
***APPENDIX B
COMMENTS AND RESPONSES TO
COMMENTS ON DRAFT EIR***



Port of San Diego
and Lindbergh Field Air Terminal

(619) 686-6200 • P.O. Box 488, San Diego, California 92117-0488

December 17, 1989

City of San Diego
Redevelopment Agency of the City of San Diego
Attn: Mr. Ron Smith
202 C Street, Third Floor - MS3A
San Diego, CA 92101-3863

**Subject: DRAFT ENVIRONMENTAL IMPACT REPORT (EIR)
NAVAL TRAINING CENTER (NTC) REUSE PLAN**

Dear City of San Diego:

Thank you for the opportunity to review and comment on the Draft EIR for this NTC Reuse Plan. The Federal Aviation Administration (FAA) is a cooperating agency for this project and sponsors the San Diego Unified Port District (SDUPD), as the operator of San Diego International Airport, in its request to receive surplus Federal property for airport uses.

The SDUPD recognizes the complexity of the issues addressed in the Draft EIR as prepared by the City of San Diego, and provides the following comments for your consideration.

1. Table ES-1 - Summary of Environmental Impacts and Mitigation Measures - Noise

A mitigation measure for the proposed elementary school is mentioned in terms of resulting to be built with sound attenuation construction. However, there are other incompatible land uses proposed in the NTC Reuse Plan that will fall within the 1989 60 decibel contour (CLUP defined sound attenuation construction boundary) that need to be built with sound attenuation construction. These proposed facilities are cited on Page 4.12-11: "Future noise sensitive receptors within the Project Area would include the proposed hotels, classroom facilities associated with the public safety institute, educational uses, elementary school, and proposed residential units." Mitigation measures should be provided to insure that interior noise attenuation is required to reduce the interior noise levels of these proposed uses to 45 dBA CNEL within the 60 dBA CNEL noise contour of the airport.

SDUPD-1

2. Section 4.1 (Page 4.1-5) - Land Use - Lindbergh Field

The Operations, Passenger and Cargo information cited in this EIR for Lindbergh Field is from 1980 and 1984. The document should reflect more current data for Lindbergh Field. Annual totals for operations, passengers and cargo information are compiled and released monthly by the San Diego Unified Port District. We have attached annual totals for 1988.

SDUPD-2

SDUPD-1. The EIR makes reference to aviation easements as mitigation for incompatible noise-related land use impacts. In addition, as agreed upon throughout the EIS/EIR process, once Project specifics are known, the acquiring entity will conduct additional analyses and prepare environmental documentation to address incompatible land use impacts.

SDUPD-2. Text in Section 4.1 has been modified.

3. Section 4.1 (Page 4.1-13) – Lindbergh Field Airport Master Plan

The preparation of the San Diego International Airport Master Plan was initiated in 1997. Although no Master Plan has been adopted, the planning process has produced public information related to proposed development options. This information is available from the San Diego Unified Port District's Clerk Office as well as the Port of San Diego's website located at www.portofsan-diego.org.

SDUPD-3

SDUPD-3. Text in Section 4.1 has been modified.

4. Section 4.1 (Page 4.1-13) Airport Environs Overlay Zone

The EIR notes that this ordinance does not apply to NTC. City staff has prepared an amendment to City code to establish an Airport Environs Overlay Zone (AEOZ) for Lindbergh Field encompassing the 1990 60 dBA CNEL contour. This amendment was presented to the City's Planning Commission on December 2, 1999, and recommended for the City Council to consider an Airport Environs Overlay Zone for Lindbergh Field in February 2000. The AEOZ will assist City staff in implementing the structural noise attenuation and aviation easement requirements for property owners within the AEOZ. The proposed residential and institutional land uses for NTC fall within the proposed boundaries of the AEOZ and may be subject to the aforementioned structural attenuation and aviation easement requirements pending final adoption of the municipal code amendment.

SDUPD-4

SDUPD-4. Text in Section 4.1 has been modified.

5. Section 4.12 (Page 4.12.7) - Noise Contour Map

The Noise Contour Map should reference the year that the noise contours are depicted. Noise contour maps for Lindbergh Field are prepared quarterly by the Airport Noise Information Office of the San Diego Unified Port District.

SDUPD-5

SDUPD-5. The noise contour map references the document from which the information was derived. In this case, the source document is the 1992 CLUP for Lindbergh Field.

6. Section 4.12 (Page 4.12.10) - CLUP for Lindbergh Field

The Airport Influence Area should be identified as the 1990 60 dBA CNEL contour for Lindbergh Field in this section and subsequent sections.

SDUPD-6

SDUPD-6. Text in Section 4.12 has been modified.

7. Noise - Sections 4.12.2 and 4.12.3 (Page 4.12-11) - Noise Impact Analysis.

According to the CLUP and City ordinance, interior noise attenuation is required to reduce the interior noise levels of residential structures to 45 dBA CNEL within the 60 dBA CNEL. The CLUP requires that an aviation easement be recorded over the Airport Influence Area of Lindbergh Field. As part of the City building permit process, all new development projects require the recording of an aviation easement which becomes part of the property title.

The 60 dBA CNEL threshold, under California Noise Standards, requires an acoustical analysis showing that new hotels and residential structures (all dwellings other than detached single-family dwellings) have been designed to limit the outside noise levels from intruding inside, by dampening noise to levels which would not interfere with speech or sleep in habitable rooms. While such uses will continue to be permitted, they must be properly insulated.

Aircraft noise impacts would be significant if noise levels to the exterior of residences would be greater than 65 dBA CNEL. In addition, aircraft noise impacts would be significant if noise levels to the interiors of hotels and residences (other than detached single-family

SDUPD-7

SDUPD-7. All future development is subject to the appropriate analysis and environmental documentation to ensure that proposed land uses are compatible with the CLUP noise contours. The recommended mitigation language has been added to Section 4.1 of the EIR. Noise mitigation regarding the MFH development is included in Section 4.12.

SDUPD-7
(cont.)

overlays) would be greater than 45 dB CNEL. These impacts would be avoided with the provision of architectural features to reduce the interior noise to the required level. Implementation of the City of San Diego Airport Environs Overlay Zone as mandated by the CLUP would avoid significant impacts to proposed residential land uses from aircraft noise by mandating noise studies and implementation of appropriate noise attenuation measures as required under California Noise Standards, State Building Code, Title 24.

The Noise Impacts analysis (Section 4.12.2) does not apply these requirements or criteria to the residential and hotel land uses proposed within the 60 dB(A) CNEL contour. The analysis should explicitly identify that a significant environmental effect would occur if an acoustical analysis is not conducted for hotel and residential uses proposed within the 60 dB(A) CNEL contour. The following mitigation measure should be implemented as 4.12.3 Mitigation Measure and included in a monitoring and reporting program to ensure the noise impact is reduced to a level less than significant.

Mitigation Measure 4.12.3. In accordance with the Airport Environs Overlay Zone and California Noise Standards, the City of San Diego Environmental Review Manager shall review noise studies in the noise-impacted areas prior to issuance of building permits to confirm that appropriate noise attenuation is proposed. The City Environmental Review Manager shall confirm that noise attenuation measures have been implemented in accordance with California Noise Standards, State Building Code - Title 24 before issuance of a certificate of occupancy.

B. Cumulative Projects - Section 7.1.3 (Page 7-4) - Lindbergh Field Expansion

The EIR should clarify that the Lindbergh Field Expansion was completed by the SDUPD under its Immediate Action Program (IAP) (SDUPD 1984) and is considered a past project.

