though the port plans or actions addressed in the comments have zero environmental impacts. According to port staff, public concerns about public access, scenic vistas or scenic viewsheds to the bay are merely “policy concerns” despite the fact that these are *environmental* issues clearly addressed in CEQA and the California Coastal Act. Instead of complying with these state laws, port staff seems to be trying to set themselves up as umpires, calling balls and strikes, instead of playing by the rules. Under state law, the port is required to analyze and fully mitigate environmental impacts identified in parties’ comments wherever possible.

In one case, a commentator expresses concerns about a previous promise by the port to build a Ferry Landing Park on the Coronado tidelands bayfront contained in a 1984 PMP amendment, which has never been carried out. The port staff’s response is that the PMPU covers a new 30-year planning horizon and that during that time the port *might* build such a park. This tactic is similar to the promise by the port that it would build a veteran’s park on Navy Pier, a promise that it has taken more than 20 years for the port to even begin to fulfill.

142 This is also similar to the port’s broken promise to build a 5.2 Acre Broadway Landing Park on and at the foot of the Broadway Pier, a promise that the port broke when it decided to build a new cruise ship terminal on Broadway Pier despite protests by cruise ship lines that under their business plans, a second cruise ship terminal on the embarcadero was not needed.

This port strategy of making and breaking promises points out the need for oversight agencies like the Coastal Commission to include clearer deadlines when they consider approving Port initiatives like the PMPU with conditions. Any such conditions must come with clear calendar deadlines and the promise of significant sanctions or daily fines if the port fails to carry out those conditions on schedule.

The Port has demonstrated that it cannot be trusted to carry out vague commitments that are not time-bound. It should also not be allowed to dismiss legitimate environmental concerns by labeling them as mere *policy* issues.

## North Embarcadero

All new buildings along the east side of Harbor Drive north of Broadway should be set back 150' – 205' from the road, consistent with approved and existing setbacks at the County's Waterfront Park, the half-completed Lane Field Park and the proposed park on the northwest block of the new IQHQ RDD project just south of Broadway. This recommendation includes any proposed redevelopment of the former Wyndam Hotel compound site.

The 150' - 205' wide setback linear park areas along the east side of Harbor Drive should be built on top of new below grade parking garages similar to the existing ones at the County Administrative Center (CAC) and under Lane Field Park west of the Intercontinental hotel complex. This would allow plenty of new revenue generating parking for the port and bayfront attractions without any need for a new above grade parking garage. Similar below grade parking structures could also be constructed beneath the proposed extensions of A St. and B St. to North Harbor Drive.

Consideration should also be given to building a new below grade parking garage beneath the block bounded by Harbor Drive, Hawthorne, Pacific Highway and Grape St. instead of building a new above-grade parking garage and commercial developments on the site which would block public views and access to the waterfront. Putting a new below grade parking garage on that site would allow a 205' setback of any new above grade structures to be built, consistent with the 205' setback at the adjoining CAC block.

The port should also amend the final PMPU to read: "M Policy 1.2.4 The District shall encourage the development of ***below grade*** mobility hubs rather than surface parking to provide proximate connections to the water and Tidelands, where feasible."

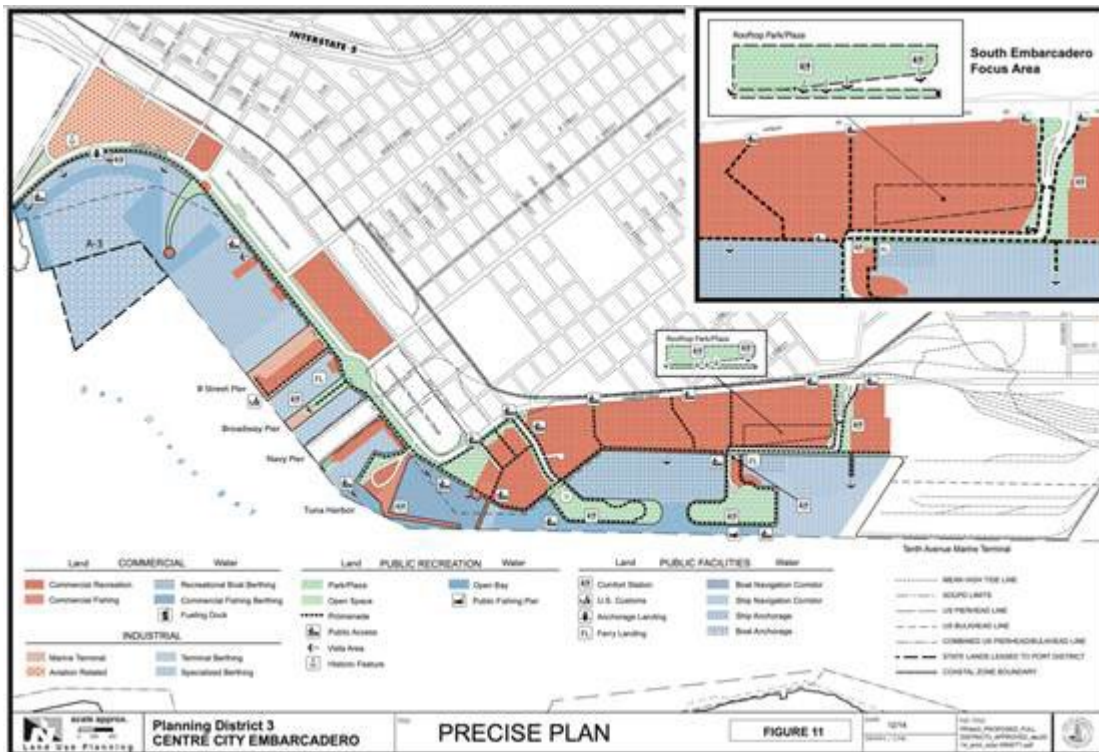
The port should also look into the feasibility of working with the city and the county to move the one-block section of Grape Street connecting Harbor Drive and Pacific Highway below grade to better connect whatever is built complying with the minimum 150' setbacks on that block with the north portion of the Waterfront Park at the CAC. If Grape Street is left as is, any visitors who might stay at any new low-cost hotel on the block bounded by Harbor Drive, Hawthorne, Pacific Highway and Grape St., or who park in a new parking garage below grade at that site will find it very dangerous if they try to cross always crowded fast auto and

truck traffic on Grape St. with their children to go to the County's Waterfront Park next door. It would be a major waterfront traffic accident waiting to happen.

In addition, the port should more carefully consider converting Harbor Drive between Hawthorne and Ruocco Park into a thinner, meandering two-lane bayfront drive and renaming that section of it the John Nolan Parkway.

The port should also more carefully review and consider implementing most of the other recommendations put forward by the port's own North Embarcadero Visionary Project Citizen's Advisory Committee (NEVPCAC) several years ago. Those recommendations seem to have been studiously ignored by the port since the committee was summarily dismissed without explanation by port staff.

143



This map included in the 2014 North Embarcadero precise Plan reflects parkland planned for the North, Central, and South Embarcaderos. The final PMPU should include this map with a detailed explanation of changes proposed in park sites and sizes over the timespan of the PMPU that can be achieved with no net loss of promised parkland on our bayfront.

## Central Embarcadero

Page 277 of the draft FPMPU states “With the exception of the redevelopment of the existing restaurant of G Street Mole (currently, the Fish Market) and roadway improvements along Harbor Drive, the PMPU does not propose any new uses, development or change in intensity of development in Central Embarcadero. Rather, the continuation of the existing uses, with potential maintenance of and minor improvements to existing development, such as Seaport Village and Tuna Harbor, could be allowed under the PMPU. Accordingly, the proposed vision in the PMPU reflects the existing state of the Central Embarcadero.”.

144 If unchallenged, this assertion would represent one of the biggest bait and switch proposals the port has every put forward, and will almost certainly be rejected by the CCC and the courts. As everyone knows, the port has entered into an exclusive negotiating agreement with the 1HWY1 development group for the redevelopment of the Central Embarcadero. That company has already proposed a completely new Seaport San Diego vision that includes the construction of seven major new hotels rising hundreds of feet above the waterfront, and thousands of new docks and piers for private yachts. As part of a project EIR Notice of Preparation (NOP), 1HWY1 has already submitted a redevelopment proposal, including very detailed project description (PD) and an Initial Environmental Impacts Checklist (IEIC). For the port staff to claim that nothing is going to happen to the Central Embarcadero for the foreseeable future doesn’t pass the laugh test.

Instead of noting this major omission, port staff only mentions it in passing in Vol 2 of the EIR (Pages 2-21 to 2-22). That brief mention notes that the PMPU EIR treatment of the Central Embarcadero is “Based on the proposal accepted by the Board on November 8 6, 2016 (2016- 0607) and the Exclusive Negotiating Agreement adopted by the Board, on May 16, 2017 (2017-0155), and signed on October 2, 2017 (Doc# 67343). At the time of this writing, this proposal comprises the following potential development intensity (all square footages, hotel rooms, retail square feet, restaurant square feet, parking spaces, and project components are approximate and could change in the future.

- (1) 390,000 square feet of retail space;
- (2) 480-foot-tall observation tower, including 10,000 square feet of restaurant and a 10,000-square-foot observation tower;
- (3) 19,130 square feet of office space;
- (4) a 500-room hotel at 405,805 square feet;

- (5) a 170-room (350 beds) micro-hotel with affordable pricing, at 117,450 square feet;
- (6) a 225-room (475 beds) hostel at 122,381 square feet;
- (7) a 20,000-square-foot event center;
- (8) 65,150 square feet of marine education space;
- (9) a 178,490-square-foot aquarium;
- (10) 164 marina slips, both for commercial fishing and recreational use;
- (11) 30 acres of public space, 21 acres of which are park space; and
- (12) 2,410 new parking spaces.”

The RFP winning proposal 1HWY1 submitted in 2015 and which the port signed an exclusive negotiating agreement for in May of 2017 was based on a significantly less dense amount of land uses on the Central Embarcadero than the current updated and expanded HWY1 proposal (which is currently undergoing EIR review by the Port and 1HWY1) with far fewer hotel rooms, less commercial development, much fewer new boat slips, piers and jetties, etc.

144 Why port staff would choose to base the PMPU PEIR on the 2016 1HWY1 proposal instead of the current proposal, upon which port staff is already conducting an EIR, is not explained in the draft final PMPU or its PEIR. *In order to comply with CEQA, the PMPU and its accompanying PEIR must be based in the current 1HWY1 Seaport San Diego proposal, not on an eight-year-old document.* CEQA requires that any program or project EIR fully consider all the potential cumulative environmental impacts of existing and proposed programs and projects, **including any proposed new projects the lead agency is aware of when the documents are drafted.** In addition, “Section 30711 of the California Coastal Act (Pub. Resources Code, Div. 20) states that **a port master plan shall include the proposed uses of land and water areas, where known.**

For port planning staff to pretend that it is unaware of what is currently being planned for the Central Embarcadero is to claim that the port’s right hand doesn’t know what its left hand is doing. We do not believe this is the case. Port Commission adoption of the proposed “final” PMPU and EIR at this point would mean that the port would be asking the California Coastal Commission (CCC) to approve this document in one planning proceeding at the same time it is considering major amendments to the PMPU along the Central Embarcadero in a concurrent parallel proceeding, which violate CEQA provisions prohibiting this kind of piecemeal planning.

Even more recently, the port has announced plans to rename the existing tidelands park along the north side of the G St. Mole in order to incorporate that established parkland into a “new” 10-acre Freedom Park which would wrap around the bayfront from Navy Pier to the Fish Market. While we support this proposal, we note that simply relabeling existing port tidelands park property with a new name does not increase the net amount of designated parkland on the embarcadero.

For example, in its latest Seaport San Diego proposal, 1HWY1 proposes to destroy the existing 3.3-acre Ruocco Park near the G St. Mole. Despite the existing contractual mandate that any effort to demolish the existing Ruocco Park must include plans to *build a new* replacement park with public access and views equivalent to the existing park - *before* the existing one can be eliminated, 1HWY1 proposes to simply rename a small portion and a parking roadway on the existing North Embarcadero Marina Park as a “new” replacement Ruocco Park. There is no effort made to get around the fact that such a tradeoff would entail a net reduction of 3.3 acres of existing tidelands park.

We recommend that the port defer any further review or approval actions regarding this “final” PMPU or any related environmental review until the port has reached final decisions regarding the evolving proposed Seaport San Diego redevelopment project, then roll the final environmental review of that project into the draft PMPU section regarding the Central Embarcadero and base its PMPU EIR on that project EIR. Then consider reviewing and approving a final PMPU that reflects what is really being planned for that subregion before submitting the final PMPU and PEIR to the Coastal Commission for its review.

### **South Embarcadero**

This section of the EIR envisions construction of a second 600 room tower to be built by the Hilton San Diego Bayfront Hotel on its existing site south of the convention center. The proposed hotel expansion would construct that second tower *adjacent to existing parking garage*.

Construction of a second tower *next to the existing parking garage* would require that the new expanded hotel complex block twice the bayfront view corridors from the downtown core to the water than it does now.

The final PMPU should be amended to require that any new tower be built *aligned directly with the existing tower* in such a manner that won’t block public bayfront views any more than the existing hotel complex does.

Thank you for this opportunity to comment on the final draft PMPU and PIER. We look forward to reviewing an updated, truly final PMPU and PIER at a later date, after the Port Commissions input and additional corrections and changes reflecting positive responses to these comments.

Don Wood  
Senior Policy Advisor  
San Diego Waterfront Coalition  
619-463-9035  
Dwood8@cox.net

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**From:** Janet Rogers <jsrogers624@gmail.com>  
**Sent:** Wednesday, February 21, 2024 7:34 PM  
**To:** Anna Buzaitis  
**Subject:** Re: Hotel numbers in NE PMPU TYPO?

**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.

Anna,  
What about the 500 rooms north of the County Admin bldg.. That is NE plus the 750

23.

**PD3.23** In the Commercial Recreation-designated area located on the block bounded by Grape Street, North Harbor Drive, Hawthorn Street, and Pacific Highway, develop retail, restaurant and/or lower cost overnight accommodations at the Regional Mobility Hub, as described below:

1.

