

RESPONSES TO COMMENTS

RESPONSES TO COMMENTS

The Draft EIR for the proposed project was originally circulated for public review and comment between July 28, 2005 and September 12, 2005. During this review period, CCDC received comments from interested agencies, organizations and individuals concerning the document. A copy of each comment letter received by CCDC along with corresponding responses is included in this section. The individual comments and the corresponding responses have each been given an Alpha-numeric reference.

The following is a list of agencies and other interested parties that submitted comments on the Draft EIR during the review period for the Draft EIR.

Letter From	Response Numbers
<u>State Agencies</u>	
California State Clearinghouse, Governor's Office of Planning and Research, Scott Morgan, Senior Planner Dated 8/1/05	1.1
California State Clearinghouse, Governor's Office of Planning and Research, Terry Roberts, Director Dated 9/13/05	2.1
California State Clearinghouse, Governor's Office of Planning and Research, Terry Roberts, Director Dated 9/14/05	3.1 – 3.2
California Coastal Commission, Diana Lilly, Coastal Planner Dated 9/12/05	4.1 – 4.5
CALTRANS, District 11, Mario H. Orso, Chief, Development Review Branch Dated 9/12/05	5.1 – 5.31

Letter From**Response Numbers****Local Agencies**

San Diego Association of Governments, Bob Lieter, Director of Land Use and Transportation Planning Dated 9/12/05	6.1
San Diego, City of, Deborah Sharpe, Project Office II, Park and Planning Division, Park and Recreation Department Dated 9/12/05	7.1 – 7.8
San Diego, City of, Linda J. Marabian, Senior Traffic Engineer Dated 9/1/05	8.1 – 8.12
San Diego, City of, Marta Williams, Program Manager, San Diego Police Department Facilities Management and Development Unit Dated 9/12/05	9.1 – 9.2
San Diego, County of, Air Pollution Control District, Andy Hamilton, Air Quality Specialist Dated 9/2/05	10.1 – 10.2
San /Diego, County of, Office of Education, Robert W. Nicholson, Senior Director, Facility Planning Services Dated 8/22/05	11.1 – 11.3
San Diego, County of, Regional Airport Authority, Angela Shafer-Payne, Vice President, Strategic Planning Dated 9/12/05	12.1 – 12.7
San Diego Gas and Electric, Christopher P. Terzich, REA, Principal Environmental Specialist, Land Planning Dated 9/9/05	13.1

Organizations

BNSF Railway Company, Alicen Clark Wong, of Gresham Savage, Nolan and Tilden Dated 9/12/05	14.1 – 14.6
Center on Policy Initiatives, Murtaza H. Baxamusa, AICP Dated 9/12/05	15.1 – 15.7

Letter From	Response Numbers
Citizens Coordinate for Century 3, Bruce H. Warren, President Dated 9/12/05	16.1 – 16.8
Environmental Health Coalition, Randa Baramki, Co-Director Toxic-Free Neighborhood Campaign Dated 9/12/05	17.1 – 17.14
Industrial Environmental Association, Patti Krebs, Executive Director Dated 9/12/05	18.1 – 18.19
San Diego Chinese Historical Society & Museum, Michael Yee, President Dated 9/12/05	19.1 – 19.3
San Diego, County of, Archaeological Society, Inc. James. W. Royle, Jr., Chairperson, Environmental Review Committee Dated 9/10/05	20.1 – 20.3
San Diego Downtown Residents Group, Gary Smith, President Dated 9/12/05	21.1 – 21.5
San Diego & Imperial Valley Railroad Company, Douglas Verity, General Manager 9/4/05	22.1 – 22.8
Save Our Heritage Organization, Bruce Coons, Executive Director Dated 9/9/05	23.1 – 23.4
<u>Individuals</u>	
Collier, Boyd, PhD. Dated 9/12/05	24.1 – 24.4
Jones, Donna, Representing Trammell Crow Residential Dated 9/12/05	25.1 – 25.6
Keagy, Roscoe D., Representing Smart & Final Stores Dated 9/12/05	26.1 – 26.2
Peterson, Matthew A., Representing Ghods Builders, Inc. Dated 9/12/05	27.1
Peterson, Matthew A., Representing Ace Parking Management, Inc. Dated 9/12/05	28.1
Sung, Amy, Ph.D. Dated 9/10/05	29.1



Arnold Schwarzenegger
Governor

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



Sean Walsh
Director

Memorandum

Date: August 1, 2005
To: All Reviewing Agencies
From: Scott Morgan, Senior Planner
Re: SCH # 2003041001
San Diego Downtown Community Plan, Centre City Planned District
Ordinance and Redevelopment Plan for the Centre City Project Area

The State Clearinghouse forwarded the above-mentioned project to your agency for review on July 28, 2005 with incorrect review dates. Please make note of the following information for your files:

Review period began: July 28, 2005
Review period ends: September 12, 2005

We apologize for any inconvenience this may have caused. All other project information remains the same.

cc: Alexandra Elias
City of San Diego
225 Broadway, Suite 1100
San Diego, CA 92101

CENTRE CITY
DEVELOPMENT
CORPORATION

AUG 08 2005
Orig. To: _____
Copy To: _____

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL (916) 445-0613 FAX (916) 323-3018 www.oprc.ca.gov

1.1

1.1 No response is required.

Form A
Notice of Completion & Environmental Document Transmittal SCH # 2003041001

Mail to: State Clearinghouse, PO Box 3044, Sacramento, CA 95812-7044 (916)445-4963

Project Title: San Diego Downtown Community Plan, Centre City Planned District Ordinance and Redevelopment Plan for the Centre City Project Area

Lead Agency: City of San Diego Redevelopment Agency **Contact Person:** Alexandra Elias
Mailing Address: 228 Broadway, Suite 1100 **Phone:** (619) 235-2200
City: San Diego **Zip:** 92101 **County:** San Diego

Project Location:
 County: San Diego City/Nearest Community: San Diego
 Cross Street: Interstate 5 and Highway 163 Zip Code: 92101 Total Acres: 1.455
 Assessor's Parcel No. Not Applicable Section: Top: Range: Base:
 Within 2 Miles: State Hwy #: 163 Waterways: San Diego Bay
 Airports: San Diego International Railways: BNSF, NCTD, MTS Schools: San Diego High School

Document Type:
 CEQA: NOP Supplement/Subsequent EIR NEPA NO Other: Joint Document
 Early Conc. (Prior SCH No.) Draft EIS Final Document
 Neg Dec Other Other
 Final EIR

Local Action Type:
 General Plan Update Specific Plan Rezoning Association
 General Plan Amendment Master Plan Precise Redevelopment
 General Plan Element Planned Unit Development Use Permit Coastal Permit
 Community Plan Site Plan Land Division (Subdivision, etc.) Other

Development Type:
 Residential: Units _____ Acres _____ Water Facilities: Type _____ MGD _____
 Office: Sq. Ft. _____ Acres _____ Employees _____ Transportation: Type _____
 Commercial: Sq. Ft. _____ Acres _____ Employees _____ Mining: Mineral _____
 Industrial: Sq. Ft. _____ Acres _____ Employees _____ Power: Type _____ Waste _____
 Educational _____ Waste Treatment: Type _____
 Recreational _____ Hazardous Waste: Type _____
 Other _____

Funding (approx.): Federal \$ _____ State \$ _____ Total \$ _____

Project Issues Discussed in Document:
 Aesthetic/Visual Flood Plain/Flooding Schools/Universities Water Quality
 Agricultural Land Forest Land/Fire Hazard Sepsic Systems Water Supply/Groundwater
 Air Quality Geologic-Seismic Sewer Capacity Wetlands/Riparian
 Archeological/Historical Minerals Soil Erosion/Compaction/Grading Wetlands
 Coastal Zone Noise Solid Waste Growth Inducing
 Drainage/Abstraction Population/Housing Balance Toxic/Hazardous Land Use
 Economic/Influx Public Services/Facilities Traffic/Circulation Cumulative Effects
 Fiscal Recreation/Parks Vegetation Other _____

Present Land Use/Zoning/General Plan Designation:
 The Centre City Plan area is planned for a variety of urban uses including office, residential, retail, hotel, industrial and civic.

Project Description:
 The project consists of a series of revisions to the planning documents which govern downtown San Diego. The following documents would be amended: San Diego Downtown Community Plan, Centre City Planned District Ordinance and the Redevelopment Plan for the Centre City Project Area. January 2004

State Clearinghouse Contact: (916) 445-0613

State Review Began: 7-28-2005

SCH COMPLIANCE 9-12-2005

Please note State Clearinghouse Number (SCH#) on all Comments

SCH#: 2003041001

Please forward late comments directly to the Lead Agency

AQMD/APCD 27

(Resources: 7/30)

Project Sent to the following State Agencies

- | | |
|---|---------------------------------|
| <input checked="" type="checkbox"/> Resources | State/Consumer Svcs |
| <input type="checkbox"/> Boating & Waterways | General Services |
| <input checked="" type="checkbox"/> Coastal Comm | Cal EPA |
| <input type="checkbox"/> Colorado Rvr Bd | ARB - Airport Projects |
| <input type="checkbox"/> Conservation | ARB - Transportation Projects |
| <input checked="" type="checkbox"/> Fish & Game # 5 | ARB - Major Industrial Projects |
| <input type="checkbox"/> Delta Protection Comm | Integrated Waste Mgmt Bd |
| <input checked="" type="checkbox"/> Forest & Fire Prot | SWRCB: Clean Wtr Prog |
| <input checked="" type="checkbox"/> Historic Preservation | SWRCB: Wtr Quality |
| <input checked="" type="checkbox"/> Parks & Rec | SWRCB: Wtr Rights |
| <input checked="" type="checkbox"/> Reclamation Board | X Reg. WQCB # 2 |
| <input type="checkbox"/> Bay Cons & Dev Comm | Toxic Sub Ctrl-CTC |
| <input checked="" type="checkbox"/> DWR | Yth/Adlt Corrections |
| <input type="checkbox"/> OES (Emergency Svcs) | Corrections |
| <input checked="" type="checkbox"/> Bus Transp Hous | Independent Comm |
| <input checked="" type="checkbox"/> Aeronautics | Energy Commission |
| <input checked="" type="checkbox"/> CHP | X NAHC |
| <input checked="" type="checkbox"/> Caltrans # 11 | X Public Utilities Comm |
| <input type="checkbox"/> Trans Planning | State Lands Comm |
| <input type="checkbox"/> Housing & Com. Dev | Tabor Rgl Plan Agency |
| <input type="checkbox"/> Food & Agriculture | |
| <input checked="" type="checkbox"/> Health Services | |
| | Conservancy |



Arnold
Schwarzenegger
Governor

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



Sean Walsh
Director

September 13, 2005

Alexandra Elias
City of San Diego
225 Broadway, Suite 1100
San Diego, CA 92101

Subject: San Diego Downtown Community Plan, Centre City Planned District Ordinance and
Redevelopment Plan for the Centre City Project Area
SCH#: 2003041001

Dear Alexandra Elias:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on September 12, 2005, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

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

Sincerely,

Terry Roberts
Director, State Clearinghouse

CENTRE CITY
DEVELOPMENT
CORPORATION

SEP 16 2005

Orig. To: _____
Copy To: _____

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL (916) 445-0613 FAX (916) 923-3018 www.epr.ca.gov

2.1

2.1 No response is required.

**Document Details Report
State Clearinghouse Data Base**

SCH# 2003041001
Project Title San Diego Downtown Community Plan, Centre City Planned District Ordinance and Redevelopment Plan for the Centre City Project Area
Lead Agency San Diego, City of

Type EIR Draft EIR
Description The project consists of a series of revisions to the planning documents which govern downtown San Diego. The following documents would be amended: San Diego Downtown Community Plan, Centre City Planned District Ordinance and the Redevelopment Plan for the Centre City Project Area.

Lead Agency Contact
Name Alexandra Elias
Agency City of San Diego
Phone (619) 235-2200 **Fax**
email
Address 225 Broadway, Suite 1100
City San Diego **State** CA **Zip** 92101

Project Location
County San Diego
City
Region
Cross Streets I-5 and Hwy. 163
Parcel No.
Township **Range** **Section** **Base**

Proximity to:
Highways 163
Airports San Diego International
Railways BNSF, NCTD, MTS
Waterways San Diego Bay
Schools San Diego HS
Land Use The Centre City Plan area is planned for a variety of urban uses including offices, residential, retail, hotel, industrial and civic.

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Coastal Zone; Cumulative Effects; Drainage/Absorption; Flood Plain/Flooding; Geologic/Seismic; Growth Inducing; Landuse; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Water Quality; Water Supply

Reviewing Agencies Resources Agency; Regional Water Quality Control Board, Region 9; Department of Parks and Recreation; Native American Heritage Commission; Public Utilities Commission; Department of Health Services; Office of Historic Preservation; Department of Fish and Game, Region 5; Department of Water Resources; California Coastal Commission; California Highway Patrol; Caltrans, District 11; Caltrans, Division of Aeronautics

Date Received 07/28/2005 **Start of Review** 07/28/2005 **End of Review** 09/12/2005

Note: Blanks in data fields result from insufficient information provided by lead agency.



Arnold Schwarzenegger
Governor

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



Sean Walsh
Director

Memorandum

Date: September 14, 2005
To: Lead Agency
From: Scott Morgan, Senior Planner
Re: SCH # 2003041001
San Diego Downtown Community Plan, Centre City Planned District
Ordinance and Redevelopment Plan for the Centre City Project Area

3.1

The State Clearinghouse sent out an end-of-review-period/closing letter for the above referenced project on September 13, 2005. We regret to inform you that we did not enclose a comment letter from Caltrans, District 11. This comment was received before the close of the review period. We apologize for this error and any inconvenience this may have caused.

Alexandra Elias
City of San Diego
225 Broadway, Suite 1100
San Diego, CA 92101

CENTRE CITY
DEVELOPMENT
CORPORATION

SEP 16 2005

Orig. To: _____

Copy To: _____

1400 TENTH STREET P.O. BOX 8044 SACRAMENTO, CALIFORNIA 95812-8044
TEL (916) 446-0613 FAX (916) 325-3013 www.opr.ca.gov

3.1 No response is required



Arnold Schwarzenegger
Governor

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



Sean Walth
Director

September 14, 2005

Alexandra Elias
City of San Diego
225 Broadway, Suite 1100
San Diego, CA 92101

Subject: San Diego Downtown Community Plan, Centre City Planned District Ordinance and Redevelopment Plan for the Centre City Project Area
SCH#: 2003041001

Dear Alexandra Elias:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on September 12, 2005, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,
Terry Roberts

Terry Roberts
Director, State Clearinghouse

Enclosures
cc: Resources Agency

1400 TENTH STREET P.O. BOX 9044 SACRAMENTO, CALIFORNIA 95812-9044
TEL (916) 445-0613 FAX (916) 628-3018 www.opr.ca.gov

3.2

3.2 The letter from Caltrans was received independently and is addressed as letter #5.

**Document Details Report
State Clearinghouse Data Base**

SCH# 2003041001
Project Title San Diego Downtown Community Plan, Centre City Planned District Ordinance and Redevelopment
Lead Agency Plan for the Centre City Project Area
 San Diego, City of

Type EIR Draft EIR
Description The project consists of a series of revisions to the planning documents which govern downtown San Diego. The following documents would be amended: San Diego Downtown Community Plan, Centre City Planned District Ordinance and the Redevelopment Plan for the Centre City Project Area.

Lead Agency Contact

Name Alexandra Elias
Agency City of San Diego
Phone (819) 235-2200 **Fax**
Address 225 Broadway, Suite 1100
City San Diego **State** CA **Zip** 92101

Project Location

County San Diego
City
Region
Cross Streets I-5 and Hwy. 163
Parcel No.
Township **Range** **Section** **Base**

Proximity to:

Highways 163
Airports San Diego International
Railways BNSF, NCTD, MTS
Waterways San Diego Bay
Schools San Diego HS
Land Use The Centre City Plan area is planned for a variety of urban uses including offices, residential, retail, hotel, industrial and civic.

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Coastal Zone; Cumulative Effects; Drainage/Absorption; Flood Plain/Flooding; Geologic/Seismic; Growth Inducing; Landuse; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Water Quality; Water Supply

Reviewing Agencies Resources Agency; Regional Water Quality Control Board, Region 9; Department of Parks and Recreation; Native American Heritage Commission; Public Utilities Commission; Department of Health Services; Office of Historic Preservation; Department of Fish and Game, Region 5; Department of Water Resources; California Coastal Commission; California Highway Patrol; Caltrans, District 11; Caltrans, Division of Aeronautics

Date Received 07/28/2005 **Start of Review** 07/28/2005 **End of Review** 09/12/2005

Note: Blanks in data fields result from insufficient information provided by lead agency.

CALIFORNIA COASTAL COMMISSION

SAN DIEGO AREA
7575 METROPOLITAN DRIVE, SUITE 100
SAN DIEGO, CA 92108-4421
(619) 767-2370



September 12, 2005

Alexandra Elias
Centre City Development Corporation
225 Broadway, Suite 1100
San Diego, CA 92101-5074

Re: DEIR for the Centre City Planned District Ordinance

Dear Ms. Elias:

Thank you for the opportunity to review the above-referenced Draft EIR. The proposed project consists of replacing the existing Centre City Community Plan and the Centre City Planned District Ordinance in their entirety, and would require a Local Coastal Program land use plan and implementation plan amendment from the Coastal Commission. Staff have the following comments on the DEIR.

4.1

The DEIR breaks down the existing vs. proposed land uses by district. However, for purposes of assessing the plan's consistency with the Coastal Act, it would be helpful if the document included at least a rough breakdown of these existing and proposed land uses for the area within the Coastal Zone. In particular, Commission staff is interested in determining the proposed changes in land use designations for hotel and other visitor-serving uses, waterfront/marine uses, and public and open space uses.

4.2

On page 4-6, the DEIR references the Coastal Commission's jurisdiction within the Coastal Zone and states that coastal development permits issued by CCDC for "new development within this area are appealable to the Commission." To clarify, only a small portion of land within the subject project area is designated appealable—the area bounded by Beardsley Street to the south, Harbor Drive to the east, and the MHTL/Downtown Community Plan Area boundaries to the north and west. Only coastal development permits issued for development within this area would be appealable to the Coastal Commission.

4.3

Sections 5.1.1.4 and 5.1.3 describe a variety of plans, ordinances, and policies relevant to the proposed project area, including the San Diego Unified Port District's Port Master Plan. Staff notes that a substantial portion of the development proposed and approved in the Port's South Embarcadero Redevelopment Program I, including the Seaport Village Expansion and the Park Expansion Site, has been replaced with a revised project currently in the final stages of planning approval at the Port District. CCDC may wish to update this section of the DEIR to evaluate any potential conflicts with this new foreseeable redevelopment project.

DEVELOPMENT
CORPORATION

SEP 13 2005

Orig. To: _____

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- 4.1 The requested information will be provided to the CCC as part of the Local Coastal Program amendment that will be submitted following approval of the Proposed Community Plan and Proposed Centre City Planned District Ordinance (PDO) by the City Council. The more detail on the area of CCC jurisdiction does not affect the conclusions of the EIR.
- 4.2 Comment noted, and language will be corrected. However, the more detail on the area of CCC jurisdiction does not affect the conclusions of the EIR.
- 4.3 While plans for Seaport Village have evolved since the Draft EIR was prepared, the currently planned uses would continue to be a mixed use development which would not pose any additional inconsistencies with the Proposed Community Plan. In addition, the San Diego Port's Master Plan has land use jurisdiction in the Seaport Village area. Thus, the conformance of the Proposed Community Plan is not as relevant as it is to the remainder of the Community Plan area.

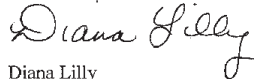
September 12, 2005
Page 2

4.4 The proposed plan includes the addition of several new designated view corridors, as indicated on 5.6-2. However, most of the existing designated view corridors would be substantially decreased in length; that is, where the existing view corridors along major streets currently extend from and through the heart of the downtown area out to the piers, many of the proposed view corridors begin at Kettner Boulevard and end at Harbor Drive. Almost all of the north/south view corridors are proposed to be eliminated, and the Ivy Street view corridor has been deleted. The EIR should include an analysis of why the elimination or reduction of each specific view corridor has been proposed and what impacts would be associated with the proposed revisions. Similar to the view corridor analysis, the proposed changes to the View Corridor Stepbacks should be specifically described and analyzed.

4.5 The proposed revisions to the Community Plan and PDO would implement a substantially different approach to the provision of parking in the downtown area than the existing plan by applying minimum off-street parking requirements for all new development. The EIR should provide some background as to why this change has been proposed. For example, did CCDC determine that the existing approach of not applying parking requirements for non-residential development has resulted in parking deficits? How was it determined that the proposed parking ratios would improve access and circulation compared to the current system? Do the proposed parking requirements represent a move away from the provision of centralized parking structures, or the development of high-density transit-friendly corridors? These potential impacts on public access should be analyzed in the EIR.

Commission staff is continuing to review the proposed changes to the revised PDO and Community Plan and may have additional comments in the future. Other information that may be received during the public comment period will be reviewed by staff during the LCP Amendment process. A final determination as to the amendment's consistency with the Coastal Act will be made by the Coastal Commission itself. Thank you again for the opportunity to comment. If you have any questions, please feel free to call me.

Sincerely,



Diana Lilly
Coastal Planner

cc: Sherilyn Sarb

(G:\San Diego\DIANA\Centre City misc\CC PDO DEIR comments.doc)

4.4 The map showing Existing Designated View Corridors is incorrect. The correct map has been included in the FEIR. As indicated by the corrected map. No designated view corridors are proposed to be deleted from existing under the Proposed Community Plan.

4.5 The proposed minimum parking requirements are based on input received from the community concerning a perceived growing need for parking and the traffic study completed for the Draft EIR. In the traffic study, completed by Wilson & Co, the parking section notes a current (albeit small) parking shortage, and an increased shortage of parking at plan buildout. In order to be conservative in the analysis, the EIR assumes that only the minimum amount of parking is provided and that no public parking structures are built. The proposed parking requirements, as outlined in the Proposed Centre City PDO and evaluated in the Draft EIR represent a balance between creating a high-density, transit friendly environment where multiple modes of travel are available and encouraged, and the need to provide a minimum amount of parking based on the demand of proposed new development.

DEPARTMENT OF TRANSPORTATION

District 11 · 2829 Juan Street
P. O. BOX 85406, M.S. 50
San Diego, CA 92110-2799
PHONE (619) 688-6954
FAX (619) 688-4299



Flex your power!
Be energy efficient!

September 12, 2005

11-SD-005
PM -16

Ms. Alexandra Elias
City of San Diego Redevelopment Agency
225 Broadway, Suite 1100
San Diego, CA 92101-5074

RE: San Diego Downtown Community Plan Update – Draft EIR (SCH 2003041001)

To Ms. Elias:

The California Department of Transportation (Caltrans) appreciates the opportunity to review the Draft Environmental Impact Report (EIR) for the proposed Downtown San Diego Community Plan Update. Given our mission of improving mobility and our direct responsibility as the owner / operator of the State Highway System, Caltrans considers itself a key stakeholder in downtown redevelopment efforts. The State highways serving downtown (Interstate 5 and State Routes 94, 163 and 75) should be regarded as both local and regional assets that facilitate access and mobility needs for the entire San Diego region.

Growth Impacts Must Be Mitigated

Caltrans recognizes that Downtown is the predominant activity center for the entire San Diego region and will likely continue to be so into the foreseeable future. As such, Caltrans encourages local governments towards redevelopment activities which can serve to target growth into existing areas more readily served by infrastructure improvements. However, there are impacts associated with growth which must be mitigated.

- 5.1
- 5.2
- 5.3

The Draft EIR document does not provide for adequate mitigation to the State highway facilities serving downtown. Specifically in the Executive Summary Table 1.3.1, the Draft EIR states: "Additional traffic on freeway ramps serving downtown associated with future downtown development would result in unacceptable delays" (Impact TRF-A.2.1). Note there is no mention of impacts to the main lanes of the highway system. But in the chapter for Cumulative Impacts, Chapter 6, under 6.2.6.1 the document states "Buildout traffic volumes would have a significant impact on the freeways serving downtown. Impacts would occur on both freeway segments and ramps." There is also no proposed mitigation whatsoever as stated on Executive Summary Table 1.3.1: "As CCDC and future developers do not have

"Caltrans improves mobility across California"

CENTRE CITY
DEVELOPMENT
CORPORATION

SEP 15 2005

Orig. To: _____
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- 5.1 The EIR notes that the proposed Downtown Community Plan will result in both direct and cumulatively significant traffic impacts to study area freeway segments and ramps. Mitigation of these impacts will require development and regional acceptance of a feasible program to improve freeway segments and ramps in the downtown area. Previous studies have identified a number of alternatives which require further analysis and refinement to ensure appropriateness, feasibility of implementation and local, as well as regional level support. To mitigate identified impacts, CCDC, along with Caltrans, SANDAG, and the City of San Diego will need to continue to pursue and promote improvement of the I-5 freeway facilities through the downtown area.
- 5.2 The potential for impact to freeway segments has been added to the Executive Summary.
- 5.3 See response to comment 5.1.

