

Table Noting Applicable Responses to Comments After Final PEIR and Final Draft PMPU were Published

No.	Commenter	Comment	Response
114	Janet Rogers, Email 1, 1/15/24, 8:00am	The commenter asks to speak to the EIR transportation consultant about the transportation analysis.	This comment does not raise an issue with the PMPU or PEIR, but simply requests to speak with the District’s traffic consultant. No response is necessary.
115		The comment raises questions about the proposed streetcar from Santa Fe Depot to the Airport.	This referenced improvement indicates the District will “support” such an improvement but neither the BRT nor the streetcar were ever included as a PMPU planned improvement. Therefore, these two improvements are not a part of the PMPU. A Second Errata to the Final PEIR has been prepared to strikeout this reference.
116		The comment asks if the District has an exemption for at-grade rail to cross all the intersections to the airport and whether a streetcar has been discussed with MTS or SANDAG.	Please see response 115 regarding the streetcar. This comment is unrelated to the PMPU or PEIR. Therefore, no response is necessary. However, the District is not exempt from requirements related to at-grade rail crossings, which are regulated by other jurisdictions, such as the CA Public Utilities Commission.
117		The comment asks if operating a bus rapid transit (BRT) line to the airport has been discussed with MTS since they operate the 992 bus route to the airport.	The potential for MTS Bus Route 992 to utilize the allocated transit right-of-way along Harbor Drive was discussed with both SANDAG and MTS, as part of the PMPU outreach process. Both agencies noted that it may be possible for Route 992, as well as other future MTS routes, to utilize the right-of-way. However, the level of detail is beyond the scope of the PMPU and, if proposed, would have to be further evaluated once the right-of-way improvements were designed and implemented.
118		The comment cites improvements in the Transportation Impact Study regarding future access to the airport and provides an opinion on which option to implement.	Please see response 115 regarding the streetcar, which is not part of the PMPU. As noted in the PMPU Transportation Impact Study, the District would support the implementation of a streetcar within the allocated transit right-of-way along Harbor Drive, if the ridership of the existing bus routes supported it; however, this is not part of the PMPU. However, the District is not responsible for, nor does it have control over, the transit operations within the region, including an automated people mover, streetcar or trolley. Moreover, the commenter provides an opinion and does not raise any specific issue with the PEIR. This comment is included in the record for consideration by the Board of Port Commissioners.

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119		The commenter asks if the District has taken a position on the automated people mover (APM) into downtown and claims that it will destroy all view corridors. The commenter also claims that the downtown condos and MTS object to the APM.	This comment refers to a possible method of transporting people to the SDIA from downtown San Diego, which is not a part of the PMPU or the PEIR and has been proposed by SANDAG. Therefore, no response is necessary.
120		The comment suggests that adjustments had to be made to the activity based model (ABM) since the majority of the Port VMT is from hotel tourists and visitors to the bay. The comment also makes a statement that there are no residents on Port land.	While the main land use inputs into the ABM are employees (by land use type) and residents, the ABM does account for visitor trips by associating them with the total number of employees and the land use they are associated with, such as retail, restaurant, hotel, airport, recreation, etc., and draws residents and visitors outside of the region to these destinations. The ABM also extends across the entire San Diego Region; so, while there are not residential inputs within the District itself, the model does account for the three million plus residents within San Diego County, as well as daily visitors from Riverside County, Orange County, Los Angeles, and Mexico. Additionally, the ABM accounts for visitors arriving via the San Diego International Airport, which was derived from the recently adopted Airport Master Plan. Please also see responses to Comment A7-10 and A7-17 of the Final PEIR.
121		The commenter asks how trips for tourists who stay at Port hotels were included.	The hotel guest trips are generated based on the number of employees and number of rooms.
122		The commenter asks how trips for other Port visitors were taken into account and claims that neither of these groups fit into the employee or resident travel pattern. The comment also suggests that the employees in the Seaport project will	The ABM extends across the entire San Diego Region; so, while there are not residential inputs within the District itself, the model does account for the three million plus residents within San Diego County, as well as daily visitors from Riverside County, Orange County, Los Angeles, and Mexico. Tourist driven uses within the District are also coded into the ABM as regional uses (based on the land use type and number of employees); thus, the model accounts for visitors from around the region as well as the adjacent counties to the District to utilize these uses. Additionally, employee trips associated with the Seaport San Diego Project were considered in the cumulative impact analysis. Please see Master Response M-1 as it relates to cumulative projects, such as the Seaport San Diego project, and responses to Comments A7-10, A7-17, and O17-6, and O17-29 of the Final PEIR.