Lower cost overnight accommodations with up to **500 beds (or equivalent rooms)**; and/or

**PD3.26** In addition to existing facilities, develop up to **750 additional hotel rooms**,

- 
- The SE says
- **PD3.72** Develop up to **600** hotel rooms (100 net new rooms above the number of rooms approved under the previously certified Port Master Plan in 2013),

The 600 haven't been built yet so they are still needed for the environmental impact.

$500+750+600=1850$

The PEIR is 1000 short according to the PMPU.

Janet

On Wed, Feb 21, 2024 at 4:35 PM Anna Buzaitis <[abuzaiti@portofsandiego.org](mailto:abuzaiti@portofsandiego.org)> wrote:

Hi Janet,



Yes, there are 850 net new rooms in Planning District 3 – 750 net new rooms in the North Embarcadero Subdistrict and 100 net new rooms in the South Embarcadero Subdistrict.

Please let me know if you have any other questions.

Thank you,

Anna

---

**From:** Janet Rogers <[jsrogers624@gmail.com](mailto:jsrogers624@gmail.com)>  
**Sent:** Tuesday, February 20, 2024 6:55 PM  
**To:** Anna Buzaitis <[abuzaiti@portofsandiego.org](mailto:abuzaiti@portofsandiego.org)>  
**Cc:** Lesley Nishihira <[lnishihi@portofsandiego.org](mailto:lnishihi@portofsandiego.org)>  
**Subject:** Re: Hotel numbers in NE PMPU TYPO?

**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.

sorry PIER

found it at least twice.

Vol 2

Air quality Table 4.2-12

Transportation Table 4.14-9

only 850 rooms in PD3

Janet

On Tue, Feb 20, 2024 at 9:46 AM Anna Buzaitis <[abuzaiti@portofsandiego.org](mailto:abuzaiti@portofsandiego.org)> wrote:

Good morning Janet,

What table are you referencing?

Thank you,

Anna

---

**From:** Janet Rogers <[jsrogers624@gmail.com](mailto:jsrogers624@gmail.com)>

**Sent:** Tuesday, February 20, 2024 9:19 AM

**To:** Lesley Nishihira <[lnishihi@portofsandiego.org](mailto:lnishihi@portofsandiego.org)>; Anna Buzaitis <[abuzaiti@portofsandiego.org](mailto:abuzaiti@portofsandiego.org)>

**Subject:** Hotel numbers in NE PMPU TYPO?

**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 Lesley,

The NE PMPU shows new rooms of 500, 750 and 600 equalling 1850.

The table shows 850.

Did you lose 1.000 rooms?

Janet



Southwest Wetlands Interpretive Association  
PO Box 575  
Imperial Beach, CA 91933

23 February 2024

Lesley Nishihira, Assistant Vice-President  
San Diego Unified Port District  
3165 Pacific Hwy  
San Diego, CA 92101

(submitted 23 February 2024 via email to [PublicRecords@portofsandiego.org](mailto:PublicRecords@portofsandiego.org))

Subject: Final Draft Port Master Plan Update (PMPU) and Final EIR

Dear Ms. Nishihira:

The Southwest Wetlands Interpretive Association (SWIA) is a non-profit organization dedicated to helping preserve and enhance wetlands throughout southern California – and particularly in the Tijuana River watershed and South San Diego Bay. Historical losses of Bay wetlands (especially, the majority of vegetated and shallow-subtidal types) have occurred from development, and climate change and sea level rise represent significant additional threats to natural resources and infrastructure/developments in and around San Diego Bay. SWIA's primary interest is that the plan will implement a long-term sustainable vision - and reality - for conserving and enhancing natural resources of the public trust tidelands (and waters) managed by the Port of San Diego (Port).

Since the PMPU process began over 11 years ago, SWIA has participated in workshops, meetings and hearings regarding its development. The document is a significant improvement compared to the current master plan. Its format - presenting the goals, objectives and policies for each major element; cross-referencing of allowable uses types/activities within lands and waters; and the district-by-district water and land use designations/maps – provides a clearer and more accessible plan for the Port's stakeholders' and the public's use. And it incorporates some of the key recommendations made by SWIA and other environmental organizations to update policies and more appropriately recognize the value and importance of conserving, restoring and enhancing natural resources within the public trust tidelands.

Ms. Nishihira  
February 23, 2024  
Page 2

147 | However, there remain several aspects of the plan that we strongly recommend be revised or added to meet the long-term goals for effective conservation of those natural resources. With the addition of these changes, the plan would provide more clear guidance and direction to meet those goals.

148 | First, the plan does not identify any "Conservation Open Space" within the entire PMPU (Table 3.1.1, Figure 3.1.1). That omission is significant, because this is the land use-based category that the plan states is intended to complement the "Conservation/Intertidal" water use-based category - where natural resource conservation and enhancements (i.e., "Habitat Management and Wildlife Conservation") are to occur (Tables 3.1.2 and 3.1.3). As SWIA and others have repeatedly recommended to the Port, especially in light of projected sea level rise effects, tidelands at Grand Caribe, East Harbor Island and other locations within the PMPU tidelands are feasible if not inevitable sites that can accommodate new wetland/intertidal/coastal transition habitats (this was full addressed in a letter dated 10/3/2017). We strongly recommend that the Final PMPU be revised to add at a minimum the East Harbor Island and Grand Caribe locations (and appropriate acreages) as Conservation Open Space to the relevant tables and figures. In addition, to the extent feasible, Conservation Open Space projects should also be integrated with complementary Recreation Open Space projects; COS projects, in addition to their inherent benefits, can also provide for adaptive management to reduce sea level rise risks to recreational and other built assets. Both Grand Caribe Isle and East Harbor Island are eminently suitable for implementing this approach.

149 | Second, the term "Coastal-Enhancing", which is not defined in the California Coastal Act, is being carried over from the Port's 1981 Master Plan (per a note to WLU Objective 3.1). The PMPU's definition ("WLU Policy 1.2.1.c. Coastal-enhancing: Any development or use that does not require a location directly near marine or coastal waters to be able to function but that provides visitor-serving functions and contributions that enhance the Public Trust responsibilities of the District") allows for a very broad interpretation: that the Port could allow many uses and activities purporting, but questionably qualifying, to meet the intent of the Coastal Act and the Port's' Public Trust responsibilities. As stated in the Coastal Act, Section 30001, agencies implementing the Coastal Act must ensure: "(d) That existing developed uses, and future developments that are carefully planned and developed consistent with the policies of this division, are essential to the economic and social well-being of the people of this state and especially to working persons employed within the coastal zone." This is particularly relevant in light of how the even more restrictive Public Trust Doctrine addresses legitimate uses: "Therefore, uses that do not accommodate, promote, foster or **enhance the statewide public's** (emphasis added) need for essential commercial services or their enjoyment of the tidelands are not appropriate uses for public trust lands." The PMPU must provide a definition of "Coastal-Enhancing" that fully reflects and responds to the stated texts of the Coastal Act and Public Trust Doctrine. The definition of "coastal-

Ms. Nishihira  
February 23, 2024  
Page 3

enhancing" must be revised to more closely adhere to the text and intent of those overarching controlling documents.

As stated in the beginning of our letter, SWIA's primary interest in the PMPU is that it will implement a long-term sustainable vision for conserving and enhancing natural resources of the public trust tidelands and waters. With the inclusion of our recommended changes, the PMPU would provide needed guidance and direction that is currently missing.

Please contact Bill Tippetts ([billtippetts@gmail.com](mailto:billtippetts@gmail.com)) if you wish to discuss our comments.

Sincerely,



Mike McCoy

President

Cc: SWIA Board



Bill Tippetts

Board Member



C.C.H.O.A.  
505 Grand Caribe Cswy.  
Coronado, CA 92118

Office 619.423.4353  
Fax 619.424.3923  
www.cchoa.org

HOMEOWNERS ASSOCIATION

Board of Port Commissioners  
Port of San Diego  
3165 Pacific Highway  
San Diego, CA 92101

February 23, 2024

Re: Board of Port Commissioners February 28, 2024 Meeting  
on the Port Master Plan Draft Program EIR

Dear Board of Port Commissioners:

The Coronado Cays Homeowners Association ("CCHOA") would like to thank the Board of Port Commissioners, managers and staff members who have spent countless hours over the past several years to reach this milestone of approving the Port Master Plan update.

We appreciate that the concerns of our community for the future of the Grand Caribe and South Cays Subdistrict (within Planning District 9 – Silver Strand) have been heard by the Port Commissioners and by Port staff members, and we celebrate the designations of Recreation Open Space, Scenic Vista Areas and a View Corridor Extension within our district (Figs. PD9.2, PD9.3 and PD9.4, pp. 337-341, Final Draft PMPU December 2023), as well as the determination that no new hotel rooms are proposed (Section 5.9.4(C)-III, Sec. PD9.25 (Id., p.349)).

During this multi-year process, we were able to work closely and transparently with our Port Commissioner and with Port staff, together with strong support from our City leaders, to support the Port's vision for the South San Diego Bay area that recognizes the value to all San Diegans (and all Californians) of the natural areas in this region, including Grand Caribe Shoreline Park (the Port's only native plant garden) and the newly-added open waters of the Trust Lands Use Plan, as well as the importance of public access to these unique areas.

We look forward to continuing our work with the Port, as the PMPU is considered by the Coastal Commission, to ensure that the Port's vision for these unique natural areas is realized and preserved for generations to come.

Sincerely,

Mark Crisson  
President, Board of Directors  
Coronado Cays Homeowners Association

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

Board of Port Commissioners February 28, 2024 Meeting on the Port Master Plan Draft Program EIR  
Page | 2

cc. Port of San Diego Commissioner, Frank Urtasun, Chair  
Port of San Diego Commissioner, Danielle Moore, Vice Chair  
Port of San Diego Commissioner, Ann Moore, Secretary  
Port of San Diego Commissioner, Dan Malcolm  
Port of San Diego Commissioner, Sandy Naranjo  
Port of San Diego Commissioner, Sid Voorakkara  
Port of San Diego Commissioner, Michael Zucchet  
Port of San Diego Planning Director, Lesley Nishihira  
Port of San Diego Program Manager, Christian Andersen  
City of Coronado Mayor Richard Bailey  
City of Coronado Council Member, Mike Donovan  
City of Coronado Council Member, Carrie Downey  
City of Coronado Council Member, John Duncan  
City of Coronado Council Member, Casey Tanaka  
City of Coronado City Manager, Tina Friend

**From:** Ellen Coppola <ecoppola49@gmail.com>  
**Sent:** Sunday, February 25, 2024 10:19 PM  
**To:** PublicRecords  
**Subject:** Do Not adopt the Final Draft PMPU or certify the Final PEIR

**Categories:** Board Related

**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,

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

**I STRONGLY OPPOSE** the adoption of the Final Draft PMPU and the certification of its Final PEIR for the following reasons:

1. The PEIR process was fatally flawed due to: the sequencing of the NOP process; incorrect buildout numbers being used; and incorrectly using the 2016 Seaport Project for the cumulative evaluation.
  - Comments were made by governmental agencies and the public in 2017 for the NOP project description based upon a 2017 draft of the PMPU. However, the approval to go to CEQA version of the PMPU was the Revised draft - 4 years later. The public and governmental agencies were not given an opportunity to submit updated input for the NOP based upon the changes made to the Revised PMPU from the 2017 draft. This led to then obsolete comments from agencies regarding earlier versions of both the PMPU and the Seaport Project. Had the NOP gone out correctly citing the Revised draft PMPU, the CEQA evaluation should have used the very different and updated 2019 version of the Seaport Project.
  - The PEIR figures used to evaluate the environmental impacts are inconsistent and often wrong. For instance, it states that the North Embarcadero would have a total of 850 additional hotel rooms by 2050 while the PMPU states 1,850 new rooms. Incorrectly underestimating the environmental impacts by 1,000 rooms is significant. Similar numeric problems exist for other categories and other Districts, which all undermine the validity of the results.
  - The Port purposely and openly misled the community, the Coastal Commission and the CEQA process about the PEIR by removing the redevelopment of the Central Embarcadero 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 blatantly wrong since the project was initiated in 2016 and a newer version was available in 2019. This is not even gaslighting since everyone knows this statement is patently false.
2. Change the PMPU to mitigate or remedy the PMPU's Significant and Unavoidable impacts identified by the PEIR.
  - Stating that environmental impacts of future projects cannot be assessed in the document that provides the development standards for those projects is a huge problem. This is especially concerning because without knowing all future projects, the cumulative analysis identified huge



negative impacts. At least 60% of the CEQA categories are still Significant and Unavoidable. And of those, the PEIR stated some can't be mitigated, such as the increase in Vehicle Miles Traveled (VMT) in Planning Districts 2 (Harbor Island) and 3 (Embarcadero). Upon review, the Embarcadero Coalition believes that the number of evaluated areas to be either SIGNIFICANT and UNAVOIDABLE or SIGNIFICANT AFTER MITIGATION to be closer to 80%. The PMPU should improve, not exacerbate, conditions, especially since the categories with these results have the biggest daily impacts on the general public. (Aesthetics and Visual 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). The underlying PMPU development standards must be changed until it results in Less than Significant outcomes.

- Failure to change the PMPU will result in a buildout with huge negative impacts. These environmental impacts are harmful to the health and welfare of the populations adjacent to the Port, especially the sensitive receptors of residents, seniors, children and the medically impaired. The fact that the sensitive receptors will live and sleep within 1000 feet of elevated GHG emissions and noise impacts requires these impacts to be mitigated to Less than Significant.
- These negative environmental impacts are harmful to the earth's systems and negatively impact climate change. The negative impacts in the proposed PMPU undermine adjacent jurisdictions, such as the City of San Diego, which has a legal responsibility to reduce VMT. Most of the VMT generated by the Port is in San Diego. VMT impacts must be remedied to Less than Significant now. The Mobility Hubs should not include parking spaces over the minimum required for an associated hotel since they increase VMT by inducing people to drive all the way downtown.

3. 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.

- 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.
- There are detailed building standards in the North Embarcadero and in other Planning Districts yet there are none in the 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.

4. 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.