SDUPD-8

SDUPD-8. Text in Section 7.1.3 has been modified.

9. Cumulative Projects - Section 7.1.5 (Page 7-5) - Terminal 2-East Improvements

The last sentence should be revised to read: A Final Negative Declaration was completed in October 1989. The project is anticipated to be implemented by June 2001.

SDUPD-9

SDUPD-9. Text in Section 7.1.5 has been modified.

Thank you for the opportunity to comment on the Draft EIR. If you have any questions or comments regarding these revisions, please contact Ted Anasis, Associate Environmental Planner at (619) 606-7269 or Nyle Marmon, Airport Noise Information at (619) 686-8111

Sincerely,


Melissa A. Mailander
Environmental Review Coordinator

Diet: Thelma Howens, Aviation
Reph Hicks, Planning
Nyle Marmon, Airport Noise Information
David Malik, Environmental Management
Dan Wilkone, Strategic Planning Services

MAK/ms



DEPARTMENT OF THE NAVY
 NAVAL FACILITIES ENGINEERING COMBAND
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Maureen Oatry
 City of San Diego
 Redevelopment Agency
 202 C Street, 3rd Floor, MS 3A
 San Diego, CA 92101-3863

11000
 Ser 3R/E/023
17 DEC 1999

Subject: Draft Environmental Impact Report (EIR) for the NTC Redevelopment Project

Dear Ms. Oatry:

Thank you for the opportunity to review the draft Environmental Impact Report (EIR) for the NTC Redevelopment Project (November 1999). We have some comments and recommendations for your consideration regarding the inclusion of the Department of the Navy's (DoN) Military Family Housing (MFH) project in your EIR for your consideration when revising the draft document.

As you know, the MFH project a Public Private Venture (PPV) whereby the property will continue to be owned by the DoN and leased to the developer for a term of 50 years. As the project site will continue to be federally owned property, it will not be subject to the policies of the City of San Diego, adopted plans, and related ordinances. However, as stated in the Environmental Assessment (EA) for the MFH project approved in March 1999, the MFH project will be generally consistent with applicable aspects of the City of San Diego Zoning Ordinance, the City of San Diego Progress Guide, General Plan, Redevelopment Plan, and the Peninsula Community Plan.

We understand and are in agreement with the City that the MFH property may be included within the City's redevelopment footprint for tax purposes. However, we are concerned with the presentation of the MFH in the City's EIR for Redevelopment, since we the DoN's MFH project is not subject to City discretionary review.

Specifically, the EIR acknowledges 39 of the original 541 acres at NTC to be retained by the Navy in its current state is not part of the NTC Redevelopment Project, but that the 72 acres retained by the DoN for MFH is a part of the NTC Redevelopment Project. The DoN disagrees with the position that the 72 acres retained by the DoN is part of the NTC Redevelopment covered by the EIR. CEQA requires State and local public agencies to consider the environmental consequences of projects which they undertake, fund or permit. Further, the Redevelopment Agency as the lead agency in this case has the principal responsibility for carrying out or approving the redevelopment project (Cal. Publ Resources Code 21067). As explained above, the 72 acres remains

DON-1. The EIR has been modified to more clearly state that the 72-acre portion of the Project Area designated for MFH Development is subject to Navy policies as opposed to City of San Diego policies, plans, and ordinances. Section 4 of the EIR has been modified to further clarify or differentiate the mitigation measures that apply to the 430-acre portion of the Project Area and the MFH Development portion of the Project Area.

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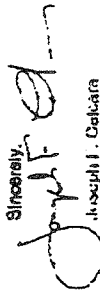
federal property, and therefore the Redevelopment Agency will not undertake, fund, permit or approve the DoN's MFH project.

Both the NTC Ukposal/Kouse EIS/EIR and NTC MFH EA included each other's project in the cumulative analysis section of their respective documents. Our recommendation, consistent with this approach, is to consider the MFH project in the cumulative analysis section of the Redevelopment EIR. Language could also be added to the Executive Summary and Introduction stating the background, status and relationship of the two properties.

In summary, the DoN's position is that the MFH project can not be evaluated in the EIR as a part of the NTC Redevelopment footprint. We recommend that the MFH project only be included in the Cumulative Impacts Section. We would be willing to meet with you to discuss our comments and concerns in greater detail.

We look forward to our continued partnership and collaboration in the development of the former NTC property and MFH project.

Sincerely,



Joseph J. Calgara
Real Estate Business Line Manager
By direction of the Commander

DON-1
(cont.)



SAN DIEGO AUDUBON SOCIETY

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VIA FACSIMILE: 619 236-6512

December 17, 1989

Ron Smith, Project Manager
NTC Redevelopment Project
Redevelopment Agency of the City of San Diego
202 C Street, MS 3A
San Diego, California 92101-3663

Dear Mr. Smith,

SUBJECT: NTC Redevelopment Project, Draft EIR, November 1989, Comments on

The San Diego Audubon Society has participated actively in all stages of the NTC Reuse and Redevelopment Processes from the Reuse Subcommittee, through the design charrette, the CEQA process, the negotiations for the Camp Miraluz Lease, the Mitigation Agreement, and the Redevelopment NCP. We strongly desire that this project not degrade the wildlife support value of the project area, including the boat channel, and that of the neighboring part of San Diego Bay.

ADEQUACY OF PROJECT DESCRIPTION

The Subject EIR does not provide an adequate Project Description, especially section 2.3, Project Characteristics, to allow an evaluation of the Environmental Impacts of this Project to allow affected outsiders and public decision-makers to evaluate the project's environmental cost, consider mitigation measures, and weigh other alternatives. The EIR mentions potential impacts to waterfowl and to shorebirds due to human activity in the water and along the shoreline. However, the Project Description does not provide any information that will allow a reader to know the nature and magnitude of those activities, and therefore the impact to waterfowl. Also the EIR mentions the potential of water quality impacts from urban runoff, including that from motor vehicles. Again, the Project Description does not provide any information that will allow a reader to assess the nature and magnitude of those water quality impacts, and what measures will be incorporated to prevent, avoid, or reduce those impacts.

Each of these impacts will be discussed specifically in subsequent paragraphs, but these discussions will have to be vague due to the deficiencies in the Project Description. The NTC Reuse EIS/EIR, dated July 1988, provided descriptions of several development alternatives for the project. Among those alternatives a few alternative components were described that would help to avoid or minimize some of the potential environmental impacts of the project. It is not possible to tell whether these components or others will be included in the Redevelopment Project due to the inadequate Project Description. As a result it is impossible to evaluate these impacts, and the EIR is inadequate both as an analysis document, and to satisfy the requirements of CEQA in consultation with subsequent case law and regulations. We urge that the Final EIR be substantially strengthened and that measures to fully offset these impacts be set forth in the EIR.

INTENDED USES OF THE EIR

Section 2.5 fails to identify what approvals are expected to be obtained based on this EIR as is required by CEQA. It only lists City approval actions, and not the relevant state and federal regulatory and resource agencies and permits. It is important for a reader to be able to understand

SDAS-1. Comment noted. As stated in the Naval Training Center Reuse Plan, enhancement of wildlife habitat and improvement of water quality in the boat channel are among guiding principles for the reuse of NTC San Diego. The EIR anticipates that there will be further environmental review as specific development proposals are prepared. The shoreline will be designed as part of the overall parks planning process.