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		increase significantly over the number today.	
123		The commenter asks if any adjustments were made for the Seaport project and if it was reflected in the ABM.	Please see Master Response M-1 and responses to Comments A7-10, A7-17, and O17-6, and O17-29 of the Final PEIR.
124		The commenter asks how these numbers are reflected in the VMT analysis.	Please see Master Response M-1 and responses to Comments A7-10, A7-17, and O17-6, and O17-29 of the Final PEIR. Any project specific analysis of the Seaport San Diego project would be evaluated in a site-specific project-level environmental analysis for that project.
125		The comment restates the conclusion from the TIS that VMT impacts in PD3 would be significant and unavoidable after mitigation and asks how significant the impact is. The comment claims that Downtown will be severely impacted with traffic congestion but acknowledges that congestion is not considered in the analysis anymore.	The commenter is correct in stating that a project’s impacts on automobile delay, as described by level of service (LOS) or vehicle capacity or traffic congestion, are not considered to be significant impacts on the environment. As outlined in the <i>State of Californian’s Governor’s Office of Planning and Research Technical Advisory on Evaluating Transportation Impacts in CEQA</i> , December 2018, a net increase in total VMT may indicate a significant transportation impact. As identified in Table 4.14-11 in Section 4.14, <i>Transportation, Circulation, and Mobility</i> of Volume 2 of the Final PEIR, the proposed commercial uses within Planning District 3 will result in a net increase of 10,643 vehicle miles traveled. Therefore, the magnitude of the impact would be 10,643 vehicles miles traveled per day, which would be a net increase of approximately 2% over 2050 total VMT with no new retail and recreational uses (see Table 4.14-11). The anticipated 2% net increase in VMT tripped the no net increase threshold of significance (see Tables 4.14-4 (thresholds) and 4.14-11 (PD 3 impacts for retail/restaurants) of the Final PEIR). Despite the implementation of MM-TRA-1, MM-TRA-32 and MM-TRA-3, this impact would remain significant and unavoidable.
126		The commenter asks for an explanation of the numbers on the SANDAG maps.	It is unclear which maps and numbers the commenter is referring to. Therefore, no further response can be provided.
127		The commenter asks how VMT is affected by moving traffic from Harbor Drive to the city streets and claims that this is obviously	Converting Harbor Drive from four-lanes to two-lanes between Hawthorne Street and Broadway as proposed by the PMPU was included in the ABM developed for evaluating VMT related impacts. Thus, any traffic diversion associated with these improvements was accounted for the in VMT impact analysis. It is anticipated that this will have a negligible impact on VMT.

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128		<p>affecting the environment.</p> <p>The commenter claims that mobility hubs will induce more people to drive downtown and asks why the Regional and Local Mobility Hubs don't cause more VMT to PD3. The commenter also claims that more downtown parking lots would induce driving to downtown.</p>	<p>The VMT analysis provided within the EIR identifies that the proposed Mobility Hubs will create a major transit stop as defined in Section 21064.3 of the California Public Resources code, as they will either connect two major transit routes OR they will contain a ferry/water taxi terminal served by either a bus or rail transit service. As outlined in Section 15064.3(b)(1) of the CEQA Guidelines "projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact." Thus, implementing the proposed Mobility Hubs would result in a less than significant VMT related impact for all land uses within a half-mile of their proximity. Please see response to Comment 017-14 in the Final PEIR (i.e., mobility hubs will reduce VMT).</p>
129		<p>The commenter asks if SANDAG has an optimal number of parking spaces for downtown and if there are any guidelines. The commenter expresses concern that the amount of traffic proposed by the Seaport project and new hotel rooms in the Embarcadero will potentially create a huge increase in both parking demand and congestion.</p>	<p>Parking regulations within the Downtown San Diego area are administered by the City of San Diego, within the upland areas. The City's Downtown parking regulations are outlined in section §156.0313of the City of San Diego's Municipal Code (https://docs.sandiego.gov/municode/MuniCodeChapter15/Ch15Art06Division03.pdf). Note that these parking guidelines do not apply to the District. An optimum number of parking spaces for the entire downtown area has not been prescribed. Furthermore, under Public Resources Code 21099(b)(2), a project's impacts on automobile delay, as described by level of service or vehicle capacity or traffic congestion, are not considered to be significant impacts on the environment. Please see Master Response M-1 to the Final PEIR for an explanation of the relationship between the PMPU and cumulative projects, such as the Seaport San Diego project.</p>
130		<p>The commenter claims that the Port's mobility hubs do not conform to the Regional Transportation Plan and cites alleged letters</p>	<p>During the plan review process, SANDAG indicated its appreciation of the District's incorporation of Mobility Hubs into the PMPU, in its comment letter dated January 7, 2022, as well as offered to coordinate on the development and implementation of the Mobility Hubs. Additionally, SANDAG's Mobility Hub Features Catalog was reviewed to ensure that the proposed Mobility Hubs were not in conflict with SANDAG's plans.</p>