- Only 2-3% of the visitors in Downtown hotels are Californians.
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I appreciate the Port's efforts and need to update the current PMP. As Californians, we want a better Port and more reasons to participate in the beauty of the Bay, but a solid wall of hotels 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,  
Ellen Coppola

**From:** Adrian Fremont <adrian.fremont@icloud.com>  
**Sent:** Monday, February 26, 2024 6:46 AM  
**To:** PublicRecords  
**Subject:** February 28, 2024 Meeting- Agenda Item 1

**Categories:** Board Related

**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,

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

**I STRONGLY OPPOSE** the adoption of the Final Draft PMPU and the certification of its Final PEIR for the following reasons:

1. The PEIR process was fatally flawed due to: the sequencing of the NOP process; incorrect buildout numbers being used; and incorrectly using the 2016 Seaport Project for the cumulative evaluation.

- Comments were made by governmental agencies and the public in 2017 for the NOP project description based upon a 2017 draft of the PMPU. However, the approval to go to CEQA version of the PMPU was the Revised draft - 4 years later. The public and governmental agencies were not given an opportunity to submit updated input for the NOP based upon the changes made to the Revised PMPU from the 2017 draft. This led to then obsolete comments from agencies regarding earlier versions of both the PMPU and the Seaport Project. Had the NOP gone out correctly citing the Revised draft PMPU, the CEQA evaluation should have used the very different and updated 2019 version of the Seaport Project.
- The PEIR figures used to evaluate the environmental impacts are inconsistent and often wrong. For instance, it states that the North Embarcadero would have a total of 850 additional hotel rooms by 2050 while the PMPU states 1,850 new rooms. Incorrectly underestimating the environmental impacts by 1,000 rooms is significant. Similar numeric problems exist for other categories and other Districts, which all undermine the validity of the results.
- The Port purposely and openly misled the community, the Coastal Commission and the CEQA process about the PEIR by removing the redevelopment of the Central Embarcadero 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 blatantly wrong since the project was initiated in 2016 and a newer version was available in 2019. This is not even gaslighting since everyone knows this statement is patently false.

2. Change the PMPU to mitigate or remedy the PMPU's Significant and Unavoidable impacts identified by the PEIR.

- Stating that environmental impacts of future projects cannot be assessed in the document that provides the development standards for those projects is a huge problem. This is especially concerning because without knowing all future projects, the cumulative analysis identified huge negative impacts. At least 60% of the CEQA categories are still Significant and Unavoidable. And of those, the PEIR stated some can't be mitigated, such as the increase in Vehicle Miles Traveled (VMT) in Planning Districts 2 (Harbor Island) and 3 (Embarcadero). Upon review, the

Embarcadero Coalition believes that the number of evaluated areas to be either SIGNIFICANT and UNAVOIDABLE or SIGNIFICANT AFTER MITIGATION to be closer to 80%. The PMPU should improve, not exacerbate, conditions, especially since the categories with these results have the biggest daily impacts on the general public. (Aesthetics and Visual 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). The underlying PMPU development standards must be changed until it results in Less than Significant outcomes.

- Failure to change the PMPU will result in a buildout with huge negative impacts. These environmental impacts are harmful to the health and welfare of the populations adjacent to the Port, especially the sensitive receptors of residents, seniors, children and the medically impaired. The fact that the sensitive receptors will live and sleep within 1000 feet of elevated GHG emissions and noise impacts requires these impacts to be mitigated to Less than Significant.
- These negative environmental impacts are harmful to the earth's systems and negatively impact climate change. The negative impacts in the proposed PMPU undermine adjacent jurisdictions, such as the City of San Diego, which has a legal responsibility to reduce VMT. Most of the VMT generated by the Port is in San Diego. VMT impacts must be remedied to Less than Significant now. The Mobility Hubs should not include parking spaces over the minimum required for an associated hotel since they increase VMT by inducing people to drive all the way downtown.

171

3. 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.

- 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.
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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,

Adrian Fremont  
Marina District

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**From:** Ann-Marie Piskule <Ann-Marie-SD2010@hotmail.com>  
**Sent:** Monday, February 26, 2024 3:28 AM  
**To:** PublicRecords  
**Cc:** Ann-Marie Piskule  
**Subject:** Do Not adopt the Final Draft PMPU or certify the Final PEIR  
  
**Categories:** Board Related

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**Sincerely,**

**Ann-Marie Piskule**

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**From:** Daniel Reeves <daniel@junipersa.com>  
**Sent:** Monday, February 26, 2024 12:06 PM  
**To:** Lesley Nishihira; Anna Buzaitis; Lily Tsukayama; Dennis Campbell  
**Cc:** Jason Giffen; Rebecca Harrington  
**Subject:** Fwd: Meeting reminder and Potential comments on the PORT PMPU/PEIR documents  
**Attachments:** Embarcadero Coalition comment Draft PMPU Jan 2022.pdf

**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.

FYI below. I'd guess this has made its way to you by now, but in case it hasn't.

Best,

Daniel Reeves  
President  
Juniper Strategic Advisory  
(619) 832-2327



Begin forwarded message:

**From:** Manny Rodriguez <[chair@downtownplanningsd.org](mailto:chair@downtownplanningsd.org)>  
**Subject:** Fwd: Meeting reminder and Potential comments on the PORT PMPU/PEIR documents  
**Date:** February 26, 2024 at 11:41:06 AM PST  
**To:** [Daniel@junipersa.com](mailto:Daniel@junipersa.com)

FYI

----- Forwarded message -----

**From:** Janet Rogers <[jsrogers624@gmail.com](mailto:jsrogers624@gmail.com)>  
**Date:** Mon, Feb 26, 2024 at 11:38 AM  
**Subject:** Fwd: Meeting reminder and Potential comments on the PORT PMPU/PEIR documents  
**To:** Manny Rodriguez <[chair@downtownplanningsd.org](mailto:chair@downtownplanningsd.org)>, Bob Link <[bob@sandiegosocialleagues.org](mailto:bob@sandiegosocialleagues.org)>

Manny and Bob,  
I see that the Port is presenting the PMPU tonight at the public spaces meeting and it says DCPC may take a stand.  
Here is what I sent to our Embarcadero Membership last night.  
I'm also attaching our document from 2022.  
I'm not finished with our long set of comments for Wednesday's meeting, but they will go today.

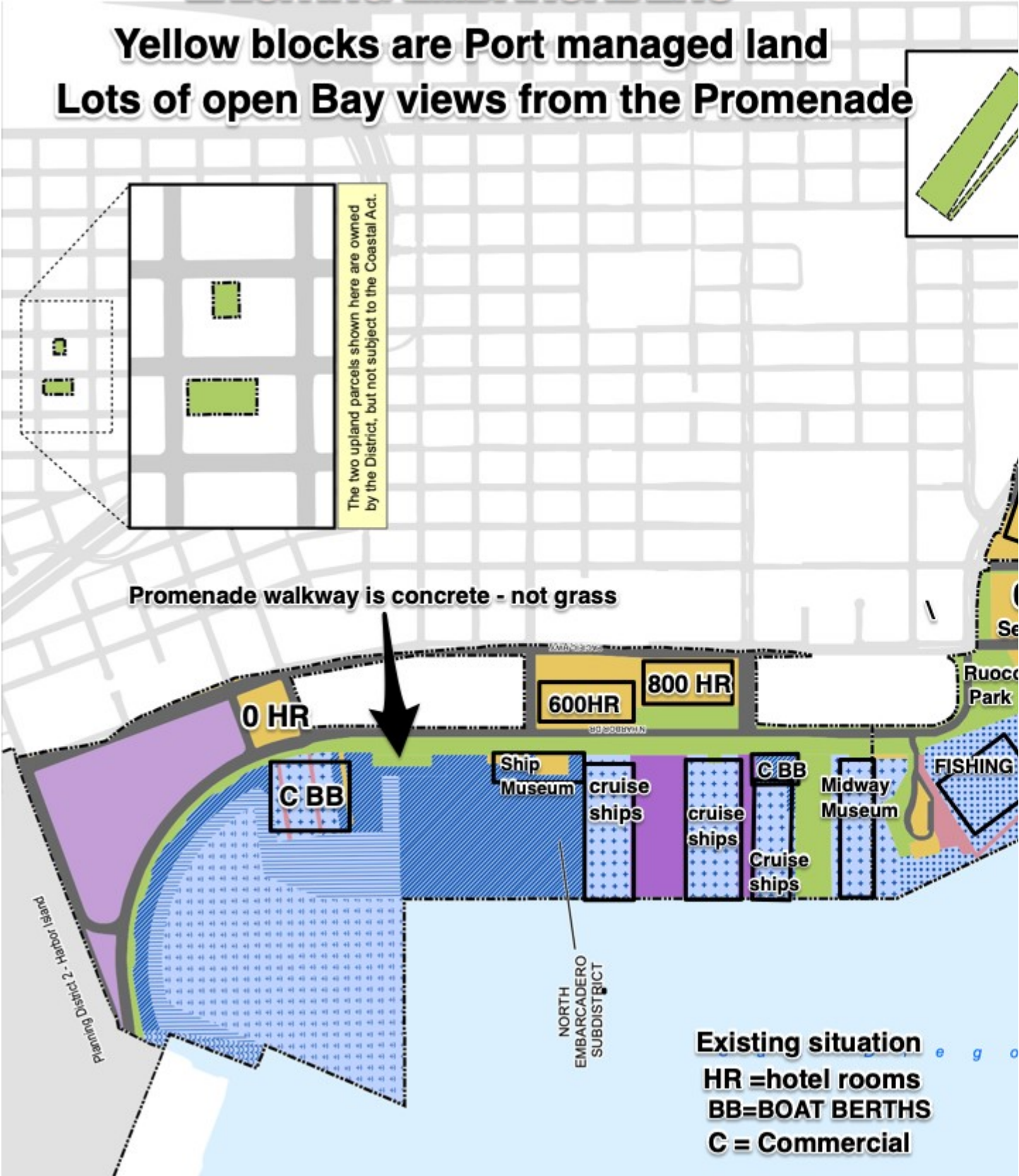
Attachment A to  
Agenda Related Materials to File No. 2024-0049

Unless you have really evaluated the whole package, please don't support this horrible impact on downtown. The PEIR is awful.

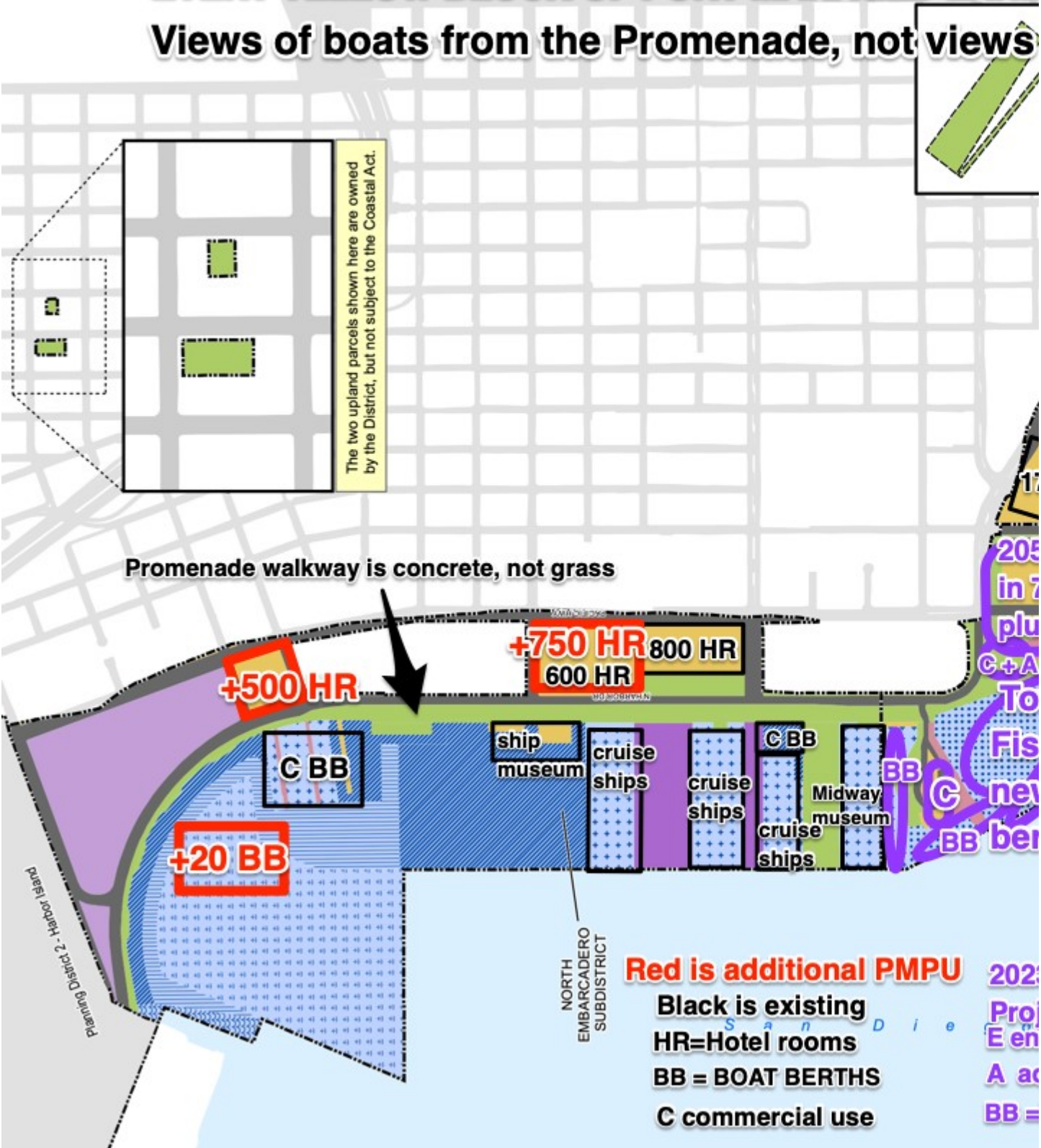
Here are Port maps that I've put all the excessive buildout on .  
Janet

**EXISTING EMBARCADERO**

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



**Existing Embarcadero +PMPU Impact +Seaport**  
**EVERY YELLOW BLOCK OF PORT MANAGED LAND**  
**Views of boats from the Promenade, not views**





----- Forwarded message -----

From: **Embarcadero Coalition** <[embarcaderocoalition@gmail.com](mailto:embarcaderocoalition@gmail.com)>

Date: Sun, Feb 25, 2024 at 9:47 PM

Subject: Meeting reminder and Potential comments on the PORT PMPU/PEIR documents

To: Embarcadero Coalition <[embarcaderocoalition@gmail.com](mailto:embarcaderocoalition@gmail.com)>

Hello Embarcadero Coalition Members,

This email is a reminder that next Wednesday, February 28th, at 10am the Port of San Diego (Port) Commissioners are meeting to vote to

1. Adopt the Final Port Master Plan Update (Final PMPU) and file it with the California Coastal Commission for certification, and
2. Certify that Plan's Final Program Environmental Impact Report (Final PEIR).