SDAS-2. The project description contained in the EIR was developed primarily from the project descriptions contained in the EIS/EIR for the Disposal and Reuse of NTC San Diego and the EA for Naval Training Center Military Family Housing. The project description from the EIS/EIR is based on the Naval Training Center Reuse Plan and is conceptual in nature in that it describes proposed land uses for the 430-acre portion of NTC San Diego subject to disposal and reuse. Details of the exact implementation activities (i.e., specific project designs) on this portion of NTC San Diego are not available at this time. However, as specific projects are implemented they will be subject to appropriate environmental review, analysis, and document preparation.

SDAS-3. Section 2.6, *Intended Uses of the EIR*, includes approval actions to be obtained by the City of San Diego, as the Local Redevelopment Authority; these approvals will include any federal, state, and local approvals required for implementation of the NTC San Diego Redevelopment Project. Therefore, this portion of the EIR is in compliance with the requirements of CEQA. Approval actions that the Navy was required to obtain, as required under NEPA, were described in the EIS/EIR for the Disposal and Reuse of NTC San Diego.

SDAS-1

SDAS-2

SDAS-3

SDAS-4. The discussion under Section 4.6.2.1, *Threshold for Determining Significance*, simply provides criterion by which Project impacts can be classified as significant and unavoidable; significant but can be mitigated, avoided, or substantially lessened; or less than significant. It is the City's position that the thresholds discussed in Section 4.6.2.1 are adequate to classify Project impacts. In fact, the analysis provided in Section 4.6.2.2, *Impact Analysis*, did determine that in several cases the Project would have significant impacts to wildlife habitat and water quality. Further, the EIR provides appropriate measures to minimize and mitigate these impacts to below a level of significance.

SDAS-5. The discussion in Section 4.6.2.2, *Impact Analysis, Impacts on Waterbird Species*, determined that "the indirect effects of the adjacent land uses and increased human presence would substantially reduce the biological value of the channel for the dominant waterbird species known to use the channel" and concludes that these impacts would be significant. Since these impacts were determined to be significant, it is unclear as to how these impacts are understated. With regard to mitigation, the mitigation in the EIR (addressing impacts consistent with the INRRMP and CEQA requirements when detailed development plans are available) was approved by the U.S. Fish and Wildlife Service in the EIS/EIR for the Disposal and Reuse of NTC San Diego.

SDAS-6. Impacts associated with the use of the intertidal habitat along the shoreline of the boat channel by waterbirds are addressed under Section 4.6.2.2, *Impact Analysis, Impacts on Waterbird Species*. These impacts were determined to be significant.

SDAS-7. See response to comment SDAS-6 above.

SDAS-3
(cont.)

SDAS-4

SDAS-5

SDAS-6

SDAS-7

what further scrutiny will be applied to this project by other agencies and to verify that no essential environmental protection is to be avoided

THRESHOLDS OF SIGNIFICANCE

The discussion in paragraph 4.6.2.1 seemed to be laying groundwork to suggest that the wildlife habitat and water quality impacts of this project may not be considered significant. We strongly urge that they be recognized as significant and minimized and mitigated accordingly.

WATERFOWL IMPACTS

Section 4.6.2.2 "Environmental Impact Analysis" acknowledges that the boat channel is very heavily used by waterbirds and that "increased human presence along the channel would likely deter certain species from using the channel when humans are present." This project will clearly increase the number of people that walk along the banks of the boat channel and boats that travel in it. This clearly identifies a significant impact, but it somewhat understates that impact. A pattern of high levels of human activity in an area will also tend to discourage use by some species even when people aren't there. Either way the impact is significant.

The EIR offers no real mitigation for this significant impact. It states that "The Port District and the Navy have initiated a baywide Natural Resources Management Planning Program that would address indirect and cumulative impacts to waterbird habitats in San Diego Bay." The impact of this project on waterbirds is a direct, not indirect impact of the project. The plan mentioned is the Navy's Integrated Natural Resource Management Plan for San Diego Bay, INRRMP. The Port of San Diego has also provided some funding for the Plan. The author of this letter is a member of the Navy's steering committee for the INRRMP. The final draft of the INRRMP is being currently assembled. The existence of the INRRMP does not protect any habitat or mitigate any impacts. It is not known if it will be fully implemented. The last comprehensive natural resources management plan developed by the Port, the South Bay Management Plan, was never adopted by the Port. The City of San Diego has not participated in the development of the INRRMP.

The INRRMP does recommend that projects along the shoreline include shoreline configurations that produce more wildlife support value than the rock revetment and steel pile walls that line most of the Bay's shoreline, where possible

INTERTIDAL HABITAT

Section 4.6.1, "Biological Resources, Existing Conditions" lists habitat communities found in the project area including "Subtidal Estuarine Open Water" and "Rocky Shallowing". Along much of the shoreline, below the rock revetment, there is a band of intertidal beach and mud habitat. This is a extremely important habitat type for wildlife. On Table 4.6-1 the EIR lists "Sensitive Species Detected at the Project Area" that includes eleven sensitive species. Of these at least three, great blue heron, great egret, and long-billed curlew commonly forage on this intertidal habitat when the tides are low enough. Also a large number of other bird species use this area when it is exposed. This extremely sensitive and productive habitat type must be addressed in the EIR.

SHOREBIRD IMPACTS

The intertidal beach and mud habitat of the shoreline provide significant foraging value for shorebirds and waders during lower tides. These birds are often extremely sensitive to human activity nearby. Many of the wading birds, that use both the rock revetment and the soft shoreline, are sensitive to human disturbance and will lose habitat value due to this project. The EIR also needs to indicate these impacts. This habitat type has experienced far more loss than any other in the development of the bay. This project must set forth mitigation for the loss of intertidal and

SDAS-7
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rocky shoreline habitat and foraging value that results from increased human presence resulting from this project, both from construction and from long term use.

MITIGATION NEEDED FOR SHOREBIRD, WADER, AND WATERBIRD IMPACTS

The disturbance level that results from the additional human activity along the banks of the boat channel and in the boat channel will have significant impacts on the shorebirds and waterbirds that use the channel. The impact will cover much of the area of the channel. It would be extremely desirable if that mitigation were provided on the project site. It could consist of shoreline habitat improvements that would provide additional soil stabilization area for shorebirds and native shoreline vegetation that would provide some visual buffering to minimize the disturbance to waterbirds. Significant water area also would need to be set aside for waterbird use, primarily during winter months when wintering waterfowl and those passing through depend heavily on sheltered and relatively undisturbed bay areas like this. Clearly this EIR must define these impacts and set forth and describe sufficient measures to mitigate them.

Such mitigation will help maintain bird activity at the project. This will provide aesthetic, recreational, and educational value for people who will live at, work at, or visit the future developments on the site. Such shoreline improvements were recommended by many of the teams of the NTC, Iouso and the Bay to Bay design charrettes run by the City.

PELICAN NESTING AREAS

We appreciate the EIR's effort to protect the Pelican nesting areas. We do not have adequate experience to assess whether the planned mitigation is adequate to maintain the productivity of the nesting area.

SDAS-9

SDAS-10

CAMP NIMITZ LEAST TERN NESTING AREA
San Diego Audubon has been very concerned that the elimination of the Camp Nimitz Least Tern Nesting Area will reduce the opportunity to maintain a population of least terns in the northern end of the bay to take advantage of its forage value. However, we support the Port's action in acquiring and contributing to the management of a substantial area of South San Diego Bay. That area includes considerable nesting area for least terns and many other species. We agree with the resource agencies that that transaction adequately mitigates the loss of the Camp Nimitz site.