Ms. Alexandra Elias
 September 12, 2005
 Page 2

- 5.3 Cont. direct control over implementing freeway improvements, no mitigation measures can be implemented by CCDC or future developers.” This non-mitigation of significant potential direct and cumulative impacts is unacceptable.
- 5.4 The California Environmental Quality Act (CEQA) requires that both the direct and cumulative impacts of a project be considered. Caltrans endeavors that any direct impacts to the State Highway System be eliminated or reduced to a level of insignificance pursuant to CEQA standards. Mitigation measures must be included in the traffic impact analysis and environmental studies for a project.
- 5.5 Cumulative impacts of a project, together with other related projects, must be considered when determining a project’s impacts. A cumulative impact is the sum of the impacts of existing conditions, other projects, and the project itself – no matter how small the contribution is from the project itself. There is no minimum size limitation on projects that may be required to mitigate for cumulative impacts if the project contributes to the problem in any amount. Caltrans supports the concept of “fair share” contributions on the part of the developer for future interchange improvement projects and/or other mitigation measures, such as freeway mainline improvements.
- 5.6
- 5.7 Caltrans asserts that some actions in the Community Plan update will generate cumulative impacts to several segments of the freeways considered in the traffic analysis which must be mitigated. Part of the proposed mitigation measures for cumulative impacts for the freeways (State Highway System) include, but are not limited to, working with SANDAG to attempt to obtain funding sources, the development of a Transportation Development Impact Fee (TDIF) that would include the State Highway System, similar to the newly adopted Transportation Impact Fee program from the County of San Diego. The recent voter-approved TransNet sales tax extension (Proposition A) has a requirement of a \$2,000 fee for each new single-family dwelling unit for regional transportation facilities. Caltrans encourages the continual development and enforcement of TDIF programs or other similar alternative funding programs for future infrastructure needs that could include operational improvements to the state highways as part of the regional transportation facilities, thereby satisfying the requirements of the TransNet extension and mitigating part of the cumulative impacts generated by development.
- 5.8 Generally, a local public agency (e.g., the City of San Diego Redevelopment Agency) approves a proposed project or plan which includes mitigation measures recommended by Caltrans; and the local agency then collects the Fair Share funds from the project proponent and administers them until such time as mitigation improvements are implemented on the State highway system, whereupon Caltrans will enter into a Cooperative Agreement with that “Lead Agency.” However, in some cases, Caltrans will enter into an agreement for mitigation directly with a project proponent when the local public agency does not wish to

“Caltrans improves mobility across California”

- 5.4 See response to comment 5.1.
- 5.5 Cumulative impacts have been considered and identified in Section 6.2.6. Impacts to freeway segments and ramps have been identified as significant.
- 5.6 The concept of promoting/requiring “fair-share” contributions on the part of developers for improvements to the freeway system will need to be addressed as part of the implementation of an acceptable program to improve freeway segments and ramps. As such, the specification of such requirements cannot be determined at this time.
- 5.7 As indicated in response to comment 5.5, significant cumulative impacts on freeways are identified in the EIR. CCDC and the City of San Diego continue to work with SANDAG on an on-going basis to identify sources and obtain funding for a variety of transportation system improvements. Two recent examples of this in the downtown area were for the Park to Bay Link and, more recently, the Harbor Drive Pedestrian Bridge at Eighth Avenue and Harbor Drive.

Also, future residential growth in the downtown will be subject to the Regional Transportation Congestion Improvement Program, as stipulated by the Transnet legislation and will provide additional funds for improvement of the regional arterial system. A separate Transportation Development Impact Fee (TDIF) program has not been proposed and is not anticipated at this time

- 5.8 See response to comments 5.6 and 7.

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5.8 Cont. collect and administer funds for State highway system mitigation. In that situation, subject to local agency approval, the local public agency will condition project approval upon the project proponent entering into a "Traffic Mitigation Agreement" with Caltrans for the mitigation.

5.9 Caltrans encourages the lead agency and the responsible agency (San Diego's Redevelopment Agency directly or via CCDC and the City of San Diego) together with other regional and local agencies, to take an active participation in the funding, development, and implementation of a joint vision for the State Highway System serving this area, similar to the action taken on mitigation measure TRF A.2.1, thereby addressing the direct and/or cumulative impacts generated by development and preserving the needed Right of Way (R/W) for the implementation of such improvements to the State Highway System.

Increase Coordination Between Transportation And Land-Use

5.10 Caltrans is supportive of land use planning which considers its effect on the regional transportation system; therefore based on CEQA guidelines we invite the San Diego Redevelopment Agency / CCDC to submit new proposed developments to the Intergovernmental/ Development Review (IGR) branch at Caltrans and/or via the State Clearinghouse for enhanced interagency coordination as well as review of possible effects and potential mitigation to the State highways.

5.11 For the Downtown area, Caltrans encourages the project proponents (e.g., San Diego Redevelopment Agency, Centre City Development Corporation [CCDC]) to adhere to the City of San Diego's "City of Villages" vision and incorporate mixed use and residential densities that will continue to support transit and other modes. As envisioned in the "City of Villages" plan, the Downtown area should act as a Regional Center area providing convenient access to jobs, housing, and services for residents and visitors. Downtown should also be linked to other Village Centers and destinations by convenient transit service, enabling people to achieve a high degree of mobility without over-reliance on a particular mode of travel.

5.12 An interconnected grid street system offers the traveler multiple paths to reach any destination thereby alleviating potential congestion by providing alternative routes. These concepts lend support to a proposal for Collector-Distributor [C-D] road(s) to and through the downtown area.

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5.9 As indicated in response to comment 5.1, CCDC will continue to participate in Caltrans and SANDAG's efforts to plan for the future transportation needs of the I-5 Corridor and other roadways affecting access to, from and within downtown.

5.10 The Proposed Community Plan and Draft EIR have been submitted to Caltrans as well as the State Clearinghouse. Development in the future is anticipated to be consistent with the development strategy envisioned in the Proposed Community Plan. Agendas for meetings where proposed projects are considered by the Centre City Advisory Committee (CCAC), which is our Project Area Committee and Community Planning Group, and the CCDC Board of Directors are available electronically via email or by U.S. Postal Service. CCDC would be pleased to include Caltrans staff on this distribution list to keep abreast of recent developments.

5.11 The Strategic Framework Element of the City of San Diego's General Plan describes downtown generally, and then states on p. 50, "The City of Villages Strategy encourages the further intensification of Downtown to increase its role as a regional hub by maintaining and enhancing its role as the pre-eminent business center in this region and developing as a major urban residential center with the largest concentration of high density multifamily housing in the region." The Proposed Community Plan is fully consistent with the City of Villages concept as embodied in the Strategic Framework Element of the General Plan.

5.12 As CCDC has indicated in the past, it has concerns regarding the appropriateness and impact of the Collector-Distributor (C-D) system. Implementation of this system could potentially have major impacts on existing development along the contemplated route. The impact of the proposed C-D system on downtown intersections and road segments needs to be further evaluated before CCDC can support a C-D system.

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Downtown San Diego Should Include Provision of Transportation Choices

As Center City is the region's primary "activity" center, Caltrans envisions a Downtown Plan that integrates recent transportation studies and plans that have been developed in the region.

5.13

Given the importance of mobility options, the Community Plan should provide an assessment of how various transportation options will be incorporated into the project. Specifically, pedestrian and bicycle access to and through Downtown should be provided and Transportation Demand Management (TDM) strategies such as carpool and vanpool formation and parking addressed as well.

5.14

Caltrans acknowledges and supports the participation of transit agencies (SANDAG / Metropolitan Transit Development Board [MTDB]) in the Downtown Community Plan Update. As a transportation partner in the San Diego region, Caltrans expects that MTDB's Centre City Transit First Study concepts will not only be integrated into the Downtown Plan Update, but the plan should also consider, integrate, and analyze previous plan concepts developed in MTDB's TransitWorks and Transit First endeavors, SANDAG's adopted Regional Transit Vision, High-Occupancy Vehicle (HOV) / Managed Lane Study, and recently adopted 2030 Regional Transportation Plan (MOBILITY 2030), as well as the City of San Diego's "City of Villages" Plan.

SANDAG's latest Regional Transportation Plan (RTP) calls for the development of a regional system of HOV / Managed Lanes as well as a robust "Bus Rapid Transit" (BRT) system to accompany the existing light rail transit and commuter rail systems. Caltrans supports SANDAG's regional vision of freeway BRT operating on HOV / Managed lanes as a flexible, effective transit mode. In the Centre City area, State Route 94 is planned as a major freeway BRT corridor in addition to regional transit service provided from Escondido and Chula Vista.

5.15

Caltrans recommends that the Lead Agency and Responsible Agency via CCDC and MTDB (SANDAG) develop ambitious, yet technically sound plan concepts for regional BRT services from future HOV / Managed lanes on State Route 94. It is also recommended that the Downtown Plan Update integrate any regional BRT services from State Route 94 into the local circulation, street design and zoning plans, especially on the freeway couplets serving SR-94 ('F' and 'G' Streets), SR-163 (10th and 11th Avenues), and I-5 (4th and 5th Avenues).

5.16

Furthermore, should the Downtown Plan develop viable plan concepts for additional HOV lanes on Interstate 5 (assuming major freeway operational needs also met via some major

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5.13 The Proposed Community Plan recognizes and promotes the diversity of transportation options in the downtown. Chapter 7 of the Proposed Community Plan contains a comprehensive view of transportation downtown, beginning with detailed descriptions of street types proposed for downtown. Bicycle facilities are shown on Figure 7-1, along with these different types of streets intended to provide a variety of mobility options. Additionally, pedestrian movement is a critical component of the urban fabric, and thus, Pedestrian Priority Zones are shown on Figure 7-2. These would be areas where an enhanced pedestrian environment is a goal of the Plan. Chapter 7, developed in collaboration with staff from the San Diego Association of Governments (SANDAG), also describes the transit network and potential future improvements, including Bus Rapid Transit (BRT). The proposed plan includes a discussion of parking, along with goals and policies, as well as a Transportation Demand Management (TDM) section. TDM measures are also included in the Proposed Centre City Planned District Ordinance.

5.14 CCDC acknowledges and supports the participation of SANDAG (formerly MTDB) staff in the development of the components of the Transportation Chapter of the Proposed Community Plan (Chapter 7). The Proposed Community Plan is consistent with the list of plans/studies and plan concepts put forth in the 2003 RTP and other related plans, but it is not required, nor would it be practical or appropriate to reproduce policies or explain in detail the reasons for consistency in the Proposed Community Plan document or in this EIR.

COMMENTS

RESPONSES

- 5.15 The Proposed Community Plan is consistent with planned transit services providing access to/from downtown. While exact routings downtown are still under evaluation, the EIR does contemplate removal of parking lanes along B Street for potential BRT during the peak hours. Furthermore, similar accommodations for BRT on Highway 94 can be made once SANDAG and Caltrans plans are more defined.
- 5.16 The Proposed Community Plan assumed improvements consistent with the SANDAG RTP which includes HOV lanes on I-5. The inclusion of direct access ramps would need to be considered as part of the development of an acceptable program to improve the freeway system serving the downtown area.

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5.16
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operational improvement like a Collector-Distributor [C-D] road), Caltrans recommends that CCDC work with regional transportation partners to also include plan concepts for direct access connections from I-5 HOV lanes onto Centre City streets. Direct Access Ramps (DARs) would provide a more balanced HOV system in the Centre City and also improve and maintain freeway operations.

Improve Freeway Operation through Downtown (e.g., I-5)

5.17

While an emphasis on walking and transit can help address local and internal transportation issues, vehicular traffic (particularly to and from freeways) will continue to be the dominant mode into, out of, and within Downtown. A recent Caltrans / City of San Diego / SANDAG study shows that by 2020, traffic on the Interstate 5 corridor will increase by over thirty percent (30%). Growth projections for the Centre City between 2000 and 2020 forecast a 52% increase in office square footage, almost 7% in retail square footage, and a 333% increase in housing units. The proposed plan update assumes growth rates that exceed this study.

5.18

Of concern to Caltrans is how this Plan Update will affect the freeway system in its operation and R/W preservation. Interstate 5 (I-5) and State Routes 94 and 163 (SR-94, SR-163) currently suffer from congestion during the morning and evening commute periods. Furthermore, only a small percentage of I-5 freeway traffic is projected to “pass through” the Centre City area. In other words, most regional freeway traffic within the Centre City requires access into or out of Centre City or a surrounding activity center (e.g., airport, seaport, Balboa Park). Changes to land use in the Downtown area may contribute to demand beyond that planned for these facilities. Therefore, Caltrans suggests that “planning principles” developed to guide the Downtown Community Plan Update reflect a multi-modal transportation system including freeways, where both “mobility” and “access” are well balanced.

5.19

The Regional Transportation Plan (RTP) and the Regional Transportation Improvement Program (RTIP) document how transportation facilities in the San Diego region are planned to be implemented. The Downtown Community Plan should document clearly a nexus between the phased implementation of the RTP and RTIP with implementation of the Community Plan. In order to assure sound coordination between transportation and land-use, additional land use intensification affecting the local and regional circulation system should only be implemented subject to the development of accompanying transportation projects. Concurrently staged development of transportation and land use is necessary to assure continued high mobility for San Diegans. That is why a joint planning and funding vision for

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- 5.17 The Proposed Community Plan densities and intensities were not known at the time I-5 study was completed. However, the analysis contained in the EIR is based on the increased buildout potential consistent with the City of San Diego General Plan, and is provided in the EIR to analyze the effect of the increased traffic on the freeway system to provide this information to Caltrans and did not assume a specific time frame or rate of growth.
- 5.18 As indicated in response to comment 5.1, I-5 is a regional facility and will be impacted directly and cumulatively by the growth in the downtown study area. However, as a regional facility, the I-5 freeway also serves a high proportion of trips which are passing through the downtown area, without a downtown origin or destination. CCDC is in agreement that both mobility and access to, from and within downtown are important objectives. Planning principles related to transportation and reflecting a multi-modal environment are contained in Chapter 7 of the Proposed Community Plan.
- 5.19 Due to the dynamics of the land economy and the real estate market, the exact timing, location, and sequence of downtown development can not be determined with any certainty. The monitoring of downtown traffic as stipulated by Mitigation Measures TRF – A.1.1 and TRF – D.1 will assist in establishing the need and timing for transportation improvements serving the downtown area.

In addition, CCDC will support Caltrans, SANDAG, and the City of San Diego in the development of an acceptable program for improving the freeway segments and ramps serving the downtown area. The development of the program should include a phasing program coordinated with available downtown development plans at that time.

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5.19
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the State Highway System serving the Center City area is so important for the implementation of staged improvements and the preservation of needed R/W.

5.20

In November 2002, a 30-month, \$400,000 Central Interstate 5 Transportation Corridor Study was completed. This Corridor Study developed an effective program of transportation improvements to address overall freeway congestion as well as access issues between I-5 and major activity centers in and around the Centre City area. Unfortunately, due to a substantial intensification of proposed land use, the Draft EIR for the Downtown Community Plan update changes various assumptions from the Central I-5 Corridor Study. Nevertheless, Caltrans encourages the City Redevelopment Agency / CCDC to integrate plan concepts and transportation improvements from the I-5 Corridor Study into the Downtown Community Plan Update.

5.21

Because the land use intensity assumptions have changed from the Central I-5 Corridor Study to this Community Plan update, there may be additional mitigation requirements necessary in order to effectively deal with the increased impacts. Caltrans may suggest that the project proponents for specific developments within this area pursue Locally Funded Projects such as highway / interchange improvements based on the joint vision mentioned above. The locally funded improvement process includes a Project Study Report (PSR), Project Report and Environmental Document, final design, and construction of the improvements. Potential improvements may include – but not be limited to – widening I-5 through downtown, widening existing ramps, ramp metering, modification to ramp signals, and/or adding auxiliary lanes to I-5.

Many of the transportation plan concepts developed in the Central I-5 Corridor Study were not officially recommended for further consideration (nor included in MOBILITY 2030, SANDAG's Regional Transportation Plan). Caltrans recognizes that this Downtown Plan Update is an opportunity to continue discussion and analysis of these transportation plan concepts within a landuse planning process. Caltrans recommends that CCDC and its support staff further analyze the following outstanding issues from the Central I-5 Study in the Downtown Plan Update.

5.22

1) Major operational improvements to the Centre City I-5 corridor ("S-Curve")

Much of the recurrent congestion experienced on I-5 in the Centre City "S-Curve" is due to conflicting demand streams from local ramps and intersecting freeways. The proposed improvement to address these operational deficiencies was a "collector-distributor (C-D) road" on the outside of the existing I-5 alignment. The proposed C-D concept would separate freeway "access trips" (to and from local ramps and freeway connectors) from

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5.20 As indicated earlier, the Proposed Downtown Community Plan proposes a general intensification of development downtown which is consistent with the Strategic Framework Element of the General Plan. Further, CCDC agrees with the need to further study the impacts of Caltrans' proposed improvements within the I-5 corridor, and specifically within the "S-Curve" of downtown. CCDC does not propose, as part of the Proposed Community Plan, nor does it support the initiation of any improvements without a complete analysis and discussion of the impacts to the downtown environment of Caltrans' proposed ramp closures, institution of a Collector-Distributor facility, expansions and/or changes to existing freeway conditions downtown.

5.21 Comment noted.

5.22 See response to comment 5.12.

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5.22
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"through trips" already in the general-purpose lanes, thereby improving freeway operations.

This proposed operational improvement might be facilitated via separate travelways and/or viaducts, with structures requiring additional Right of Way (R/W) encroaching into Centre City or surrounding neighborhoods. Caltrans recognizes the potential impacts of these proposed improvements and respects the region's need to further study these impacts.

5.23

2) *Major capacity-enhancing improvements to the "S-Curve"*

Notwithstanding its operational deficiencies, much of Interstate 5 in the vicinity of Centre City does not have the capacity for today's traffic demands, particularly in the morning and afternoon commute periods. In 2020, general traffic volumes will increase to a point that freeway segments within the Centre City area will also have insufficient capacity during the peak periods which will be of longer duration due to the proposed development.

The Central I-5 Study recommended that I-5 include an additional two (2) freeway lanes to accommodate High-Occupancy Vehicle (HOV) lanes through the Centre City area to increase capacity and promote ridesharing. SANDAG has shown its support of this plan concept by including this improvement in its "reasonably-expected" financial scenario of MOBILITY 2030. Given the physical constraints of the "S-Curve," Caltrans and the partnering agencies acknowledged that one feasible alternative for accommodating two additional lanes on I-5 without significant right of way acquisitions was to:

- Develop the aforementioned "collector-distributor road" outside of the existing I-5 alignment
- Convert one inside lane in each direction into an HOV lane
- Convert the remaining outside auxiliary lane (in each direction) into general purpose lanes (note: auxiliary lanes not needed if C-D road present)

5.24

3) *Minor operational improvements to the "S-Curve"*

As part of the analysis for the proposed C-D road, the Central I-5 Corridor Study recommended that access to and from Interstate 5 be reduced in order to improve freeway operations. To increase spacing between on/off-ramps, some low-volume ramps were recommended for closure. It is recommended that CCDC, regional agencies and Caltrans

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5.23 CCDC does not propose as part of the Proposed Community Plan, nor does it support the initiation of any improvements without a complete analysis and discussion of the impacts to the downtown environment of Caltrans' proposed ramp closures, institution of a Collector-Distributor facility, expansions and/or changes to existing freeway conditions downtown.

5.24 As indicated in response to comment 5.23, CCDC does not propose as part of the Proposed Community Plan, nor does it support, any freeway improvements without a complete analysis and discussion of the impacts to downtown.

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5.24
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work together to resolve issues with near-term ramp closures (e.g., 'C' Street on-ramp) as well as long-term closures needed to accommodate operational improvements such as a C-D road (e.g., 1st Avenue on-ramp).

Since the Central I-5 Corridor is at capacity during the peak A.M. and P.M. periods, ramp meters are in place or will soon be added to the on-ramps for various interchanges serving the Downtown area. In fact, as Caltrans general policy, we assume that all local ramp interchanges in the San Diego metropolitan area will have signalized ramp control by the year 2020. The circulation element of the Downtown Plan Update should reflect this policy. The additional traffic being generated by new development in the area may result in long queues of vehicles, which will exceed the storage available on the ramps. This will result in the storage of traffic on the local street system and serious congestion at the on-ramps and local street intersections.

5.25

4) *New freeway connection from I-5 to 10th Avenue Marine Terminal and East Village*

The Central I-5 Study recommended that a new freeway connection be established between Interstate 5 and the 10th Avenue Marine Terminal. SANDAG has shown its support of this plan concept by including this improvement in its "revenue-constrained" financial scenario of MOBILITY 2030. The proposed connector would not only remove heavy trucks from the local Barrio Logan community, but it would also provide additional freeway access to the Convention Center, Ballpark District, and East Village. Viable alignments of the proposed freeway connector may involve new roadway structures, which could create other impacts on Centre City as well as Barrio Logan. It is recommended that CCDC work with Caltrans, the Port of San Diego, and the local communities to develop viable plan concepts for the proposed and recommended freeway connector within the framework of the Downtown Community Plan Update process.

Improve other Major Arterials in and around Downtown (e.g., SR-163, Pacific Hwy.)

5.26

1. *Pacific Highway as a potential high-occupancy arterial roadway*

The Central I-5 Corridor Study recommended that improvements be made to facilitate general purpose and HOV connectivity between Interstate 5 and Pacific Highway north of Interstate 8. Should HOV lanes not be developed on Interstate 5 through the Centre City, Pacific Highway could serve as a viable alternative to access the downtown area. Improvements to Pacific Highway have been developed to facilitate HOV demand from I-5 to the Old Town Transit Center as well as Lindbergh Field. Caltrans recommends that

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5.25 As indicated in response to comment 5.23, CCDC does not propose as part of the Proposed Community Plan, nor does it support, any freeway improvements without a complete analysis and discussion of the impacts to downtown. As indicated in response to comments 5.1, 5.12 and 5.20, the location of any new freeway connection between I-5 and the Tenth Avenue Marine Terminal has not been determined. The I-5 Corridor Study recommended "further consideration and study within the broader context of the Central I-5 Corridor Study" of new freeway ramps to the Tenth Avenue Marine Terminal. The I-5 Corridor study concludes that "because of significant impacts of the viaduct to the local community, alternative alignments, including increased use of 32nd Street should be evaluated in detailed engineering and environmental studies. These are neither the responsibility of CCDC, nor a component of the Proposed Community Plan requiring review.

5.26 Pacific Highway south of Laurel Street is in the North Embarcadero Visionary Plan (NEVP) area. Any improvements to Pacific Highway proposed by Caltrans must be consistent with the NEVP, and approved by CCDC, the Redevelopment Agency and the Port of San Diego.

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5.26
Cont.

improvements on Pacific Highway be considered and developed south of Laurel Street to Broadway to foster HOV demand further into the Centre City area.

5.27

2. Potential Improvements to State Route 163

State Route 163 (The Cabrillo Freeway) is a four-lane freeway from Interstate 8 to Centre City. Caltrans would like CCDC to include innovative strategies in the Downtown Plan Update that could look at ways to balance travel demand in the corridor with the environmental sensitivities inherent in the route. Examples could include value pricing (Fastrak), HOV / transit-only operation during peak commute hours, weekday HOV / transit operation, etc. However, due to considerable community and environmental concerns, this particular segment has no long-range capacity-enhancing improvements planned. Caltrans acknowledges local stakeholders' need to preserve the unique nature of State Route 163 and its surrounding environs within Balboa Park.

Central Interstate 5 Right of Way Issues

Caltrans acknowledges the disruptive nature of transportation facilities, particularly State highways, on surrounding communities in the Centre City area. Caltrans encourages the Redevelopment Agency / CCDC to develop a Downtown Plan that considers freeway facilities as assets and subsequently seeks mutually beneficial opportunities to reduce freeway nuisances and disruptions.

5.28

Caltrans acknowledges CCDC's planning goal to "reconnect" Centre City with its surrounding communities. Caltrans respects this goal and supports an open dialogue to create and develop opportunities to achieve such goals. These opportunities, however, should be developed in a manner that does not foreclose or inhibit the State's ability to develop long-range transportation improvements within its Right of Way (R/W) in the future. A critical aspect of any future development in the Center City area, especially property adjacent to I-5, would be consideration of its effects on preservation of R/W in the central I-5 corridor. Furthermore, any possible airspace lease in the Downtown area would need to include the State's indemnification against park replacement if/when the land is needed for future freeway widening.

To date, preliminary concepts to "reconnect" Centre City with its surrounding community have been introduced for public debate with minimal participation or input from Caltrans.

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5.27 CCDC does not propose, and would not endorse, improvements to SR 163 that have been eliminated in previous studies due to environmental and community concerns. If Caltrans proposes changes to SR 163, CCDC would be willing to review and provide input.

5.28 The concept of reconnecting downtown to Balboa Park was the subject of a feasibility study by Simon Wong Engineering, and completed in August 2003. While the study determined that the construction of such a facility is feasible, there are a number of urban design issues that must be resolved to ensure that it is successful. Pursuit of this improvement would be planned and coordinated with Caltrans.

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5.29

1. *Cortez Hill / Tweet Street Park*

The proposed development of linear parkland in the Cortez Hill / Tweet Street area would utilize a portion of the State R/W. This Tweet Street Park is shown as "existing" parkland, to which a freeway lid may be appended for linkage to Balboa Park and for development as a "mixed neighborhood center." It seems preliminary to classify the park as "existing" since no formal agreement has yet been reached with CCDC. Caltrans has been pursuing an Airspace lease in this area for several years, but the language is still being sorted out. As any proposed airspace lease must be submitted to the statewide Airspace Advisory Committee, it must be said that the park does not yet exist. The area shown as "Tweet Street Park" is thus still operating State right of way. Perhaps on the EIR mapping, the parcel should be shown as "proposed parkland." Caltrans has not declared the R/W needed for Cortez Hill Park to be "excess" and does not anticipate doing so in the future. Caltrans continues to work with CCDC toward the development of this parkland, with the understanding that this R/W may need to be reclaimed for future highway improvements.