The Final Draft PMPU, if approved and certified by the California Coastal Commission, will become the Port's guiding document until the year 2050, or until it is replaced with an updated Plan. The Port is currently operating under its last Port Master Plan that was approved in 1980.

Timeline

2024

- Port Board to consider certification of the Program EIR and adoption of the PMPU (*Anticipated in February 2024*) **Happening Feb 28**
- Processing of the PMPU with the California Coastal Commission (*Anticipated spring 2024 - summer/fall 2025*)

2025

- California Coastal Commission considers certification of the PMPU (*Anticipated in late 2025*)
- Port Board approves the PMPU as certified by the Coastal Commission (*Anticipated in late 2025*)
- California Coastal Commission accepts the Port's approval of the PMPU (*Anticipated in late 2025*)

**We are asking that as many of you as can attend, do, and please bring others with you.** We need a large scale showing to reinforce our comments and concerns so that the Commissioners take notice. We also want the Coastal Commission to take notice. This has been an effective tactic in the past. **Please wear ANY SHADE OF BLUE TOP to identify that you are a member, or support, the Embarcadero Coalition.**

The Port Building is located at [3165 Pacific Highway](#) in San Diego (corner of Pacific Highway and Sassafras Street). There is a parking lot but it isn't very large. However, there is a parking lot across Pacific Highway that can be entered from Sassafras Street. Otherwise, you can walk, take public transportation, carpool or rideshare. This is the only agenda item for the meeting so please come earlier than the 10am start time.

There are three ways in which you can ensure your concerns are heard. You can use any/all of the below comments as a letter to the Port or craft your own letter to the Port and email it to them prior to the meeting on the 28th. You may also provide comments during the meeting by either signing-up to speak at the entrance to the meeting room or by leaving a recorded message with the agenda item number ONE (1) prior to 8am the day of the meeting to be played during the meeting. Public comment is limited to 2 minutes per person.

To email letters/comments, email it to: [PublicRecords@portofsandiego.org](mailto:PublicRecords@portofsandiego.org)

To call to record a message in advance the number is: 619-736-2155

If you are unable to attend in person, the livestream link is:

<https://www.portofsandiego.org/about-port-san-diego/board-meetings>

Hope to see you Wednesday morning,  
Janet and Susan

\*\*\*\*\*

Below is a sample email to the Port. Feel free to edit or write your own.

Below that letter is a list of potential comments to make at the meeting or over the phone, based on the letter. Remember you only have 2 minutes.

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

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

I appreciate the Port's efforts and need to update the current PMP. As Californians, we want a better Port and more reasons to participate in the beauty of the Bay, but a solid wall of hotels 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,

Potential Speaker bullet points

Dear Port of San Diego Commissioners,

I am \_\_\_\_\_, a member of the Embarcadero Coalition. I **STRONGLY OPPOSE** the adoption of the Final Draft PMPU and the certification of its Final PEIR for the following reasons:

1. The PIER process was fatally flawed due to the sequencing of the NOP process, frequently incorrect numbers being used, and incorrectly using the 2016 Seaport Project for the cumulative evaluation.

2. Change the PMPU to mitigate or remedy the PMPU's Significant and Unavoidable impacts identified by the PEIR.

3. Create new detailed building standards in the Central and South Embarcadero, or be held to these standards once certified by the Coastal Commission.

4. Change the plans in the Embarcadero to center on activities that draw Californians to the Bay, instead of creating a wall of hotels to mainly attract out-of-state visitors.

- Coastal-dependent activities attract Californians to the Bay, not more hotels.

5. Adhere to the building density on the Embarcadero stated in the FAR standards the Port agreed to in the PMP, NEVP and amendments

- That's a FAR of 4.5 between Ash and B Street and 3.0 in the Central and South Embarcadero.

6. PMPU Building standards in the Embarcadero should include new parking structures being underground like the other local developments.

7. Don't combine Parks/Plaza with Promenades/Walkways for Recreation Open space (ROS). Green space and places to congregate are not fungible with walkways.

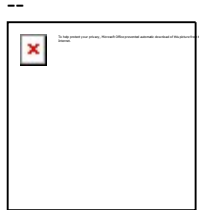
Supply a reconciliation between the current PMP and proposed PMPU.

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

- Coastal land should not be used for events centers, new golfing activities, or casinos if that is another revenue generating activity the Port is coveting.

I appreciate the Port's efforts and need to update the current PMP. As Californians we want a better Port and more reasons to participate in the beauty of the Bay, but a solid wall of hotels 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.



## **Embarcadero Coalition**

January 8, 2022

Subject: Public Comment on the Draft PMPU and Draft Program EIR

Chair, Commissioners, and CEO  
Port of San Diego

The Embarcadero Coalition respectfully requests changes to the Draft PMPU and expresses concerns about the Draft Program EIR.

We agree that it is time to update the current Port Master Plan, integrate the amendments into the plan and make adjustments for new realities. We understand that the current Port Master Plan, as a legally binding certified document, is the starting point. You are updating the Plan, not starting over from scratch. Outstanding plans, guidelines and commitments are still in effect and need to be carried over to the new Plan. We are amenable to some changes that enhance or improve the situation as it has developed over time.

We appreciate changes the Port has made that we previously requested. Adding setbacks and landscaping along Pacific Hwy, reducing building heights and reducing the number of hotel rooms are all steps in the right direction, but we believe considerable changes still need to be made to reach the goals and meet the commitments set forth by the Coastal Commission, the Port and the North Embarcadero Visionary Plan.

The Coalition is concerned with development plans for all of the Embarcadero.

### **Embarcadero Vision**

#### **5.3.1 Existing Setting**

Put California residents back into the consideration equation. The Port uses the term “visitor” or “visitor serving” because they do not have residents on their lands. However, we feel they really mean “tourists”. There are 40,000 Downtown residents and we are expected to double in the foreseeable future. The Port makes the mistake of counting us once, like a tourist, instead of recognizing that downtown residents use the Port’s amenities on a regular basis all year. We walk or bike weekly, often daily, and patronize the restaurants and facilities more than the tourists. Downtown residents are here all the time and the Port continues to turn its back on us, figuratively and literally.

Please see the letter that the Seaport Village developer sent the State Lands Commission (attached). The letter dismisses the current 40,000 downtown residents and the 3 million San Diegans who use the Port in favor of an estimate of 10 million yearly visitors (an average of over 27,000 visitors per day to “Seaport”). His presentation totally dismisses the needs of the community and focuses on the Port’s maximum revenue model instead of the Coastal Commission’s directive that public access across all income levels must be the Port’s first priority.

#### Central and South Embarcadero

It is very disturbing that the Port appears to abandon its responsibility to provide developers with standards and parameters to build on public land and waterways.

The Coastal Commission's comment to the Revised Draft asked the Port to include the Central Embarcadero, as well as National City and Chula Vista into the PMPU with development standards. We totally agree and asked for Central Embarcadero inclusion previously as well. The South Embarcadero has no building standards included either.

We are asking again for these projects to be included with development standards.

#### **5.3.3 Central Embarcadero Subdistrict**

##### **Include the Central Embarcadero before finalizing the PMPU**

We do not believe it is possible to provide an accurate review without the Central Embarcadero planning district. The massive development planned for Central Embarcadero will have a huge impact on everything from design, parks, Recreation Open Space (ROS), parking, hotel rooms and Vehicle Miles Travelled (VMT). Any PMPU revision without it is unbalanced and uninformed. The Port of San Diego's own website lists the massive redevelopment of Seaport Village in its Projects section. Therefore it is disingenuous to state in the PMPU Draft (page 277) that, "the PMPU does not propose any new uses, development or change in intensity of development in Central Embarcadero. Rather, the continuation of the existing uses, with potential maintenance of and minor improvements to existing development, such as Seaport Village and Tuna Harbor, could be allowed under the PMPU." A developer was selected by the Port in 2016. The Port advised the developer was to submit an updated rendition of Seaport Village by the end of December, 2021. After five years, it would seem they should be closing in on a final version that would be included in the PMPU and EIR.

A article in the business section of the Union Tribune on December 12th implies that the Jacob family is having more input in the project than the public. This project is not on private property but held in public trust and the public should be weighing in on the development parameters.

<https://www.sandiegouniontribune.com/business/story/2021-12-31/housing-market-vacation-rentals-ccas-san-diego-business-stories-to-watch-in-2022>

The Central Embarcadero (CE) development will dominate the whole world's view of San Diego for generations, if the Port continues with its mega development plan.

It is imperative that CE is included for a comprehensive evaluation of the Port Master Plan before the plan is finalized. It is paramount that thoughtful and balanced development occur in Seaport Village and elsewhere along the waterfront so that these areas do not completely dominate and overwhelm downtown and the surrounding landscape.

The Seaport Village developer has made mention in possible public renditions that San Diego needs an “iconic” landmark. Apparently we already have several iconic landmarks that companies such as Apple have used to feature their new products. Apple introduced its iPhone 13 with a film taken along our waterfront from the Coronado Bridge to the new Rady Shell. The anchoring elements of the film, the bridge and the shell, both have elegant and timeless design lines, which tastefully and beautifully enhance San Diego’s waterfront. Any redesign of Seaport Village and surrounding areas must ensure the plan integrates and complements these existing elements and does not diminish them.

As far as process:

1. Stating that nothing significant is going to happen in the Central Embarcadero, as is portrayed in the PMPU, when the Port has a developer and has been planning a massive overhaul for years, is misleading at best.

2. The PMP is supposed to be the planning document which defines the parameters for developers. By removing the CE from the PMPU and public view and not including those parameters, it appears the Port is waiting for the developer to present a project the Port likes and then they will make it an amendment to the PMP thus allowing the developer to set the parameters. The Port has a responsibility to give the developer parameters that have been set in conjunction with public comment. That is not being done.

3. Leaving the CE out of the Transportation Analysis in the EIR is unacceptable. The Seaport Developer told the State Land’s Commission that the project is so big it will have 10 million visitors a year. The EIR states that after mitigation, and without the CE, the VMT increases are significant and unavoidable. The impact on traffic will be horrific if the Port adds 10 million visitors a year to that little corner of downtown. This quantity of visitors will create a huge negative VMT impact on the new, smaller Pacific Hwy.

4. The Port policy to leave the number of parking spaces up to Public Demand is another unacceptable policy, if the Port plans to put in enough parking spaces demanded by 10 million visitors a year in CE. That quantity is over 27,000 visitors a day. This policy is contrary to the Climate Action Plan.

5. Since the developer was required to provide the Port with his revised plan the end of December 2021, it is not a burden wait top to integrate it into this 30 year plan.

Please include the Central Embarcadero sub-district into the Draft PMPU and update the Draft EIR with its inclusion, before finalizing the Draft PMPU and presenting the Plan to the Coastal Commission.

We have a few comments on the CE section of the Draft PMPU. We have highlighted our requested changes in red, and the current Draft PMPU in blue.

### 5.3.3(A) Vision

**Protect** Existing waterfront open spaces, such as Tuna Harbor Park, Ruocco Park, and Embarcadero Marina Park North, provide recreational opportunities and expansive views of the water.

## Roadway Improvements

PD3.45 Reconfigure the North Harbor Drive/West Harbor Drive right-of-way to accommodate all modes of travel while allowing for:

- Two general travel lanes north of Market Street; (Where is the room for two travel lanes and two dedicated transit lanes, especially where Harbor Drive curves around the southern end of the IQHQ development? Two travel lanes anywhere on Harbor Drive complicates the VMT and congestion problems on Pacific Hwy)
- c-f Same concern about space for these lanes, plus concern of losing Green space and the negative impact on memorials. CE needs to be included in the reconciliation of green space ROS, parks and plaza.

## Views

Figure PD3.4 should have an inland Scenic Vista location added at the corner of Pacific Hwy and Harbor Drive to preserve the views created by Ruocco Park

PD3.51 Preserve scenic vista areas in the following locations as generally depicted in Figure PD3.4:

- c. Along the waterfront south of ~~Ruocco Park~~ the Midway and north of Market Pier.
- d. Preserve the Bay views of the Bay from the corner of Pacific Hwy and Harbor Drive through Ruocco Park.

## 5.3.2 North Embarcadero Subdistrict

The North Embarcadero Alliance Visionary Plan (NEVP) addresses the development area in the North Embarcadero and the integration and updating of those principles into the new PMP is of utmost concern.

### "City Meets the Bay

The Visionary Plan is fundamentally about connectivity and linkage between downtown San Diego and the bay."

The (NEVP) is still relevant to developing the North Embarcadero since only one phase has been implemented. According to the geographical description of the NEVP, the property owners between Pacific Hwy and the railroad tracks, are third party beneficiaries of the NEVP and its inclusion in the PMP. The land owned by Catellus at the time of the NEVP is included in all the the development considerations of the PMP, such as the Floor Area ratio.

Goals expressed in the NEVP and MOU

- ✳ Provide access and open space for the public
- ✳ Optimize existing property values
- ✳ Improve linkages with surrounding neighborhoods and the South Embarcadero area
- ✳ Enhance existing aesthetic values

### Current PMP - Centre City Embarcadero Planning Subareas

page 59 PLANNING DISTRICT 3

“The North Embarcadero Alliance Visionary Plan area includes all of Subareas 31, 32, 33, and part of Subarea 34. The Visionary 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.”

The current PMP references the NEVP rather than delineating the planning guidance. We understand that the integration of plans means that references to the NEVP won't be needed since the relevant aspects will be included into the new PMP language.