WATER QUALITY IMPACTS

The EIR addresses the biological impacts of water quality in the "Marine Environment" paragraph 4.6.3 of the Biological Resources section. It also mentions water quality impacts and mitigation in section 4.9.3. Unfortunately neither of those sections adequately describe the anticipated water quality impact levels or set forth and describe actual mitigation measures to offset them as required by CEQA. The EIR presents no analysis to demonstrate its contention that compliance with NPDES permits will reduce impacts on the bay below a level of significance. Simply mentioning NPDES requirements, Best Management Practices, or other regulations does not in itself satisfy the CEQA requirements.

This project will result in heavy motor vehicle traffic and parking in an area that has had very little. It will also introduce significant intensive landscaping and pet droppings to an area that has had very little. These will have a significant impact on the water quality of the bay, especially the boat channel. This channel has significant value for birds, fish, and other wildlife. We strongly urge that these sections be strengthened to satisfy the requirements of CEQA and to identify ways to adequately protect the bay's natural resource.

The previous design efforts suggested that embayments be formed into the upland of the project area in a few places and that engineered wetlands be constructed to clean runoff water

SDAS-8. Construction activities on the site will be a temporary impact to waterbird species. Mitigation measures have been identified to reduce impacts below the level of significance. The mitigation measures include consistency with the Natural Resources Management Planning Program and CEQA requirements, and minimizing construction noise during the breeding season. Additionally, the adopted Reuse Plan for the Naval Training Center includes a policy statement stating that "sand beaches along the water's edge remain an option, as do the creation of wildlife and habitat opportunities." Creation of naturalized shoreline areas will be evaluated for implementation during the Specific Plan review and adoption process.

SDAS-9. Comment noted. Thank you for your comment.

SDAS-10. Comment noted. Thank you for your comment.

SDAS-11. Section 4.8.2.2, *Impact Analysis*, has been modified to provide more detailed information regarding compliance with NPDES requirements and implementation of best management practices. With regard to impacts to the water quality in San Diego Bay and the boat channel, the analysis in the EIR is adequate. Additionally, the mitigation measures provided in Sections 4.6 and 4.8 are sufficient to mitigate impacts to the Bay and boat channel to below a level of significance.

SDAS-11
(cont.)

from the project area before it enters the bay. Limits on the use of non-native vegetation in landscaping, can also be helpful because ferns, pesticides, and irrigation are not needed. We urge that a comprehensive set of mitigation measures specifically appropriate to the project and project site be defined and set forth.

In Section 4.6.3 the document proposes for mitigation that the project should "Design runoff drainages to empty into areas of San Diego Bay where greater tidal flushing exists". This is not a solution. San Diego Bay is an impaired water body. Reducing any part of it is not an acceptable practice. Mitigation measures should be set forth that will prevent dry weather and first flush contaminants and sediments from entering the bay, and minimizing their emissions during continued rainy weather.

SDAS-12

SDAS-12. Mitigation measure number 5, which proposes to "Design runoff drainages to empty into areas of San Diego Bay where greater tidal flushing exists," is one of several mitigation measures developed to reduce potential impacts to the Bay's water quality. Other proposed mitigation measures include, but are not limited to, diverting first-flush runoff washloads from all paved surfaces to soakway basins, treatment of discharges to the City's sewage system, regular monitoring of discharges to natural drainages to ensure that they comply with the Clean Water Act, implementation of a Storm Water Pollution Prevention Plan, preparation of an Oil and Hazardous Substances Spill Contingency Plan and Spill Prevention, Control, and Countermeasures Plan, etc. The analysis provided in the EIR concludes that mitigation measure number 5, in conjunction with the other mitigation measures provided in Sections 4.6 and 4.8, will reduce impacts to San Diego Bay to below a level of significance.

This property is valuable because it is adjacent to the bay. It would be totally inappropriate for the City and the developer to be cavalier about protecting the bay while profiting from its benefits. The fish, wildlife, visitors, and citizens of San Diego who use the bay should not suffer reduced water quality because of this project. We strongly urge that the City and the developer incorporate the very reasonable water quality elements into the project that are needed to not degrade the bay and to allow it to heal from the water quality insults of the past.

CONCLUSION

This is a large project on a very visible and valuable part of San Diego bay. We will all benefit if it is done well and will suffer if it is done poorly. We strongly urge that the EIR be upgraded to reflect a more thoughtful approach to protecting the bay's natural resources for us and for our descendants. If there are any questions about these comments or about potential improvements to the EIR of the project, I can be reached at my home, 619-224-4591 or peugh@home.com.

Respectfully,



James A. Peugh
Coastal and Wetlands Conservation Chair

PO Box 6606, San Diego, California 92106

Mr. Ron Squitla
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Fax 619-236-6512

December 18, 1999

Dear Mr. Smith:

I have reviewed the Draft Environmental Impact Report for the NTC Redevelopment Project and wanted to raise the following concerns and some possible solutions.

1) **Reduction in the scale of the project:** One of the major impacts of the project as currently configured will be an increase of traffic in the community as part of the project. Many of the intersections in the neighborhood are already at unacceptable levels of service. This project will continue to erode the level of service on the few major roads in and out of the Peninsula community. Living on a peninsula, residents are constrained in their alternatives to entering and leaving their community. Furthermore, the success of this project is predicated on the ability of City residents and tourists to get to and from the project area. One way to mitigate this impact, since road widening in this urban environment is not feasible, is to scale back the size of the project, as suggested in the lower traffic alternative. Fewer housing units, businesses, and hotel rooms would all contribute to ease the negative impacts upon the neighborhood while at the same time carrying out the goals of the project.

2) **Redirection of funds to mitigation:** Some of the impacts could be mitigated by completion of traffic projects in the community, which are mentioned in Section 4.2-34. However, these traffic projects are all unfunded. The NTC project will generate funds. Nowhere is any intention made of dedicating NTC-generated monies to relieve the traffic problems this project will create. Some mechanism should be established to ensure that some of the monies from the development of NTC be directed to fund Peninsula traffic projects.

3) **Oversight in the analysis:** According to the draft EIR, some of the traffic problems created by the redevelopment project will be mitigated by the various NTC project employees moving into the Peninsula neighborhood. This hypothetical scenario would minimize an increase in commuting traffic. Using numbers cited in the draft EIR, however, I understand that many more jobs than housing units will be created by the proposed NTC redevelopment. Therefore, it cannot be argued that traffic problems will be mitigated in this way.

Sincerely yours,

Steven Barlow
Point Loma resident

SB-1. The approved alternative to carry out this Project is the LRA or Preferred Alternative as indicated in the EIS/EIR, Reuse Plan, and Redevelopment EIR. Every attempt will be made to mitigate traffic impacts and coordinate with the Peninsula Community Planning Board traffic committee.

SB-2. It is anticipated that the Project would pay traffic impact fees into the Peninsula Community development impact fee program. This is the means by which new development in the community pays for its share of required transportation improvements.

SB-3. We agree. While it is anticipated that there would be some internal interaction among uses within the Project site, this would not eliminate the Project's traffic impacts on the surrounding transportation network. In fact, the vast majority of Project trips have been assigned to streets and intersections outside of the study area; very little internal/internal traffic was assumed in the analysis.