5.29 Comment noted. The Proposed Community Plan will show Tweet Street as "proposed".

5.30

2. *"Lid" or "Cover" on Interstate 5*

Caltrans supports "context-sensitive solutions" to transportation improvements to minimize impacts on local communities. The Interstate 15 (I-15) park deck and enhanced bridges across I-15 at El Cajon Boulevard and University Avenue are examples of this kind of enhancement. However, development of an I-5 cover or the use of existing State R/W for non-freeway purposes should be considered in context with the results of the Central I-5 corridor study and other potential transportation project needs. There are many demands on limited R/W that should be carefully considered, taking into account both transportation and land use needs.

5.30 See response to comment 5.28.

Due to the extraordinary cost of context-sensitive measures such as covering I-5, Caltrans cannot alone advocate for such an infrastructure investment without the collective will of the region to support it. We therefore see the substantial investment in Centre City development as an opportunity to move towards consensus on the types of context-sensitive solutions desired as well as potential sources of funding for any significant proposed improvements. Also, airspace development and lease implications will be important issues to resolve for any "lid" application.

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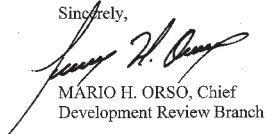
5.31

3. Other Right of Way and/or "Airspace" Issues

Caltrans notes that there is already some potential illegal new condominium development encroachment ("Mills") into State R/W which could complicate any widening project in the corridor. Also, as a general comment, Caltrans does maintain several existing airspace leases along the I-5 corridor through the downtown area, notably the Neal Goode homeless shelter at 17th Street, and some parking spaces at 1st and Cedar. In the same area of the "S curve" downtown, there are other R/W factors which might become important such as a developer at Ash Street who has plans to place underground structures within the State R/W. Obviously this proposal would require substantial intergovernmental review and coordination, if even feasible.

Caltrans recognizes the important link between transportation and land use, which is especially critical in the regional center that is Downtown San Diego. Thank you again for the opportunity to be involved in the Downtown Community Plan Update process. Caltrans looks forward to continuing cooperation with the San Diego Redevelopment Agency / CCDC in coordinating land use and transportation issues. Caltrans envisions a continuing level of participation in the Plan Update and subsequent activities, and we encourage a more committed partnership to reflect this vision. If you have any general questions on the Department's comments, please contact Brent McDonald at (619) 688-6819.

Sincerely,



MARIO H. ORSO, Chief
Development Review Branch

cc: BMcDonald Dev. Rvw. MS-50
PLandrum Planning MS-50
EAllegre Planning MS-50
EGojuangco Frwy. Ops. MS-55
FBirchmore R/W MS-54
JGrisafi R/W Engr. MS-52

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5.31 Comment noted.



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CENTRE CITY
DEVELOPMENT
CORPORATION

SEP 12 2005

Orig. To: _____

COPY TO: _____ File Number 5001700

September 12, 2005

Ms. Alexandra Elias
Centre City Development Corporation
225 Broadway, Suite 1100
San Diego, CA 92101

Dear Alex:

We have reviewed the draft San Diego Downtown Community Plan Update, Planned Development Ordinance (PDO), and Environmental Impact Report, and offer the following comments:

Land Use and Urban Design

The community plan does an excellent job of encouraging intensification of both residential and employment uses. The urban design guidelines support building a pedestrian friendly environment, and are consistent with the goals of our Regional Comprehensive Plan.

Transit

The plan correctly identifies B and C Streets as potential Bus Rapid Transit (BRT)/shuttle corridors in Figure 7-3. Exclusive transit lanes along this couplet would be needed to provide fast and efficient operations. As noted in Figure 7-3, final design for any transit plans in these corridors would require additional study.

We will better be able to assess BRT and shuttle facility and service needs in the downtown area upon completion of two study efforts currently underway that will guide both short- and long-range improvements to the regional transit system. The Comprehensive Operational Analysis (COA) being undertaken by the Metropolitan Transit System (MTS) will evaluate and restructure existing services to improve its efficiency and effectiveness in meeting regional travel needs, while the Independent Transit Planning Review being managed by SANDAG will evaluate the longer-range transit plan contained in our Regional Transportation Plan in light of global "best practices." Both of these studies will be completed in mid-2006. The next step will be to develop a detailed mid- to long-range service and facility improvement plan for the downtown area based on the results of these two studies. This effort is set to begin in early 2006 and would be jointly managed by SANDAG and MTS, and coordinated with CCDC staff.

6.1

MEMBER AGENCIES

- Cities of
- Carlsbad
- Chula Vista
- Coronado
- Del Mar
- El Cajon
- Encinitas
- Escondido
- Imperial Beach
- La Mesa
- Lemon Grove
- National City
- Oceanside
- Poway
- San Diego
- San Marcos
- Santee
- Solana Beach
- Vista
- and
- County of San Diego

ADVISORY MEMBERS

- Imperial County
- California Department of Transportation
- Metropolitan Transit System
- North San Diego County Transit Development Board
- United States Department of Defense
- San Diego Unified Port District
- San Diego County Water Authority
- Mexico

6.1 As the comments in this letter refer to the Proposed Community Plan, and raise no issues related to the adequacy of the EIR, no specific responses are necessary.

Parking

We generally concur with the proposed parking policies in the draft community plan and acknowledge CCDC efforts to minimize parking impacts through increased usage of alternative modes. While we recognize the need to create sufficient parking to accommodate future growth, there are pricing strategies that can be implemented that would further strengthen the draft community plan Goal 7.3-G-2 of increasing transit usage and Policy 7.5-P-1 of providing transit reimbursement and other benefits to other users of non-motorized travel. A recent study (Transit Cooperative Research Program Report 95, *Parking Pricing and Fees*, Transportation Research Board, 2005) reports that most employees are provided with free or subsidized parking by their employers. The role of employer-provided parking as a contributor to high rates of single-occupant vehicle use has received considerable attention. Commuters on average avoid direct payment of the majority of the true costs of parking, which serves as a contributor to high rates of single-occupant vehicle use. Transportation demand management (TDM) strategies that eliminate this subsidy (for example, by requiring the employee to pay for parking or implementation of parking cash-out plans) have shown to have a positive effect on lowering vehicle trip generation rates and increasing the use of alternative modes.

We recognize that implementation of TDM programs with parking pricing strategies is an issue that needs to be addressed on regional scale. Our request, then, is for CCDC's support for evaluating such regional TDM strategies that could benefit downtown and to work with SANDAG on this effort.

Bicycle Facilities

Pacific Highway should be specified as having a Class 2 facility (bike lane). Additionally, we recommend that wheeled traffic be separated from pedestrian traffic along Harbor Drive.

One-way streets complicate bicycle circulation, especially on the north end of downtown where grades are significant. They also encourage higher motor vehicle speeds. Please consider converting some streets back to two-way. Where one-way streets are to remain, bikeways should be provided in couplets to provide for travel in both directions (for example Third and Fourth Avenues should have bikeways).

The plan should reference the City of San Diego Bicycle Master Plan. See especially page 97 for recommendations on how to reconfigure roadway striping to accommodate a bike lane.

Bicycle parking is seriously undersupplied downtown. The plan should specify the need for sidewalk bike racks, which should be of the inverted U design, and the need for bicycle lockers in private parking garages.

Thank you for the opportunity to comment on these downtown documents. We look forward to working with you to implement the community plan, and we congratulate you on a successful completion to what has been a complex community plan update process.

Sincerely,



BOB LETTER
Director of Land Use and Transportation Planning

CITY OF SAN DIEGO
MEMORANDUM

DATE: September 12, 2005
TO: Alexandra Elias, Senior Planner
Centre City Development Corporation
FROM: Deborah Sharpe, Project Officer II, Park Planning and Development Division
Park and Recreation Department
SUBJECT: Draft EIR for San Diego Downtown Community Plan, Sch. No. 2003041001

Thank you for the opportunity to review the Draft Environmental Impact Report (EIR) and offer information to make the public disclosure regarding parks and open space more concise. This Draft EIR was reviewed by the Park and Recreation Department for consistency with the City Progress Guide and General Plan recommendations relative to population-based parks and open space, as well as the City's park land inventory and needs statistics.

General comments:

The Recreation Element of the City's Progress Guide and General Plan recommends 2.8 acres of park land for every 1,000 residents, consisting of neighborhood and community parks. For every 3,500-5,000 residents a minimum 10.0 acre neighborhood park is required to be located within ½ mile service radius. For every 18,000 to 25,000 residents a minimum 20.0 acre community park and a recreation center is required to be located within 1 ½ mile service radius. For every 50,000 residents a community swimming pool is required within 1 ½ - 2 miles service radius.

The total population of the Downtown Community at full development in 2030 would warrant approximately 249.5 acres of population-based parks (89,100 x 2.8 ÷ 1,000 = 249.48) by these standards. According to the Park and Recreation Department's inventory of population-based park land, the existing and future parks as identified in the Downtown Community Plan will total approximately 76.88 acres at full community development. This represents .87 acres per 1,000 residents, well below the recommended standard.

The Recreation Element recognizes that these park land acreage recommendations must be applied with flexibility in the urbanized areas of the city where land resources are limited in order to capture and optimize park and recreation facilities opportunities as they present themselves, or are feasible to pursue. However, the Draft EIR should acknowledge the General Plan's population-based park land recommendations and discuss how the community plan update proposes to address the issue of not meeting those standards. The Draft EIR should discuss how impacts to surrounding communities will be mitigated due to the lack of land within the Downtown Community Planning Area large enough to provide for community park usage, such as organized sports, recreation center and swimming pool. There is no doubt that residents in the

7.1

7.1 The Recreation Element of the City's Progress Guide and General Plan (General Plan) sets forth a series of goals and guidelines to help guide the provision of recreation opportunities in both existing and new communities. On page 165, the General Plan identifies a range of acreages for various types of parks. The General Plan indicates that: "Population –based facilities *ideally* [emphasis added] constitute between 1.0 and 3.9 acres of land for each 1,000 residents. Open space lands, sports fields, plazas, landscaped areas should constitute approximately 1.1 to 2 acres/1000 residents". It is important to note that the General Plan goes on to indicate that "These figures are norms or abstract concepts, however, and should not be supplied rigidly."

As indicated on page 160 of the General Plan: “There is considerable variation among the various communities and areas of the City with respect to the actual facilities provided, total acreage and acres/1000 population.” On this same page, the General Plan acknowledges that “...the type of facilities and services and the space arrangements should relate to the population and use characteristics of the area served. The space and equipment indicated as desirable for them should be considered guidelines and not fixed needs.” The General Plan also recognizes that “In older, already developed parts fo the City, where recreation is difficult to acquire, efforts should be directed toward providing staff and facilities which compensate for deficiencies in acreage. Land, equipment, and supervision in varying proportions can still add up to recreation opportunity and service to the residents.”

The downtown area is treated differently than other areas within the City. This fact is further recognized by City of San Diego Strategic Framework Element which establishes an approach to, “Develop alternative methods of providing parks and recreational areas to meet the needs of urban and built-out communities, recognizing available land constraints and seizing opportunities for the creation of more accessible parks and integration of public space and recreation. Some examples include additional or enhanced structures within park and recreational areas, public plazas, pocket parks, urban trails, linear parks, and joint use facilities.”

The Proposed Downtown Community Plan embraces the City’s goals for new park development concurrent to meet the needs of the growing population. The Community Plan represents major advances in achieving new park space for downtown residents. In East Village, which will experience a substantial amount of the new population growth, the proposed Community Plan designates three new parks. The Proposed Community Plan and Centre City PDO also establish a Transfer of Development Rights (TDR) program for achieving the new park land. The Proposed PDO requires developments to integrate open space and recreational facilities. Lastly, the development impact fees for parks that are collected downtown will reinforce the implementation strategy.

In light of the unique circumstances associated with downtown and the flexibility included in the park goals, the proposed Community Plan would not be substantially inconsistent with the Recreation Element of the General Plan. As noted on page 5.1-22, the per capita park ratio would be 1.47 acres per 1000 residents. It should also be noted that this ratio is conservative because

COMMENTS

RESPONSES

it does not include Balboa Park. As noted on page 161 of the Recreation Element, parts of resource-based parks including Balboa Park "...can and do function to fulfill local neighborhood and community park needs of surrounding residents." If only 10% of the 1,200 acres of Balboa Park were counted toward downtown's needs, the overall ratio would equal the 2.8 acre/1000 ratio identified in the comment.

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RESPONSES

Downtown Community will want to participate in organized team sports and programmed recreation activities for themselves or their children which typically occur in community parks. Currently, large park acreage deficiencies exist in the surrounding communities which would be exacerbated by Downtown Community residents utilizing those limited resources.

7.2 Attached for your use is the Park and Recreation Department’s population-based park inventory which has been updated to include some of the park facilities identified as existing or proposed in the Draft EIR.

Specific comments:

7.3 Page 4-19, Park/Open Space
Typically, “small cafes” in and of themselves are not considered appropriate facilities for population-based parks (e.g., neighborhood, community and mini parks which serve a neighborhood recreation need.)

7.4 Page 4-27, 4.5.2.2 Parks, Open Space, and Recreation (Chapter 4)
Although streetscapes and plazas with pedestrian orientation are desirable elements of community, they should not be counted towards meeting park standards unless they incorporate some form of passive recreational amenities, such as fitness stations, benches tables, walking or running tracks, outdoor stage area, children’s play equipment, etc.

Page 5.1-22, 5.1.3.4 Substantially increase the physical deterioration of existing neighborhood, community or regional parks through excessive use (LU-D)

7.5 First Paragraph - The City of San Diego has a Joint Use Agreement with the San Diego Unified School District for Washington Elementary School which allows the community to access the school playground before and after school hours and on weekends and holidays. The City does not have such an agreement with for San Diego High School because of the intensive intramural sports team use by the school which does not allow time for community use. Additionally, the City has no formal agreement to utilize landscaped areas owned by the Community College District for park purposes and should not be regarded as such.

7.6 Second Paragraph - The mathematical calculations in this paragraph are misleading. The calculation used both existing and approved park acreage, but used only existing population. The calculation should include both existing and approved park acreage, and population, but not include the acreage and population proposed by the community plan update. Assuming, for discussion purposes, that the existing and “pipeline” park acreage is 104 acres, this represents 2.5 acres per 1,000 residents using the current and “pipeline” population ($104 \div 41,400 \times 1,000 = 2.5$ acres/1,000) not 4.0 acres per 1,000 as stated. The reduced 55.6 acres represents 1.34 acres/1,000 residents, not 2.0 acres per 1,000 as stated.

7.2 Comment noted.

7.3 Downtown is a unique, urban environment, and small cafes are a common feature in parks and open spaces in the downtowns of major cities. Such uses are a common feature of successful urban parks because they activate and populate recreation areas. Page 159 of the Recreation Element indicates that other recreational opportunities “...include sports fields, open space parks, plazas, large and small landscape areas and mini-parks.”

7.4 See response to comment 7.3.

7.5 Although no formal agreement may exist with San Diego High School, its sports fields are available when not in use for school activities. Similarly, although no formal agreement may exist with the San Diego Community College, the lawn areas are open to the public and are commonly utilized. Thus, inclusion of these areas is considered appropriate.

7.6 As discussed in response to comment 7.1, the Recreation Element does not establish a hard and fast rule for providing parkland to the various communities within the City of San Diego. As further indicated in response to comment 7.1, the per capita ratio of parkland would be consistent with the inclusion of a small portion of Balboa Park.

COMMENTS

RESPONSES

7.6
Cont.

The existing and proposed park acreage identified in the proposed Downtown Community Plan (104 and 130.8, respectively) should only include the land owned by a government agency or where the City has received authorized usage via an executed agreement.

represents .86 acres per 1,000 residents

Page 5.1-25, Table 5.1-1 Existing Downtown Parks and Open Space

7.7

Attached is the Park and Recreation Department's Inventory and Needs statistics for Center City which has been revised to show the existing population-based park acreage and the additional acreage proposed in the Downtown Community Plan. This Table should be revised to jibe with the inventory of record which is based on City property records.

The locations and sizes of the "Other approved and under-development parks" should be identified so the acreage can be verified.

Also attached is a GIS aerial photo showing the acreage and park names of record for the area noted as Martin Luther King, Jr. Promenade in the Draft EIR for your use.

Page 5.1-26, Improved Accessibility

7.8

Although the Park and Recreation Department supports the Community Plan's proposals to "...increase the number, variety, quality, and accessibility of park space...", it does not agree that "...there would be no significant impact to parks and recreations." The existing and proposed park acreage of 130.8 represents 1.47 acres per 1,000 residents at full community development (130.8 ÷ 89,100 population x 1,000 = 1.47 acres/1,000). If the non-governmental land is removed from the calculation as done on Page 5.1-22, the result is 82.40 acres ÷ 89,100 x 1,000 = .93 acres/1,000. These figures are well below the 249.48 population-based park acreage recommended by the General Plan for 89,100 residents and should be discussed in this EIR as an unmitigated impact. A large impact will be felt in adjacent communities, which are already deficient in population-based park acreage, where team sports and recreational activities are programmed at park and recreation facilities.

Deborah Sharpe, Project Officer II
Park Planning and Development

Attachments: Centre City Population-Based Park Acreage Needs Statistics
GIS Aerial Photo of parks along Harbor Drive

Cc: Ted Medina, Park and Recreation Director
April Penner, Deputy Director, Park Planning and Development Division
Park and Recreation Department

7.7 The information in this table was drawn from the Proposed Community Plan. If this Plan is modified to reflect any of the information contained in the table, it will be included in the FEIR.

7.8 As indicated in response to comment 7.1, the planned parkland in downtown is not considered inconsistent with the Recreation Element.

Centre City		9/19/2005		
Population-Based Park Needs		CDCD POPULATION		
DU X PPH	2004	2030	DU X PPH = POP	
Population	21,237	89,100	53,100	DU
Population-Based Park Acreage	59.46	249.48	1.68	PPH
2.8 acres/1,000 population = acres required			89,100	POP
(Source: Land Development Code)	PPH	1.41 PPH	1.62	
PARKS by CLASSIFICATION				
	Gross Acres	Developable Acres	Useable Acres	Future Acres
Community	0.00	0.00	0.00	0.00
SUBTOTAL	0.00	0.00	0.00	0.00
Neighborhood				
Amici Park	1.16	1.16	1.16	0.00
Children's Park	1.68	1.68	0.00	0.00
Civic Center Plaza	1.38	1.38	0.00	0.00
Civic Square (future)	0.00	1.40	0.00	1.40
College "Plaza"(future)	0.00	0.46	0.00	0.46
County Admin.	6.00	14.80	6.00	8.80
East Village(future)	0.00	4.10	0.00	4.10
Embarcadero North	9.90	9.90	9.90	0.00
Embarcadero South	10.60	10.60	10.60	0.00
Freeway lids (future)*	0.00	11.20	0.00	11.20
Heath Davis House	0.12	0.12	0.12	0.00
Horton Plaza	0.49	0.49	0.49	0.00
King Promenade	0.45	0.45	0.45	0.00
Marina Linear Park*	3.01	3.01	3.01	0.00
N. Embarcadero Prom.	11.80	11.80	11.80	0.00
N. Central Square (future)	0.00	0.60	0.00	0.06
Old Police Headquarters*	0.00	1.00	0.00	1.00
Pantoja Park	2.13	2.13	2.13	0.00
Park In the Park	2.80	2.80	0.00	0.00
Post Office Sq. (future)	0.00	0.60	0.00	0.60
Rose Park (future)	0.00	1.40	0.00	1.40
St. Joseph's (Cortez) (fut.)	0.00	1.15	0.00	1.15
SUBTOTAL	51.52	82.23	45.66	30.17
Joint Use				
Washington E.S.	1.05	1.05	1.05	0.00
SUBTOTAL	1.05	1.05	1.05	0.00
* VERIFY ACREAGE				
Total Park Acreage	52.57	83.28	46.71	30.17
	gross	developable	useable	future
			acres	acres
			developed	

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COMMENTS

RESPONSES

Total Population-Based Acreage			
2004			
	52.57	acres existing	46.71 acres existing
	59.46	acres required	59.46 acres required
	(6.89)	deficit gross	(12.75) deficit useable
<hr/>			
2030			
	52.57	acres existing	46.71 acres existing
	30.17	future acres	30.17 future acres
	249.48	acres required	249.48 acres required
	(166.74)	deficit gross	(172.60) deficit useable
<hr/>			
Neighborhood and Community Park Population-Based Park Goals:			
Neighborhood Parks (10 ac./ 5,000 people)		Community Parks (20 ac./ 25,000 people)	
	Req. Park Acres	Required Ac. Minus Current Park Ac.	
2004	Neighborhood Park Ac.	42.47	4.24 surplus useable
	Community Park Ac.	16.99	(16.99) deficit useable
		59.46	(12.75) deficit useable
<hr/>			
2030	Neighborhood Park Ac.	178.20	(101.32) deficit useable
	Community Park Ac.	71.28	(71.28) deficit useable
		249.48	(172.60) deficit useable

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CityDUPPH2030.XLS Page 2



THE CITY OF SAN DIEGO

September 1, 2005

Alexandra Elias
Centre City Development Corporation
225 Broadway, Suite 1100
San Diego, CA 92101-5074

Subject: Review of the Traffic Sections of the Draft Downtown Community Plan dated June, 2005 and the EIR dated July, 2005

Dear Ms. Elias;

Thank you for giving us the opportunity to review the Traffic Sections of the Draft Downtown Community Plan and EIR. The following are our comments:

Community Plan:

- 1) Figure 7-1- Street Typologies Map- Columbia St and Commercial Street do not connect with a green street parallel to Harbor Drive as shown on this map.
- 2) Page 7-2 – last bullet- The City does not support the removal of Cedar Street off-ramp nor the conversion of Cedar Street from one-way to two-way traffic. This bullet should be removed as a significant change in the street system as indicated on this page. Also, remove any reference to the street cross sections that have been removed from this plan. This comment also pertains to the EIR.
- 3) Page 7-5 – Remove the photo and text indicating the “removal of the Cedar Street off-ramp. Also, remove any reference to the street cross sections that have been removed from this plan.
- 4) Each community plan in our City typically includes a Future Roadway Classification map and Future Average Daily Traffic map in the Transportation Section. Please include a map showing the Future Roadway Network Modifications that will be adopted as part of this plan update and a Future Average Daily Traffic map in the Transportation Section of the Community Plan. The Community Plan serves as the final adopted document that is frequently referenced by City Engineers in the future.

Transportation, Circulation, Access and Parking Section of the Draft EIR:

- 1) Page 5.2-19, Table 5.2-9: The following improvements that are identified in this Table are either opposed by the City or not supported in the Traffic Study:
 - Convert Cedar Street from Front St to Fifth Avenue to two-way, 2 lanes and removal of the off-ramp from I-5.



Planning Department
202 C Street, MS 5A • San Diego, CA 92101-3865
Tel (619) 236-6479 Fax (619) 236-6478

SEP 26 2005

Orig. To: _____
Copy To: _____

8.1
8.2
8.3
8.4

8.5

8.1 Comment noted. The referenced figure will be corrected as necessary.

8.2 Comment noted. The deletion of the Cedar Street off-ramp and the conversion of Cedar Street to two-way operation have been identified as a desirable improvements to the downtown roadway network. Actual removal of the off-ramp would only occur after further more detailed studies and approval of Caltrans. It should be noted that the deletion of the Cedar Street off-ramp has been identified as resulting in significant traffic impacts in the EIR.

8.3 See response to comment 8.2

8.4 Comment noted. Figure 7-1 of the Community Plan identifies the future roadway classifications. Inclusion of a map indicating future traffic volumes is not considered necessary.

8.5 See response to comment 8.2.

Page 2 of 2
Alexandra Elias
September 1, 2005

- 8.6 • Convert C Street from Park Blvd to I-5 to two-way, 2 lanes. Links to freeways should be maximized in capacity.
- 8.7 • Convert G Street from Front St to First Avenue to two-way, 3 lanes. This is not consistent with the one way street conversion recommended by CCDC for improved railroad crossings. Change to state; Convert G Street from Kettner Boulevard to First Avenue.
- 8.8 • Convert Sixth Avenue from I-5 to Ash Street to two-way, 2 lanes.
- 8.9 • Convert Eighth Avenue from Ash Street to G Street to one-way, 2 lanes.
- 8.10 • Reduce Ninth Avenue from Ash Street to Market Street from one-way, three lanes to one-way, two lanes.

The following additions are recommended:

- Open B Street from First St. to Third Street
- 8.11 2) Page 5.2-44: The EIR states that a number of intersections are not "feasible" mitigations measures. It is our understanding that they are feasible but not desirable because widening would have to occur. Please be clear on this distinction.
 - 8.12 3) Page 5.2-49, Mitigation Measures TRF-A.1-1, second sentence: Please change the word "evaluation" to read "traffic study."

If you have any questions, please do not hesitate to call me at 619-236-6496.

Sincerely,

Linda J. Marabian
Senior Traffic Engineer

cc: Keith Greer, Planning Department
Lara Gates, Planning Department
Charles Richmond, Development Services
Ann Gonsalves, Development Services
Deborah Van Wansele, Transportation Department

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- 8.6 The conversion of C Street between I-5 and Park Boulevard to two-way operation has been included with the objective of improving access and circulation to adjacent land uses in the area. The traffic analyses conducted as part of the EIR did not identify any resulting impacts associated with this modification.
- 8.7 The conversion of G Street from one-way to two-way operations from Front Street to First Avenue has been assumed as part of the Community Plan. Subsequent to the EIR traffic analyses, conversion of G Street from one-way to two-way operation from Kettner Blvd. to First Avenue was identified as part of an overall strategy to improve safety at the downtown at-grade rail crossings. This change will be noted and included in the Community Plan.
- 8.8 As noted, the EIR traffic analyses concluded that the conversion of Sixth Avenue from the existing one-way operation to two-way operation, between Ash Street and I-5, would result in significant and unmitigated traffic impacts. The proposed modification will therefore not be assumed as part of the Community Plan.
- 8.9 As noted, the EIR traffic analyses concluded that the reduction of Ninth Avenue from three lanes to two lanes between Ash Street and Market Street would result in unmitigated traffic impacts. The proposed modification will therefore not be assumed as part of the Community Plan.
- 8.10 Due to the potential for significant impacts on adjacent land uses (specifically the existing Community Concourse), the opening of B Street between First Street and Third Street has not been assumed as part of Community Plan.
- 8.11 The feasibility determination for the intersection mitigation measures was based upon an assessment of the physical availability of right-of-way to implement the required improvement. In a number of instances, limited building set backs along with required sidewalk widths, limited the feasibility of the required mitigation measures.
- 8.12 Comment noted. The suggested change will be incorporated.