Geographical boundaries of the NEVP

The Project Area is bordered by Market Street on the south, Laurel Street to the north, the railroad right-of-way to the east and the San Diego Bulkhead line (the bayward edge of land) to the west, in downtown San Diego

### Final Draft MEIR of the NEVP April 2000

States “Protection and enhancement of existing Bay viewing areas located north of the Cruise ship Terminal along North Embarcadero.”

Port Master Plan

The Proposed Project is located within Planning District 3 (Centre City Embarcadero) of the Port Master Plan (PMP). The PMP was amended April 25, 2000 (Board of Port Commissioners Resolution 2000-83) to **incorporate the NEVP**. The Project as proposed is consistent with the PMP as currently adopted, as discussed in Section I of the Initial Study.

CCDC

The Centre City Community Plan and Centre City Planned District Ordinance were amended by the CCDC in 2006 to address the NEVP.

Catellus' public comment letter, dated Jan 26, 2000 in response to the Draft Final MEIR for the North Embarcadero Visionary Plan expressed concern about adequate detail concerning public view impacts between Pacific Highway and the Bay. The comments requested that additional information or clarification be included in the MEIR to better inform the public and affected property owners concerning the impacts of the Visionary Plan and the related developments described in the Visionary Plan.

"In light of the significances that the Visionary Plan places on the creation and preservation of east-west view corridors should be included in the MEIR, particularly along A, B and C Streets between Pacific Hwy and the SDE Bay, where some of the most intense development under the Visionary Plan will occur. One photo-simulation along Broadway does not adequately describe the potential view impacts for the Visionary Plan or how the setback and step backs described in the VP will help mitigate such view impacts."

174

"The discussion in the the 4th bullet concerning view impact of the Lane Field project simply refers the reader to the discussion of view impacts for the Visionary Plan as discussed above, however the discussion earlier in the MEIR does not provide adequate detail or photo simulation to assist the reader in understanding how the east-west views to the SD Bay will be protected by the setbacks and step backs described in the VP."

Catellus' concern about view corridors and preserving the views was well founded. We consider the C Street view corridor a failure from Pacific Hwy. The corridor is not welcoming to the public, the view doesn't go to the bay and there is not a sense of open access. That corridor, with setbacks and step backs, would not protect the east-west views if Bosa had already built on the Pacific Hwy-Broadway corner. It looks purely like a private hotel entrance, and mainly functions that way. Even the public parking spaces and the public viewing deck are not obviously known or available.

**Addendum to the Master EIR**  
**North Embarcadero Visionary Plan—Phase 1 Coastal Access Features Project**

Some of the Project Goals and Objectives include:

- Contribute to provision of uses and amenities that serve the local and regional community and tourists.
- Preserve and maximize views of and to the Bay.
- Provide public access and open space amenities, particularly along the Bayfront.
- Enhance connections between the North Embarcadero and adjacent neighborhoods and districts.



In addition, the City and the Port are part of a Joint Powers Agreement that goes until 2047 with the purpose of implementing the NEVP. The plan cannot be implemented if the basic tenets are ignored rather than integrated into the new PMP.

Language from the current PMP page 59 needs to be included in the vision statement on page 263 in the DRAFT PMPU.

Current PMP page states, "The Visionary 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." (emphasis added)

Add additional language from the Final MEIR of the NEVP as well.

We have highlighted our requested changes in red, and the current Draft PMPU in blue.

### 5.3.2(A) Vision

#### **Add additional paragraphs to this section of the Draft PMPU**

**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."**

- **Contribute to provision of uses and amenities that serve the local and regional community and tourists.**
- **Preserve and maximize views of and to the Bay.**
- **Provide public access and open space amenities, particularly along the Bayfront.**
- **Enhance connections between the North Embarcadero and adjacent neighborhoods and districts.**

These aspects are included in the NEVP, Master EIR, current PMP and need to be included in the Draft PMPU and Final PMP.

**We don't believe that street view corridors alone fulfill the requirements of optimizing property values or preserving and maximizing views to and from the Bay.**

We are dismayed that the PMPU has returned to mainly being a visitor-serving document, meaning tourists, and dismissing the important relationship between the California residents who live in San Diego, many of whom are close neighbors to the Port, and use the Port regularly all year. The impact of downtown residents on the Port is not just our increasing numbers, but our frequency of use. Downtown residents

use the Port on a regular basis all year long, which significantly magnifies our impact and importance to fulfilling the Coastal Commission's and Port's stated goals for public use.

\*\*\*\*\*

We will address sections in the Draft PMPU to change the language and explain our concerns.

## **Draft PMPU**

### **5.3.2 (C)III Visitor serving Commercial Uses page 269**

As we stated in previous public comment the residents of the condos at Santa Fe Place have seen the RLJ, owner of the Wyndham, upgrade to the Wyndham and believe that is the best use of the Port property in order to optimize property values and public access. The transformation, both inside and out, will upgrade the property to a first class hotel, like a Hilton or Hyatt, while keeping the same foot print that the inland and upland properties in the city were built around. The Embarcadero Coalition supports RLJ's lease being renewed as our first choice for blocks A, B and C in the Draft PMPU.

The NEVP and current PMP clearly intended for the density and building heights to decrease significantly as we approach the County Administration Building. We are pleased that the Port has reduced the building heights significantly from the original Discussion Draft and made some reductions to the number of hotel rooms. However, we still have considerable concerns about the density and design of the plan as presented.

We believe the maximum number of hotel rooms on blocks A-D Figure 3.8 in the Draft PMPU should be 600-700. The Wyndham currently has 600 hotel rooms and the two Lane Field hotels total 800 rooms. In order to decrease density and achieve the FAR maximum of 4.5, 600-700 hotel rooms should satisfy the criteria.

Since distance creates perspective and makes buildings appear smaller, we still prefer the towers on block A/B (and C/D if a tower remains) to be pushed to the west, and put the very low buildings, up to 30ft tall, on the east side, like we have today. We understand that this request is different than the NEVP but believe it improves the PMP commitment to optimize property values by improving view shed and saving the view corridor down Pacific Highway that highlights the County Administration building, one of the main tenets of the NEVP.

The NEVP clearly intended for the County Administration building to be highlighted including from Pacific Hwy. This building is one of the main reasons we have repeatedly asked that the buildings are kept closer to Harbor Drive rather than building new towers close to Pacific Hwy. See our discussion on views below.

We understand that the NEVP had buildings getting shorter toward Harbor Drive, but we believe there is an inconsistency and conflict with these two building guidelines and believe the shorter buildings could be podiums with a maximum height of 30 ft, should be on the Pacific Hwy side in order to highlight this significant landmark, and keep this pedestrian view from the east side of Pacific Hwy.

\*\*\*\*\*

### **Building standards**

The Blocks labeled A,B C and D in the Figure PD3.8, page 274 of the Draft PMPU or the areas bounded by Pacific Hwy and Harbor Drive and between B Street and Ash, must have Floor Area Ratios of 4.5 added to the plan.

174

The NEVP FAR was used in the development of Lane Field hotels, including in the Coastal Commission documents. This number is an important measurement to manage the density of development in the North Embarcadero. This measure restricts the density on these blocks as intended by the NEVP and PMP. Both height and density were intended to decrease as we move from south to north, from Broadway to Ash, in an attempt to highlight the County Administration Building. This number is also consistent with the Downtown Community Plan. The Coastal Commission told the Port to use the guidelines in the NEVP for planning guidances, which the PMP provides. The current PMP refers to figure 4.4 and 4.5 in regards to FAR and building heights. The FAR is included in the legal document and needs to be included in the Draft PMPU.

### **Floor Area Ratio NEVP page 63**

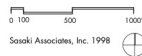
Development density limits, together with other requirements such as height limits, massing limits, and setback requirements, set parameters for the final build-out potential of a site. Consistent with the Centre City Planned District Ordinance and the Marina Plan District Ordinance, Figure 4.4 describes the maximum intensity of development in terms of Floor Area Ratio (FAR). Floor Area Ratio is defined as the ratio of gross floor area to site area. Gross floor area includes on-grade and above-grade parking area. Site area excludes land in rights-of-way. The Intercontinental FAR is 3.8.

In addition, please remove the new base building height of 65ft. This additional raised podium will make a huge increase in the lower structures and isn't need for the tower base. Leave just one podium height at 30 ft. A 30 ft podium height is consistent with the non-tower buildings currently between the Navy buildings south of B Street to Ash.

Notes:

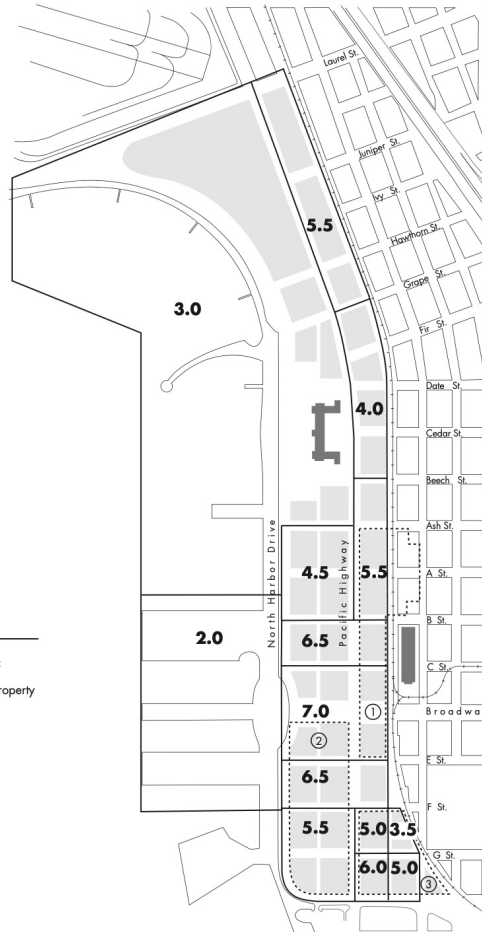
FARs may vary from those cited for the following areas (see text):

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



**Figure 4.4**

Floor Area Ratios



NORTH EMBARCADERO ALLIANCE

The structure south of B street should conform with the podium height north of B street at a maximum of 30 ft.

The building heights should be measured from average finished grade plane, not the base building height.

We strongly support the City's request that Block D be redefined as Activated Recreation Open Space when the Navy leaves. This change would eliminate item 4 and place it under Activated ROS. SEE ROS sections and it would-be a great choice in optimizing property values.

The NEVP acknowledges the importance of buildings being sited to the best location based on the conditions. For instance, since the Lane Field Intercontinental was built before Bosa builds at the corner of Pacific Hwy and Broadway, the Bosa building will be situated to take advantage of the remaining location. The Marriott Spring Hill moved south in order to provide the Grande South condominium a clear view to the Bay, since the Grand South was built first.

Tower and podium location should be situated in order to accommodate the buildings that were built first in the North Embarcadero, such as the condominiums west of the railroad with the entitlements of the Catellus Development Corporation.

**Eliminate the design guideline of a street wall.**

In 1998 the Port adopted the City's design guide for a street wall and put it in the NEVP. The street wall concept makes sense for a City, but not for the Port, where it walls off everyone from the Bay for the full block on every block. A street wall enables the Port to build corner to corner on every block, except for a sidewalk. Even if the towers are limited, the Port designed huge podiums taking up the whole block. See Figure PD 3.8. This design contradicts the goals of the Coastal Commission, Port and the public. It is a direct violation and inconsistent with the current PMP, where open views and public access of the Bay, especially from the pedestrian level, are the main development guideline. Therefore, we propose eliminating the street wall requirement.

Figure PD3.9 Podiums do not have to start within 5 ft of the setback. For instance, the entryway to a hotel could set the whole hotel much farther back from the setback. We understand that podiums provide a source of revenue for retailing, meeting rooms and potentially above ground parking, but the smaller podiums we propose are sufficient for a hotel with a total of 700 rooms and underground parking. The podiums should be a maximum of 30 feet high, which is consistent with the height of the shorter buildings on blocks B and D now. Optimizing property values for owners on the lower levels of the properties is very important.

If the orientation of the hotel towers are turned 90 degrees from the current towers, there should only be one tower per block and the towers should be aligned in a straight line. The towers should be sited, to use the Port's language, to optimize property values and preserve and maximize views to and from the Bay, for the property owners in the San Diego Jurisdiction of the NEVP, which would be the property owners between the railroad lines and Pacific Hwy. Utilizing views shed at various heights and photo simulations are effective ways to verify the guidelines are being met on future projects.

*Page 269 5.3.2(C)-III Visitor-Serving Commercial Uses*

*Retail, Restaurant and Overnight Accommodations*

- PD3.25 Modify, or replace in-kind, existing hotel rooms, including associated retail, restaurant and/or meeting space, to the same or lesser size, and in the **same general footprint** in the Commercial Recreation-designated area between Ash Street and Broadway. *If the existing hotel rooms are retained or replaced, up to 100 additional hotel rooms could be added to the same general footprint and all the hotel towers are on the west side of the property near Harbor Drive.*
- PD3.26 ~~In addition to existing facilities,~~ *If the current hotel lease isn't renewed, and there is totally new construction, develop a maximum of 750-700 hotel rooms (current 600 hotel rooms plus an additional 100 hotel rooms ) additional hotel rooms* on blocks A, B, C and D (although block D should be converted to Activated ROS), with ~~30,000~~ *a maximum of 20,000* additional square feet of associated retail and restaurant, and ~~30,000~~ *a maximum of 20,000* additional square feet of meeting space, for a total of up to ~~2,350~~ *700* hotel rooms plus ancillary facilities, in the Commercial Recreation-designated area between Ash Street and Broadway. *There is only one tower per block and and construction is aligned to optimize property values.*

174

Page 273 5.3.2(D)-II Building Standards  
Structure Height and Scale

PD 3.38 In the area bounded by Ash Street, North Harbor Drive, B Street, and Pacific Highway, including portions of the block south of B Street, as generally depicted in Figure PD3.8, the following standards apply:

- a. Base building structures shall be limited to a maximum height of ~~65~~ *30* feet:
- b. ADD: *A Floor Area Ratio of 4.5 shall apply to the area north of B street and south of Ash.*
- c. ~~b. Above the base building structure,~~ *Average finished grade plane, the following* height limits apply, subject to the tower requirements in PD3.39, in the area north of B Street: ...  
  