SB-1

SB-2

SB-3

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December 16, 1999

Ron Smith, Redevelopment Coordinator
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SUBJECT: Comments on the Draft Environmental Impact Report (EIR) for the NTC
Redevelopment Project

Dear Mr. Smith:

At the meeting on November 30, 1999 I spoke of my concerns about certain traffic issues in the NTC Redevelopment Project EIR. Following are my written comments about these traffic issues, which include the same basic points I made on November 30, although somewhat expanded.

Traffic Issues in the Draft Environmental Impact Report

There has been a substantial increase in traffic and congestion on Point Loma in recent years due to several factors, including increased Navy activity at the end of Point Loma, the recent airport expansion, increased population growth, and tourism. At this point the congestion is not only inconvenient, it is a potential danger since Point Loma is a peninsula with only a few exit roads. When special events are now held, it is virtually impossible to leave Point Loma, and an emergency situation can leave residents without an exit or escape route.

As a Point Loma resident I am very concerned about the general increase in traffic predicted in the NTC draft Environmental Impact Report (EIR), particularly given adverse impacts to many streets which are already at Level of Service (LOS) D, E, and F, and which -- according to the EIR -- cannot be mitigated because the streets cannot be widened. I am also concerned that the mitigation that is proposed is limited to a few sites near to NTC, when the impact spreads over the entire peninsula. Who will take responsibility for this?

In addition to these general concerns, I want to discuss in more detail some specific deficiencies of the EIR in the treatment of traffic on the streets and intersections close to the proposed NTC residential areas and bordering the America's Cup Harbor/Shelter Island area, as follows:

North Harbor Drive between Nimitz and Roscrans Street

1. Current Level of Service (Table 4.2-1): The EIR lists a current Level of Service (LOS) C for the segment of North Harbor Drive between Nimitz and Scott Street and a LOS A for the segment between Scott Street and Roscrans, based on an Average Daily Trips (ADT) capacity of 40,000 for both segments. The 40,000 ADT may be an accurate capacity for the Nimitz-Scott segment, which is currently a very wide street with a wide landscaped median. However the Scott-Roscrans segment is much narrower, has a very narrow median, has no dedicated

VS-1. Funding for improvements needed to mitigate transportation deficiencies throughout the entire Point Loma area would be acquired through various means. The Point Loma Community's Development Impact Fee program will provide funding that is earmarked for transportation improvements. Additionally, funding through regional and citywide programs could be used to help fund these improvements. The transportation improvements needed in this area would need to compete citywide and regionally for a limited supply of funding. These will be combined with funding from development projects, such as the NTC Redevelopment Project. However, due to the uncertainty of these projects being fully funded, impacts have been identified as significant and unmitigable in the EIR.

VS-2. While four lane facilities with a raised median are typically considered to be similar to a four-lane major arterial in terms of capacity (i.e., LOS E = 40,000), we concur that this segment of North Harbor Drive would be expected to have somewhat less capacity than assumed in the EIR. We are reanalyzing this segment to have a capacity of a four-lane major collector, with a LOS E capacity of 30,000. (It should be noted that major collectors are typically separated by a two-way left turn lane, rather than a median.) The traffic study and EIR sections have been revised accordingly.

VS-1

VS-2

VS-2
(cont.)

left turn lane or right turn lane to Rosecrans, and may not even meet current City standards. Its carrying capacity is not 40,000 ADT, and it is a LOS C- at best.

VS-3

2. Impacts under NTC Buildout Traffic (Table 4.2-3): The EIR predicts no significant impacts from NTC buildout on this part of North Harbor Drive, despite the close proximity of 850 planned new residential units at NTC -- a significant increase in dwelling units on Point Loma! Residents of the NTC dwelling units will have access to North Harbor Drive via Lanning Road (seldom used before), and will use North Harbor Drive instead of congested Rosecrans Street as the easiest way to head south to Point Loma for work, shopping, on bayfront recreation. Others working on the NTC property or staying at the NTC hotels will also use Harbor Drive to reach Point Loma. This additional use has not been adequately considered in the EIR.

VS-4

3. Port District Proposal to Narrow Harbor Drive: In the Cumulative Impacts Section, the EIR briefly references the America's Cup Harbor/Shelter Island Master Plan (Section 7.1.13) proposed by the San Diego Unified Port District (SDUPD), but states that "detailed project development information is currently not available."
In fact, the Port Commission approved a detailed plan in December 1998 which will have very significant impacts on traffic on Harbor Drive and Shelter Island. A major component of the plan (to be reviewed again by the Port Commission in early 2000) is to narrow North Harbor Drive by approximately half, which will result in a street that does not meet the minimum 98 foot City standard for a four-lane major street.

VS-5
VS-6
VS-7
VS-8

The SDUPD will use the extra space for parking, to support more development around America's Cup Harbor. Although the final width for the narrower street is under negotiation with City staff, the carrying capacity on North Harbor Drive will be reduced under any of the scenarios discussed, even as traffic increases from the new commercial activity. Other nearby streets may also be affected (Scott Street, Shelter Island Drive).
Recommendations:
1) Review and revise the current LOS for the Scott Street Rosecrans segment.
2) Reassess the impact on North Harbor Drive from the residential/other development at NTC.
3) Include the impact of SDUPD proposals for America's Cup Harbor/Shelter Island Plan on North Harbor Drive capacity in the Cumulative Impacts Section 7.1.13.
4) Also include impact information in Section 4.2.6 of the Transportation/Circulation Chapter.

VS-9

Intersection of North Harbor Drive and Rosecrans Street.
The intersection of Rosecrans Street and North Harbor Drive is not included in the Table 4.2-2, which provides data on current Level of Service, although it is included in Table 4.2-5, Evaluation of Significance of Project-Related Impacts. This latter table forecasts that NTC development will result in drop from the current LOS -- whatever it is -- to LOS F at the Rosecrans-North Harbor Drive intersection (and surely some of this impact comes from North Harbor Drive traffic). Further, the EIR states that the LOS F impact cannot be mitigated.

VS-10
VS-11
VS-12

Recommendations:
1) Include the Rosecrans North Harbor Drive intersection data and LOS rating in Table 4.2-2.
2) Explain in more detail the reasons for inability to mitigate this intersection.
3) Explain the inconsistency between the LOS A for Scott-Rosecrans segment of North Harbor Drive and the LOS F for the Rosecrans-North Harbor Drive intersection.

VS-3. The significance of impacts is based on the volume-to-capacity change resulting from the addition of Project traffic and the "with Project" LOS. The entire Project has been included in this analysis. A traffic model was developed to determine the Project's traffic distribution pattern. The improved access to North Harbor Drive has been reflected in the traffic model and in all traffic analyses.

VS-4. Actions to reduce the cross-section of North Harbor Drive will require amendment to the Circulation Element of the Peninsula Community Plan. This action cannot be undertaken without Council approval and required environmental clearances. The capacity implications of this reconfiguration will have to be evaluated and mitigated by the applicant (Port of San Diego).

VS-5. We concur. This has been done and will be incorporated into both the traffic study and the EIR.

VS-6. Analysis of project related traffic impacts in the EIR includes the traffic generated by all proposed land uses on the site, distributed in accordance with a SANDAG traffic model run. This analysis has been included in the draft EIR.

VS-7. See response VS-3.

VS-8. See response VS-3.

VS-9. The previously omitted analysis will be incorporated into the EIR. Existing operations are characterized by LOS C in the morning peak hour and LOS E in the afternoon peak hour.

VS-10. We concur. Rosecrans Street-North Harbor Drive has been added to Table 4.2-2.