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131		<p>from SANDAG and MTS supporting this claim.</p> <p>The commenter asks if their interpretation is correct that even if the Seaport Project or PMPU caused gridlock on Pacific Highway, impacts would still be less than significant because Santa Fe Depot and Seaport Village transit center are within ½ mile. The commenter asks how traffic problems are mitigated if they aren't considered an issue under CEQA and VMT.</p>	<p>Per Section 15064.3(b)(1) of the CEQA Guidelines and Public Resources Code 21099(b)(2), a project's impacts on automobile delay, as described by level of service or vehicle capacity or traffic congestion, are not considered to be significant impacts on the environment. Please see the response to comments 013-2, 017-6, 017-9, and 017-29 of the Final PEIR. Please also see Master Response M-1 of the Final PEIR for an explanation of the relationship between the PMPU and cumulative projects, such as the Seaport San Diego project.</p>
132	Janet Rogers, Email 2, 2/15/24, 10:30am	<p>The comment requests the location of the specific model used for the PMPU VMT analysis. The comment also asks how non-employment VMT was addressed. Lastly, the comment asks what was assumed in the VMT modeling for the Seaport project.</p>	<p>The specific land use changes included in the ABM sub-area model run conducted for the PMPU VMT analysis are included in Appendix A of the PMPU Transportation Impact Study (Appendix D of Volume 3 of the Final PEIR). While the main land use inputs into the ABM are employees and residents, the ABM does account for visitor trips by associating them with the total number of employees and the land use they are associated with (retail, restaurant, hotel, airport, recreation, etc.). The ABM also extends across the entire San Diego Region; so, while there are not residential inputs within the District itself, the model does account for the three million plus residents within San Deigo County, as well as daily visitors from Riverside County, Orange County, Los Angeles, and Mexico. Additionally, the ABM accounts for visitors arriving via the San Diego International Airport, which was derived from the recently adopted Airport Master Plan.</p> <p>The land uses proposed for the Seaport San Diego Project, utilized the project description from the 2016 Seaport San Diego project Exclusive Negotiating Agreement, which was the only project description available at the time the NOP was published in March 2017. Although not legally required, the traffic analysis used a conservative methodology and the SANDAG model inputs included the cumulative project as it was proposed in 2020. Please see Master Response M-1, as it relates to cumulative projects such as the Seaport San Diego project.</p>

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133	Janet Rogers, Email 3, 2/14/24, 10:03am	The commenter provides as an attachment a spreadsheet with reconciliation of Parks/Plaza and Promenade between the PMP and PMPU, and asks the District to fill in the spreadsheet. The comment also raises questions regarding the number of Recreational Boat Berthing slips in PD3 in relation to the Seaport Village project.	This comment is similar to late comments received - Comments 4, 32, 55, and 80 – and is referred to in District responses to those comments attached to the agenda sheet. Additionally, please see Master Response M-1 of the Final PEIR, as it relates to cumulative projects, such as the Seaport San Diego project. Please note that the District is not required to add formulas or numbers to a spreadsheet created by a commenter.
134	Don Wood, Email 1, 2/16/24, 10:14am	Comment expresses concern about public review comments about public access and scenic viewsheds being labeled as “policy concerns” when they are address under CEQA and the California Coastal Act.	This comment is similar to comment 141 below. The comment claims that comments that raise opinions regarding public access and scenic viewsheds are dismissed as policy issues and not considered environmental issues. However, the comment does not provide any specific examples to which the District may respond. Regardless, as evidenced in numerous responses, the District provides substantive responses to comments that raise environmental concerns about public access, scenic vistas, and scenic viewsheds. As examples, please see District responses to Comment 013-3, 015-19, 015-20, 015-22, 017-9, 017-11, 017-25, and 017-35 of the Final PEIR. As demonstrated by these examples, comments that raise policy issues are still addressed with responses from the District and consideration is given as to whether the comment raises an issue under CEQA or identifies an inadequacy with the PEIR. Comments that relate solely to the PMPU, such as those which disagree with its proposed provisions or recommend different or additional provisions, raise policy rather than environmental issues and do not require a written response under CEQA.
135		The comment expresses concern about “a previous promise” to build a ferry landing park included in a 1984 amendment to the PMP and also cites similarities to the Navy Pier park.	This comment is similar to comment 142 below. This comment is not specific to the PMPU. Please see responses to Comments A1-16 (Navy Pier), 07-1 (Ferry Landing), 07-5 (Ferry Landing), 014-4 (Navy Pier), 015-2 (“long promised parks”), 015-3b (Navy Pier), 015-3c (Broadway Landing Park), 015-3j (Navy Pier), 015-8 (Navy Pier), 015-14 (“promised parks”), and 018-11 (Navy Pier) of the Final PEIR. Additionally, a Port Master Plan is not a static plan and may be legally amended by the District and Coastal Commission despite past PMP amendments