THE CITY OF SAN DIEGO

IN REPLYING
PLEASE GIVE
OUR REF. NO.
59921

September 12, 2005

Alexandra Elias, Senior Planner
Centre City Development Corporation
225 Broadway, Suite 1100
San Diego, CA 92101

Dear Ms. Elias:

On behalf of the San Diego Police Department, I would like to submit the following corrections to the law enforcement sections of Chapter 5.4, Public Facilities and Services, of the draft Downtown Community Plan EIR.

9.1 It is stated in section 5.4.1.4, Law Enforcement, that the Central Division substation has a staff of 178 and serves a population of approximately 85,900. Currently, the population served by Central Division is approximately 86,700 and, as of the date of this letter, there are actually 160 officers working out of Central Division. In this section it is also stated that, "The officers are made up of detectives, community service officers, sergeants, lieutenants and a captain." A more accurate representation of the breakdown of these 160 officers would be to state that, "The officers are made up of patrol officers, detectives, sergeants, lieutenants and one captain."

9.2 Also included in section 5.4.1.4 is reference to the Police Department's goal of maintaining an officer to population ratio of two officers per one thousand residents. This section states that, "Currently the ratio is 3.5 officers per 1,000 residents, which exceeds the established goal." In fact, the current ratio of officers to one thousand residents is 1.55.

9.3 In addition, it is stated in section 5.4.1.4 that, "SDPD has recommended an increase in staff of 38 officers over the next five years, plus equipment, and an increase in civilian staff as well." After conducting a more detailed analysis of the anticipated growth in population in the downtown area and the corresponding increase in calls for service, the Police Department recommends the addition of 43 officers, four detectives, eight sergeants, two command staff, and five civilians, for a total of 62 additional personnel, over the next fifteen years.

9.4 The existing Central Division substation, located at 2501 Imperial Avenue, will not accommodate the 62 additional personnel and, therefore, a new police substation in the northwest area of downtown would also need to be sited to support the demand for services. The need for



Office of the Chief of Police
1401 Broadway • San Diego, CA 92101-5729
Tel (619) 531-2000

CENTRE CITY
DEVELOPMENT
CORPORATION

SEP 14 2005
Orig. To: Alex

- 9.1 The updated information has been included in the FEIR. However, the updated information regarding police staffing does not change the conclusion of the EIR that the current police force would not be sufficient to meet the per capita goal of the police department.
- 9.2 Comment noted. CCDC is uncertain how the existing ratio was misstated. However, the updated information reflects a change in the current staffing levels and would not change the conclusion of the EIR that the current police force would not be sufficient to meet the per capita goal of the police department.
- 9.3 Comment noted. However, the updated information regarding police staffing does not change the conclusion of the EIR that the current police force would not be sufficient to meet the per capita goal of the police department.
- 9.4 While the comment indicates that a new substation would be required to accommodate the additional police staff needed to serve the buildout of downtown under the Proposed Community Plan, the EIR can not evaluate potential physical changes which may occur from this new substation. Because no specific site has been identified, any analysis would be speculative under Section 15145 of the CEQA Guidelines and need not be addressed in this EIR. Environmental review would be required at the time a specific site is identified.

Page 2
Draft Downtown Community Plan EIR
September 12, 2005

9.4
Cont.

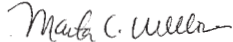
approximately 60 parking spaces for Department, employee, and public vehicles should be considered when identifying a site for the substation.

9.5

Section 5.4.3.1, Environmental Impacts/Demand for New or Expanded Public Service Facility, includes many references to the incorrect information described above. For consistency purposes throughout the law enforcement sections of the document, please ensure that the corrections to section 5.4.1.4 are also reflected in section 5.4.3.1.

Please contact me at (619) 531-2662 if you have any questions regarding this information.

Sincerely,



Marta C. Williams
Program Manager
San Diego Police Department
Facilities Management and Development Unit

cc: Howard Kendall, Acting Assistant Chief of Police, Training, Community Relations and Support Services
Bruce Pfefferkorn, Acting Assistant Chief of Police, Special Operations
Joel Bryden, Captain, Central Division
Chris Haley, Supervising Management Analyst, Crime Analysis Unit

5.4.3 Environmental Impacts
5.4.3.1 Demand for New or Expanded Public Service Facility

9.5 The text has been revised to reflect the updated information presented in the comment letter.



Air Pollution Control Board
 Greg Cox District 1
 Dianne Jacob District 2
 Pam Slater-Price District 3
 Ron Roberts District 4
 Bill Horn District 5

September 2, 2005

Alexandra Elias
 Centre City Development Corporation
 225 Broadway, Suite 1100
 San Diego, CA 92101-5074

**DISTRICT COMMENTS ON THE DEIR FOR
 THE PROPOSED DOWNTOWN COMMUNITY PLAN UPDATE**

The San Diego County Air Pollution Control District (District) has reviewed the subject Draft Environmental Impact Report (DEIR) and submits the following comments.

Relationship to Regional Air Quality Planning

The proposed plan emphasizes mixing of land uses, multiple dispersed recreation opportunities, development of walkable neighborhood centers, providing a better pedestrian environment overall, and increasing transit services. The various smart growth elements of the plan meet or exceed strategies outlined in the District's publication, *Tools for Reducing Vehicle Trips Through Land Use Design*. Providing more housing opportunities Downtown, where alternatives to automobile use are available and will be further enhanced, should result in lower regionwide mobile source emissions relative to the no-project scenario.

Construction-Related Emissions

The DEIR finds that localized particulate matter emissions from construction will be significant and commits to mitigation measures to reduce this impact. The list of strategies to reduce onsite generation of dust is appropriate. However, it is important to note that despite common use of such control strategies, the District receives numerous dust-related complaints from residents and businesses near construction sites throughout the County. CCDC should work with the District and the City of San Diego Development Services Department to ensure the stated mitigation measures are adhered to closely.

With regard to engine emissions from construction equipment, the DEIR states that "Emissions standards for new construction equipment require soot filters" (at 5.8-7). However, under the current regulatory schedule, particulate traps for off-road diesel engines will not be required for many years. In addition, there is no guarantee that new engines will be used on Downtown construction sites. Also, construction at different

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10.1

10.1 While CCDC has no direct authority to assure implementation of dust control, the City of San Diego would, through its Grading Ordinance.

10.2


sites may expose residents for a number of years without respite, with more continuous exposure for those who both live and work Downtown. Accordingly, Mitigation Measures 8, 12, and 13 (section 5.8.4) requiring use of alternative-fueled and/or particulate filter-equipped construction equipment, where feasible, is appropriate. However, for situations in which use of alternative-fueled or particulate filter-equipped equipment is not feasible, an additional mitigation measure should be added which requires construction contractors operating Downtown to use their newest, least-polluting equipment whenever possible.

Co-Location With Industrial Uses

Another area of concern is the potential exposure of sensitive populations to acutely toxic materials, or long-term exposure to sub-acute levels of potentially carcinogenic materials. The DEIR finds that the Plan will discourage the development of new industrial sources within the Plan boundaries. However, the potential exists to locate intensive residential, commercial, or mixed uses in close proximity to existing industrial uses at the southwest corner of the plan area, and near freeways. Appropriately, the DEIR gives consideration to the California Air Resources Board's recently issued guidance, *Air Quality and Land Use Handbook: A Community Health Perspective*. Planning for sensitive land uses in areas closest to the sources examined in this guidance should consider localized patterns of emissions, meteorology, occupation of proposed land uses, and wind patterns that may affect on-site exposure. The setbacks described in the ARB guidance and discussed in the DEIR (at 5.8-10) should be implemented whenever possible.

Thank you for the opportunity to comment. Please feel free to contact me with any questions, at 858-650-4671 or andy.hamilton@sdcounty.ca.gov.

Sincerely,


Andy Hamilton
Air Quality Specialist

CENTRE CITY
DEVELOPMENT
CORPORATION
SEP 7 2005
Orig. To: _____
Copy To: _____

10.2 The following provision has been added to Mitigation Measure AQ-B.1:

If alternative-fueled and/or particulate filter-equipped construction equipment is not feasible, construction equipment shall use the newest, least-polluting equipment, whenever possible.



SAN DIEGO COUNTY OFFICE OF EDUCATION

6401 LINDA VISTA ROAD, SAN DIEGO, CALIFORNIA 92111-7399 (858) 292-3500

Superintendent of Schools
Rudy M. Costruito, Ed.D.

August 22, 2005

Alexandra Elias
Senior Planner
Centre City Development Corporation
225 Broadway, Suite 1100
San Diego, CA 92101-5074

234.0381

RE: Response to Notice of Preparation of a Draft Program Environmental Impact Report (EIR)

Dear Ms. Elias:

The San Diego County Office of Education (COE) is in receipt of the Notice of Availability for a Draft Environmental Impact Report (EIR) for San Diego Downtown Community Plan, and amendments to the Redevelopment Plan for Centre City Project Area and Planned District Ordinance. This letter constitutes our response to the notice.

The COE provides a variety of school and educational services to County residents. Unlike local school districts, the COE provides its services throughout the County, making it the equivalent of a countywide school district. As a result, the COE is affected by new development wherever it occurs in the County.

Some COE programs provide direct services to students, including children (infants, pre-school, and students in grades K-12) as well as adults. Other COE services are provided through public schools, including all forty-two school districts and all five community college districts in the County. These services include staff development for teachers and current and prospective administrators as well as numerous management support services. The following COE programs may be affected by the Draft Environmental Impact Report (EIR) for San Diego Downtown Community Plan, and amendments to the Redevelopment Plan for Centre City Project Area and Planned District Ordinance:

- Regional Occupation Program
- Hope Infant Handicapped Program
- Migrant Education Program
- Outdoor Education Program
- Teacher Training and Development
- Administration Training and Development
- COE Administration

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DEVELOPMENT
CORPORATION

AUG 29 2005

Orig. To: _____

Copy To: _____

Board of Education

Nick Aguilar Ernest J. Dronenburg, Jr. Susan Hartley Robert J. Watkins John Witt

SERVICE AND LEADERSHIP

11.1

11.1 Comment noted. While the operations of the COE may be affected by the increased number of residential units downtown, the focus of the EIR was on the San Diego Unified School District because specific schools within and around downtown would be directly impacted by future students. Furthermore, if future residential demand is not met in the downtown, other areas of the county would likely experience more growth than may have been assumed by the COE. Thus, serving an expanding population would face COE regardless of whether the Proposed Community Plan is approved.

COMMENTS

RESPONSES

Page 2
Response to Notice of Preparation
of a Draft Program Environmental Impact Report (EIR)

11.2

We encourage and support cities and counties in the use of the redevelopment process and tax increment revenues for the elimination of blight and to improve the economic viability of areas. However, school districts and the COE will be impacted due to increases in population.

11.3

Based on the future 53,100 residential units the local school district and the COE will be impacted. The student yield factor used in the draft EIR to generate the number of students is to conservative. We feel a more realistic yield factor, which is recommended by the state is, 0.5 for Elementary School Districts, 0.2 for High School Districts and 0.7 for Unified School Districts.

We look forward to working with the Agency to reduce or fully mitigate these impacts in creative and mutually beneficial ways when possible. If you have any questions regarding this correspondence, please feel free to contact me at (858) 292-3680.

11.2 Comment noted with respect to the impact of increased population on schools. However, the use of redevelopment and tax increment funding is not an issue which is required to be addressed under CEQA.

11.3 The student generation rates were derived from direct consultation with the Instruction Facilities Planning Department of the San Diego Unified School District.

SAN DIEGO COUNTY
REGIONAL AIRPORT AUTHORITY

P.O. BOX 82776, SAN DIEGO, CA 92138-2776
619.406.2400 WWW.SAN.ORG

September 12, 2005

Centre City Development Corporation
Attn: Ms. Alexandra Elias
225 Broadway, Suite 1100
San Diego, CA 92101-5074

SUBJECT: Draft Environmental Impact Report for the San Diego Downtown
Community Plan, Centre City Planned District Ordinance and Redevelopment Plan for
the Centre City Area (SCH #2003041001)

Dear Ms. Elias:

Thank you for the opportunity to review and comment on the Centre City Development Corporation's (CCDC's) Proposed Downtown Community Plan Update; Environmental Impact Report (EIR) and Planned District Ordinance (PDO). The San Diego County Regional Airport Authority (Authority), acting in its capacity as the Airport Land Use Commission (ALUC) for San Diego County and the operator of San Diego International Airport, has a direct interest in the land use policies that the Downtown Community Plan Update, EIR and PDO will contain. To assist you in addressing these comments, the Authority has identified comments first as they relate to the Airport Land Use Commission consistency determination process for the Community Plan Update and second to the Airport Land Use Compatibility Plan (ALUCP) and San Diego International Airport.

ALUC Consistency Determination Process for the Community Plan Update

One of the fundamental responsibilities of the ALUC, as defined by Section 21670.3 of the California Public Utilities Code, is to coordinate with municipalities and airport operators on land use issues surrounding airports within San Diego County and review local agencies' land use plans, airport plans and certain other land use projects for compliance with the criteria and policies set forth in the applicable Airport Land Use Compatibility Plan (ALUCP). The purpose of this requirement is to minimize the public's exposure to excessive noise and safety hazards within the areas around public and military airports - to the extent that these areas are not already developed with incompatible uses. The manner in which this function is accomplished is through the enforcement of the ALUCP land use compatibility policies.

As you are aware, the Authority is currently in the process of preparing an updated ALUCP that includes all of the public-use and military-use airports in the County. This ALUCP will provide for the orderly growth of each airport, and the area surrounding each airport within the Authority's jurisdiction, and will provide policies to safeguard

SAN DIEGO
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Centre City Development Corporation
Ms. Alexandra Elias
September 12, 2005
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In an effort to support a more efficient use of your staff's time, the Authority would propose to work with your staff prior to the adoption of the Downtown Community Plan Update and PDO to incorporate as many of the noise and safety constraints identified in the ALUCP as feasible. During the past year Authority staff has been working cooperatively with City staff to address the concerns regarding potential land use conflicts between the draft ALUCP's noise and safety restrictions and the future land use desires of the City and CCDC, and to assist the City in ensuring compatible land uses in the vicinity of those airports. We would suggest scheduling meetings between Authority staff and CCDC staff in an attempt to resolve as many issues as possible and allow the Downtown Community Plan Update and PDO amendments to go forward containing policies that will reflect the ALUCP criteria. We recognize that there may be several outstanding ALUCP policy issues that staff may not be able to resolve, and will require direction from the ALUC, but to the extent that we can craft language that serves both our purposes, we would recommend revising the draft Downtown Community Plan documents at this time.

Authority staff would request an opportunity to meet with your staff to provide appropriate revised language at your earliest convenience. We look forward to our continued discussion of the development of the draft Downtown Community Plan Update and amendments to the PDO, taking into consideration the requirements of the ALUCP update and the needs of both agencies to work towards the protection of both the airports and the people of the City.

Please contact Linda Johnson at (619) 400-2463 if you have any questions related to the consistency determination or to schedule a meeting.

Airport Land Use Compatibility Plan and San Diego International Airport

The adopted San Diego International Airport (SDIA) Airport Land Use Compatibility Plan (ALUCP) provides a land use plan for the environs surrounding SDIA, based on noise contour maps and runway protection zones. The ALUCP provides projected noise contours that are important for determining the compatibility of land uses around the airport. It identifies certain land uses as being compatible, conditionally compatible or incompatible with airport uses; and requires mitigation, including sound attenuation and aviation easements for certain development projects that are located within the Airport Influence Area (AIA).

The SDIA ALUCP also establishes land use restrictions in Runway Protection Zone (RPZ) and safety areas to preclude incompatible development from intruding into areas of significant risk resulting from aircraft takeoff, landing and pattern operations.

Centre City Development Corporation
Ms. Alexandra Elias
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In an effort to support a more efficient use of your staff's time, the Authority would propose to work with your staff prior to the adoption of the Downtown Community Plan Update and PDO to incorporate as many of the noise and safety constraints identified in the ALUCP as feasible. During the past year Authority staff has been working cooperatively with City staff to address the concerns regarding potential land use conflicts between the draft ALUCP's noise and safety restrictions and the future land use desires of the City and CCDC, and to assist the City in ensuring compatible land uses in the vicinity of those airports. We would suggest scheduling meetings between Authority staff and CCDC staff in an attempt to resolve as many issues as possible and allow the Downtown Community Plan Update and PDO amendments to go forward containing policies that will reflect the ALUCP criteria. We recognize that there may be several outstanding ALUCP policy issues that staff may not be able to resolve, and will require direction from the ALUC, but to the extent that we can craft language that serves both our purposes, we would recommend revising the draft Downtown Community Plan documents at this time.

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The SDIA ALUCP also establishes land use restrictions in Runway Protection Zone (RPZ) and safety areas to preclude incompatible development from intruding into areas of significant risk resulting from aircraft takeoff, landing and pattern operations.

Centre City Development Corporation
 Ms. Alexandra Elias
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The height of all structures must be reviewed by the CCDC/City to ensure that they conform to Federal Aviation Regulation (FAR) Part 77 Guidelines, using the site development plan review procedure. Any use found to be a "hazard" or an "obstruction which would have a significant adverse impact" by the Federal Aviation Administration (FAA) should be determined not to be in conformance with the ALUCP.

The SDIA ALUCP also imposes density limitations that limit the maximum number of dwellings or people in areas close to the Airport in order to reduce the potential severity of an aircraft accident. Any proposed project located within the Airport Approach Overlay Zone (AAOZ), with certain limited exceptions, may not "intensify human occupancy of the site to an extent greater than 110 percent of the average intensity of existing uses . . . within a one quarter mile radius of the project site."

While the DEIR correctly identifies that the SDIA ALUCP is applicable to development that will occur in the area subject to the provisions of the AIA, the DEIR, particularly Section 5.1.3.1, does not provide an adequate analysis of the implementation of ALUCP policies. There are provisions of the Downtown Community Plan that could result in conflicts or inconsistencies of the provisions of the ALUCP, particularly regarding location of land uses that will increase the number of sensitive receptors in noise impacted areas and the increase in intensity of development in noise impacted areas. The DEIR should provide a detailed analysis of the plan's consistency with the ALUCP policies regarding development in the AIA and the RPZ.

Two of the areas that are of critical concern for SDIA are the Little Italy and Cortez neighborhoods. These areas are located under the approach for the Airport's Runway 27 and departure for Runway 9. These areas are subject to noise generated by arriving and departing aircraft, and uses in this area should be compatible with the on-going operations of a major international airport. As such, the intensity and scale of development in this area are of critical importance.

The majority of the Little Italy neighborhood has been designated for "Mixed Commercial" uses. Unfortunately, the DEIR does not provide a description of the "Mixed Commercial" land use classification, making it difficult to judge the scale and intensity of proposed development in areas subject to this classification. The document should be modified to explicitly define "Mixed Commercial" with sufficient specificity to determine if the proposed uses will be compatible with airport operations.

In addition, the "Core" and "Employment/Residential Mixed Use" land use classifications applied to the remainder of Little Italy lack sufficient specificity to determine what impacts, if any, will result from their application to the Little Italy area, other than the proposed buildout totals provided in Table 4.1-2. The DEIR should

12.1

12.2

12.3

12.1 In response to this comment, CCDC conducted a focused analysis of the proposed uses in the general areas of concern in the Cortez and Little Italy neighborhoods. The analysis focused on the following three issues: (1) proposed intensity of uses, (2) proposed types of uses, and (3) proposed mix of uses.

The proposed intensity of uses is regulated both in the current and proposed Centre City Planned District Ordinances by Floor Area Ratio (or "FAR"). Neither the existing, nor the proposed PDO, contains regulation of units per acre for residential uses. The FAR is the square footage of a proposed development divided by the site square footage. In the areas subject to airport noise and safety requirements, the proposed Centre City PDO contains exactly the same FARs as the existing PDO. Therefore, no increased intensity of uses in those areas is anticipated under the proposed PDO.

Uses that are allowed in the zones contained in the existing and proposed land use districts, especially pertaining to the following noise sensitive receptors (as defined in the Noise Analysis Chapter 5.7) are virtually unchanged as well, as shown in the following table (see Proposed Centre City PDO for specific zone requirements, as these uses have been generalized for discussion purposes):

COMMENTS

RESPONSES

Land Use	Existing PDO	Proposed PDO
Multifamily Residential	P	P
Group Residential	P	P
Live/Work	P	P
Living Units/Single Room Occupancy units	C	C
Senior Housing	C	C
Hospitals	P	P
Colleges & universities	P	P
Performing Arts Theatres	P	P
Religious Assembly	P	P

The analysis demonstrates that the proposed PDO is equivalent, if not more restrictive, than the existing PDO for land uses of specific concern (residential and other “sensitive receptors”).

Finally, downtown is a mixed use environment. Currently, residential uses are allowed throughout downtown, and in some areas (including a portion of Cortez) there is an incentive (in the form of a floor area bonus) for the provision of residential. While the proposed PDO contains incentives for the provision of certain types of housing (affordable and/or family units, for example), it does not provide incentives for general residential. Also, currently, up to 100% of any development may be residential in Cortez and Little Italy, with the exception of a requirement for “Street Level Uses” (or active commercial uses) on a portion of India Street. The land use districts in the proposed PDO require a minimum of 40% (or 80%) ground floor commercial or in some cases not more than 20% ground floor commercial. The areas where these requirements apply cover considerably more area in the proposed PDO than under the existing PDO. Therefore, the analysis shows that the proposed PDO could be expected to result in less residential in the mix of uses than under the existing PDO.

Lastly, application of the guidelines and regulations imposed by the combination of the City’s Proposed Community Plan, Planned District Ordinance, Airport Approach Overlay Zone (AAOZ), and the Airport Environs Overlay Zone (AEOZ) would assure consistency with the existing ACLUCP.

12.2 The proposed Planned District Ordinance provides the more specific level of detail for the types of uses allowed within the Mixed Commercial District. In the PDO, the Mixed Commercial (MC) District is defined as follows:

This district accommodates a diverse, array of uses, including residential, artists' studios, live/work spaces, hotels, offices, research and development, and retail. Commercial and service uses, including light industrial and repair, warehousing and distribution, transportation and communication services that are essential for the livelihood of businesses and residents of the downtown area are also permitted. With the Mixed Commercial District, no more than 20 percent of the ground floor street frontage may be active commercial uses.

A more specific list of uses is contained in the proposed PDO. As indicated, some of the uses are allowed "by right" while others require a permit to assure that the uses are appropriate for the area.

12.3 Section 4.5.2.1 of the EIR provides information on the types of uses allowed under the various land use classifications as well as planned development intensities.

COMMENTS

RESPONSES

Centre City Development Corporation
Ms. Alexandra Elias
September 12, 2005
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provide additional detailed information regarding the types and intensity of uses allowed under these designations.

12.4

Impact LU-B3 on page 5.1-19 identifies aircraft noise as a significant impact. The DEIR states that "(n)oise incompatibility occurs when noise generators are located near sensitive noise receivers." Aircraft noise is an existing baseline condition in the Little Italy and Cortez neighborhoods and is not a result of the adoption or implementation of the Downtown Community Plan and Redevelopment Plan. The DEIR should be revised to indicate that the implementation of the Plans would significantly increase the number of sensitive receptors that would at buildout be located in areas subject to aircraft noise in excess of 65 dB CNEL.

12.5

Policy 5.3-P-1 states that building heights will be restricted "in the approach zone to Lindbergh Field, as required by the Federal Aviation Administration (FAA)." This should be revised to include restrictions on building height under the ALUCP.

12.6

In Chapter 5.2, Impact TRF-A.2.1 identifies that traffic volumes at buildout would have significant impacts on freeways serving downtown, including significant impacts to the southbound I-5 onramp at Grape Street, with levels of service "F" in the AM and PM peak hours. This is of importance to the SDCRAA as the Grape Street onramp to southbound I-5 is an important route for traffic leaving SDIA. It is not clear from the document whether the cumulative impact analysis includes anticipated traffic growth resulting from increased passenger activity at SDIA. The DEIR should include the forecast passenger activity growth at SDIA along with all other applicable regional plans. Similarly, Impact TRF-A.1.2 should analyze traffic volumes on major streets in the neighborhoods surrounding the Downtown Community Plan area including increased traffic anticipated to occur as a result of additional forecast passenger activity at SDIA.

12.7

In Chapter 5.7, the analysis indicates that state and city building requirements mandate that residential and transient occupancy buildings (i.e., habitable rooms) should be attenuated to 45 dB on the interiors. However, the mitigation measures do not adequately demonstrate how this measure will be implemented. In areas where aircraft noise exists, mitigation measures should be adopted and enforced to demonstrate that these land uses will be attenuated to 45 dB on the interior of the structures through the use of sound insulation and an acoustical study prior to the certificate of occupancy. After this is completed, an avigation easement should be required to be issued to the airport operator.