(continued on next page)

VS-11. Each of the four corners of this intersection contain structures and parking that have been located near the roadway, widening to provide sufficient capacity would require condemnation of the business establishments on all four corners. Currently, there are no funded improvements to alleviate future congestion at this location. While the project contributes to this congestion, it does not create it and therefore should not solely bear the costs of addressing this deficiency. If additional through lanes are required, they would likely be extended to upstream intersections, since mid-block “neck downs” can create operational problems, entailing further right-of-way acquisition and community disruption.

VS-12. As with the Average Daily Traffic (ADT) volume on North Harbor Drive, peak hour volumes approaching the intersection via North Harbor Drive are not exceptionally high. However, this intersection is oversaturated by heavy north/south volumes on Rosecrans Street. The heavy Rosecrans Street traffic uses up most of the “green time” at the signalized intersection. This causes delays at each approach of the intersection. The segment analysis methodology does not specifically include delay encountered at signalized intersections. This results in different findings between the two methodologies.

Scott Street from Nimitz to Talbot Street

The draft EIR is deficient in the failure to include Scott Street in the traffic analysis, even though Scott Street is closer to NTC and more critical to good traffic circulation than many of the 34 streets listed. Scott Street runs parallel to Rosecrans, and is widely used as an alternative to Rosecrans between Talbot and North Harbor Drive. It provides direct access to Shelter Island and the Sportfishing complex, and serves a busy commercial area. Scott Street is currently four lanes between North Harbor Drive and Shelter Island Drive, and is listed as a four-lane collector in the Peninsula Community Plan. It is currently very congested in the area of Shelter Island Drive and Canon Streets.

Also, a proposal has been floated as part of the North Bay Redevelopment Project/Point Loma Village Plan to reduce the number of traffic lanes to three and substitute a left turn lane for the fourth traffic lane -- which will impact traffic on Scott Street. However, the EIR contains no information on this proposed reduction in lanes in the Cumulative Impacts section under the North Bay Redevelopment Project (Section 7.1.2).

Recommendations:

- 1) Include Scott Street in the EIR traffic analysis.
- 2) Include the Cumulative Impacts from the proposed reduction of lanes on Scott Street in the traffic analysis.
- 3) Update Sections 4.2.6 and 7.1.2 of the draft EIR to reflect current plans.

Shelter Island Drive and Shelter Island Drive/Scott Street Intersection

Shelter Island Drive has also been excluded from the EIR traffic analysis, even though it serves a busy commercial area and is the access to Shelter Island. NTC development will definitely impact this street, as residents and workers at NTC come to Shelter Island for recreation, dining, commercial.

In addition, the EIR does not include traffic data on the intersection at Shelter Island Drive and Scott Street, even though it is a very busy intersection at almost any time of day.

The America's Cup Harbor/Shelter Island Master Plan and the North Bay Redevelopment Project/Point Loma Village Plan will also impact traffic flow on this street and at this intersection.

Recommendations:

- 1) Include Shelter Island Drive (Rosecrans to east of Shelter Island) in the EIR traffic analysis.
- 2) Include analysis of the Shelter Island Drive-Scott Street intersection in the EIR.
- 3) Include the Cumulative Impacts from the America's Cup Harbor/Shelter Island Master Plan and the North Bay Redevelopment Project/Point Loma Village Plan in the traffic analysis.

Thank you for your consideration of these comments and recommendations. If you have any questions, please contact me.

Sincerely,

Virginia Silverman
Virginia Silverman

VS-13. We concur. Analysis of Scott Street has been added to the traffic analysis in the EIR. Please refer to Section 4.2.2.2 and Table 4.2-3.

VS-14. As with North Harbor Drive, the reclassification of a Circulation Element roadway will require a Community Plan amendment, with the appropriate environmental review, community involvement, and City Council approval. The applicant would have to analyze and mitigate the impacts associated with this capacity reduction.

VS-15. See response VS-13.

VS-16. See response VS-13.

VS-17. See response VS-14.

VS-18. We concur. Analysis of Shelter Island Drive has been added to the traffic analysis in the EIR. Please refer to Section 4.2.2.2 and Table 4.2-3.

VS-19. Evaluation of this intersection is beyond the scope of this analysis.

VS-20. Detailed land use information for the America's Cup Harbor/Shelter Island Master Plan proposal has not been available, and is therefore considered a speculative project not required for evaluation under CEQA. The North Bay Redevelopment Project/Point Loma Village Plan would be primarily a redevelopment project, similar in concept to the NTC. Specific development proposals are not known at this time and therefore cannot be analyzed. If such proposals represent a redevelopment of previously occupied uses, then they are eligible for a traffic generation credit in the same way as NTC.

4.2.6 Cumulative Impacts

The traffic study prepared for this Project was based on SANDAG's anticipated traffic conditions for the region. The SANDAG Regional Model uses 2015 as its horizon year. SANDAG's model was modified to reflect the internal Project Area roadway system, area wide transportation improvements likely to be constructed by the Buildout year, area changes to area wide land uses, and implementation of the Project. Included in the model as cumulative Projects were Midway Center, Kona Kai, and Harbor Island Hotel.

The Kona Kai development on Shelter Island would generate approximately 1,900 ADT. Mitigation measures associated with this development include reconstruction of the north/south roadway between Harbor Island Drive and North Harbor Drive to provide a T-intersection. These improvements have already been implemented and the SANDAG model has been revised accordingly.

Evaluation of roadway segments in the conditions on 52 roadway segments with and growth in the area. Evaluation of segments within the Project Area vicin Buildout year. These conditions would year. Analysis of peak hour intersection or F at 11 intersections.

Box - This whole paragraph makes no sense. The ADT's seen upstream - any mitigation measures should have been on or around Shelter Island, not Harbor Island. See also 7.1.6

As described in Section 4.2 of this cumulative traffic impacts on roadway deemed infeasible due to the land use and historical resources constraints of the urbanized, built out area. A significant unmitigable traffic impact would therefore occur on certain segments with or without implementation of the Project.

If redevelopment of the property proceeds as planned, there would be an increase in the amount of employment opportunity in the immediate area. With an increase in jobs it is expected that an increase in the number of people living and working in the same area would occur, thus reducing the commute. This would also improve traffic congestion in the Project Area and vicinity. However, cumulative traffic impacts would be significant and unmitigable.

VS-A. Text in section 7.1.6 has been modified.



SAN DIEGO CITY SCHOOLS

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BUSINESS SERVICES DIVISION
Facilities Planning Department

December 15, 1999

Ron Smith
City of San Diego Redevelopment Agency
202 C Street, M.S. 3A
San Diego, CA 92101

Dear Ron:

Subject: Response to 'Environmental Impact Report for the NTC Redevelopment Project'

This letter serves as the response to the findings of the Environmental Impact Report for the NTC Redevelopment Project, dated November 1999.

The district's concerns relative to the findings of the Environmental Impact Report are outlined below.

- In the 'Schools' section of Section 4.0, Environmental Impact and Mitigation Measures, it is stated on Page 4.14-9 that "The Project includes the construction of an elementary school within a 7-acre parcel on-site, which would accommodate the additional students." There is no additional information provided relative to the construction of this school, including financing sources/responsibility. The district's position is that full mitigation of the significant impact produced by the student generation from the Project (i.e. construction of the school, plus additional classrooms at the middle school level) should be provided by the developers of the Project. The district estimates the cost of full mitigation at \$6.2 million - \$6.0 million for construction of the elementary school, and \$200,000 for the portable classrooms needed to accommodate the additional middle school students.
- In Section 7.0, Cumulative Impacts, it is stated on Page 7-17 that "School fees totaling \$1.4 million would be allocated to the San Diego Unified School District that would offset impacts associated with the middle school students. In addition, the affected school districts will receive a statutory share of annual tax increment revenue generated in the Project Area. Finally, 7 acres within the project area will be designated for a new elementary school to be constructed and maintained by the San Diego Unified School District that would accommodate the additional elementary school students. Upon implementation of these measures, cumulative impacts to school facilities would not be significant."