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136		The comment expresses a need for deadlines to be imposed by oversight agencies (e.g., Coastal Commission) when considering approving Port initiatives like the PMPU.	This comment is similar to comment 142 below. Please see responses to Comments 015-2 (“long promised parks”) and 015-14 (“promised parks”) of the Final PEIR.
137	Janet Rogers, Email 4, 2/17/24, 5:35pm	The comment is a general complaint that the commenter is unable to make sense of the technical appendices related to the Transportation Impact Study. The comment asks where certain numbers come from, including the total VMT in the PMPU boundary (i.e., 608,838 VMT). The comment also asks if the VMT includes the PMPU and the 2016 version of the Seaport San Diego project.	<p>The comment complains that the technical modeling is too complicated to understand “and the public should not need a degree in planning or traffic analysis to make sense of the [analysis].” Please note that one of the primary purposes of an environmental impact report is to summarize the technical analysis, which is prepared by qualified technical experts, in more readily accessible format. As stated in CEQA Guidelines Section 15147, “[t]he information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. <i>Placement of highly technical and specialized analysis and data in the body of an EIR should be avoided through inclusion of supporting information and analyses as appendices to the main body of the EIR...</i>” [emphasis added.] The EIR also included an Executive Summary, which summarized the impacts for all resource areas, including transportation.</p> <p>The appendices to the transportation Impact Study are direct outputs of the SANDAG Series 13 Activity Based Model. The columns identified by the comment are defined as follows:</p> <ul style="list-style-type: none"> • MGRA (Master Geographic Reference Area): The Geographic location of where the land uses are inputted into the ABM. • untyped: Type of land use input (employees, residents, or acreage) • locoed: Type of land use that is being inputted • amount: The total amount (i.e., of employees, acres, or residents) of the land use that is being inputted. <p>This data was used in setting up the model, in the case of Appendix A, and in conducting the VMT analysis, as is the case with Appendix B. This data cannot be simplified as it is the technical backup that was used from conducting the transportation impact analysis contained in the EIR and is in alignment with industry accepted practices.</p> <p>The 608,838 vehicle miles traveled (VMT) identified in Appendix B of the Final PEIR is the total VMT in the PMPU boundary. As shown, 195,755 VMT of the 608,838 VMT (in 2050) would be attributable to the PMPU.</p>

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			Regarding inclusion of the Seaport San Diego Project in the VMT model, please see response to Comment 017-6 of the Final PEIR. As indicated, it is included in the model as part of the base condition since it is a cumulative project.
138	Abby Rosenthal, Email 1, 2/20/24, 5:10pm	Comment asks what is the District’s plan for the “old Navy Building” site now that the site will be transitioned from the U.S. Navy’s jurisdiction to the District’s.	Please note that this comment does not address the adequacy of the Final PEIR and no response is needed. Please note that this comment does not raise an environmental issue or address the adequacy of the Final PEIR and no response is needed.
139	San Diego Waterfront Coalition, Letter 1, 2/21/24	Comment is general opinion that the PMPU and PEIR are “profoundly deficient” and points to the “acknowledged omission of proposed changes to sections of the North and Central Embarcadero”. The comment also suggests that the label Final Draft for the PMPU “infer[s] that the port is still open to additional changes in the “final” PMPU and PEIR based on that additional public input”.	Please see the Final PEIR Master Response M-1 of the Final PEIR. Additionally, the term “Final Draft” applied to the PMPU is used to indicate that it is the final draft before being considered for approval by the Board, wherein it becomes the “Final” PMPU. The Board, in its decision-making capacity, may request changes to the Final Draft prior to approval (should it be approved). In this case, District staff would make any Board requested revisions as directed and the document would then be considered approved and Final.
140		The comment indicates the commenter is making additional comments “suggesting significant improvements” to the documents to “make them more likely to pass muster” with the California Coastal	Comment noted. This comment does not raise any specific issue with the PMPU or PEIR. Therefore, no response is needed.

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		<p>Commission and in the court of law. The comment also indicates support for comments submitted by SWIA and the Embarcadero Coalition.</p>	
141		<p>Comment claims District responses to comments on the Draft PMPU and PEIR are dismissed because they are “policy related” and not environmental issues. The comment provides a general example that “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.”</p>	<p>This comment is similar to comment 134 above. The comment claims that comments that raise opinions regarding public access, scenic vistas, and scenic viewsheds are dismissed as policy issues and not considered environmental issues. However, the comment does not provide any specific examples to which the District may respond. Regardless, as evidenced in numerous responses, the District provides substantive responses to comments that raise environmental concerns about public access, scenic vistas, and scenic viewsheds. As examples, please see District responses to Comments 013-3, 015-19, 015-20, 015-22, 017-9, 017-11, 017-25, and 017-35 to the Final PEIR. As demonstrated by these examples, comments that raise policy issues are still addressed with responses from the District and consideration is given as to whether the comment raises an issue under CEQA or identifies an inadequacy with the PEIR.</p>
142		<p>The comment refers to “breaking promises” made in the past and cites Fery Landing Park identified in a 1984 PMP amendment, the park on Navy Pier, and Broadway Landing Park. The comment suggests that the Coastal Commission should include “clearer deadlines when they</p>	<p>This comment is similar to Comment 135 and 136 and is not specific to the PMPU. Please see responses to Comments A1-16 (Navy Pier), 07-1 (Ferry Landing), 07-5 (Ferry Landing), 014-4 (Navy Pier), 015-2 (“long promised parks”), 015-3b (Navy Pier), 015-3c (Broadway Landing Park), 015-3j (Navy Pier), 015-8 (Navy Pier), 015-14 (“promised parks”), and 018-11 (Navy Pier) of the Final EIR.</p>