Again, thank you for the opportunity to comment on the Draft Environmental Impact Report for the San Diego Downtown Community Plan, Centre City Planned District Ordinance and Redevelopment Plan for the Centre City Area. If you have any

12.4 As indicated in response to comment 12.1, the Proposed Community Plan would not substantially increase the number of sensitive uses over that which would already occur under the adopted Community Plan.

12.5 The proposed policy will be changed in the Proposed Community Plan to refer to the Airport Approach Overlay Zone. This would supercede the EIR version.

12.6 Expansion of the SDIA is assumed in the SANDAG Series 10 forecast which was the basis for the transportation model which was used in the traffic analysis.

12.7 Noise attenuation is already required under UBC and AEOZ. These regulations require the provision of acoustical studies and plan check review to assure compliance with interior noise limits. In addition, the AEOZ requires avigation easement in areas over 65 CNEL prior to issuance of building permit.

COMMENTS

RESPONSES

Centre City Development Corporation
Ms. Alexandra Elias
September 12, 2005
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questions regarding San Diego International Airport, please contact Ted Anasis at
(619) 400-2478.

Sincerely,



Angela Shafer-Payne
Vice President, Strategic Planning
San Diego County Regional Airport Authority

cc: Board Members, SDCRAA
Thella F. Bowens, President/CEO, SDCRAA
Breton K. Lobner, General Counsel, SDCRAA



September 9, 2005

Alexandra Elias
 Centre City Development Corporation
 225 Broadway Street, Suite 1100
 San Diego, California 92101-5074

Re: Comments on the Updated Downtown Community Plan and Redevelopment Plan

Dear Alex:

SDG&E appreciates the opportunity to review and comment on the above referenced project. Since we provided comments on this project in April 2005, SDG&E has developed some additional information that has been attached for your use and review that may be helpful in developing your plan. These documents are as follows:

- Electric Transmission Relocation Guidelines
- Contact information to assist you in verifying the location and disposition of existing SDG&E facilities near your project;
- Contact information for SDG&E Land Use and Natural Resource Personnel
- SDG&E Environmental Document Preparation Guidelines for Energy
- SDG&E Land Use Design Policy Recommendations
- SDG&E's Ability and Plan to Provide Service: The Long -Term Resource Plan

Furthermore, in keeping with the City's draft General Plan Update elements, SDG&E has several existing programs that meet the intent of the draft General Plan's goals, guidelines and standards that may be appropriate to be reflected within the context of the Downtown Community Plan. These SDG&E programs include:

- SDG&E Existing Residential and Business Energy Efficiency Programs
- SDG&E California Energy Star New Homes Program
- SDG&E Savings by Design Program
- SDG&E Energy Efficiency Construction Training

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Alexandra Elias
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Page 2

13.1

Finally, when locating future electric facilities, SDG&E's goal is to provide safe and reliable service to 1.3 million customers in the region while placing new facilities in compatible land use areas. The locating and permitting of electric facilities such as substations are scrutinized by the California Public Utilities Commission (CPUC), the City and the communities we serve. Also, more often than not, these new facilities require a rigorous public, environmental review process.

Conversely, future residential projects that are proposed adjacent to our existing electric facilities can create concerns and conflicts that should be addressed by developers and the City before a project is approved. Unfortunately, these issues may not receive appropriate, timely consideration, due to a lack of understanding of the facilities' operational issues by the City and/or the developer and perhaps exclusion of SDG&E's involvement upfront.

While a buffer zone or transition zone within industrial, commercial or mixed use areas around SDG&E facilities may be a solution, it is overly simplistic to believe a one-size-fits-all buffer zone will resolve future conflicts particularly in the dense mixed use environment of the downtown area. There will be instances where no buffer zone is necessary and other times where a wider buffer may be appropriate, depending on the type of facilities and surrounding land uses and times where the placement of a typical buffer is not feasible.

SDG&E suggests that the Downtown Community Plan include a mechanism to allow careful scrutiny and review by the planning staff to address these land use and electrical facility compatibility issues so that SDG&E can become involved early in the process to that all affected parties have an opportunity to develop prudent and equitable solutions.

SDG&E would be happy to meet with you and the CCDC team to further discuss ways in which we can partner to assist in achieving the important goals of the Community Plan Update, land use compatibility issues. To find out more about some of the programs outlined previously, visit our web site at <http://www.sdge.com/construction>. Please feel free to contact me with any questions or comments at (858) 637-3713 or in writing at 8315 Century Park Court, CP21E, San Diego, California 92123.

Sincerely,



Christopher P. Terzich, REA
Principal Environmental Specialist, Land Planning

Attachments

13.1 CCDC will work with SDGE in the event future development is proposed adjacent to any of its facilities which could pose a health and safety risk to future occupants. Such conflicts will be identified during the Secondary Study which will be required for new developments. As noted in the comment, each development offers a different potential conflict. Therefore, buffers or other measures are best identified on a development-by-development basis during the Secondary Study process.

SDG&E's Ability and Plan to Provide Service:**The Long –Term Resource Plan****Energy Outlook and Resources**

-- Cost-effective energy efficiency programs are estimated to reduce SDG&E's energy requirements by an additional 9% by 2014. This result is in addition to the accomplishments of SDG&E's past energy efficiency programs, which have already reduced energy needs by roughly 10%.

-- Renewable resources are planned to provide 20% of SDG&E's energy needs in 2010, increasing to 24% by 2014.

-- After accounting for the substantial reductions in energy needs resulting from SDG&E's past and future aggressive and highly successful energy efficiency programs, remaining average year annual energy needs are substantially met by existing SDG&E resources, CDWR contract allocations, and renewable purchases through 2010. In a less probable high-demand year (for example, sustained hot weather), the additional energy will come from additional purchases from the market and from local generation added primarily for grid reliability, as explained further below.

-- As allocated CDWR contracts begin to expire in 2008 and beyond, additional energy resources will be needed. By 2011, approximately 25% of average year energy will come from resource additions, including additional renewable purchases, on- and off-system generation, and purchases from the market, facilitated by the additional import capability provided by the added transmission interconnection.

Capacity Outlook

--Cost-effective energy efficiency and response resources are estimated to meet 10% of San Diego's total capacity need in year 2014.

--By provided 20% of SDG&E's retail energy needs in 2010, renewable resources are estimated to meet roughly 10% of San Diego's total capacity need in that year and 11% in 2014.

-- Beginning in 2011, additional renewable and conventional generation will be needed, including additional on-system resources to meet grid reliability criteria, and a portion of the resource need created by load growth and expiration of the CDWR contracts. If Sunrise were to be reallocated, the timing of these additions would likely change as would the resulting Reliability Must Run (RMR) cost reduction since SDG&E would have "headroom" to accelerate additions of on-system resources.

-- Pursuant to SDG&E's Balanced Portfolio Strategy, a portion of these needed resources are expected to come from on-system resources, and a portion from off-system. While these projections represent a reasonable set of assumptions made years in advance of specific project proposals, SDG&E observes that there may be fine tuning of exact year of need, resource types (for example, a based loaded versus an intermediate loaded plant), and plant location (for example, an on-system resource versus an off-system one).

Transmission Implications

-- By 2010, the plan calls for an additional major transmission project to comply with ISO Grid Planning Criteria, displace existing high-cost RMR generation, provide for the potential retirement of aging local units, deliver additional off system generation—renewable and conventional—to lower costs, increase supply diversity, and replace a portion of the expiring CDWR contracts. SDG&E believes that the benefits of added transmission infrastructure, as described in the testimony of Witness Brown make it a required element of any SDG&E resource portfolio. SDG&E therefore seeks specific authorization in this proceeding to pursue the necessary project approvals to fill this 2010 need. As SDG&E pointed out last year, the question is not whether additional transmission is beneficial; it is how much of a resource portfolio is delivered through transmission rather than on-system generation options to meet resource gaps not filled through energy efficiency and demand response alternatives. In addition, whether SDG&E has the ability to successfully complete these projects in the time frames indicated could impact SDG&E's ability to meet the goal of achieving a 20% renewable energy supply by 2010.

Fuel Diversity

-- SDG&E's ability to add fuel diverse resources is constrained by the nature of its service territory, public policy, and possible limited availability of nonfossil resources. There are few hydro resources in San Diego, and there is no policy support for either local coal-based or additional nuclear resources. Thus, the plan depends on renewable resources (both supply-side and customer-side distributed renewable generation) for fuel diversity, although there is a potential that off-system purchases will come from coal and nuclear plants outside the service territory, further contributing to fuel diversity.

-- The addition of Liquefied Natural Gas (LNG) supplies to California's gas resource mix would provide an opportunity to further diversify the geographical location, delivery system, and cost components of the fuel supply for the gas-fired portion of SDG&E's preferred plan.

Source:

Order Instituting Rulemaking To Promote Policy And Program Coordination And Integration In Electric Utility Resource Planning R.04-04-003, Long-Term Resource Plan Of San Diego Gas & Electric Company (U 902 E) Direct Testimony Before The Public Utilities Commission Of The State Of California, July 9, 2004

Full Text Link:

http://www.sdenergy.org/uploads/7-9-04SDG&E_LTRP.pdf

Statewide Program:

<http://www.cpuc.ca.gov/PUBLISHED/REPORT/49078.htm>

PLEASE NOTE: SDG&E is providing this information to you as a courtesy. SDG&E does not represent that the information contained herein is accurate. SDG&E disclaims all warranties, express or implied, including the warranty of fitness for a particular purpose. You are solely responsible for selecting this information to use and you are solely responsible for any consequences resulting from your use.



SDG&E LAND USE DESIGN POLICY RECOMMENDATIONS

ENERGY FACILITIES

It has become increasingly important to ensure that adequate energy supplies and the means to transmit and convey energy are provided to the built environment. Because the built environment requires energy resources to operate and energy facilities require physical space to produce and convey this critical commodity, energy facilities should be considered a type of land use that requires integration into our land use planning efforts. Given the increasingly urban nature of southern California, the scarcity of suitable facility sites and the sensitivity of conserved resource areas, natural gas and electrical facility planning should become an integral part of all land planning efforts.

Goal: Sensible and efficient electrical and natural gas facility integration into the natural and developed environment.

Objectives:

- Use existing transmission corridors as effective wildlife corridors.
- Provide additional open space buffering between utility facilities and residential development.
- Ensure adequate area is reserved early in the development process for critical electrical service facilities.
- Provide opportunities for other appropriate land uses to be located within overhead electrical facility alignment areas.
- Assure that utility facilities safely integrate into the developed landscape.

Land Use Policies

Energy

- Development located within or adjacent to multiple species habitat plan preserve areas, adjacent to overhead electrical transmission lines and/or easements should incorporate additional open space buffers to maintain a minimum 400-foot width along transmission line routes in areas that would provide connectivity between designated or planned open space multiple species preserves.



- Residential development proposed adjacent to other overhead electrical transmission lines and/or easements should incorporate additional open space, non-building area or rear yard setbacks to provide greater buffering from the transmission facilities.
- Additional open space or non-building area buffer should be integrated into new residential development or redevelopment located adjacent to existing or planned energy generation facilities, gas compressor stations, gas transmission lines, electrical substations and other large scale gas and electrical facilities.
- Redevelopment plans, community plan updates, general plan amendments, new master plans or similar larger scale developments that are located one mile or more from an existing substation should contact SDG&E to determine whether a set aside area of a minimum of two acres net usable pad area is necessary to accommodate a new substation facility based on increased electrical demand. The set aside area for the substation site should be located adjacent to proposed major arterial roadways and intersections and/or existing or planned electrical transmission rights of way. Also, additional right-of-way/corridor area for any necessary extension of transmission lines/facilities to serve the substation should be integrated into the plans. Coordination with SDG&E as to the location and size of the set aside area is essential and should be completed early in the process of formulating the plan, update or amendment. The set aside area can be designated with appropriate alternate land uses in the event the site is not needed for utility use.
- Appropriate secondary land uses should be encouraged to be located within overhead transmission facility rights-of-way when appropriate and could include natural open space, passive parkland, plant nurseries, parking lots, private roads, access ways and driveways based on final review and approval of SDG&E. Trails can also be included as a secondary land use as long as proper indemnification, funding and maintenance language is set forth in a written agreement between SDG&E and the agency and project developer.
- Landscape trees, shrubs and groundcover associated with new development or redevelopment around existing and planned gas and overhead or aboveground electrical facilities should conform to SDG&E's landscape guidelines.

COMMENTS

RESPONSES

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**SDG&E Land Use and Natural Resource Issues
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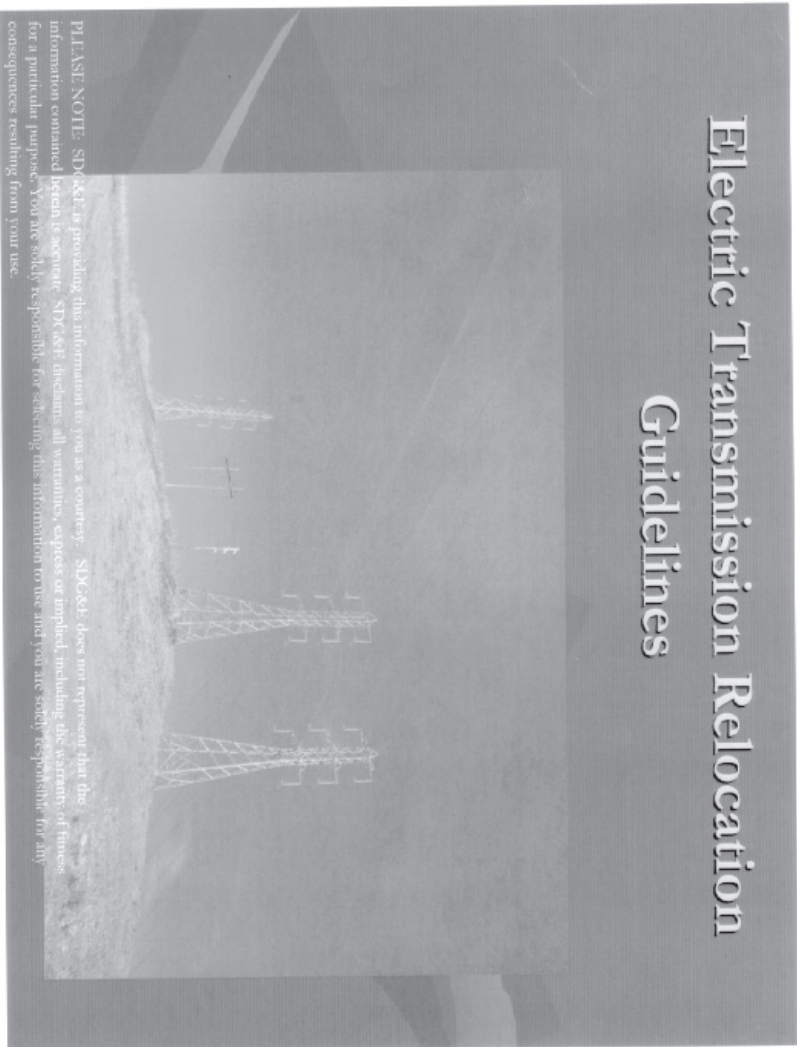
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**Guidelines for Electric Transmission
Line Relocations**


- Guidelines are available to provide assistance to Developers and Local Agencies preparing discussions of electric utility construction or relocation activities in CEQA environmental documents (EIR, MND, ND) addressing the "whole of the action" for their larger projects.
- An adequate discussion of utility activities in the CEQA documents for larger Developer or Agency projects can support SDG&E's claim of exemption from the permitting requirements of the California Public Utilities Commission (CPUC), General Order 131-D (GO 131-D).
- An exemption from CPUC permitting would save time and costs for installing the utility facilities that are part of a Developer's or Agency's larger project. In cases where SDG&E cannot make a claim of exemption, the use a CEQA document prepared by a Developer or Agency as the environmental document for CPUC permitting would have the potential to reduce that permitting timeframe.

Transmission Line Relocation – Rancho Theoretical



- EIR must describe and analyze all impacts and provide mitigation for the relocation to avoid:
- Piecemealing
- Supplemental, Subsequent EIR or Addendum to meet the requirements of CPUC GO 131D
- Costly construction delay of six months or more
- Impacts are mostly associated with biological resources, visual/aesthetics, construction, land use and cultural/paleontological.

Transmission Line Relocation – Rancho Theoretical (continued)

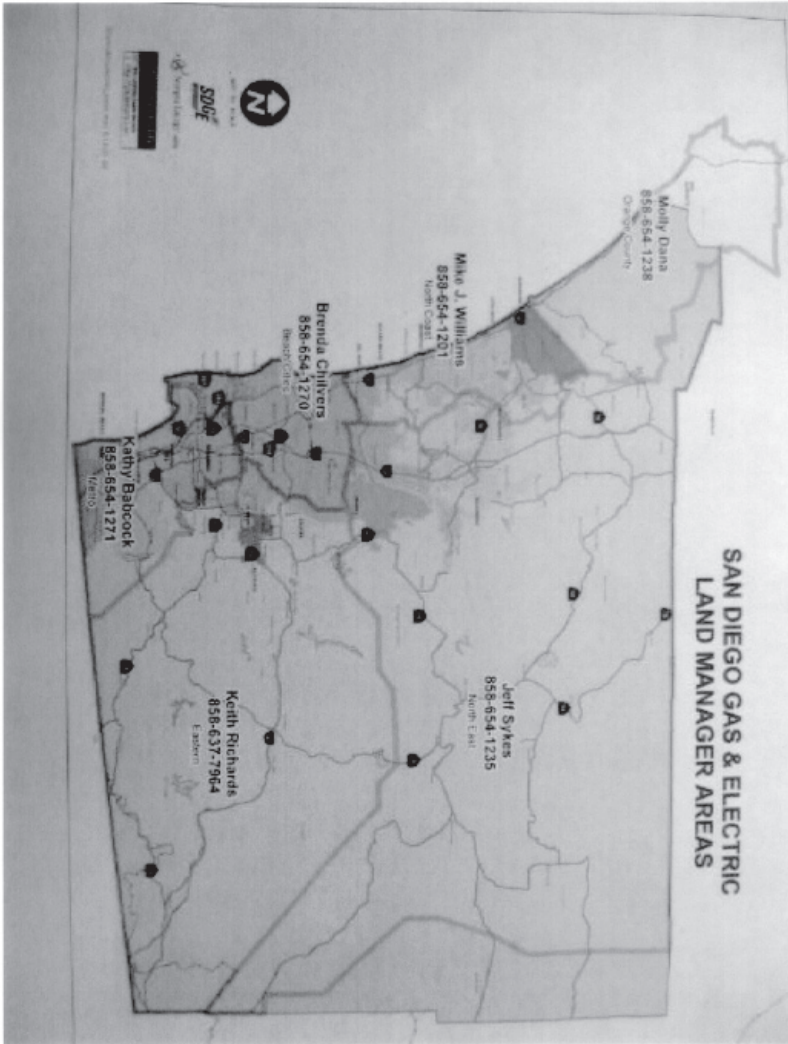


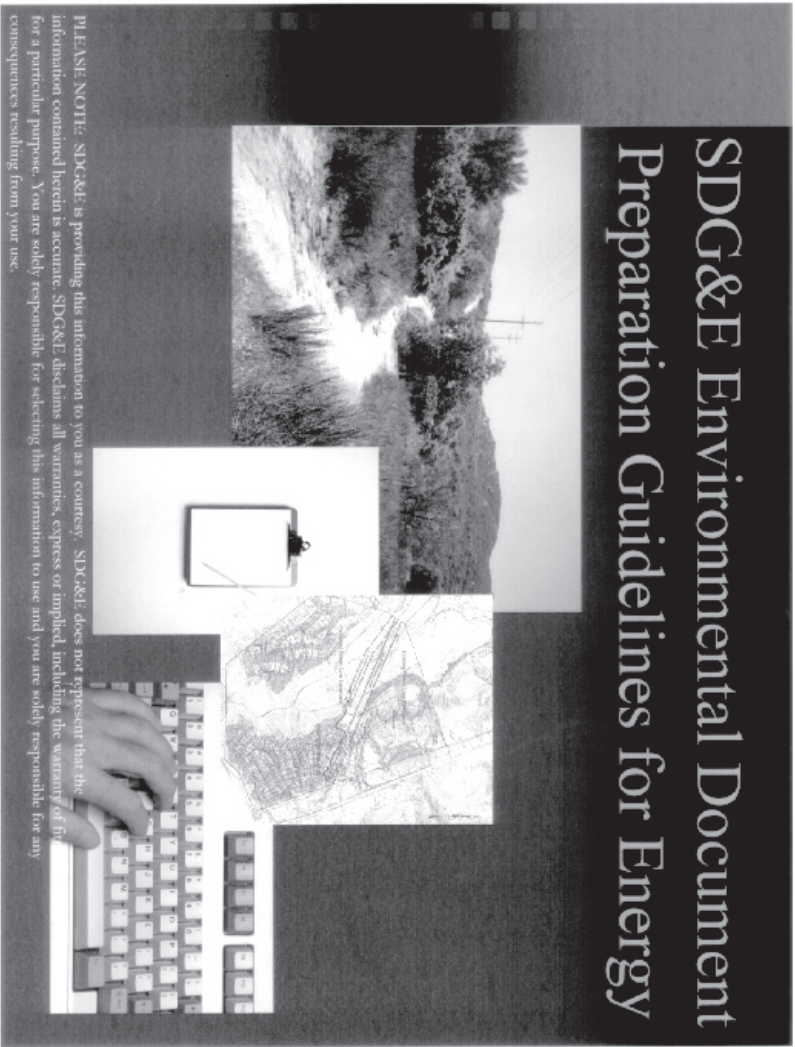
The map displays a topographic view of a landscape with contour lines. A central feature is a 'Proposed Power Line Easement' shown as a shaded area. To its left, an 'Existing Power Line Easement' is also indicated. A section of the map is labeled 'Underground', suggesting the proposed line's path. The map includes various terrain features and what appears to be a road or utility corridor.

- EIR relocation analysis should include:
 - Impacts associated with removal of existing poles and related facilities
 - Impacts from trenching for underground facilities located outside of the development footprint
 - Impacts from access road construction, pulling sites and pole excavation for overhead facilities
- Contact SDG&E early in the EIR preparation process for guidelines to assist in determining these impacts.

- Contacts to Determine the Location and Disposition of SDG&E Facilities
- SDG&E Land Managers will assist with:
 - The location of SDG&E facilities, rights-of-way or property
 - Utility relocation issues
 - The use of or encroachment into rights-of-way and easements and associated access
 - Residential subdivisions and other projects proposed adjacent to SDG&E facilities, easements or rights-of-way
 - SDG&E Land Manager contacts are assigned geographically as shown on the following slide

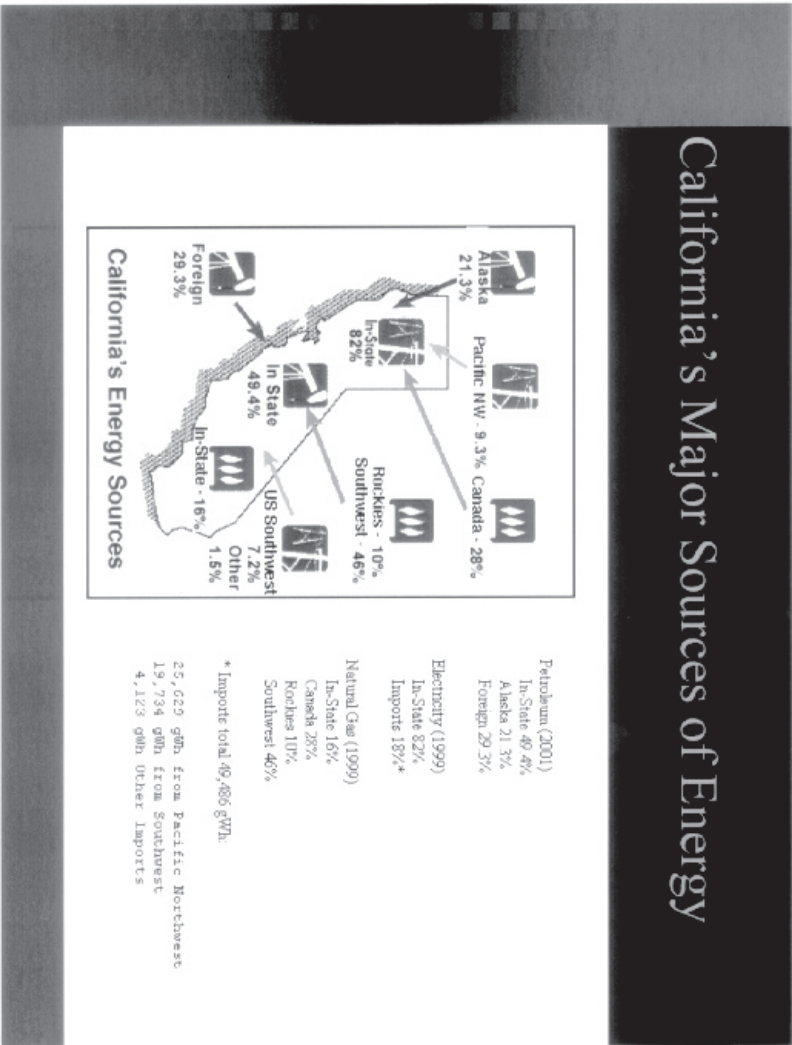
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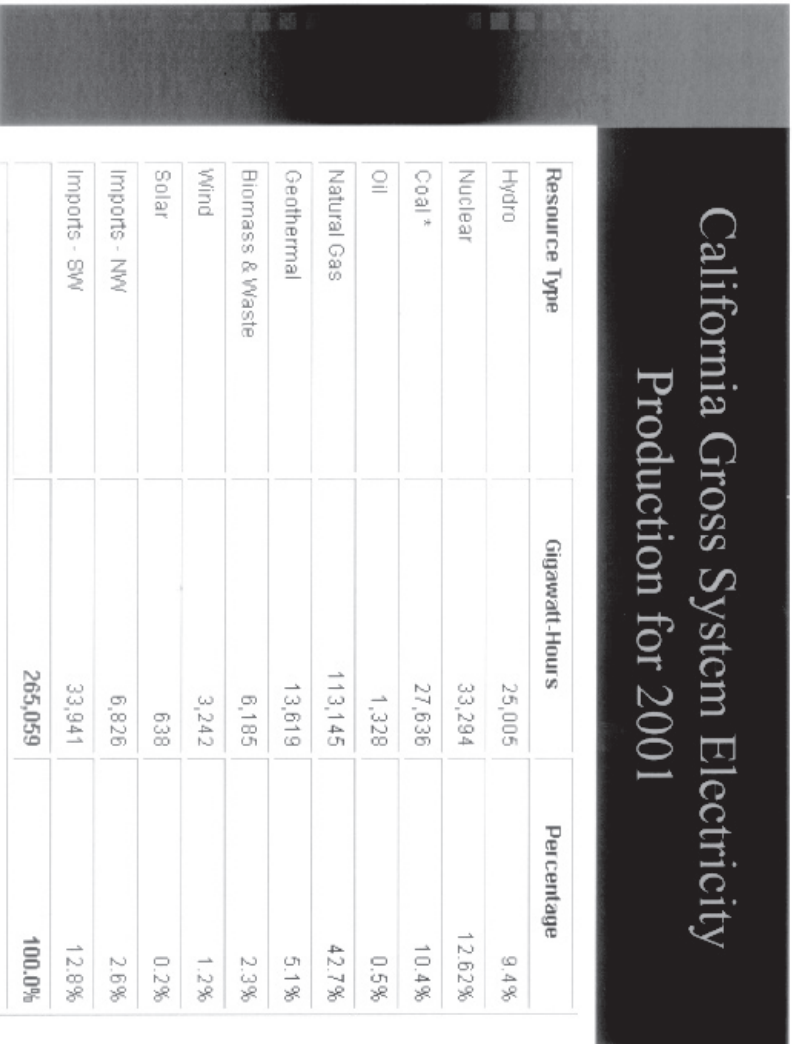




Suggested Existing Conditions
Information

- Existing Statewide Energy System
 - ◆ Major Sources of Energy
 - ◆ California Energy Production
 - ◆ San Diego Electric and Natural Gas Transmission System
- San Diego County Energy Consumption
- Local Power Plants
- Applicable Regulations





Electric Transmission System

- Transmission of electricity from power plants to the utilities is governed by the California Independent System Operator (ISO).
- Three 138 kV electric transmission lines enter San Diego County from the north at Camp Pendleton – 69, 138 and 230 kV lines continue south along the coast and one 230 kV line goes inland then south.
- One 500 kV electric transmission line enters San Diego County from the southeast near Jacumba.