SDCS-1

SDCS-1. Section 4.14.3 has been modified to update information regarding school impact fees.

The San Diego City Schools' comments relative to the Project's impact on school facilities and desired mitigation is noted. Since October 1, 1998, however, major changes in state law have been enacted and bond measures have been passed at the state and local level which significantly alter the role of cities and local agencies in imposing mitigation measures for projects such as the NTC Redevelopment Project.

Senate Bill 50 (GREENE) was enacted on August 27, 1998. The bill authorized a \$9.2 billion K-12 school and higher education bond to be presented to the voters November 3, 1998. The State Bond measure, known as the CLASS SIZE REDUCTION KINDERGARTEN-UNIVERSITY PUBLIC EDUCATION FACILITIES BOND ACT OF 1998 was presented to the voters of the state on November 3, 1998, and was approved.

In addition to consideration of the CLASS SIZE REDUCTION KINDERGARTEN-UNIVERSITY PUBLIC EDUCATION FACILITIES BOND ACT OF 1998, voters within the boundaries of the San Diego Unified School District also considered and passed a \$1.51 billion bond measure known as Proposition MM. Proposition MM provides for \$317 million for major repairs and code compliance items.

(continued on next page)

SDCS-1
(cont.)

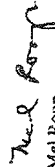
* In the Executive Summary on Page ES-13, it is stated in the "Community Services and Facilities" section that middle schools would not accommodate the Project's student generation, but that school fees and the school district's statutory share of annual tax increment revenue would offset the cost of additional middle school students. No mention is made of the significant elementary school impacts, or how these impacts would be fully mitigated.

As previously stated, it is the district's position that the Project developers are responsible for providing full mitigation of the significant impact produced by the student generation from the Project. The financial and land contributions outlined in Section 7.0 do not constitute full mitigation. As previously described, the district estimates the cost of full mitigation, aside from the elementary school site, at \$6.2 million. There is no estimate in Section 7.0 of the tax increment revenue that the district might expect to receive from the Project, but any financial contribution that does not fully finance the construction of the elementary school and the portable classrooms at the middle school level will not constitute full mitigation. In addition, relative to the tax increment revenue, any revenue would not be available in time to provide facilities generated by the Project.

The district requests that the language of the EIR be changed to reflect the continued existence of significant unmitigated impacts, defined by the lack of sufficient funding to construct the needed school facilities as detailed earlier in this letter.

Thank you for providing the district with the opportunity to comment on the EIR. If you have any questions relative to this correspondence, please contact me at 725-7366.

Sincerely,



Mel Roop
Manager

MR:jw

c: H. Hurley
B. Husson
P. Zoller
T. Calhoun
J. Hintzman

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Senate Bill 50 significantly revised developer fee and mitigation procedures for school facility purposes as set forth in the Government Code. The fees set forth in Govt C §65996 constitute the exclusive means of both "considering" and "mitigating" school facilities impacts of projects. Govt C §65996(a). The provisions of Senate Bill 50 are "deemed to provide full and complete school facilities mitigation." Govt C §65996(b).

The legislation provides that the statutory fees are the exclusive means of considering as well as mitigating school impacts. It does not just limit the mitigation that may be required, but also limits the scope of review and the findings to be adopted for school impacts.

Once the statutory fee is imposed, the impact will be mitigated because of the provision that the statutory fees constitute full and complete mitigation. Govt C §65995(b).

Adoption of a statement of overriding considerations for school facilities impacts is unnecessary when the statutory fee is assessed because the impact is deemed as a matter of law to be adequately mitigated. Govt C §65995(b).

The local agency is legally prohibited from imposing mitigation for the NTC Redevelopment Project which exceeds the limitations imposed by SB 50.

Mr. Scott Morgan
December 16, 1999
Page Three

DOT-11

- The timelines for how long it will take to evaluate the resources discussed above, prepare the appropriate documentation, and then process that documentation through the relevant agencies, such as the State Office of Historic Preservation, must also be considered.

DOT-12

- Any work performed within Caltrans' right of way will require an encroachment permit. Additionally, Caltrans no longer maintains both the metric and imperial unit versions of the Standard Plans, Specifications, Special Provisions and manuals. Therefore, all plans as well as encroachment permit applications submitted to Caltrans must be stated in metric units. Information regarding encroachment permits may be obtained by contacting our Permits Office at 619.688.6158. Early coordination with our agency is strongly advised for all encroachment permits.

Our contact person for SR-209 is Roger Cardin, Route Manager, at 619.688.6770. For Traffic Operations our contact person is Henry Morris, Branch Chief, at 619.688.6891.

Sincerely,

L. de la Torre

for
BILL FIGGE, Chief
Planning Studies Branch

RL / S:ds

DOT-11. Comment noted.

DOT-12. We agree that encroachment permits will be required for any work in the Caltrans right-of-way. During the course of the permit processing, we recommend that issues related to SR-209 ownership, cultural resources, analysis methods, etc. be addressed.

MTDB

Metro Area Transit Development Board



1755 Imperial Avenue, Suite 1000
San Diego, CA 92101-7490
(619) 221-1111
FAX (619) 221-1407

December 13, 1999

CIP 476

Ms. Maureen Ostrye, Project Manager
Redevelopment Agency of the City of San Diego
Economic Development & Community Services Department
202 C Street, Third Floor (MS 3A)
San Diego, CA 92101-3863

Dear Ms. Ostrye:

Subject: DEIR FOR THE NTC REDEVELOPMENT PROJECT

Thank you for the opportunity to respond to the Draft Environmental Impact Report (DEIR) for the Naval Training Center (NTC) San Diego Redevelopment Project in the City of San Diego. We have the following comments:

- On page 2-11, the DEIR indicates that one of the NTC Redevelopment plan's objectives includes increasing parking. We recommend that the objective be changed to reduce the demand for parking through promotion of transit, pedestrian, and bicycle improvements. A related objective should be to reduce the land area devoted to parking over the long term. The parking land should be developed in a way that it can ultimately be integrated into the multi-use development of the NTC.
- On page 2-12, under Section 2.5-- Streetscapes, Transportation, and Circulation, the EIR should include bus stop area and sidewalk improvements, and enhancements to the pedestrian environment to provide direct, attractive pedestrian connections between uses.
- On page 3-1, under Transportation and Circulation, the EIR should mention the bus routes that serve the NTC area (Route 28 and Route 35).
- On page 2-2, under Offsite Circulation, there should be a detailed description of the bus routes and bus stops that serve the area, as described in our enclosed letter dated September 14, 1999.
- On page 4-2-7, Figure 4-2-1 should include bus routes and bus stop locations.
- On page 4-2-32, Section 4.2.3.1-- Offsite Improvements, we recommend improvements to increase the safety and comfort of pedestrians and bicyclists. An aggressive plan to make walking (including walking to transit) and bicycling more viable modes of transportation can reduce cumulative traffic impacts.