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		consider approving Port initiatives like the PMPU with conditions” and notes the District’s response that indicates the PMPU would replace the current PMP. The comment suggest a “broken promise”.	
143		The comment provides several opinions, which include increasing building setbacks in North Embarcadero, requiring underground parking structures, modifying M Policy 1.2.4 to encourage “below grade” mobility hubs, moving a block of Grape Street to below grade, converting Harbor Drive between Hawthorne and Rocco Park into a “meandering two-lane bayfront drive and renaming it”, consider implementing recommendations provided by the North Embarcadero Visionary Project Citizen’s Advisory Committee (NEVPCAC), and inclusion of a 2014 North Embarcadero Precise Plan Map in the PMPU.	The comment requests specific changes to the PMPU. The recommended changes are included in the record for consideration by the Board of Port Commissioners. The comment also raises the issue of driver and pedestrian safety as it relates to potential future changes at Grape Street. The PMPU is a long-term planning document and does not propose any specific development on Grape Street. (See Section 1.2 of the PMPU, which states that “the District is not proposing to approve and/or implement any specific projects with the PMPU.”) A future project proposed at this site, including a potential future low-cost hotel, would undergo development review, including site review, traffic engineering review, and CEQA review to identify any potential environmental effects, including any potential for creating a hazardous traffic condition, along Grape Street. Please also see response to Comment 015-4 [scope of a program EIR vs. project EIR].) and responses to Comments 017-14 and I15-6 (underground parking).

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144		The comment suggests that the PMPU should include development projects, such as the Seaport San Diego project, as part of the PMPU and analyzed as a component of the PMPU in the PEIR.	Please see Master Response M-1 of the Final PEIR. M-1 explains why the Seaport San Diego project is considered a cumulative project and is not part of the PMPU. The response also explains that the development scenario used for the Seaport San Diego project was based on reasonable development assumptions at the time the NOP was published, consistent with State CEQA Guidelines Section 15125.
145		The comment suggests revisions to the PMPU to require any new 600 room hotel tower that could be built next to the existing Hilton San Diego Bayfront Hotel to be aligned with the existing tower and not block any public bayfront views any more than the existing Hilton hotel.	The commenter refers to a planned 600-room hotel tower adjacent to the Hilton San Diego Bayfront Hotel. However, reference in the PMPU to 600 hotel rooms in the South Embarcadero includes a previously entitled 500-room hotel associated with the Phase III San Diego Convention Center and up to an additional 100 rooms in a location to be determined. Additionally, Park Boulevard is a designated view corridor extension. Any future projects in the South Embarcadero would need to be consistent with the PMPU’s policies related to view corridors extensions. (See PD3.75 <i>Preserve the Park Boulevard View Corridor Extension, as generally depicted in Figure PD3.4, to protect views from public rights-of-way in accordance with the requirements of Chapter 4, Baywide Development Standards.</i>)
146	Janet Rogers, Email 5, 2/21/24, 7:34pm	Comment asks about 500 rooms north of County Administration Building, indicates that the 600 rooms identified in South Embarcadero have not been built and require environmental impact analysis, and suggests that the PEIR is 1000 rooms short of what is described in the PMPU.	<p>In PD3, Embarcadero, the PEIR modeled 850 hotel rooms, which includes up to 750 new hotel rooms in the North Embarcadero and up to an additional 100 rooms in the South Embarcadero. The remaining 500 rooms in the South Embarcadero were analyzed in the Phase III Convention Center Expansion EIR, which was certified and the PMPU approved by the Board on September 19, 2012 (Resolution 2012-136). The PMPA was certified by the Coastal Commission in 2013. Therefore, the environmental analysis for a 500-room hotel was already conducted and approved.</p> <p>Due to continued refinements to the PMPU during the public planning phase, the PEIR did not receive an update to the number of lower cost accommodations that could occur in PD2 or PD3. Therefore, the District has included the additional lower cost accommodations (up to 1400 beds in PD2 and up to 500 beds in PD3) in a Second Errata to the Final PEIR. Accompanying the errata is a technical memorandum that analyzes the additional environmental effects associated with this update to the Final PEIR. This technical memorandum is provided as Appendix N in Volume 3 of the Final PEIR. Note, there are no changes or clarifications added to the PMPU as the lower cost accommodations are already described in the PMPU and the PEIR’s project description.</p>