Natural Gas Transmission System

- Large high-pressure gas lines enter the state from several sources including Canada and the Southwest.
- Southern California natural gas storage areas fed by these transmission lines are located in Orange and northern Los Angeles County
- From these storage facilities, high pressure gas transmission lines enter the County from the north inland area (Rainbow Area) - one that veers to the coast (30-inch) and one that continues inland (16-inch).

- San Diego County Electricity Deliveries
Year 2000**
- 1,013,799 Residential Accounts consuming 6,041 Million kWh
 - 125,969 Non-Residential Accounts consuming 11,700 Million kWh
 - Total of 1,139,768 accounts consuming 17,741 Million kWh
 - Statewide, 250,310 Million kWh consumed

Estimated San Diego County Natural Gas Deliveries Year 2000

- Residential: 5,412 Million Cubic Feet
- Non-Residential: 6,087 Million Cubic Feet



Local Power Plants

- These power plants do not necessarily provide all of the electrical power to the County of San Diego (it is pooled with multiple sources by the ISO):
 - ◆ South Bay (Duke Energy): 693 MW
 - ◆ Encina (Cabrillo Power): 965 MW
 - ◆ San Onofre Nuclear Generation Station (SCE): 2,150 MW
 - ◆ Palomar Energy Power Plant, Escondido (SDG&E): 550 MW (On Line 2006)



Existing Energy Regulations

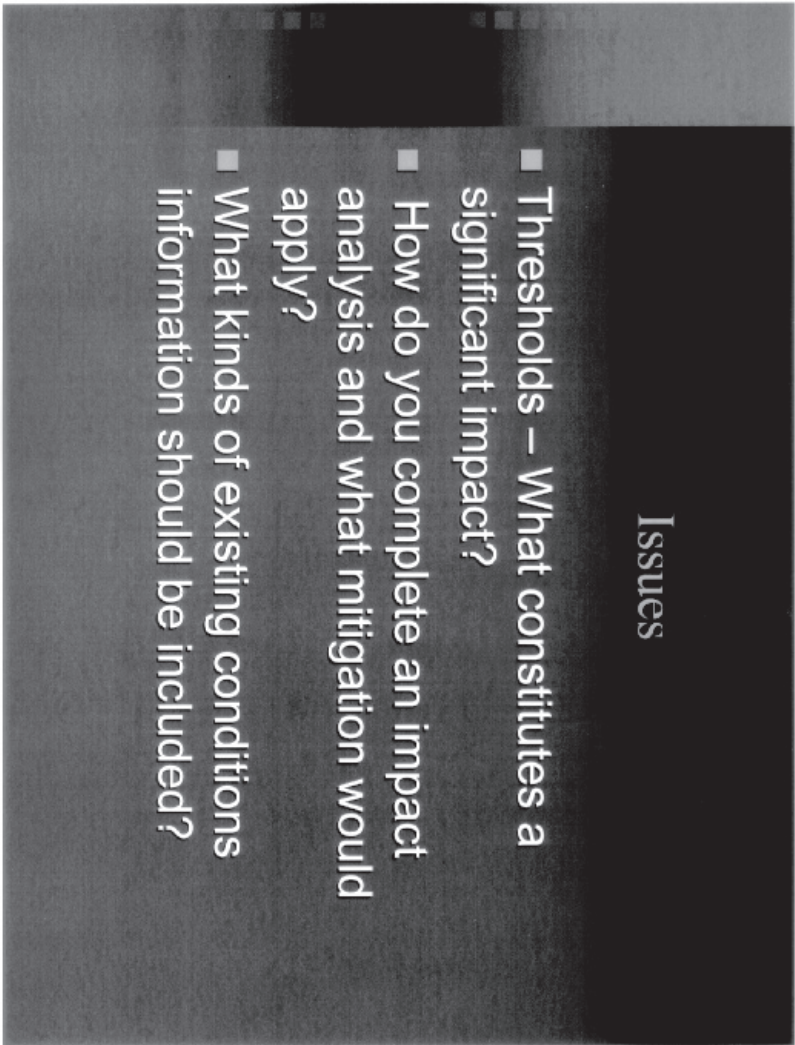
- 2001 Title 24, Part 6
California's Energy Efficiency Standards for Residential and Nonresidential Buildings
 - ◆ The Energy Efficiency Standards for Residential and Nonresidential Buildings were established in 1978 in response to a legislative mandate to reduce California's energy consumption. New standards went into effect on June 1, 2001.

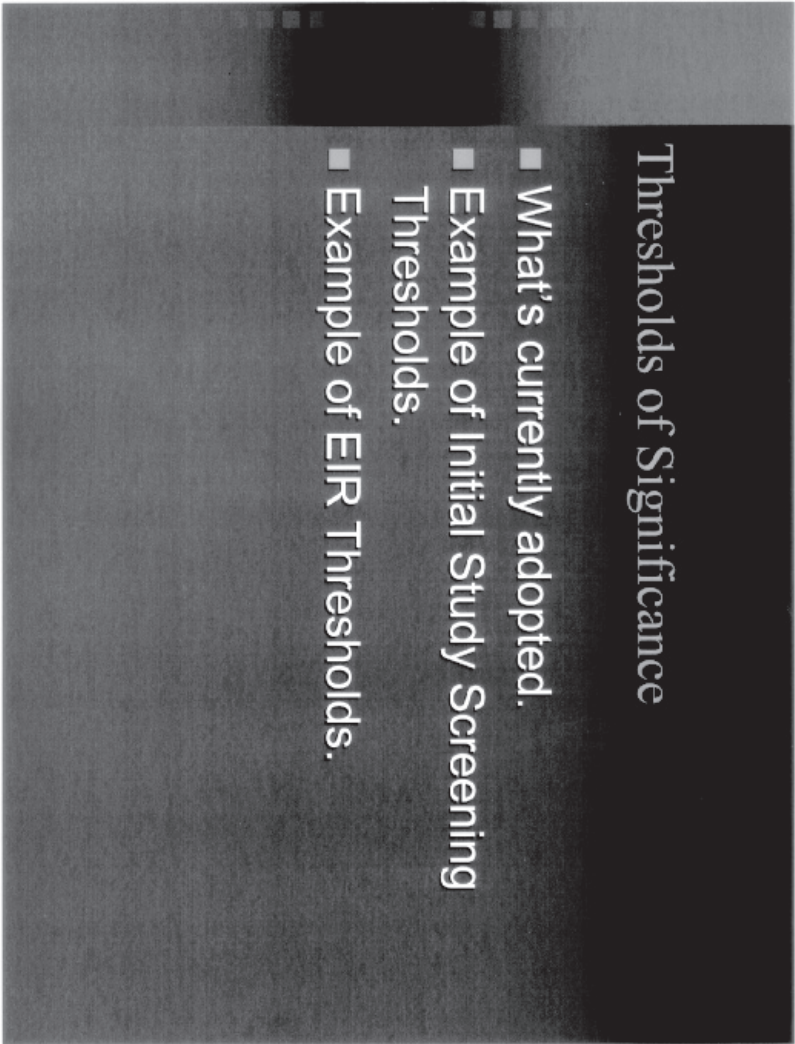
Existing Energy Regulations (cont.)

- The **Home Energy Guide** is designed specifically for residential builders to give out to new homeowners. The Guide satisfies California's Energy Efficiency Standards (Title 24, Part 6), which require that builders give new homeowners information on how to efficiently operate their new home.









Determining Significance

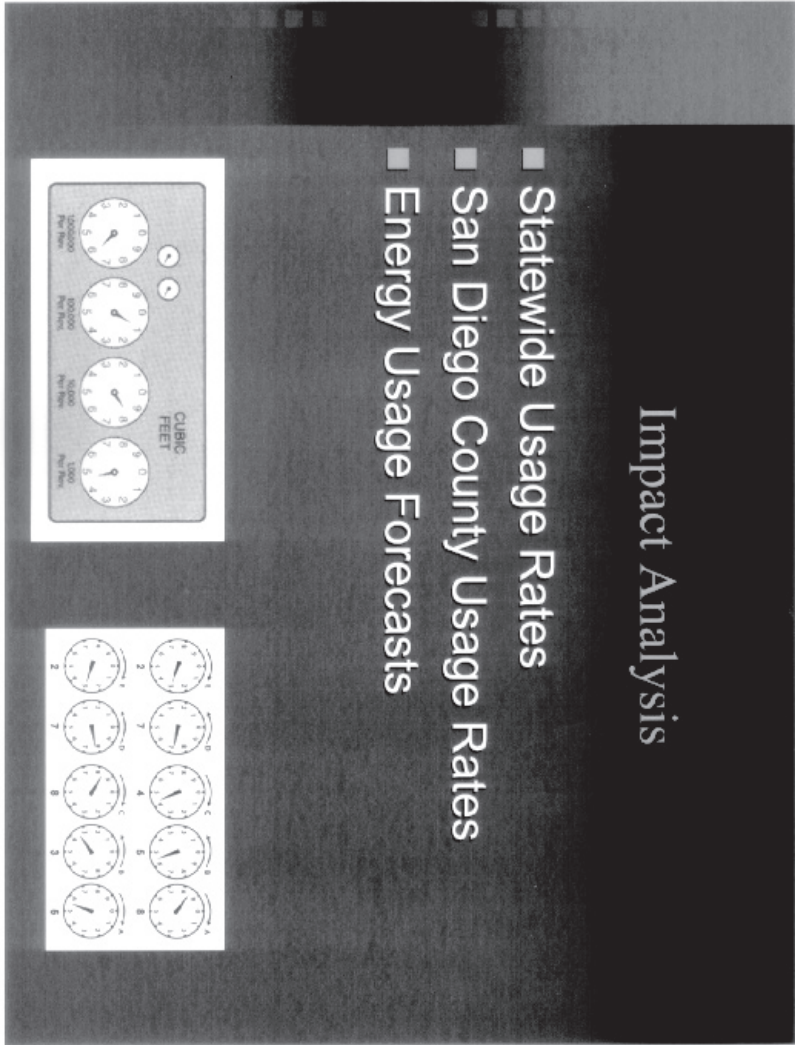
- Currently, no locally adopted thresholds:
 - ◆ Energy/Utilities are not covered under the current CEQA Checklist
 - ◆ Could use issues under old CEQA Checklist:
 - ◆ Would the project conflict with adopted energy conservation plans?
 - ◆ Would the project use non-renewable resources in a wasteful and inefficient manner?
 - ◆ Would the proposal result in a need for new systems, or substantial alterations to power or natural gas?

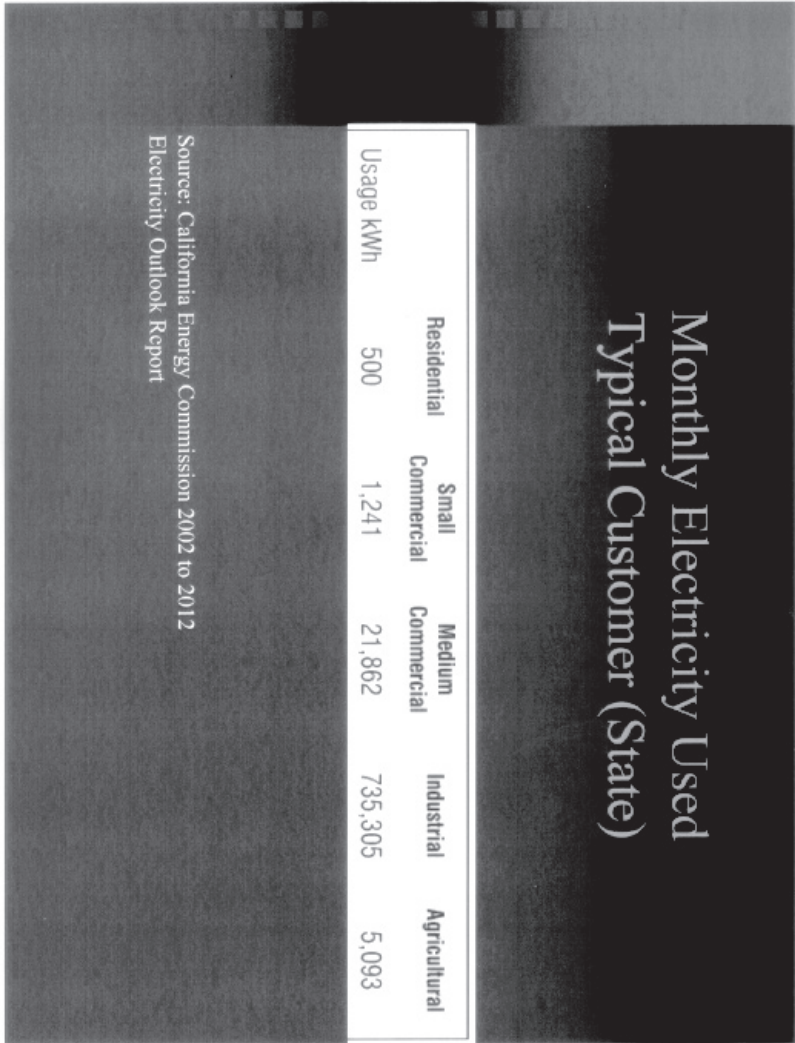
Determining Significance (cont.)

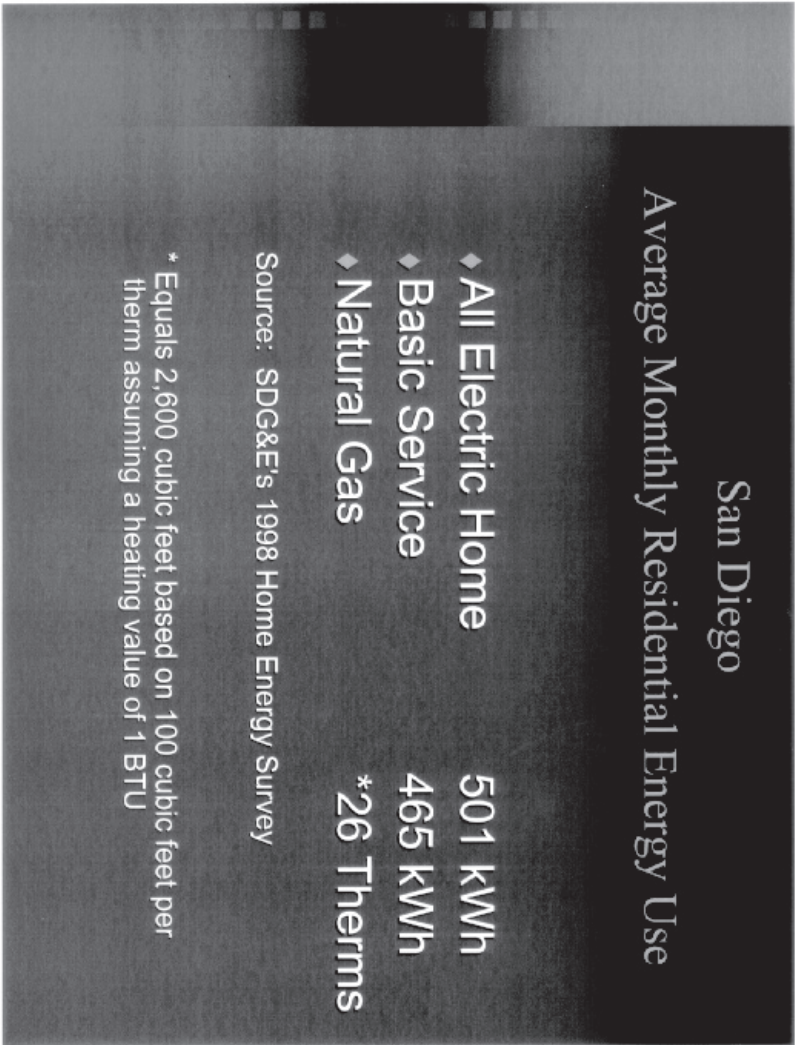
- Derived from the City of Los Angeles Draft Guidelines:
 - ◆ Initial Study Screening:
 - ◆ Would the project design or operation conflict with adopted energy conservation plans or exceed the growth in the applicable community plan?
 - ◆ Would the project result in the need for new off-site energy supply facilities, or major capacity enhancing alterations to existing facilities?

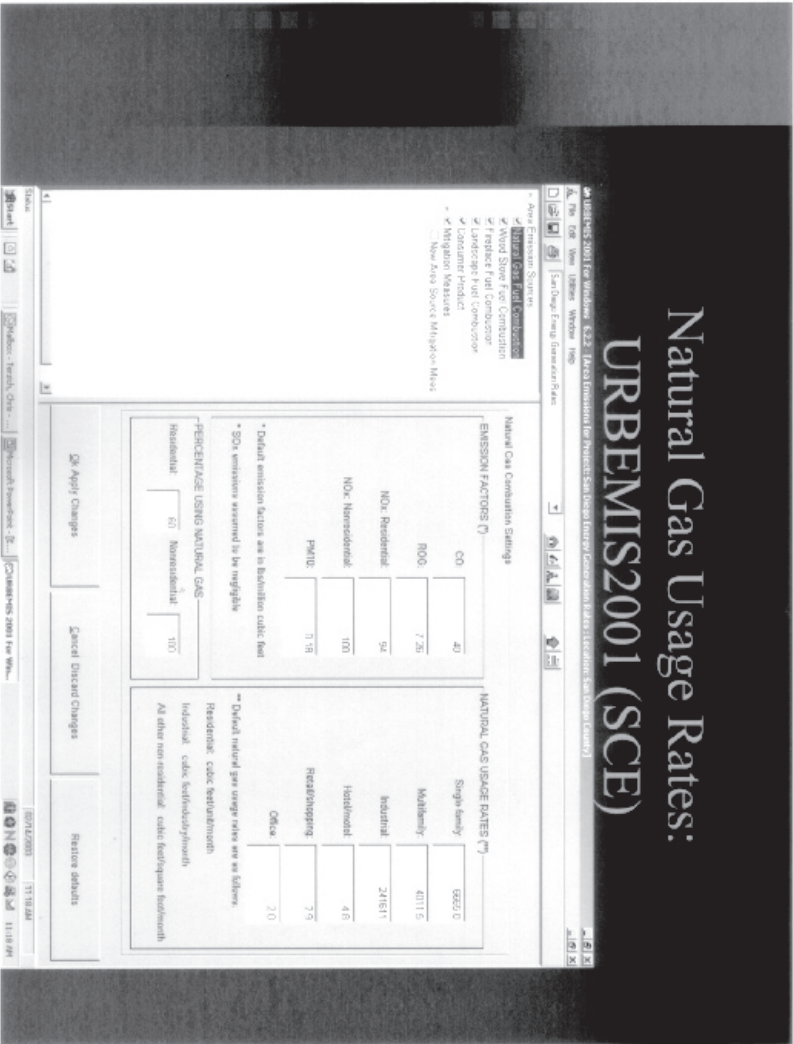
Determining Significance (cont.)

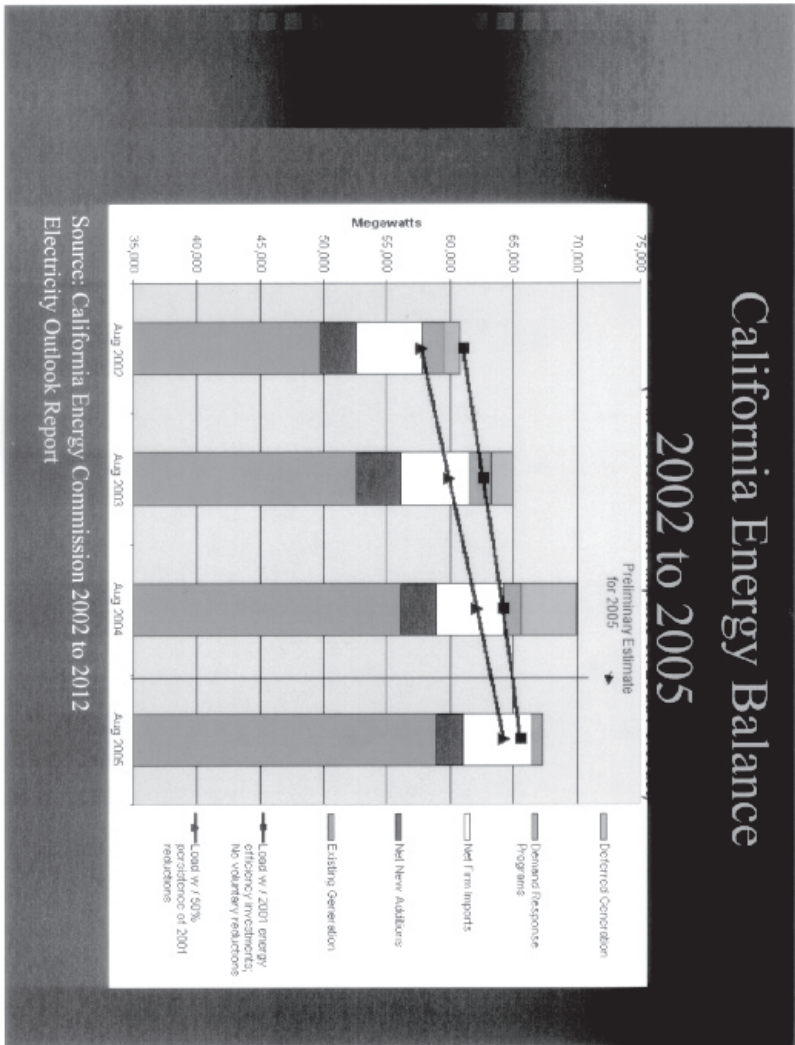
- EIR Thresholds:
 - ◆ The extent to which the project would require new off-site energy supply facilities and distribution infrastructure, or capacity enhancing alterations to existing facilities;
 - ◆ The degree to which the project design and/or operations incorporate energy conservation measures, particularly those that go beyond state or local requirements.