~~4 . Structures shall not exceed 200 feet in height, in the area between A Street and B Street, within the eastern portion of the block, adjacent to Pacific Highway (identified as Block D on Figure PD3.8).~~  
  
*REPLACE: In the area between A Street and B Street, within the eastern portion of the block, adjacent to Pacific Highway (identified as Block D on Figure PD3.8 and currently occupied by the 1220 Pacific Hwy Navy buildings) convert the area to Activated Recreation Open Space.*
- d. ~~e. Structures shall not exceed 65-30 feet in height, in the area south of the B Street reconnection.~~

**PD3.39** The following tower requirements (as depicted below) apply to all buildings over 65 feet in height:

Tower Component	Numeric Standard	Notes
Maximum Tower Height	See PD3.38 for maximum structure height by block.	n/a
Maximum North-South Tower Dimension	<del>120 ft</del> <b>100 ft</b>	The maximum tower floor plate dimension of any tower shall be measured from elevation drawings.
Maximum East-West Dimension	none	
Minimum Tower Separation	<del>60 ft between Towers</del> <b>200 ft</b>	
Maximum Tower Coverage	<del>30% of Allowable Footprint.</del> <b>N-S podiums are restricted to 25 ft width (step back) measured from the base of the tower</b>	Allowable footprint means maximum allowable footprint at ground level, after building setback or other requirements. <b>INSERT: and setback</b>
Tower Setback	Towers shall conform to setback, stepback, and <del>streetwall</del> requirements, as identified in PD3.40 through PD3.43.	<b>The is no street wall length requirement or restriction to be close to the setback</b>

Add:

Tower	one tower per block	Tower will be aligned (sited) to optimize property values and preserve and maximize views from and to the Bay for existing buildings between the railroad tracks and Pacific Hwy (San Diego jurisdiction of the NEVP)
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Change Figure PD3.9 And Figure PD3.8 -

- The North-South podiums should be a maximum of 25 feet wide measured at the base of the Tower (step back), and leave open space and public access to the Bay from Pacific Hwy on the rest of the block. This could be ROS.
- The East-West Podium is a minimum of 25 ft wide at the base of the tower.
- The podiums are a maximum of 30 ft high.
- The Podium should cover a minimum of 65% of the tower base. The other 35% allows for articulation of the façade, variation in the design of the streetscape and public realm, and/or the integration of project features such as public plazas, outdoor dining, etc.

- There is only one tower per block and towers should be aligned east-west to optimize property values of the property owners in the NEVP geographical description originally owned by Catellus and preserve and maximize views of and to the Bay.
- The view shed method is one method utilized to maximize views and property values for the buildings that already exist west of the railroad tracks. Catellus argued for photo simulations as well.
- The North-South width of the tower shall be a maximum of 100 ft for consistency with the tower width of the Lane Field Hotels.

Arranging development in this fashion will allow the non-hotel side the block to provide both Coastal-related and Coastal-enhancing access to the bays defined in the PMPU policies. The south side of each block could be designated Activated ROS.

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174

#### page 264 5.3.2(B) Special Allowances

##### B Street Cruise Operations Staging

~~PD3.1 The temporary closure of the completed B Street connection as described in PD3.7, between Pacific Highway and North Harbor Drive, may occur when needed for truck and other staging uses associated with cruise operations.~~

Replace: **When available, convert B Street to a pedestrian only promenade.**

In the City of San Diego' discussion draft public comment letter to the Port on July 31, 2019 the City said to make B Street a pedestrian promenade instead of a truck and bus staging area for cruise ships. We support the City's request. It should still be 80ft for the street portion plus the 30 ft walkway.

City of San Diego Comment Letter Discussion Draft July 31, 2019 stated:

The PMPU should identify the 1220 Pacific Highway site for recreational open space as a pedestrian only connection between Pacific Highway and the Embarcadero. The PMPU should only allow a mobility hub without parking for automobiles or for trucks or other staging associated with cruise operations. The PMPU should also identify a mobility hub for automobile parking along Pacific Highway north of Laurel Street rather than a location between Hawthorn and Grape Streets.

The Port should realize that temporary closing is unrealistic. First, piers are for staging the servicing needs of cruise ships, not inland streets. Please ensure that the piers are capable of fulfilling their function. April 2022 already has 17 days scheduled with cruise chips. Some days have 3 ships scheduled. The need for staging is not temporary but



over half the month already and growing. We are concerned where the trucks and buses will go that currently serve the cruise ships if the Port reduces Harbor Drive to two driving lanes. The issue needs to be addressed long before the 2049 expiration of the Navy lease.

### Navy Pier

#### PD3.3

Designate the entire Navy Pier with the Recreation Open Space land use designation on the Embarcadero Planning District Water and Land Use Map (*Figure PD3.2*).<sup>\*</sup> Navy Pier should retain handicap parking and ingress and egress for vehicles. (ROS acreage should be adjusted)

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174

Roadways go from curb to curb not building face to building face. The width for Walkways are additional on both sides of the street.

#### page 266 Roadway Reconnections

PD3.7 The following roadway reconnections shall be made in the area bounded by Ash Street, B Street, Pacific Highway, and North Harbor Drive, including portions of the block south of B Street, as generally depicted in *Figure PD3.4*:

- Extend A Street to North Harbor Drive to provide a link between North Harbor Drive and Pacific Highway for pedestrian, bicycle, and vehicle use. The minimum width of this connection shall be 80 feet, ~~building face to building face~~, **curb to curb**, measured at grade.
- Reconnect B Street between Pacific Highway and North Harbor Drive for pedestrian, bicycle, and vehicle use, ~~in addition to temporary truck and other staging associated with cruise ship operations, as described in PD3.1~~. The minimum width of this connection shall be 80 feet, ~~building face to building face~~, **curb to curb**, measured at grade.

NEVP- Public "rights-of-way" aligned with existing downtown streets shall be created through development parcels in the North Embarcadero, as identified in Figure 4.10. The right-of-ways shall be a minimum of 80-foot-wide, consistent with established right-of-way dimensions for **downtown streets**. The rights-of-way shall have the character of a public street or otherwise feel welcoming to the general public.

- If a north-south connection is provided linking Ash Street to B Street, the minimum width of that connection shall be 30 feet, building face to building face, measured at grade. This connection is a pedestrian only connection. based onto NEVP. If it is a roadway, then the measurement is curb to curb.
- NEVP- Rights-of-Way through Development Parcels

Illustrated in Figure 4.10, a continuous north-south movement through a series of public and quasi-public spaces should be created through development parcels, if practical. This could be designed as an interesting sequence of spaces with a diversity of activities and spatial experiences (e.g. galleries, courts, exterior plazas, etc.). The north-south movement could meander, and it could pass through a series of interior and/or exterior spaces. **Accommodating pedestrians only**, these pathways, if provided, should be inviting to the public and located near the center of the block. Such passages can link pedestrian circulation from parcel to parcel.

page 267 Recreation Open Space

PD3.10 Upon reconfiguration of Harbor Drive as described in PD3.8, expand and activate the Recreation Open Space, as generally depicted in *Figure PD3.5*, and as follows:

Add: e. Block D, presently the 1220 Pacific Hwy Navy building north of B Street, from page 274, will be converted to Activated Recreation Open Space.

page 270 5.3.2(D)-I Public Realm Standards

#### Pathways

PD3.33 Maintain east-west pedestrian linkages along Grape Street and Ash Street to connect the San Diego County Administration Building and the waterside promenade along North Harbor Drive.

- ADD: Ash Street development shall provide at least a 25 ft sidewalk and parkway and landscaping.

#### Views

##### PD3.34

Preserve scenic vista areas in accordance with the requirements of *Chapter 4, Baywide Development Standards*, in the following locations as generally depicted in *Figure PD3.4*:

- F. ~~West~~ **EAST** end of Broadway Pier;
- G. ~~West~~ **EAST** end of Navy Pier; and

\*\*\*\*\*

page 275 Setbacks and Stepbacks

PD3.40 The following setbacks shall apply, consistent with *Figure PD3.8*:

- A building setback of ~~25~~ **30** feet, ~~like a walkway~~, from the curb shall be maintained along Pacific Highway, to allow for the implementation of a parkway and sidewalk, as well as landscaping adjacent to the building. ~~A Street, B Street and Ash all have at minimum 30 Ft setbacks for walkways, parkways and landscaping.~~

~~PD 3.41A minimum of 65% of the base building façade shall be placed within 5 feet of the minimum required building setback, as generally depicted on Figure PD3.9. A~~  
maximum 30 ft high podium shall be placed around the tower base. ~~minimum of~~ The tower is setback a maximum of 25 ft from the podium facade in the North -west direction. The remaining building may be set back further, to allow for articulation of the façade, variation in the design of the streetscape and public realm, and/or the integration of project features such as public plazas, outdoor dining, etc. The reminder of the block would be ROS. The tower would be sited to maximize the view shed of the condominiums west of the railroad tracks, to optimize the property values, and preserve and maximize views of and to the Bay, since the condominiums were built first as part of the NEVP.

PD3.42 Upper story step backs, consistent with *Figure PD3.8*, shall be provided, limiting the base building frontage height to a maximum of ~~50~~ **30** feet, for a maximum depth of 25 feet, at the following locations:

- ~~parallel to these streets measured from the base of the tower~~
- ~~Along Ash Street;~~  
~~Along the A Street reconnection;~~  
~~Along the B Street reconnection;~~
- ~~and a minimum depth of 25 ft parallel to the these streets and measured form the base of the tower:~~  
~~Adjacent to Harbor Drive setback areas; and~~  
~~Adjacent to the optional north-south connection,~~
- ~~to Pacific Hwy setback~~
- The podium is restricted to a maximum of 25 ft in the N-S directions, and a minimum of 25ft in the E-W direction as measured from the base of the tower.

- PD3.43 Along Pacific Highway, the following standards apply, as generally depicted in Figure PD3.8 and Figure PD3.9.
  - The Pacific Highway base building frontage shall be a ~~minimum~~ maximum of 45 ~~30~~ feet.
  - ~~The Pacific Highway base building structure may be a maximum height of 65 feet, to comply with the City of San Diego Fire Department requirements. Above 50 feet, the building shall step back 15~~ 25 feet.
  - There is no street wall requirement, or required maximum distance from the setback.

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## TRAFFIC

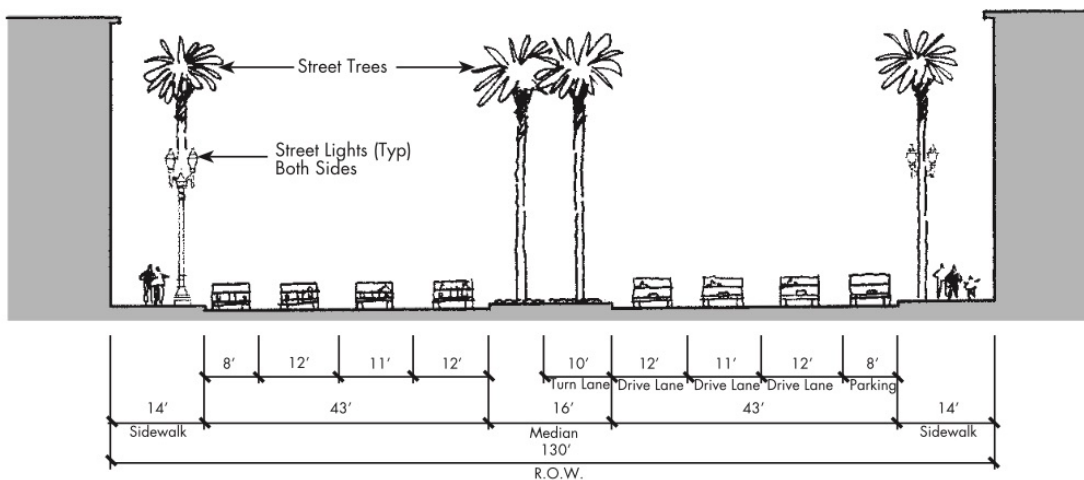
174

The Columbia neighborhood is across the street from the Port on Pacific Hwy, therefore the Port's treatment of Pacific Hwy is of upmost importance to these residents.

Here is how Pacific Hwy is presented in the NEVP.

## CHAPTER • SIX

108



Pacific Highway

### NEVP Pacific Highway page 106 Site Access and Traffic

The Plan establishes Pacific Highway as an elegant tree-lined boulevard accommodating through traffic and pedestrian circulation. The street is designed with six travel lanes, a center turn lane and/or median, two parking lanes, and two fourteen-foot- wide sidewalks. Consistent with the CCDC Pacific Highway Concept Plan, the Visionary Plan establishes a consistent 130- foot-wide street section from Hawthorn Street to Harbor Drive in place of the inconsistent street section existing today.

Unfortunately, that version of Pacific Highway no longer exists. This shows Pacific Hwy Tuesday 12/28/21 when Harbor Drive was closed for the Holiday Bowl parade. Dumping Harbor Drive traffic onto Pacific Hwy is not acceptable. Now add 27,000 visitors daily for Seaport and all the employees at IQHQ. The Port should not be making plans to create a daily horrific traffic jam downtown.

174



Although it is still the tree line boulevard entrance to the city, Pacific Hwy is not 6 lanes with extra capacity and the PMPU needs to change to adjust to the new reality. Pacific

Hwy is 4 traffic lanes with two class 4 bike lanes and a parking lane. Traffic is often reduced to one lane in a direction due to Lane Field hotels on the South bound lanes. Pacific Hwy cannot carry additional traffic.

The EIR Transportation study basically confirms this. It says the VMT impact after mitigation will be significant in District 3 with the Ports plans. The Traffic Study did not even consider the impact of Seaport bringing in 10 million annual visitors, as the developer states to the State Lands Commission. Pushing all this traffic onto Pacific Hwy in a high density residential neighborhood is irresponsible and against the Climate Action Plan and efforts to reduce congestion downtown and reduce Green House Emissions.