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			<p>Please see the Second Errata to the Final PEIR and the accompanying technical memorandum, which programmatically analyzes the environmental effects of up to 1,900 beds in PD2 (i.e., up to 1,400 beds) and PD3 (i.e., up to 500 beds). As shown, no new or substantially more severe significant environmental effects would occur with the inclusion of the lower cost accommodations and recirculation of the Final PEIR is not required.</p>
147	SWIA, Letter 1	<p>The comment provides information about the organization, Southwest Wetlands Interpretive Association (SWIA), and its past participation in the PMPU planning process. The comment indicates it has recommendations for the PMPU to meet long-term goals for effective conservation of natural resources.</p>	<p>This comment is about the organization and its past participation in the PMPU planning process, as well as an introductory statement that additional recommendations for PMPU follow in the letter. This comment does not raise a specific issue with the PMPU or PEIR and does not require a response.</p>
148		<p>The comment indicates that the PMPU does not identify any Conservation Open Space within the entire PMPU and cites Table 3.1.1 and Figure 3.1.1. The comment recommends that the Final PMPU be revised to add, at a minimum, Conservation Open Space to East Harbor Island and Grand Caribe locations with appropriate acreages. Also, requests to COS to</p>	<p>This comment is similar to comment 87. Please see the response to comment 87.</p>

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		be integrated with complementary ROS.	
149		Comment indicates that “Coastal-Enhancing” is not defined under the CCA and claims the PMPU’s definition allows for broad interpretation. The comment cites CCA Section 30001. The comment believes the Coastal Enhancing definition should be modified to more closely adhere to the CCA.	This comment is similar to comment 86 and has been included in the record for Board consideration.
150		Comment is a conclusionary comment.	This comment does not raise any issues which require a response.
151	Coronado Cays HOA, Letter 1, 02-23-24	The comment express appreciation for the PMPU planning process, listening to concerns, and working closely together to support the vision for the South San Diego Bay.	This comment expresses appreciation of the planning process and does not raise any issues or questions that require a response.
152	Ellen Coppola, Email 1, 02-25-24, 10:19pm	The commenter expresses opposition to the adoption of the Final Draft PMPU and certification of the Final PEIR and indicates that the reasons are to follow.	The comment expresses general opposition to the PMPU and certification of the Final PEIR but does not raise a specific environmental issue requiring a response. This comment has been included in the record for Board consideration.

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153		The commenter claims that 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.	This comment provides a summary of the concerns raised in subsequent comments. The individual responses to each of the issues raised in this comment are provided in the response to comments #154 through #156 below.
154		The commenter suggests that governmental agencies and the public were not given an opportunity to submit input on the on the NOP based on the changes made to the PMPU from the 2017 draft and suggests that this led to obsolete comments. The commenter claims that if the NOP had gone out correctly citing the revised PMPU, the CEQA evaluation should have used the very different and updated 2019 version of the Seaport Project.	The commenter alleges that the draft PMPU changed from the time of the Notice of Preparation/Initial Study to the release of the Draft EIR and that “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.” The assertion raised by the commenter has been rejected by the courts. (<i>Gentry v. City of Murietta</i> (1995) 36 Cal.App.4th 1359, 1384 [“In any event, the Guidelines contemplate that “only one initial study need be prepared for a project. If a project is modified after the study has been prepared, the [lead] agency need not prepare a second initial study.”].) Furthermore, numerous CEQA cases have recognized that “The CEQA reporting process is not designed to freeze the ultimate proposal in the precise mold of the initial project...” (<i>Citizens for a Sustainable Treasure Island v. City and County of San Francisco</i> (2014) 227 Cal.App.4th 1036, 1062.)
155		The comment claims that the PEIR figures used to evaluate environmental impacts are inconsistent and often wrong, citing the difference of 1,000	The commenter makes a general claim that the PEIR used incorrect information in the evaluation of environmental impacts, citing an alleged discrepancy between the PMPU and PEIR of 1,000 hotel rooms in the North Embarcadero. The commenter raises similar concerns as those raised in comment 146 above; please see the response to that comment. The commenter may be confused about the number of new hotel rooms in the North Embarcadero (PD3). As shown in Planned Improvement 3.2.6 a total of 750 <i>new</i> hotel rooms (not already in existence) are included in the PMPU. Additionally, pursuant to Planned Improvement 3.2.3 a total of 500

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		rooms in the North Embarcadero between the PMPU and PEIR and suggests that this difference is significant. The comment further claims that similar numeric problems exist for other categories and other districts.	<i>new</i> lower cost overnight beds (not already in existence) are included in the PMPU. Please see the Second Errata and Appendix N that addresses the 500 new beds. As shown in the Second Errata, no new significant environmental effects or increase in severity of effects would occur.
156		The commenter claims that the Port purposely mislead the community, Coastal Commission, and the CEQA process by removing redevelopment of the Central Embarcadero from the PMPU and stating that CE will remain the same as it is today. The commenter claims that the obsolete version was used in the cumulative analysis.	Please see Master Response M-1 of the Final PEIR, which explains why the Seaport San Diego project is a cumulative project and is not part of the PMPU. The response also explains that the development scenario used for the Seaport San Diego project was based on reasonable development assumptions at the time the NOP was published, consistent with State CEQA Guidelines Section 15125
157		The comment requests changes to the PMPU to mitigate or remedy the significant and unavoidable impacts identified in the PEIR.	The comment is a general comment that requests changes to the PMPU to avoid all significant and unavoidable impacts. However, no specific significant and unavoidable impacts are identified and no recommended changes are provided in this comment. As indicated in Section 15093 of the CEQA Guidelines, “CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered ‘acceptable.’” The District has prepared a Statement of Overriding Considerations which will be considered by the Board of Port Commissioners. In addition, the Final PEIR includes alternatives to the proposed PMPU which meet some of the central project objectives, while reducing one or more significant impacts. However, due to the nature of the unavoidable significant impacts identified in the Final PEIR, such as unknown timing of future projects, specific locations, and timing associated with infrastructure