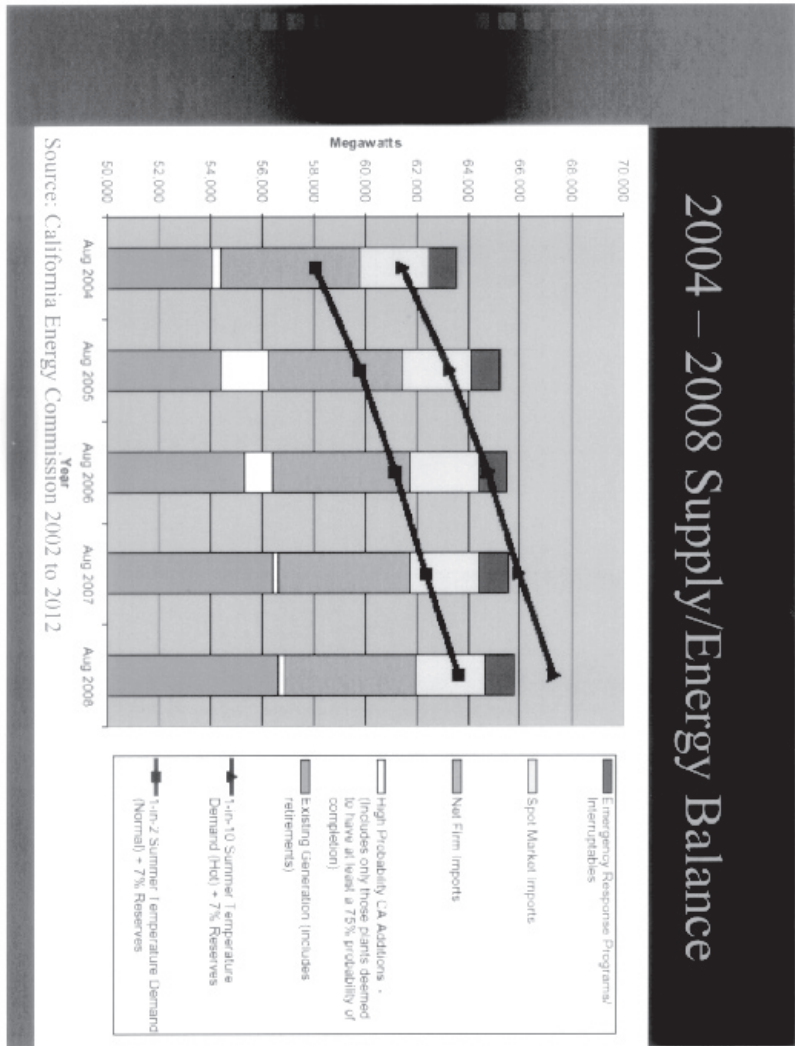


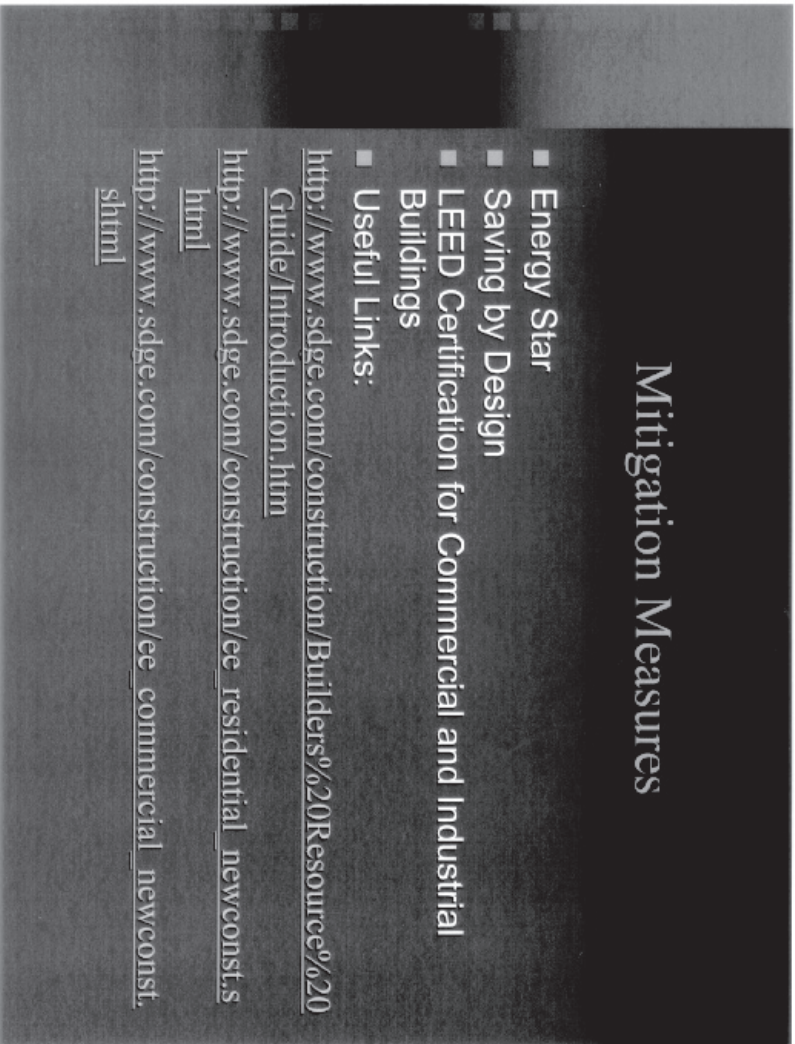












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September 12, 2005

VIA FACSIMILE 619.236.9148
AND U.S. MAIL

Ms. Alexandra Elias
Centre City Development Corporation (CCDC)
225 Broadway, Suite 1100
San Diego, CA 92101

Centre City Development Corporation
SEP 14 2005
City of San Diego

Re: Draft Environmental Impact Report ("DEIR") for San Diego Downtown
Community Plan (the "Project"), CCDC Ordinance and Redevelopment Plan

Dear Ms. Elias:

Our firm represents the BNSF Railway Company, ("BNSF"), the owner and operator of the railway facilities on California Street and on Harbor Drive in the Project area. BNSF is concerned about the large number of high-rise residential projects, including those proposed by the Community Plan, which will be developed adjacent to the railway corridor. We have reviewed the DEIR and provide the following comments and suggestions:

1. Acoustical Study

14.1 The acoustical study failed to measure ambient noise adjacent to the railway tracks and did not analyze the potential railway noise impacts (including horn noise) at night. In addition, Figure 5.7-2 failed to include noise on California Street on the Noise Contours Map. Yet the DEIR concludes that the "[a]verage hourly noise levels generated by railroad activity along California Street and Harbor Drive do not exceed 65 dB(A) CNEL". The DEIR fails to provide factual support for this conclusion.

14.2 Mitigation Measure LU-B.4-1 incorrectly assumes that railway noise impacts (from engines, wheels, and horns) need only be mitigated in sleeping rooms. The measure must be expanded to include common areas and balconies, where railway noise must also be mitigated.
14.3 We suggest LU b.4-1 be revised to require all residential developments in the Project area to mitigate interior noise to 45 dBA, and exterior noise in the Project's common areas to 65 dBA.

The DEIR also (i) identifies noise from train horns and crossing bells as 95 dB(A) at 50 feet from the source; and, concludes that noise could intrude in residences as far as 1,000 feet away from the railway tracks in areas where there are no obstructions; and (ii) concludes that

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A378-005 - 42092.1

14.1 Train noise depends upon a number of factors. Frequency of activity, types of trains (freight, Amtrak, Coaster), track conditions, travel speed, and use of train horns. Trains moving along the Harbor Drive/California Street corridor are slow moving, and are dominated by Amtrak or Coaster during the day, and several freight trains mainly at night. Future track utilization is forecast to slowly grow. In response to this comment, the hourly noise exposure at 50 feet from the track centerline was calculated using the FTA Manual (1995) for three trains, six locomotives, and a 15 mph travel speed. Without including horn noise, the noise level at 50 feet from the tracks was estimated at 59 dB Leq (one-hour average). When train horns are included, the level at a distance of 50 feet was estimated to be 65 dB Leq. Due to the influence of trains during the evening hours, the Leq level is considered representative of the CNEL value. Thus, train noise would exceed 65 CNEL.

Unlike traffic noise, train noise would be intermittent and only exceed 65 CNEL when horns are in use which would occur as a train approaches a road crossing. As a consequence, the EIR considers train noise to constitute a land use rather than health and safety issue.

COMMENTS

RESPONSES

- 14.2 This comment is correct. LU-B.4-1 has been revised in the FEIR to require 45 dB Leq within all habitable rooms. However, balconies are not required under Title 24 to be maintained at 45 dB Leq or less.

- 14.3 As discussed above, the mitigation measure has been revised to require interior noise levels in habitable rooms to not exceed 45 dBA Leq. However, no mandatory requirement will be included for exterior areas. State law does not mandate outdoor noise limits. The City's General Plan does require adequate outdoor recreation areas to be provided where noise levels would not exceed 65 dB CNEL. However, balconies need not be protected if sufficient common recreation area is provided which would not exceed 65 dBA CNEL. Thus, noise attenuation for outdoor recreation areas would be determined by the City as individual projects are proposed along the railroad tracks.

GRESHAM SAVAGE NOLAN & TILDEN,
A PROFESSIONAL CORPORATION
Alicen Clark Wong

Mayor and Members of the City Council
Chair and Members of the Redevelopment Agency
September 12, 2005
Page 2

diesel train engines may produce short-term noise of 85 dB(A) while maneuvering, but the duration is too short to create a measurable noise constraint. Although these noises may last only for a short duration on the CNEL scale, its the maximum noise level of the horn or the crossing bell that will be audible to residents who live on a railway track. Therefore, we ask that CCDC require proponents of residential projects adjacent or across from railway tracks ("Project(s) Proximate to the Railway") to disclose the noise to potential buyers.

2. Disclosures Prior to Sale

Many of the 41,000 additional residents who will live in the Project area will reside adjacent to the railway tracks and freight trains usually travel in the early morning, when residents are asleep. Therefore, the following proposed conditions of approval will ensure that potential buyers consider railway noise impacts prior to purchasing a unit next to the tracks.

(i) CC&Rs: To ensure adequate disclosure throughout the Project area, we ask CCDC to require every Project Proximate to the Railway to record private Covenants, Conditions and Restrictions ("CC&Rs"), including the following language in bold type on page 1:

Notice of Disclosure

Each Owner's interest is subject to the fact that BNSF Railway Company operates trains 24 hours every day on the railway tracks on California Street and on Harbor Drive and in the switching yard at Eighth and Imperial Avenues. By accepting the conveyance of an interest in the [insert name of project here] (the "Project"), each Owner accepts all noise, vibration, fumes, and particulate matter (dust) generated by trains, as well as the fact that the railway may block sunlight.

(ii) Certificate of Occupancy: Upon issuance of the Certificate of Occupancy for each phase or development of a Project Proximate to the Railway, and prior to offering the first unit for sale or lease, the project proponent shall post a copy of the Notice of Disclosure in a visible location in every unit, and include a copy of the Notice in all informational materials distributed to potential purchasers.

(iii) Public Report: Every tract map recorded for a Project Proximate to the Railway shall be required to include the following Notice as a condition of map approval, and the condition shall be included in the Public Report (commonly referred to as the "white report").

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A178-000 - 42992.1

14.4

14.4 The purpose of real estate transaction disclosures is to reveal the condition of a property before transfer of title takes place. This is primarily to ensure an informed decision as to the acquisition of the interest in real property.

The purpose of a mitigation measure in an EIR, by contrast, is to avoid, minimize, rectify, reduce or compensate for an *environmental* impact identified in the EIR (CEQA Guidelines, Section 15370). The mere disclosure of the existence of railroad noise does not avoid, minimize, rectify, reduce or compensate for the noise produced by the railroad activities.

As a policy matter, the decisionmaker may decide to enact an ordinance requiring the type of disclosure sought by the commenter; however, such a requirement is not a mitigation measure, and is not appropriately enforced by inclusion in the EIR.

GRESHAM SAVAGE NOLAN & TILDEN,
 A PROFESSIONAL CORPORATION
 Alicen Clark Wong

September 12, 2005
 Page 3

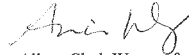
14.4
 Cont.

Each Owner by accepting a conveyance in Tract No. [insert tract map no. here], takes title to the land subject to the railway operations adjacent to Harbor Drive and in the switching yard, immediately adjacent to the Project. These railway operations include trains operated by BNSF Railway ("BNSF") and other railway carriers. Each Owner is hereby notified that BNSF operates 24 hours per day, and that railway operations may result in the following conditions in each residential unit, and in the common areas: noise, vibration, particulates (dust), may block sunlight.

14.5 We ask that CCDC require the DEIR to identify railway noise and mitigate it appropriately. Also, that each Project Proximate to the Railway comply with the above-referenced conditions to ensure adequate disclosure of railway noise.

14.6

Very truly yours,


 Alicen Clark Wong, of
 GRESHAM SAVAGE
 NOLAN & TILDEN,
 A Professional Corporation

cc: Mark A. Ostoich
 Bob Brenda

A378-000--42092.1

14.5 Based on the previous responses, the DEIR adequately addressed train noise.

14.6 As indicated in response to comment 12.4, CCDC does not intend to require real estate sales disclosure of train noise or any other noise source.



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(by fax)

CENTRE CITY
DEVELOPMENT
CORPORATION

SEP 13 2005

Orig. To: 9:27A.M.

Copy To:

FROM: Murtaza H. Baxamusa, AICP
TO: Alexander Elias, Centre City Development Corporation (CCDC)
SUBJECT: Draft Environmental Impact Report for the Proposed Downtown Community Plan
DATE: September 12, 2005.

CPI appreciates the opportunity to review the Draft EIR and to participate in the Steering Committee of the Downtown Community Plan Update.

We are concerned that this EIR will be used to eliminate public input from the environmental impacts of future development projects approved by CCDC for the next five years. Listed below are some of our concerns on the document.

TRAFFIC AND CIRCULATION: NO MITIGATIONS IMPLEMENTED

In response to potential traffic impact on streets, Mitigation Measure TRF-A.1-1 says that there will be a study conducted after five years. However the intent of CEQA is to incorporate mitigation measures into project approvals, and not to approve projects unless the mitigation has been implemented. California Public Resources Code Section 21081(a)(1) states that projects cannot be approved unless "changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment". Studying impacts is not mitigation. Worst still, studying post-project impacts is not mitigation, and does not ensure a sincere effort at pursuing feasible mitigation measures with public input.

Therefore issuance of development permits should be contingent on a public review of mitigation measures being implemented.

LAND USE: INCONSISTENCY WITH THE GENERAL PLAN

As community plans within the city are updated, their goals and policies are supposed to reflect the new village strategy (Strategic Framework EIR, IV-21). The Downtown EIR has not attempted to do a comprehensive evaluation of whether the goals and policies of the Community Plan conform to the General Plan.

For example, several components of the Downtown Community Plan could potentially conflict with the following goals of the Action Plan:

15.1

15.2

15.1 This mitigation measure follows the acknowledgement that, on a programmatic level, "the timing associated with implementation of improvements . . . is difficult to predict." This is because of the uncertainty regarding the actual realization of the projects that are assumed will create the predicted impacts. Courts have upheld mitigation measures which articulated other performance standards, identified possible component parts of a future mitigation measure, and committed the agency to: (1) a study which would determine which of the components, if any, would actually mitigate the identified impact, and (2) implement the measures the study identified as proper mitigation. Even though the EIR concludes that the impact would be significant and not mitigated, CCDC has committed in Mitigation Measure TRF-A.1-1, to the regular review of the grid system's capacity, and to "incorporate needed roadway improvements" as needed, as disclosed by this regular monitoring. CCDC is therefore committing to a meaningful program of mitigation at this level.

15.2 A discussion of the relationship of the proposed Community Plan to the General Plan is provided on page 5.1-14 of the EIR.

15.3 *Goal 7: Promote Economic Prosperity*

- Establishment of economic development policies to promote high quality employment opportunities; (7a)
- Achieve a higher standard of living for all San Diegans; (Core Value in Goal 7)
- Consider wage levels of jobs created; (7f)
- Prepare economic impact assessments for selected projects. (7f)

15.4 *Goal 8: Promote Equitable Development*

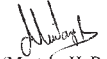
- Analyze and anticipate the dynamics of gentrification in individual communities; (8a)
- In adopted redevelopment areas, secure public ownership of real estate to provide opportunities for affordable housing and office space for neighborhood residents and service providers; (8a)
- Encourage non-profit group resident education programs focusing on residents' legal rights, home-buying and selling strategies, and skills in negotiating for equitable development in the midst of gentrification. (8a)

15.5 Therefore there should be acknowledgement of these goals and policies in the Community Plan, and a demonstration by the Agency that the certification of the documents does not conflict with any of these goals and policies.

15.6 HOUSING: IMPACTS NOT EVALUATED
 The EIR states that affordable housing issues are not required to be addressed in an EIR. However, CEQA Guidelines Section 15131 make it clear that economic or social effects of a project may be used to determine the significance of physical changes caused by the project. Increasing base FARs is a physical change that will impact the supply of affordable housing by making it infeasible for low-income population to live downtown.

In Section 21083(c), CEQA requires an agency to determine that a project may have a significant effect on the environment if it will cause substantial adverse effects on human beings, either directly or indirectly. This section was added to CEQA by the same bill in 1972 (AB 889, Chapter 1154 of the Statutes of 1972) that added the definition of the term "environment" and the term "project". The statement "there are no issues related to affordability that would translate into unique physical changes in the environment" (page 1-4) is inaccurate when you know that affordability is intricately linked to land entitlements, zoning, FAR, design guidelines, parking requirements and surrounding land-uses.

15.7 GROWTH INDUCING IMPACTS
 There should have been a study of the gentrification of surrounding neighborhoods as a result of downtown growth. Anticipated impacts include increased traffic congestion, rising property values, parking crises and turnover of property to real estate investors. This EIR is incomplete in that respect.


 (Murtaza H. Baxamusa)

15.3 Economic issues are not required to be evaluated in an EIR. As stated in CEQA Guidelines Section 15131(a), economic or social effects of a project shall not be treated as significant effects on the environment. "While an EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect."

15.4 The equitable nature of development is considered a social issue which, as indicated in response to comment 15.3, is not required to be evaluated in an EIR.

15.5 See responses to comments 15.3 and 4.

15.6 The commenter seeks to have CCDC and the Agency characterize the status of affordable housing as a proper subject for CEQA review. However, under Section 21060.5 of the Public Resources Code, the "environment" with which CEQA is concerned is the physical conditions within an area. Furthermore, as indicated in response to comment 15.4, an EIR is not required to address social or economic issues. Thus, the effects on affordable housing are social and economic effects and, therefore, not subject to CEQA.

15.7 The EIR does study the potential physical effects of the project upon the surrounding neighborhoods. However, the "rising property values" and the identity of the future property owners is a social or economic impact not subject to CEQA analysis. On the other hand, traffic and parking impacts are studied in Section 6.2.6 of the EIR.



Citizens Coordinate for Century 3

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CENTRE CITY
DEVELOPMENT
CORPORATION

SEP 12 2005

Orig. To: _____
Case# To: _____

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President-Elect
Richard D. Barrett

DIRECTORS
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September 12, 2005

Alexandra Elias
Centre City Development Corporation
225 Broadway, Suite 1100
San Diego, CA 92101-5074

RE: Comments regarding the Draft Environmental Impact Report for the San Diego Downtown Community Plan

Thank you for this opportunity to comment on the Draft Environmental Impact Report (EIR). We look forward to the opportunity to comment on the Downtown Community Plan update and the Centre City Planned District Ordinance once the public hearings have been scheduled.

San Diego's Citizens Coordinate for Century 3 (C-3) was established in 1961 as a land-use advocacy organization with a mission to address the highest standards of environmental quality in both the built and natural environment, which includes physical design, historical preservation, economic benefit and social progress as set forth in "Toward Permanent Paradise." C-3 has closely followed the re-development of downtown since CCDC's creation in 1975. We have reviewed the EIR and have the following concerns.

1) As recently as five years ago, the total build-out population of the Downtown Plan Area was projected to be 50,000 by the year 2025. The current population projection is 90,000. Office development is projected to increase by almost 10 million square feet. C-3 is not against such intensification of downtown, but we feel strongly that it is essential that all impacts are measured, and necessary mitigation measures are identified. We are concerned that given the nature of downtown, certain mitigation measures will be unfeasible or counter-productive. For example, according to the EIR, increased traffic will lead to "unacceptable levels of service on specific roadway intersections and/or segments within downtown." The likely mitigation measure will be the widening of the roadways which in the context of downtown will necessitate the narrowing of sidewalks, the elimination of parallel parking that provides a buffer from moving vehicles for pedestrians and, at the intersections, a longer distance for pedestrians to cross. These measures are the very opposite of what new-urbanist principles call for to improve the pedestrian experience. Without mitigation, stalled traffic will lead to more air pollution and noise, worsening the pedestrian experience. We are stressing this point because the plan maintains that the increase in densities will enrich the pedestrian. This is a basic contradiction that needs to be addressed.

2) Freeway access in and out of the Downtown Plan Area associated with future downtown development will result in unacceptable delays, but this is dismissed as not being the responsibility of CCDC or future developers. This should be addressed in the EIR.

3) The 36,000 parking-space deficit causes great concern. Currently there is a 2,000 space deficit and that has required considerable remedial measures such as the Downtown Parking Management Group, the Downtown Community Parking District, the Parking Advisory Board, the Shuttle Task Force, the District 2 Parking, Transportation and Connectivity Summit, etc.

4) The proposed mitigation measures for the transportation impacts mentioned above are studies at 5-year intervals. "At five year intervals, commencing upon adoption of the proposed Community Plan, CCDC shall conduct a downtown-wide evaluation of the ability of the grid system to accommodate traffic within downtown..."(Table 1.3.1). After plan approval? First we approve the plan and then determine if it works? Such a statement is symptomatic

16.1

16.2

16.3

16.4

16.1 The EIR identifies the potential for conflict between the pedestrian goals and policies of the Draft Community Plan and the intersection improvements potentially required to maintain satisfactory traffic flow. Mitigation Measure TRF-A.1-1 specifically requires CCDC to review the effect of proposed improvements on pedestrian and bicycle activities whenever specified conditions could occur.

16.2 Freeway impacts are identified and discussed, but it is also true that the identified mitigation measures are not within the power of CCDC or future developers to implement. The California Department of Transportation must agree to and authorize any improvements to freeways or freeway access ramps.

16.3 The Draft EIR acknowledges the potential for significant shortfalls. However, as noted in the EIR, the actual parking supply would likely be greater than assumed in the EIR due to the private market taking advantage of opportunities for parking garages.

16.4 This mitigation measure follows the acknowledgement that, on a programmatic level, "the timing associated with implementation of improvements . . . is difficult to predict." This is because of the uncertainty regarding the actual realization of the projects that are assumed will create the predicted impacts. Courts have upheld mitigation measures which articulated other performance standards, identified possible component

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parts of a future mitigation measure, and committed the agency to: (1) a study which would determine which of the components, if any, would actually mitigate the identified impact, and (2) implement the measures the study identified as proper mitigation. By committing in Mitigation Measure TRF-A.1-1, to the regular review of the grid system's capacity, and to "incorporate needed roadway improvements" as needed, as disclosed by this regular monitoring, CCDC is committing to a meaningful program of mitigation. See response to comment 15.1.

September 12, 2005
 Centre City Development Corporation
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16.4
 Cont.

of a document, the purpose of which seems to be justifying the plan as proposed rather than measuring its potential impacts.

16.5

5) The preceding statement is especially true of public services and housing. The EIR goes to great lengths not to evaluate these impacts, because it is said to be "outside the scope of CEQA." For example, there is no reference in the EIR to the required number of parks that the proposed population of 90,000 demands. There are vague references to so-called "allowed" and "required" acres in the Downtown Community Plan Update, but no such references appear in the PDO or the EIR. The population impact will be mitigated by the necessary number of parks (e.g., livability goals), and this needs to be in the EIR.

16.6

6) The EIR claims that the financial climate (e.g., the impact of downtown real estate speculation on surrounding neighborhoods) is not part of the environment. However, the proposed increase of base maximum and minimum FAR's in the redevelopment project area has caused massive real estate speculation causing land prices to jump from \$300 per sq. ft. in 2004 to over \$500 per sq. ft. in 2005. This has already caused disruptions and negative effects to the quality of life and livability not only for those living in downtown, but also in surrounding neighborhoods. As the next 25 years unfold and buildout is approached, there is considerable reason to worry that the financial climate will be a maelstrom for those who make less than 300% AMI and believed they could live in and around downtown.

The percentage of low and moderate-income housing will decrease dramatically given current development trends. While CEQA does not require consideration of socio-economic issues, providing housing for employees near their employment has obvious environmental benefits. This extremely narrow interpretation of CEQA mandates could be counterproductive. How are we to decide whether the proposed plan will not lower the quality of life presently enjoyed by the residents, workers and visitor of downtown? Uncertainty as to its effects could lead to the rejection of the community plan.

16.7

7) This EIR is a Master EIR that is being called a Program EIR. This is misleading and obfuscates the true intention of this EIR to streamline and eliminate environmental impacts of the future 25 years' of redevelopment downtown. This EIR appears designed to make it possible for developers to build projects without conducting subsequent impact reviews per project. Indeed, this EIR only requires that officials look over their shoulder in five-year increments to survey the effects of the development on a very narrow range of impacts without any required mandates to mitigate the problems they identify.

16.8

The overarching problem with this EIR is that it does not project whether the Downtown Community Plan Update and revised Planned District Ordinance are feasible. Both planning documents state very clearly their intentions to create a great city, make it livable for everyone, including providing public and cultural amenities, infrastructure, quality connectivity, equal access and ensuring diversity in all its manifestations. However, there is no guaranty that this vision will be achieved. C-3 is deeply committed to a vision of the proposed Downtown Community Plan which insures not only increased densities, but also maintains the overall quality of life of downtown.

Sincerely,

 Bruce H. Warren
 President

16.5 As indicated in response to comment 15.6 and on page 5.4-10 of the EIR, Sections 15126.2(a) and 15382 require an EIR to evaluate only the physical impacts associated with providing public services required to serve a development proposal.

Additional information relative to the General Plan goal for parkland is contained in responses to comment 7.1.

16.6 The commenter seeks to have CCDC and the Agency characterize impacts to the downtown "quality of life" as a proper environmental subject for CEQA review. As indicated in response to comment 15.6, CEQA is concerned with changes in the physical conditions within an area. The need for affordable housing and the other quality of life issues raised are not related to physical conditions of the environment. Thus, while they may properly be considered by the decisionmakers in the course of considering adoption of the Community Plan amendment and PDO, they are not appropriate subjects for the EIR to address.