Attachment: Appendix A, Appendix B, Appendix C, Appendix D, Appendix E, Appendix F, Appendix G, Appendix H, Appendix I, Appendix J, Appendix K, Appendix L, Appendix M, Appendix N, Appendix O, Appendix P, Appendix Q, Appendix R, Appendix S, Appendix T, Appendix U, Appendix V, Appendix W, Appendix X, Appendix Y, Appendix Z, Appendix AA, Appendix AB, Appendix AC, Appendix AD, Appendix AE, Appendix AF, Appendix AG, Appendix AH, Appendix AI, Appendix AJ, Appendix AK, Appendix AL, Appendix AM, Appendix AN, Appendix AO, Appendix AP, Appendix AQ, Appendix AR, Appendix AS, Appendix AT, Appendix AU, Appendix AV, Appendix AW, Appendix AX, Appendix AY, Appendix AZ, Appendix BA, Appendix BB, Appendix BC, Appendix BD, Appendix BE, Appendix BF, Appendix BG, Appendix BH, Appendix BI, Appendix BJ, Appendix BK, Appendix BL, Appendix BM, Appendix BN, Appendix BO, Appendix BP, Appendix BQ, Appendix BR, Appendix BS, Appendix BT, Appendix BU, Appendix BV, Appendix BW, Appendix BX, Appendix BY, Appendix BZ, 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Appendix XF, Appendix XG, Appendix XH, Appendix XI, Appendix XJ, Appendix XK, Appendix XL, Appendix XM, Appendix XN, Appendix XO, Appendix XP, Appendix XQ, Appendix XR, Appendix XS, Appendix XT, Appendix XZ, Appendix YA, Appendix YB, Appendix YC, Appendix YD, Appendix YE, Appendix YF, Appendix YG, Appendix YH, Appendix YI, Appendix YJ, Appendix YK, Appendix YL, Appendix YM, Appendix YN, Appendix YO, Appendix YP, Appendix YQ, Appendix YR, Appendix YS, Appendix YT, Appendix YZ, Appendix ZA, Appendix ZB, Appendix ZC, Appendix ZD, Appendix ZE, Appendix ZF, Appendix ZG, Appendix ZH, Appendix ZI, Appendix ZJ, Appendix ZK, Appendix ZL, Appendix ZM, Appendix ZN, Appendix ZO, Appendix ZP, Appendix ZQ, Appendix ZR, Appendix ZS, Appendix ZT, Appendix ZY, Appendix ZZ.

MTDB-1. The need for increased parking within the Project Area was identified as an objective of the NTC Redevelopment Plan based on studies of the Project Area; this objective is anticipated to be carried forward during Project implementation. However, the application of transit- and pedestrian-oriented design guidelines, as adopted by the City of San Diego, have been identified within the Naval Training Center San Diego Reuse Plan as guiding principles for development. Text has been added to the EIR describing these items (please refer to page 2-13). Additionally, the Peninsula Community Plan establishes recommendations for bicycle and pedestrian circulation and transit service in and around the Project Area. A Class II bicycle route (restricted right-of-way located on the paved road surface) is recommended for Rosecrans Street along the Project frontage. The provision of this facility would require approval from Caltrans because Rosecrans Street is a state-owned facility. Page 4.14-10 of the EIR states, "A vision for the redevelopment of the Project Area is to provide a link between San Diego Bay and Mission Bay, which would contribute to the City's goal to provide more bicycle-friendly circulation routes... Therefore, the Project would have a beneficial impact on the City's bicycle circulation system." The Peninsula Community Plan does not identify any existing or recommended future pedestrian routes serving the Project Area or its immediate vicinity, except for the Whittier stairway, which extends westward from Rosecrans Street.

MTDB-2. Refer to response to comment MTDB-1 above.

MTDB-3. Text added (please refer to page 3-1).

Ms. Maureen Ostrya
December 13, 1999
Page 2

MTDB-7

- On page 4.2-40, Section 4.2.6 --Cumulative Impacts, we propose several mitigation measures for the significant unmitigable impacts. Please consider transit, pedestrian, and bicycle improvements, such as: traffic signal priority along Rosecrans Street for buses, financially supporting bus routes serving the MTC area, charging for parking (including hotel parking) to discourage auto use, offering customer discounts for transit users, subsidizing monthly transit passes for employees, modifying intersections for easier pedestrian crossings, expanding sidewalks, creating landscaped parkways, or other means.

- On page 7-10, Section 7.1.15, "The study's objective is to develop sufficient information regarding alignments, bus station locations," etc., should be changed to: "The study's objective is to develop sufficient information regarding alignments, station locations," etc. The study will determine station locations for the North Bay and Beach Area Guideway Study, which may include Light Rail Transit (LRT) or Automated Guideway Transit (AGT) technology.

MTDB-8

Again, thank you for the opportunity to respond to the DEIR. If you have any questions, please contact Kathy Dannelly at my staff at 619 557-4546 or by e-mail at kdannelly@midtb_sdmts.com.

Sincerely,

Toni Bates

Toni Bates
Principal Transportation Planner

KYARNO
L-OSTRYE-KDONNE

Enclosure: MTDB letter dated 9/14/99

cc: Nancy Bragado, MTDB
Kathy Dannelly, MTDB

MTDB-4. Text on page 4.2-10 was modified based on information provided in the letter received from MTDB dated September 14, 1999.

MTDB-5. Bus routes and stops have been described adequately in text (refer to MTDB-4 above), It has been determined to be unnecessary to show these graphically.

MTDB-6. Please refer to response MTDB-1.

MTDB-7. Proposed improvements to facilitate pedestrian and bicycle transit are described under response MTDB-1. However, your proposed mitigation measures are appreciated and will be considered as future implementation activities are undertaken. Proposals for Rosecrans Street improvements to facilitate transit and non-motorized modes of transportation should be coordinated with Caltrans District 11. Financial support of transit service, charging for parking, offering customer discounts for transit users, subsidizing transit passes, and other measures to facilitate transit/bicycle/pedestrian modes are the responsibility of the master redeveloper of the site, individual tenants of future implementation activities, or other parties.

MTDB-8. Text modified. Please refer to page 7-10.



Gray Davis
GOVERNOR

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse



Loretta Lynch
DIRECTOR

December 17, 1999

Maureen Oshye
San Diego Redevelopment Agency
202 C Street
1st Floor
San Diego, CA 92101

Subject: Draft EIR Naval Training Center (NTC) San Diego Redevelopment Project in the City of San Diego
SCTM: 99081140

Dear Maureen Oshye:

The enclosed comment(s) on your Draft EIR was (were) received by the State Clearinghouse after the end of the state review period, which closed on December 16, 1999. We are forwarding these comments to you because they provide information or raise issues that should be addressed in your final environmental document.

The California Environmental Quality Act does not require Lead Agencies to respond to late comments. However, we encourage you to incorporate these additional comments into your final environmental document and to consider them prior to taking final action on the proposed project.

Please contact the State Clearinghouse at (916) 445-0613 if you have any questions concerning the environmental review process. If you have a question regarding the above-named project, please refer to the eight-digit State Clearinghouse number (99081140) when contacting this office.

Sincerely,

Terry Roberts
Senior Planner, State Clearinghouse

Enclosures
cc: Resources Agency

1600 FENTON STREET, P.O. BOX 1044 SACRAMENTO, CALIFORNIA 95832-8044
916-445-0613 FAX 916-331-0699 WWW.OPR.CA.GOV/CLEARINGHOUSE.HTM

GOPR-1. Thank you for your comment.

GOPR-1