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158		<p>The comment expresses concern that the environmental impact analysis is programmatic and cannot provide project level analysis due to lack of project details for all future projects. The comment claims that “at least 60% of the CEQA categories are still significant and unavoidable and points to an increase in VMT in PDs 2 and 3. The comment claims the PMPU “must be changed until it results in Less than Significant outcomes.”</p>	<p>improvements (Impact-TRA-1) or net zero GHG emissions target in 2050 (Impact-GHG-1), none of the alternatives would completely avoid any of the identified significant and unavoidable impacts. Please also see response to comment 158, below.</p> <p>The comment expresses a fundamental misunderstanding of a programmatic analysis allowed under CEQA. Please see the Final PEIR, Volume 2, Chapter 1, page 1-2 through 1-4. As stated on page 1-2:</p> <p>“[t]he proposed PMPU is a comprehensive update to the existing PMP to establish water and land uses on District Tidelands and to guide future development and conservation over the approximately 30-year planning horizon. The PMPU identifies land use policies and delineates broad categories of uses on water and land use maps by planning district, which are further discussed in Chapter 3, <i>Project Description</i>, of this Final PEIR. Consistent with the requirements of the California Coastal Act (CCA) and where known, the PMPU includes a list of appealable projects for associated planning districts that could be considered for future project-specific development. Importantly, however, the District is not proposing to approve and/or implement any specific projects with the PMPU. Because sufficient details regarding the timing, design, development intensity, and location of future projects of the PMPU are not available to facilitate a project-level impact analysis and because no approvals would be provided for specific development projects at this time, this Final PEIR evaluates the potential physical changes to the environment associated with the PMPU at a programmatic level.</p> <p>According to State CEQA Guidelines Section 15168, a program EIR is an PEIR that may be prepared on a series of actions that can be characterized as one large project and that are related either geographically or as individual activities carried out under the same authorizing statutory or regulatory authority, and that generally have similar environmental effects that can be mitigated in similar ways. One of the benefits of preparing a program PEIR is that it allows for a reduction in paperwork by streamlining the environmental review of future subsequent activities found to be within the scope of the program described in the Draft Final PEIR. A program EIR is distinct from a project EIR, which is prepared for a specific project and must examine site-specific considerations in detail.”</p> <p>Regarding significant and unavoidable (SU) determinations, the comment is ignoring the rationale provide for each SU impact determination. Many of these SU determinations have been made due to uncertainty associated with future projects that will still need to be reviewed for CEQA compliance as part of future project discretionary reviews. For example, Impact-AES-1 would remain SU because the type of construction equipment and the duration and location of construction of future development projects are unknown at this time and,</p>

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			<p>therefore, it cannot be guaranteed that implementation of MM-AES-1 would reduce adverse impacts resulting from construction activities on scenic vistas or view corridor extensions to below significant levels. It is for similar reasons (e.g., unknown project timing, location, duration, etc.) that Impact-AES-2, Impact-CUL-1, Impact-CUL-2, Impact-CUL-3, Impact-GHG-1, Impact-WQ-1, Impact-NOI-2, Impact-NOI-3, Impact-NOI-4, Impact-NOI-5, Impact-NOI-6, Impact-NOI-7, Impact-NOI-8, Impact-NOI-10, Impact-PS-1, Impact-PS-2, Impact-TRA-1, Impact-TRA-2, and Impact-TRA-3 would remain SU after mitigation is incorporated. Further, CEQA does not require the PMPU to be changed until it results in less than significant impacts. Where significant impacts cannot be avoided if a project is implemented as proposed, the lead agency must describe the impacts which cannot be mitigated to a level of insignificance and explain the reasons why the project is being proposed notwithstanding the significant unavoidable impacts. (State CEQA Guidelines Section 15126.2(c).) If the Board decides to adopt the PMPU notwithstanding the significant unavoidable impacts discussed in the PEIR, the Board will comply with State CEQA Guidelines Section 15093 and will balance the benefits of the PMPU against its unavoidable significant impacts and, if the benefits outweigh the unavoidable impacts, the Board may approve the PMPU and adopt a Statement of Overriding Considerations.</p>
159		<p>The comment claims that failure to change the PMPU will result in a buildout with huge negative impacts. The comment claims that 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 comment claims sensitive receptors living and sleeping within 1000 feet of elevated GHG emissions and noise impacts requires these impacts</p>	<p>The comment provides a general opinion regarding potential environmental impacts but does not identify any specific “environmental impacts that are harmful to the health and welfare of the populations adjacent to the Port” which have are not addressed in the Final PEIR. The comment also does not identify any inadequacy in the Final PEIR’s analyses of potential impacts associated with GHG emissions and noise. (See Final PEIR, Section 4.6, Greenhouse Gas Emissions and Energy, and Section 4.10, Noise.) As no specific examples are provided that are supported by substantial evidence, no additional response is necessary or possible.</p>