#### **Draft program EIR : Traffic Analysis**

- A. For traffic and related parking the Draft EIR has the traffic study in Volume 2, Appendix D. The Summary table below comes from that document.
- B. Volume 1 of the Draft EIR Chapter 4, 4.14 Transportation, Circulation, and Mobility has the discussion of the traffic report. It states in its summary, in part, *"Therefore, the project would result in a cumulatively considerable contribution to the significant cumulative VMT- related impact. **Impact-C-TRA-1, Impact-C-TRA-2, and Impact-C-TRA-3** would be cumulatively considerable and unavoidable."* Keep in mind that the EIR Transportation Study of the impact on traffic is after mitigation and without the impact from the Central Embarcadero upgrade to SEAPORT.
- C. Significant increase to VMT is not "unavoidable" if the Port makes different choices. As a sustainability issue, this position is unacceptable, especially since mobility hubs are often glorified parking lots inducing people to drive downtown. SANDAG and MTS have both objected to the Port's Mobility hubs, since they don't conform to the regional transportation system. It is unacceptable to create such significant traffic impacts considering the Climate Action Plan.
- D. Even without the Central Embarcadero, the mobility hubs and potential parking structures, either stand alone or incorporated into hotel parking, are being planned in the Embarcadero will only induce more travel downtown which is attributing to the unavoidable aspect of the analysis. The Port needs to find ways to significantly reduce VMT or downtown will be a congested nightmare.

Encourage the public to use true Regional Mobility hubs in the SANDAG and MTS transportation plans and take transit downtown. Do not create additional downtown parking lots that are not directly linked to the regional transit system. The Port's shuttle should transport people between Port amenities and transit connections, not between parking lots.

The Central Embarcadero changes are not included in this study yet the developer's letter to the State Lands Commission states that he expects 10 million visitors annually. Although that seems excessive, we're going with his estimate, which would make this a small Disneyland-like project. The Midway, which is one of the top tourist attractions in



the country, gets 1.5 million tourists annually. This would be over 27,000 visitors daily to the new Seaport, so using Parking Demand as justification for parking spaces would create a huge burden on downtown. If someone is going to develop a project with that type of demand, it should not be on an isolated point where it is required to go through downtown to get there. A development of that extent should be developed in a more easily accessible destination.

The Port and the California Coastal Commission need to resolve themselves to the reality that it is acceptable and desirable for people to park outside of the downtown area, take transit into the city center, and then move around on downtown services like the Port's shuttle. Other cities have successfully used this model for decades (New York, San Francisco, Washington DC, Boston, etc). That is a major way to decrease the VMT, but that is not what the Port is suggesting. They are planning enough spaces to replace all of the parking they are going to move, but also enough to meet demand.

The Port should not proceed with the PMPU until it can address the CAP traffic issues, including in the Central Embarcadero and the traffic impact to Pacific Hwy due to the plans already addressed. It is not acceptable to say that the traffic impact is **"significant and unavoidable"**. **Of course it is avoidable if the Port changes its plans.**

Port Master Plan Update  
Transportation Impact Study

Table 4.2 summarizes the significance of the VMT impacts after implementation of the mitigation measures.

Table 4.2: Impact Significance After Mitigation

District <sup>1</sup>	Employment VMT	Retail & Recreational VMT	Transportation Improvements VMT
1	NI	SU	NI
2	SU	SU	SU
3	NI	SU	SU
4	NI	NI	NI
5	N/A		
6	N/A		
7	N/A		
8	NI	SU	NI
9	NI	SU	NI
10	NI	SU	NI

Notes:

<sup>1</sup> Planning District 5, 6, and 7 were precluded in the analysis.

NI = No Impact;

SU = Impact would remain significant and unavoidable because due to timing uncertainty of implementation.

In the VMT analysis we don't get quantitative information like the travel time, but the impact will be much worse with fewer lanes and far greater traffic with both the IQHQ properties and SEAPORT development. This is unacceptable.

Do not divert Harbor Drive traffic to Pacific Hwy. Per current PMP page 59, "General commercial, residential, and commuter traffic would utilize an enhanced Pacific Highway grand boulevard". Don't dump all the Port's traffic onto Pacific Hwy so that Harbor Drive can be used for sightseeing at the bay while driving. In addition the SEAPORT project would generate huge amounts of traffic to Pacific Highway as well. The Port must find mitigation solutions and NOT cause significant increases in VMT on Pacific Hwy before going forward with either project.

This traffic problem is another reason the Central Embarcadero needs to be included in the evaluation of the PMPU.

See the new lane markings and bike lanes



page 266 [Roadway Improvements](#)

[PD3.8 Reconfigure North Harbor Drive to more efficiently accommodate all modes of travel while allowing for:](#)



- ~~Two~~ FOUR general travel lanes, ~~one-two~~ lanes in each direction, between Grape Street and F Street;
- A multi-use path, ~~segregated between pedestrians and vehicles~~, along the west side of the street as part of the Recreation Open Space; and

PD3.9 Existing on-street parking shall first be consolidated into mobility hubs ~~outside of the North Embarcadero~~, ~~as described in PD3.4 and PD3.5~~, to then enable the reconfiguration of North Harbor Drive (see PD3.8).

\*\*\*\*\*

#### Parking /Mobility Hubs

174

Although we agree that there should be good ways to travel around the Embarcadero without using your car, like a Bayside shuttle or Bayside circulator, we agree with MTS and SANDAG that the Port is not developing true mobility hubs, because their locations do not integrate into the regional transportation system. Our concern is that the mobility hubs are glorified parking facilities to consolidate parking and they will contribute to more VMT by encouraging drivers to drive all the way into the city to park and then use the alternative mobility options. The true mobility hubs are outside of downtown as SANDAG explains. MTS implores the Port to work with them to develop a mobility strategy. For instance, the LOCAL Mobility Hub to link to transit in the North Embarcadero between Ash and Broadway is at Santa Fe Depot. The Port may have locations for drop off/pickup locations and rentals for bicycles, but additional parking lots and significantly increasing VMT are against the CAP. Hotel parking lots should not be used to add significant public parking either.

Chapter 4 TABLE 4.1. Parking requirements and number of spaces are not in the PMPU. The footnote on the Mobility hub table states “Parking demand study would be required to determine the number of spaces that need to be included in the hub.” “PARKING DEMAND” is a bad metric in general. That includes all the visitor demand to park downtown, which could be thousands of spaces. If local parking is readily available, demand will remain high for convenience reasons which will keep VMT high. This type of demand is counter-productive for the CAP. However, the demand for parking spaces shrink at hotels as visitors and tourists to downtown hotels move away from rental cars and personal vehicles rather than pay for a car rental and a hotel parking fee. Instead they use companies like Uber and Lyft.

Using “Public Demand” to determine the number of parking spaces required is an unrealistic, since the public demand is for lots of almost free parking. That violates everything in the Climate Action Plan. Surely the Port doesn’t intend to build enough parking spaces to met the public demand for over 27,000 visitors a day to the new Seaport, yet that is what the Port proposes.

Although the Lane Field Marriott Spring Hill has above ground parking that is the exception and was only granted due to the recession. The Navy/Manchester/IQH property, The Intercontinental and the Waterfront Park/County parking lots are all below grade. No developer should be considered who can't agree to underground parking.

The Citizen's Advisory Board to the NEVP made it clear that parking on the Port property should be below ground. Even the NEVP guidelines state that every effort should be made for parking to be subterranean. Since all the other developments have underground parking, that is a reasonable and expected requirement.

The number of parking spaces should be focused on accessible parking for people with disabilities, and hotel demand, not "PUBLIC DEMAND".

Hotel parking demand in the Embarcadero has greatly decreased with the availability of mobile apps for services like Uber and Lyft and the free FRED. Tourists don't want to pay car rental rates and hotel parking fees for cars they barely use. The parking space per hotel room can go from .75 to .3, which appears to be a new functional rate. At this rate, the Wyndham already provides additional public parking.

As a result, there is no need to have huge above ground podiums around hotels to account for public parking. Parking is either underground or it doesn't exist.

**Footnotes: Table 4.1 Mobility Hub: Accessibility Requirements and Amenities**

- *3) Parking demand study would be required to determine the number of spaces that need to be included in the hub.*  
Change to ***"Parking demand by hotel guests and ADA accessible parking needs study would be required to determine the number of spaces that need to be included in the hub."***

The Port should have to justify any additional public parking, Use existing and already planned parking to replace parking spots lost to the Embarcadero development. Also, making spaces should be below ground.

**5.3.2(C)-I Landside Access**

**Mobility Hubs** page 265

PD 3.5: Develop a Local Gateway Mobility Hub between Ash and B Streets, in the area generally depicted in *Figure PD3.3*. The mobility hub shall, "Meet the criteria of a Local Gateway Mobility Hub, or larger, in accordance with *Chapter 4, Baywide Development Standards*"

We don't think that this Mobility hub should have additional public parking spaces either as a stand alone parking lot or additional parking spaced incorporated in to hotel parking.

- 1.The Port's Mobility Hub concept is out of sync with SANDAG, MTS. Adding parking garages downtown induces travel and increases VMT by bringing cars into downtown just to ride the Ports shuttle bus or circulator. True Mobility Hubs for automobiles are located outside of downtown and people ride transit into downtown, as SANDAG and MTS have determined in their transportation plans.
- 2.The lack of available parking will be exacerbated by the required removal of parking spaces from the Embarcadero and Navy Pier. However, that can be remedied by referring drivers to public parking at the Intercontinental Hotel and the 2,000 public spaces announced by IQHQ. At that point, the shuttle bus or circulator is appropriate.
- 3.Use Transportation Demand Management (TDM) to identify existing parking opportunities without creating more parking garages. Parking garages masquerading as Mobility Hubs are not linked into the MTS transit system and therefore won't function as connected Mobility Hubs - just parking garages.
- 4.4. Utilize parking apps that identify available parking spaces.

174

Page 166 **4.1.1(A) Land Use and Siting**

2. **Parking.** Regional Mobility Hubs shall be used to consolidate parking for public destinations primarily located on-site and within one-quarter mile of the hub or up to one-half mile for public destinations served by transit. Parking may be provided through either above- or below-grade structured parking or a combination thereof. The levels of parking spaces for vehicles shall be full levels below grade. The number of parking spaces shall be determined by hotel guests demand at a maximum ratio of .3 spaces per hotel room plus projected demand for ADA accessible parking.

**4.1.2(A) Land Use and Siting**

2. **Parking.** Local Gateway Mobility Hubs should be within 500 feet of off-street public parking. All public parking spaces for vehicles shall be full levels below grade. The number of parking spaces shall be determined by hotel guests demand at a maximum ratio of .3 spaces per hotel room plus projected demand for ADA accessible parking.

3. Surface lots and above grade parking should be well screened from public view and shall be well lighted.

**NEVP Parking - Subterranean**

Underground parking should optimize the number of parking spaces available on a given development site and may extend into the vault space beneath the adjacent

sidewalk area and street (particularly east/west streets) but must afford sufficient clearance and depth for the planting of trees.

Underground parking must be a full level below grade; partially depressed parking is not recommended given that it disrupts street-level activity and creates a physical barrier between the street and the development frontage.

### **Parking - Above Ground**

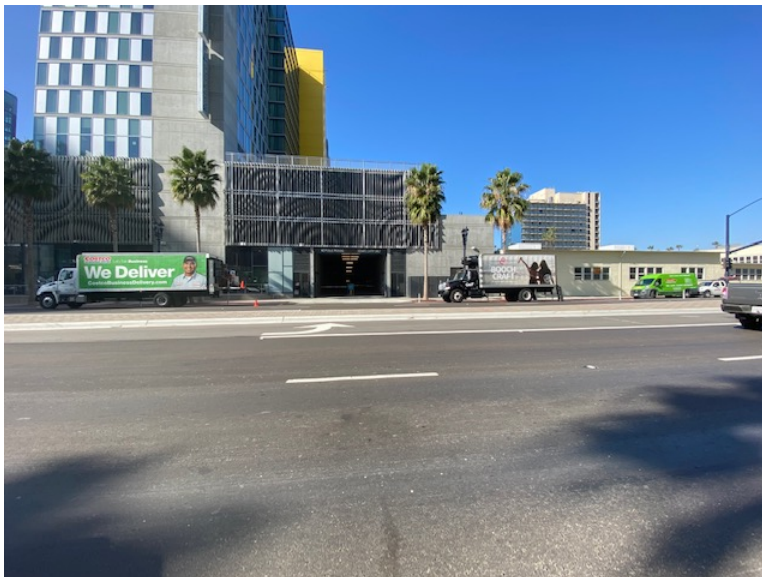
To the extent that such facilities have frontage on Pacific Highway, they should either be totally encapsulated (i.e. clad in such a manner that it is indistinguishable from the building elements around it) or visually screened by means of other uses, by substantial perimeter planters, or by architectural elements which effectively shield vehicles within the structure from view at grade level. Ceiling-mounted lighting within the structure should also be screened from grade-level view.

At street level, other uses, preferably active uses, shall screen above-grade parking from predominant public view along Pacific Highway and North Harbor Drive frontages.

\*\*\*\*\*

### **SITE ACCESS AND SERVICE -NEVP**

According to the NEVP, parking and service access to sites in the North Embarcadero should be provided from east/west streets.



#### **ADD: Service Treatment**

Truck loading should be an integral part of the development and should be screened from public view. All exterior garbage and refuse facilities and mechanical equipment should be screened in a manner that is compatible with the overall building design and streetscape treatment.