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160		<p>to be mitigated to Less than Significant.</p> <p>The comment is a multi-part comment. It claims that the “negative environmental impacts are harmful to the earth’s systems and negatively impact climate change.” The comment continues by claiming that “[t]he negative impacts in the proposed PMPU undermine adjacent jurisdictions, such as the City of San Diego, which has a legal responsibility to reduce VMT.”</p> <p>The comment also claims that “VMT impacts must be remedied to Less than Significant”. Finally, the comment claims that “[t]he 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.”</p>	<p>The comment expresses opinions related various environmental issues. The first several statements are broad in nature and general. Please see responses to 157, 158, and 159. As for mobility hubs, please see the District’s response to 017-14 in the Final PEIR. These comments are included in the record for Board consideration.</p>
161		<p>The comment requests the creation of “detailed building standards in the Central and South</p>	<p>Please see the responses to comments 25 attached to the agenda sheet and M-1, 015-3g and 017-28 in the Final PEIR.</p>

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		Embarcadero” or to maintain existing development levels.	
162		<p>The comment requests the creation of “building standards for the Central Embarcadero or retain the existing condition. 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.</p>	Please see the responses to comments M-1 and O17-28 in the Final PEIR.
163		<p>The comment indicates that there are detailed building standards in the North Embarcadero and in other Planning Districts yet there are none in the South Embarcadero. The comment states that the PMPU should be setting the standards</p>	Please see response to comment 161, above.

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		for development, not letting developers decide them. The public needs to be part of the process.	
164		The commenter requests that the plans in the Embarcadero are changed to center on activities that draw Californians to the Bay instead of creating a wall of hotels to attract out-of-state visitors. The commenter claims that only 2-3% of the visitors in downtown hotels are Californians and that hotels do not attract Californians to the Bay.	This comment raises similar concerns as comment 47, attached to the agenda sheet, as well as comments 015-2 and 017-4 in the Final PEIR. Please see the responses to those comments.
165		The commenter requests that the District adhere to the building density in the Embarcadero stated in the FAR standards agreed to in the PMPU, NEVP, and amendments.	This comment raises similar concerns as comment 11, attached to the agenda sheet, as well as comments A7-30.cc and 017-21 in the Final PEIR. Please see the responses to those comments.
166		The commenter requests that the building standards in the Embarcadero should require all new parking facilities to be underground.	This comment raises similar concerns as comments #20 and #63, attached to the agenda sheet, as well as comments BT5-1 , 015-24 , 017-7 , and 017-14 in the Final PEIR. Please see the responses to those comments.
167		The comment requests not to combine	This comment raises similar concerns as comment 4, attached to the agenda sheet. Please see the response to that comment.

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		Parks/Plaza with Promenades/Walkways for ROS. The comment claims the port needs to reconcile the current PMP’s Park/Plaza and Promenade.	
168		The comment suggests it is misleading to use green coloring on maps to areas that will be concrete walkways and plazas. The comment requests differentiating between green space and non-green space.	The graphics showing water and land use include various colors represent water and land use designations. In this case, green is applied to ROS areas. How ROS is developed is not depicted on these water and land use designations maps.
169		The comment asks to reject the Coastal Enhancing definition and indicates that coastal land should not be used for certain types of revenue generating activities.	This comment is similar to comment 86, attached to the agenda sheet, and has been included in the record for Board consideration.
170		The comment is a conclusionary comment.	The comment does not raise an issue or question and therefore no response is required.
171	Adrian Fremont, Email 1, 02-26-24, 6:46am	Form letter that is identical to Comments 152-170.	The comment letter is a form letter identical to Comments 152-170. Please see the responses to Comments 152 through 170, above.
172	Ann-Marie Pickle, Email 1, 02-26-24, 3:28am	Form letter that is identical to Comments 152-170.	The comment letter is a form letter identical to Comments 152-170. Please see the responses to Comments 152 through 170, above.
173	Embarcadero Coalition, Email 1, 02-25-24, 9:47 pm	Form letter that is identical to Comments 152-170.	The comment letter is a form letter and talking points that raise identical to Comments 152-170. Please see the responses to Comments 152 through 170, above.

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174	Embarcadero Coalition, Letter 1, 01-08-22	Comments raised in this letter are identical to comments that are raised in Comment Letter O17 of the Final PEIR. This letter does not raise any new issues.	Comments raised in this letter are identical to comments that are raised in Comment Letter O17, which is included in the Final PEIR, Volume 1, Chapter 2. Please see the District responses to Comment Letter O17 in the Final PEIR.