Access to parking and loading areas shall be screened from predominant

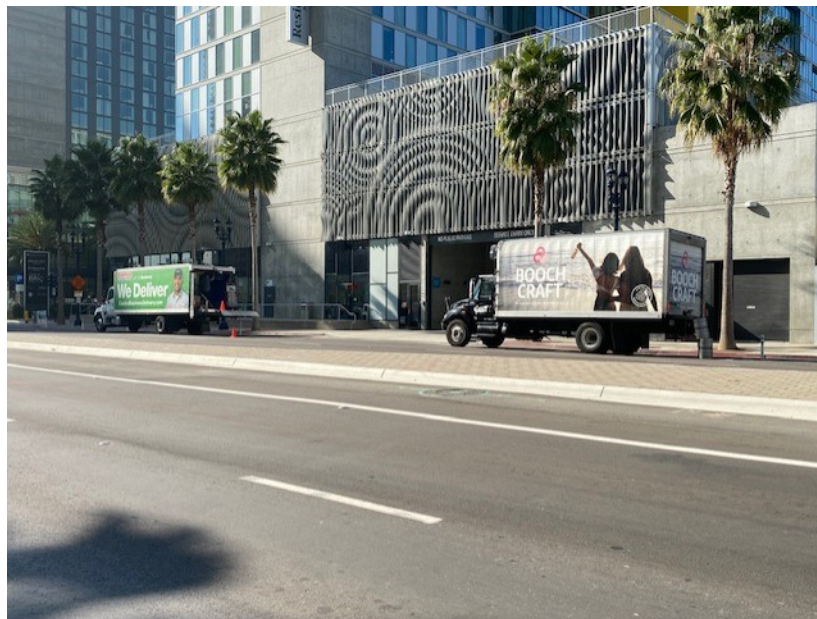
view, be provided from the east/west streets, minimize the visual impacts, and designed to allow vehicles to maneuver on site without obstructing public pedestrian or vehicular circulation.



174



Unfortunately, the Lane Field Hotel service access was put on Pacific Hwy and residents were promised it would not cause a problem because there was a service entrance. In reality Pacific Hwy is being treated like an alley way for service deliveries. Daily big trucks park next to the bike lane instead of going inside. One lane of traffic is often blocked, reducing traffic to one driving lane, and the deliveries are done from the street instead of from inside the garage.



We are dismayed with the actual functioning of the service access to the Lane Field hotels and feel this needs to be addressed in the PMPU so we don't have the same problem between B Street and Ash. We don't want the same disrespectful treatment of the neighborhood on the next development. IN the NEVP service was supposed to be on the east-west streets for a reason.

\*\*\*\*\*

### **Parks/Plazas/Recreation Open Space**

We request the Port create a reconciliation document between the Park/Plaza (green space) acreage in the current PMP and Recreation Open Space (ROS) acreage in the new Draft PMPU. In order to do this reconciliation the Port must include the Central Embarcadero acreage. The Port already has significant mitigation issues from existing projects, but the only way to ensure the Port delivers on its commitments is with a reconciliation. We believe this reconciliation should be public and transparent. This full reconciliation cannot be done without the information from the Central Embarcadero.

For example:

Initial PARK/PLAZA Acreage commitment in current PMP

Increase from amendments/mitigations

Decrease from completed projects

Decrease from completed mitigations

=Remaining commitments

Compare to Draft PMPU Recreation Open Space and make adjustments

The city residential population is already at 40,000. It is expected to grow to 80 or 90 thousand in the next 30 years, the time period of this PMP. Downtown residents, use the park facilities on a regular basis, and individually much more than an individual tourist. Residents exercise, enjoy the bay, and visit the restaurants and facilities throughout the year. Our impact is multiplied due to frequency. As Downtown residency grows the need for outdoor space will grow considerably. The Port needs to increase park and activated recreations spaced to meet this demand. We don't want to be walled in by hotels. In order to facilitate the Port's need for activated recreation open public space, the 1220 Pacific Hwy space should be turned into activated ROS, and B and A streets should be beautiful pedestrian walkways to the bay.

Port policies requires the Port to make public assess and opens space a priority.

#### **4.2.1 Standards for Recreation Open Space**

The following requirements apply to areas designated as Recreation Open Space:

1. Shall be located directly adjacent to the waterfront, i.e. between development and the water's edge. Additional Recreation Open Space areas above the minimum

required acreage within a subdistrict may be located landward of development;  
(ROS on 1220 Pacific Hwy would be complementary and landward)

2. Should be designed with landscaping or native indigenous vegetation; (Palm trees are not native. The only native tree is the Torre Pine.)

#### **Page 180 4.3.3 Standards for Walkways**

A and B Streets are pictured as Walkways in Figure PD3.4

##### *4.3.3(A) Location and Access*

4. Walkways shall have a minimum width of 30 feet unless otherwise specified in the development standards for each subdistrict. Walkways are in addition to Roadway Requirements, not included.

#### **page 182 4.4 View Standards 4.4.1**

##### **Coastal Views**

174 Figure PD 3.4 Some coastal views should be from the inland side of the Port property, such as Pacific Hwy, not just down street corridors and the waters edge.

Figure PD3.4 page 261: Although we appreciate all the Access and Scenic Views in the PMPU, we think they are insufficient. There's a level of absurdity when the only views relevant to the Port occur when people are in the middle of the street or are able to see water when they are at the water's edge.

1. View corridors: More aptly named Street View Corridors. If you are driving down the street paying attention to driving, the Port wants you to look at the water view. Or if you are a pedestrian, you can stop in the middle of the street to look at the water.
2. If you are at the water's edge, the Port states it won't block the views of the water, most of the time. However, in many instances viewers still must go to the end of the pier or the deck for the scenic view.
3. Public access for public viewing areas located inside of, in front of, any portion of an area, are not marked. There is no signage outside of the Intercontinental Hotel, Navy Pier, Lane Field Park identifying them as having public viewing areas. All areas appear to be the private property upon which they are located.

The Standard for water views and access should include the inland side of the Port land, not just directly waterside or the street corridors. For instance, Ruocco Park provides real scenic views since the views start at Harbor Drive and Pacific Highway and you can see the water, Coronado and beyond. Downtown residents don't want to lose this green space in the Seaport Village redevelopment. More vistas need to be created or preserved from Pacific Hwy. The complaints of feeling walled off are not just at the water's edge, but from the inland side of the Port as well. An example of being

“Walled off” is Harbor Drive West at the Convention Center. There are no Port views from Gaslamp at Harbor Drive even though the Port is across the street. Instead it is wall-to-wall convention center and hotels. Central Embarcadero and North Embarcadero don’t want to end up like the South Embarcadero. It is difficult to even find your way through to the water side.

The Lane Field Hotels north of Broadway wall off water views from the East, including a very poor view corridor through C Street, that only looks like a hotel entrance, and from the North or South with their 300 ft long hotels. We want bay views from the inland side of the Port. North of Ruocco Park to Ash Street, you cannot see the Bay while standing on Pacific Hwy, unless you are on Broadway. Every two blocks there should be a view from Pacific Hwy to the water, besides a street corridor. That places one between B and A streets, which the City requested at 1220 Pacific Hwy. Do not create a wall of hotels and retail to block the people of California, who live in and visit San Diego, from the Bay.

Additional inland view corridors added in red

174

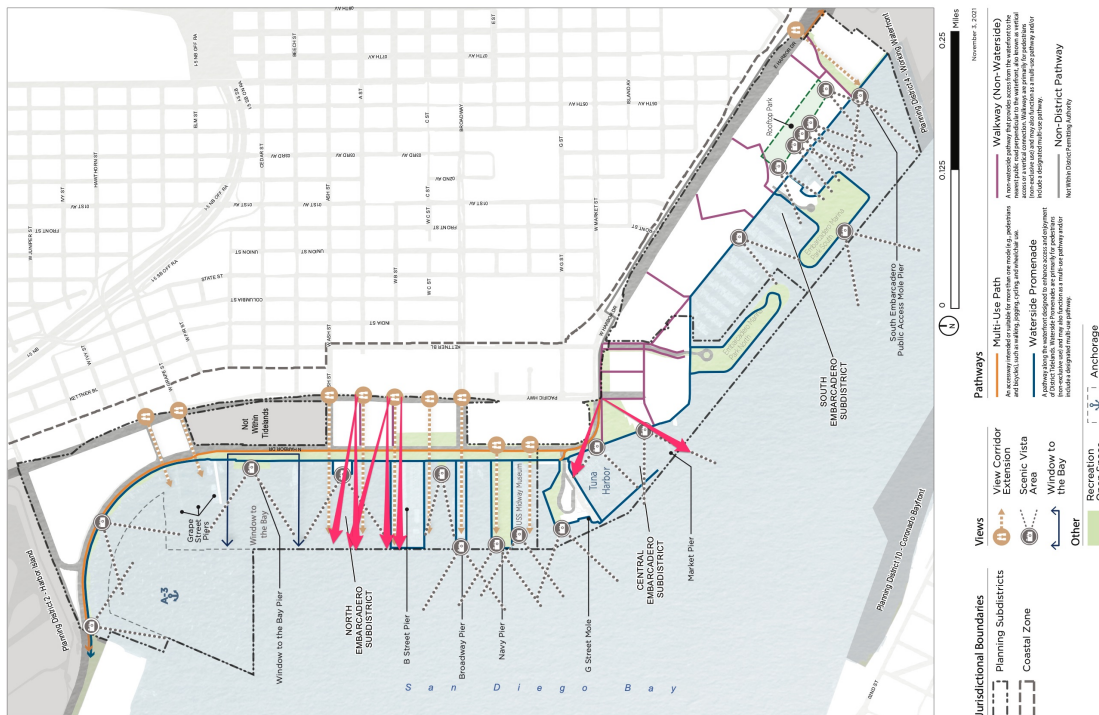


FIGURE PD3.4 EMBARCADERO PLANNING DISTRICT - COASTAL ACCESS: VIEWS AND PATHWAYS

## Standards for Scenic Vista Areas

Scenic vista areas preserve physical access to the scenic views and visual qualities of the Bay from **publicly accessible points** on Tidelands. They are identified in each



planning district's Coastal Access Views and Pathways Map and are specifically identified in the development standards for each subdistrict. The "Window to the Bay" identified in the Embarcadero Planning District (PD3) is a form of a scenic vista area. The following requirements apply Baywide:

#### ADD

5. In addition to waterside, end of pier and street corridors, there shall be views from the inland side of the Port, such as on Pacific Hwy between A and B streets, between A Street and Ash, and the Pacific Hwy/Harbor Drive intersection at the corner of Ruocco Park. These create important view sheds from the inland side of the Port.

Views down Pacific Highway of the County Administration Building are also important.

Current pedestrian and driving view on Pacific Hwy headed north.



#### View Corridors - NEVP

Illustrated in Figure 4.11, public view corridors shall be aligned along existing east-west streets in downtown San Diego (and the required "rights-of-way" through development parcels - discussed above), providing visual access to the bay **or to focal elements, such as the County Administration Building. Public view corridors are straight, largely unobstructed shafts of space with clear views to the bay or a focal**

**element from public rights-of-way, as viewed at ground level. The minimum width of public view corridors shall be the same width as the street right-of-way (typically 80 feet).** Sky bridges or gross floor area above, over, or within public view corridors are prohibited. Typical street furnishings associated with a public street, such as street trees, are permitted within a view corridor. Along Broadway, canopies and other structures should be designed to minimize impacts to views down that street.

The Plan encourages the establishment of community oriented uses, such as children's playgrounds, and varied landscapes that provide for interesting and diverse experiences.

View down Pacific Hwy if the Lane Field type buildings were built.



We don't think the small setbacks and step backs the Ports is proposing are sufficient on for this view corridor. This picture shows our concern if buildings similar to the Lane Field hotels are allowed on the east side of the Port property.

#### **SPECIAL PRECINCTS TREATMENT - NEVP County Administration Building Precinct**

The County Administration Building is the centerpiece of the County Terrace, and it has a **significant landmark presence on Pacific Highway. Buildings in the area should enhance the setting of the County Building, framing the structure while giving deference to its unique character and role in the North Embarcadero.**

Building height limits, setback requirements, and other guidelines should help ensure that the County Administration Building retains its rightful place in the North Embarcadero.

We continue to support having the towers on the Harbor Drive side of the blocks, like they are today, which improves the view shed for the buildings east of Pacific Hwy since the greater the distance from the condominiums the greater the perspective and contribution to optimizing property values.

Please don't block this beautiful landmark from the city and the adjacent high density Columbia residential neighborhood. It would have a huge negative impact on the character of the neighborhood.



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#### **5.3.4 South Embarcadero Subdistrict**

##### **5.3.4(A) Vision**

page 281 paragraph two:

Proposed public access improvements include accessibility enhancements at the South Embarcadero public access mole pier, a continuous waterside promenade



throughout the subdistrict, and preserving scenic views from the shoreline **without diminishing existing Recreation Open Space.**

#### Recreational Marina Facilities

- PD3.66 Modify, or replace in-kind, existing recreational marina-related facilities in the subdistrict, provided there is no ~~unmitigated~~ increase in shading or fill.

#### 5.3.4(D)-I Public Realm Standards

##### Views

PD3.74 Preserve **existing** scenic vista areas

174

#### Section 5.3.4(D)-II Building Standards

“There are no building standards specified in the South Embarcadero Subdistrict.”

Why aren't there building standards if the Port is earmarking projects like a new marina and consolidation of "development parcels" in PD3.59? It is very disturbing to have another set of projects where the Port is abandoning its responsibility to provide developers with standards and parameters to build on public land and water ways.

#### **DRAFT program EIR: Sea Level rise analysis**

We are not Climate experts, but the Port needs to make more significant efforts to advert the impact of sea level rise. We don't think the Port has adequately addressed the problem.

Sincerely,

Embarcadero Coalition  
[embarcaderocoalition@gmail.com](mailto:embarcaderocoalition@gmail.com)

Contact: Janet Rogers and Susan Simon

This will be deleted, but it shows why the Port has included the street wall

NEVP on

## **Building Setbacks**

Building setbacks from the property lines are regulated to ensure a consistent relationship between adjacent buildings and their shared street frontage, and to provide a recognizable, urban street enclosure.

Buildings (street walls) along all streets in the North Embarcadero, including east-west streets and excluding Broadway, Cedar, and North Harbor Drive at the foot of Broadway, shall be built up to, or within, five feet of the property or leasehold line. Buildings along Broadway and Cedar Street shall be set back from the property or leasehold line by the amount indicated in Figure 4.7. These setback requirements allow for expanded views to the bay and landmark County Building, respectively, and for enhanced pedestrian linkages between transit stops and the bayfront. At the County Administration Building, buildings shall be set back by the amounts indicated in Figure 4.7, thereby framing the County Terrace at this location. Buildings along North Harbor Drive at Broadway shall be set back from the existing right-of-way (lease- hold) line by the amount indicated in Figure 4.7, allowing for a reconfigured (curved) North Harbor Drive and a sizeable, well- defined park at the foot of Broadway.