16.7 CEQA Guidelines Section 15180(b) expressly provides that "[A]n EIR on a redevelopment plan shall be treated as a program EIR with no subsequent EIRs required for individual components of the redevelopment plan unless a subsequent EIR or a supplement to an EIR would be required by CEQA Guidelines] Sections 15162 or 15163." This EIR complies with that section that is specifically applicable to redevelopment plans such as the Proposed Community Plan. Further, and contrary to the commenter's assumption, there will be "subsequent impact reviews per project," but they will be conducted with an eye toward the application or non-application of Sections 15162 and 15163.

16.8 The function of an EIR is not to make the determination as to whether a particular project or plan is "feasible." Rather, an EIR is an "informational document." As such, the EIR is to be just one of many sources of information the decisionmakers will use to determine whether the Plan should be adopted.

Environmental Health Coalition

COALICION de SALUD AMBIENTAL

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Mr. Peter Hall, President
Center City Development Corporation
225 Broadway
San Diego, CA 92101

September 12, 2005

**Subject: Center City Development Corporation Plan Update
and Environmental Impact Report**

Dear Mr. Hall:

Environmental Health Coalition (EHC) is a community-based organization that has, for the past 25 years, dedicated its efforts to achieving environmental and social justice. We believe that all people have the right to live, play and work in a safe and healthy environment. We organize and advocate to protect public health and the environment.

A myriad of contradictory issues surface when reviewing CCDC's Community Plan Update and EIR. The Plan, in Chapter 3 Land Use And Housing states that: "Achieving the vision for downtown requires continued redevelopment with an array of uses; ensuring balanced neighborhood development; and better integration of downtown with the waterfront, Balboa Park, and surrounding communities."

In view of this statement, we would like to comment on the EIR and it's shortcomings.

Land Use And Planning:

- 17.1 [] • **Flexible use:** The EIR has not adequately analyzed potential impacts of this land use designation for the purpose of CEQA. Furthermore it failed to address the following:
 - 17.2 [] 1. The ARB has recently finalized its land use guidance, contained in the document, *Air Quality and Land Use Handbook: A Community Health Perspective, March, 2005*. This document calls on local land use planning processes to consider toxic impacts of siting decisions that place industrial and residential land uses in close proximity. The ARB calls for at least a 500-foot separation between freeways and sensitive receptors such as residents; and a 1,000-foot separation between industrial facilities and distribution centers. No such analysis currently exists for the proposed new development in the Flexible land use designated areas.
 - 17.3 [] 2. The Port Commission voted on 9/1/05 to establish a 1,000-foot buffer between waterfront industries and residential development from the North Embarcadero down to the National City Marine Terminal. This would protect residents from toxic emissions and the industry from lawsuits.
 - 17.4 [] 3. The Flexible use designation does not conform with the Barrio Logan Vision Plan (see attachment), developed by the residents of Barrio Logan.

- 17.1 As no specific issues related to the adequacy of the analysis of the Flexible Use designation is identified, no specific response can be made. However, it should be noted that the Flexible Use designation has been eliminated in the latest version of the Community Plan and replaced by the Mixed Commercial designation.
- 17.2 A discussion of the California Air Resources Board (CARB) guidelines is included on page 5.8-10 of the EIR where the setbacks identified in this comment are specifically discussed. In this discussion, the potential exists for new residential development to occur within 1,000 feet of industrial uses. This analysis would apply to residential within any proposed designation including the Mixed Commercial (formerly Flexible Use) designation identified in the comment. The discussion goes on to address the fact that a substantial health risk to future residents depends largely on long-term exposure which is indicated to require a period of 70 years of continued exposure. Thus, the impacts were not considered significant.

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- 17.3 The action referenced on the part of the Port of San Diego consisted of a recommendation adopted during a workshop. As such, it has no regulatory authority over land outside of the Port jurisdiction. This action reflects to guidelines established by the CARB, as discussed in response to comment 17.2, and is subject to the same long-term exposure requirements to constitute a significant health hazard.
- 17.4 As the Barrio Logan Vision has not been officially adopted or recognized by the City of San Diego or any other recognized public entity, the EIR appropriately did not include it in the discussion of plan consistency. Nevertheless, it should be noted that, on page 3-12 of the Proposed Community Plan, the Mixed Commercial (formerly Flexible Use) designation would require any new industrial development to demonstrate that air quality in the vicinity would not be adversely impacted. This provision specifically references Barrio Logan in recognition of the past concerns expressed by this community. Even without this Community Plan provision, state and federal regulations governing new industrial uses would require air emissions controls.

- 17.4 Cont. The Vision Plan seeks to solve the incompatible land use that has for 30 years adversely impacted Barrio Logan residents with an increase in childhood asthma, toxic fumes, noise, unsafe conditions, among other things.
- 17.5 4. Residents of Barrio Logan, a primarily low-income community of color, consider the placing of such a use, where industry will be yet again placed next to their homes and schools, as environmental racism. (They do not want such uses in their back yards)
- 17.6 5. The Flexible use areas will allow the development of industrial uses in a potential liquefaction zone, and in the Downtown Special Earthquake Fault Zone. This poses yet a greater hazard to the residents of that area as well as those in the surrounding community of Barrio Logan.
- 17.7 6. Nowhere in the report is there a list of the businesses that will be allowed to operate in the Flexible use.
- 17.8 7. Human service facilities will be allowed in the Flexible use areas. Barrio Logan is already surrounded by a disproportionate number of human services. Additional facilities will adversely impact the community.
- 17.9 • **Industrial:** The report states that this classification permits, among other things "energy generating facilities." The community would like to have this point clarified.
- 17.10 • **Transfer of Development Rights Program:** Policy 5.3-P-1 Restrict building heights as follows: Stepping down towards the water in the North Embarcadero area.

We believe that the same consideration should be afforded towards the Barrio Logan area. Given the height limit in Barrio Logan in the areas adjacent to CCDC, we propose that the following height limits be adopted:
 1. Maximum height limit south of Commercial should be 50 feet. That would be consistent with Barrio Logan's PDO.
 2. Maximum height limit between Commercial and Imperial should be 80 feet.
- 17.11 • **Transient Activities:** Increased development, contrary to the EIR's claim, will have a significant land use impact on the surrounding community of Barrio Logan. The displaced downtown homeless population will, as they did after the completion of the Ballpark and other developments downtown, migrate to Barrio Logan's parks and vacant and underutilized lots. This will exacerbate and further lower the quality of life for Barrio Logan residents.
- 17.12 • **Affordable Housing:** CCDC's projection is to "attain an overall employment level of approximately 90,000 people". The plan should offer pro formas on income distribution of the downtown workforce as well as those of the surrounding communities in order to provide and project the number of affordable housing

- 17.5 Industrial uses are not anticipated to be a major component of the Mixed Commercial (formerly Flexible Use) designation. As indicated on page 3-12 of the Proposed Community Plan, uses within this designation are anticipated to include residential, artists' studios and live/work spaces, hotels, offices, research and development, and retail. This is further reinforced by the narrative on page 6-24 about the form of development envisioned for the Southeast portion of the East Village District which would be adjacent to Barrio Logan. As indicated in this discussion, "Southeast promises to become an eclectic mix of housing types, and the interest and intrigue that accompany diverse environments. Much of the sub-district is intended for a "fine-grain" scale of development with multiple buildings per block, and lower building intensity than in most neighborhoods." As a result, existing industrial uses would be expected to transition to the target uses in the long-term which would represent a benefit to the community of Barrio Logan over the current condition. Furthermore, as discussed above, any new industrial uses would be required to implement air emission controls and incorporate high quality building design.
- 17.6 Any new industrial uses which would be constructed in the Southeast sub-district would be required to conform to the requirements of the Uniform Building Code (UBC) related to protection against earthquake damage. Any risk associated with earthquake damage to existing industrial development would be unaffected by the Proposed Community Plan.
- 17.7 See response to comment 12.2 for uses allowed in Mixed Commercial designation.
- 17.8 Comment noted. However, social service institutions are allowed in other areas of downtown, and there is no evidence to support a substantial number of new social service facilities would occur within the Southeast sub-district of East Village. In addition, any effects (e.g. public health and sanitation issues) from these facilities are already occurring and no evidence exists to suggest that these effects would be substantially increased.
- 17.9 Energy-generating facilities would include electrical substations and power transmission lines needed to meet the needs of downtown.

- 17.10 As indicated on page 5-12 of the Proposed Community Plan, much of the area near Barrio Logan (known as the Southeast sub-district of East Village) would be placed within a “fine-grain” classification. Furthermore, the floor area ratio (FAR) allowed within the areas nearest Barrio Logan would have one of the lowest ratios downtown. Although BASE FAR in downtown could go up to 12 in some cases, the FAR for the Southeast sub-district adjacent to Barrio Logan would be 3. This FAR would not allow the tall towers referenced in this comment. Lastly, Goal 5.3-G-3 encourages buildings in the Southeast sub-district to “step down” toward surrounding neighborhoods, as reflected in the proposed FARs. In fact, the proposed FAR was reduced from a preliminary draft of the Community Plan (November 2004) from a proposed 4 FAR with a potential bonus of 2 FAR for a total of 6 FAR to a proposed 3 FAR (as currently allowed) with a proposed bonus of 1 FAR for a total of 4 FAR based on public comments.
- 17.11 The EIR concurs with the observation made by this comment. The potential for significant impacts from transient activities on Barrio Logan is identified on page 5.1-20 of the EIR.
- 17.12 As indicated in response to comment 15.6, affordable housing is not an appropriate subject for the EIR.

17.12
Cont.

needed for the incomes currently paid by downtown employers. Presently we believe that the majority of downtown workers earn no more than a living wage. A full time worker earning a living wage of \$10/hr, makes an average of \$19,000.00/yr. This puts most workers at the 30% AMI level. We believe that CCDC should be providing and projecting more units at a deeper affordability.

17.13

- **Air Quality:** The proposed Downtown Development requires a new environmental analysis of air quality impacts. The proposed project would place a large residential development where air quality impacts to residents themselves are likely to be significant. The existing environmental documents fail to even identify this issue. The increase in ground level ozone created by an increase in vehicular and construction traffic is significant and should be studied further.

17.14

- **Urban Design:** We urge CCDC to adopt strict compliance with the Green Building LEED Certification program in the development of downtown. We as a society should beautify and enhance our built environment through sustainability, conservationism and a regard to human health.

We recognize the effort that you and your staff put in producing such a document. We thank you for the opportunity to comment and participate in the review process. The community of Barrio Logan and EHC are valuable entities that would help you in transforming downtown San Diego into a vibrant and healthy community for all.

Sincerely,



Randa Baramki
Co-Director Toxic-Free Neighborhood Campaign

17.13 Potential impacts related to new development downtown is specifically addressed in the EIR. The amount of carbon monoxide (CO) expected at buildout is shown to be well below the significance threshold in Table 5.8-2 on page 5.8-8. On this same page, the potential for significant localized CO concentrations (hotspots) is specifically evaluated and determined to be not significant. The only other localized risk is associated with exposure to stationary source emissions related to industrial uses and the Tenth Avenue Marine Terminal, in particular. As discussed in response to comment 15.2, the potential for health risk is considered not significant.

17.14 The Proposed Community Plan recognizes the importance of green building practices by including a specific chapter devoted to Sustainable Development (Chapter 5.8). Furthermore, Policy 5.8-P-1 states, "Prepare and implement Green Building guidelines and/or standards appropriate to the intense San Diego Downtown context to ensure high levels of energy efficiency and reduction in life-cycle environmental impacts associated with construction and operations of buildings."

**A New Community Vision for Barrio Logan!
Support a Barrio Logan that is Safe, Healthy and Affordable for Everyone!**

The residents of Barrio Logan deserve a community that is vibrant, healthy and free of toxic pollution. The current community plan and zoning have not accomplished that. As downtown San Diego and the surrounding neighborhoods change, we need to ensure that future development in our community will benefit and be affordable to current residents. Residents en Accion Logan, (Comité REAL) a committee of the Environmental Health Coalition, drafted the following principles for future development in Barrio Logan:

Ensure Healthy Neighborhoods!

- Industrial areas must be separated from residential areas.
- New housing should not be built close to the freeway, on 28th Street or on Harbor Drive.
- Truck traffic from the Port and other major industrial facilities, must be redirected away from residential areas and be limited to designated truck routes along Harbor Drive, 28th St., 32nd St., and Civic Center Drive.
- Sound barriers, such as walls and green belts, should be built along the freeway.

Create Affordable Housing!

- New rental and for sale housing must be affordable to current residents (those making less than \$40,000 per year).
- More affordable senior housing should be constructed.

Preserve community character!

- New buildings should not exceed three stories in height.
- The existing housing stock must be protected, maintained, and rehabilitated.
- Protect and preserve Barrio Logan's culture and history; Support and enhance the artistic creativity throughout the community.
- Protect community-serving small businesses.

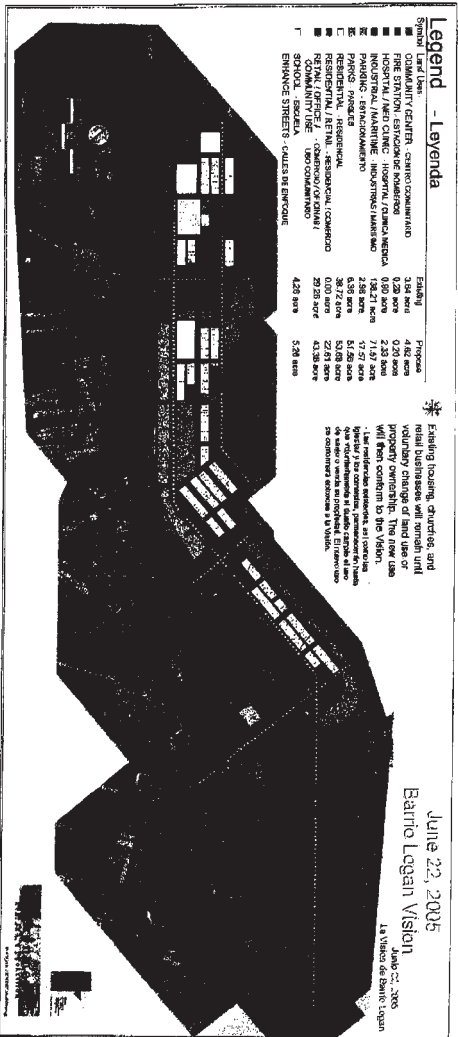
Promote a healthy community!

- New development must include more centrally located community services, more parks, and more recreational and educational centers for all age groups.
- All new development should prioritize the creation and protection of jobs with livable wages and healthcare benefits.

Yes, I/we support the Environmental Health Coalition Comité REAL Vision for my community! I/we call on the City of San Diego to complete a new community plan for Barrio Logan based upon this vision, map and principles!

Name _____ Organization _____
 Address _____ Phone _____ Email _____
 Comments _____ Date _____

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This Vision will make our community safer!
 Approximately 1,543,900 pounds of toxic or hazardous materials, liquids and solids, and 374,650 cubic feet of toxic or hazardous gases will be removed from our neighborhood!

This Vision will make our community healthier!
 Over FIVE TONS (11,000 pounds) per year of toxic air contaminants that are currently emitted near homes and schools will be moved to an industrial area. This includes over 600 POUNDS of diesel emissions, and over 100 POUNDS of heavy metals.

This Vision will make our community more affordable!
 Between 1200 and 1600 affordable housing units will be added to the community!

Esta Vision hará nuestra comunidad más segura!
 Aproximadamente, 1,543,900 libras de materiales tóxicos, tanto líquidos como sólidos, y 374,650 pies cúbicos de gases tóxicos serán removidos de nuestra comunidad!

Esta Vision hará nuestra comunidad más sana!
 Más de CINCO TONELADAS (11 mil libras) por año de contaminantes tóxicos del aire que actualmente se emiten cerca de casas y escuelas, serán reubicados a una zona industrial. Esto incluye más de 600 LIBRAS de emisiones de diesel, y más de 100 LIBRAS de metales pesados.

Esta Vision hará nuestra comunidad más accesible!
 Entre 1200 y 1600 unidades de viviendas accesibles serán añadidas a la comunidad!



September 12, 2005

Mr. Peter Hall, President
Centre City Development Corporation
225 Broadway, Suite 1100
San Diego, CA 92101

**Subject: Centre City Development Corporation Plan Update
and Environmental Impact Report**

Dear Mr. Hall:

The Industrial Environmental Association (IEA) is a San Diego regional public policy trade organization representing manufacturing, shipbuilding, defense, high technology, pharmaceutical, biotechnology, utility, power generation, plating, warehousing and distribution companies and solid waste/recycling operations. Recently, we have become increasingly concerned with the encroachment of residential uses in or in close proximity to industrial zones in all areas of the county.

When incompatible land uses do occur, there is the potential for tremendous economic and operational burdens on the industrial facility. Incompatible land uses in proximity to one another also burden a community, public agencies and businesses with controversy that must be managed at great expense to all concerned. This has especially been the case in the area of the working waterfront and the Barrio Logan community, and the comments in this letter also reflect the views of the Working Waterfront Group (WWG.)

It is because of these conflicts that IEA has been an active participant in several statewide initiatives to more closely examine land use incompatibilities. Our interest is based on the premise that it is far better to present incompatible land uses from occurring the first place, rather than address conflicts after the fact.

With the update of the Centre City Development Corporation (CCDC) general plan, there are areas shown as "flexible use" that would allow residential projects in close proximity to Solar Turbines at Harbor Drive and Laurel Street and to the city's major heavy industrial zone in Barrio Logan.

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Page 2

Heavy industrial zones are typically characterized by their outputs/emissions, physical size, production volumes, intensity hours of operation, shipping, receiving transportation activities and outdoor storage, all of which occur in the area directly adjacent to the CCDC planning area.

Following is background information and land use guidelines that apply, and we hope will merit your further review during consideration of these areas of "flexible use" in the plan update:

Governor's Office of Planning and Research (OPR): As part of the State of California's issuance of new general plan guidelines late last year, OPR stated:

- 18.1 [] • It is important to recognize that there are certain industrial uses that will always be incompatible with residential and school uses. Residential and school uses are harmed by incompatible land uses that have environmental effects, such as noise, air emissions (including dust) and exposure to hazardous materials;
- 18.2 [] • The compatibility problem can also operate in reverse and harm a business in the form of higher mitigation costs or the curtailment of economic activities;
- 18.3 [] • Residential and school uses in proximity to industrial facilities and other uses that, even with the best available technology, will contain or produce materials that, because of their quantity, concentration or physical or chemical characteristics, pose a significant hazard to human health and safety.

California Air Quality and Land Use Handbook: The California Air Resources Board (ARB) developed the handbook to promote better, more informed decision-making by local land use agencies. Land use policies and practices, including planning, zoning and siting activities play a critical role in air quality and public health in local communities. Even with the best available control technology, some projects that are sited very close to homes can result in elevated air pollution exposures.

Recommendations from the guidebook on siting new residential land uses are:

- 18.4 [] * Distribution Centers-Avoid siting new sensitive land uses within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day or more than 40 trucks with operating transport refrigeration units). Take into account the configuration of existing distribution centers and avoid locating residences and other new sensitive land uses near entry and exit ports.

- 18.1 The Proposed Community Plan recognizes the importance of promoting industrial development that would be compatible with the mixed use goal for downtown including residential uses. In describing the uses allowed in the Mixed Commercial (formerly Flexible Use) designation, the Proposed Community Plan directs any future industrial or service uses to demonstrate that air quality in surrounding residential areas and neighborhoods not be adversely affected. Furthermore, adherence to local, state and federal regulations related to the use and storage of hazardous wastes would reduce potential impacts to surrounding areas.
- 18.2 Comment noted.
- 18.3 As indicated in response to comment 16.1, hazardous materials regulations would reduce potential exposure risks.
- 18.4 As indicated in response to comment 17.2, a significant health risk to future residents from the Tenth Avenue Marine Terminal or other localized industrial activities within or adjacent to the downtown area would not occur.

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18.5 [] * Rail Yards-Avoid siting new sensitive land uses within 1,000 feet of a major service and maintenance rail yard; within one mile of a rail yard, consider possible siting limitations and mitigation approaches.

18.6 [] * Ports-Avoid siting new sensitive land uses immediately downwind of ports in the most heavily impacted zones.

18.7 [] **SANDAG Sourcepoint Research:** In researching incompatibilities as part of the Otay Mesa plan update, SANDAG's Sourcepoint found that a generic buffering standard between heavy industrial uses and residential is 1,000-2,000 feet.

Governor's Goods Movement Initiative: The CCDC planning area is directly adjacent to port-related activities. In January of 2005, the Governor initiated a Goods Movement Initiative to look at the growth of the state's economy at the ports, the effects on neighboring communities and the environmental impacts generated from port, rail and transportation operations. Many of the problems and concerns with the efficient safe and growing volume of delivery of goods from ports have stemmed from inappropriate land use decisions that allowed encroachment on operations, congestion in transportation corridors, increase in emissions because of circuitous routing or bottlenecks of vehicles, loss of mitigation lands such as for staging areas, etc.

Goods movement infrastructure at the port must be considered as one integrated, multi-modal system. San Diego has growing importance in the global supply chain and can benefit from the congestion and overflow that is occurring at the ports of Long Beach and Los Angeles. The Goods Movement report finds that both truck and rail access and free-flowing corridors to ports are the means to move goods more efficiently. Growth in goods movement sources also increases traffic congestion, noise, light source and emission effects. This growth in the goods movement system will in turn increase the potential for concerns in communities impacted by this growth, with an important factor being the proximity of that community to goods movement activity.

18.8 [] **Recommendation:** Extensive efforts have gone into the identification of problems associated with collocation of industrial and residential uses as detailed above. We strongly urge CCDC to consider these guidelines and exclude residential uses from the "flexible use" category in the plan update.

With regard to the accompanying Environmental Impact Report, we have the following comments:

18.5 As with the Tenth Avenue Marine Terminal operations, the health risk associated with future residential development within 1,000 feet of the railroad switching yards would not result in sufficient long-term exposure levels to constitute a significant health risk.

18.6 As indicated in response to comment 17.2, a significant health risk to future residents from the Tenth Avenue Marine Terminal or other localize industrial activities within or adjacent to the downtown area would not occur.

18.7 Comment noted.

18.8 As no significant health hazard would be associated with the Tenth Avenue Marine Terminal or railroad switching yard, CCDC does not consider it necessary to eliminate residential uses from the Mixed Commercial (formerly Flexible Use) designation.

COMMENTS

RESPONSES

Page 4

18.9 ***Air Quality:** The Statement on page 2 of the Air Quality Analysis that reads “smart growth that mixes residential, commercial and employment uses in higher density nodes with available multiple transportation modes is considered an extremely positive air quality strategy” is lacking full definition. It is very important for planning purposes that “employment uses” be distinguished from “industrial uses.” While co-locating residential with typical commercial or office uses would be compatible and positive, the same generalization is not applicable to industrial operations.

18.10 Unlike commercial or office uses, it is important to note that the formula for health risk assessments for residential impacts are calculated on the basis of exposure for 24 hours a day, 7 days a week, 365 days a year for 70 years.

18.11 Page 24 of the Air Quality Analysis states that the San Diego Air Pollution Control District advocates the incorporation of residential uses in existing employment areas. Once again, there needs to be a clear distinction between an employment site and an industrial site.

18.12 ***Noise:** Residential development in too close proximity to railroad and some industrial operations creates incompatible exterior noise levels. The maximum exterior noise level for outdoor areas in connection with residential developments is 65 dBA CNEL and is very difficult to mitigate.

18.13 ***Health & Safety:** The industrial/military complex beginning at the 10th Avenue Marine Terminal is within the area of influence of the CCDC plan. Industrial users routinely are permitted, prepare risk management plans and security assessments based on their operation in an industrial zone. Workers in industrial areas routinely receive extensive training and are knowledgeable in emergency procedures. Introduction of residential in close proximity may cause a business to have a higher level of permitting, undertake new mitigation measures, add technology controls or experience delays in building new facilities or changing operations.

18.14 ***Visual Impacts/View Corridors:** In the Public Utilities Commission proceeding 01-09-012 with regard to the Park Boulevard Grade crossing, the Centre City Development Corporation stated as part of those proceedings “that a grade separation structure would divide the downtown, as well as wall off the bay from residents and visitors.” However, the kind of tall, high-density residential projects that could be developed in the flexible use areas would create even more visual impacts than a grade separation structure and create a division between the Barrio Logan community and downtown.

18.9 Comment noted. As stated in response to comment 15.5, industrial uses are not expected to represent a major component of the Mixed Commercial (formerly Flexible Use) designation.

18.10 The EIR recognizes this long-term risk definition on page 5.8-10.

18.11 Comment noted. The Proposed Community Plan does not advocate a substantial level of new industrial development in downtown.

18.12 See response to comment 14.3.

18.13 Consideration of the potential impact residential development may have on permitting requirements for new industrial uses is outside the scope of the EIR and is not considered an environmental issue under CEQA.

18.14 The reference to the visual effects of a grade separation structure at Harbor Drive was focused on the potential view obstacle it would present to Park Boulevard which is identified in the Community Plan as a view corridor. As indicated on page 5-12 of the Proposed Community Plan, much of the area near Barrio Logan (known as the Southeast sub-district of East Village) would be placed within a “fine-grain” classification. Furthermore, the floor area ratio (FAR) allowed within the areas nearest Barrio Logan would have one of the lowest ratios of downtown. Although FAR in downtown could go up to 12 in some cases, the FAR for the Southeast sub-district adjacent to Barrio Logan would be 3. This FAR would not allow the tall towers referenced in this comment. Lastly, Goal 5.3-G-3 encourages buildings in the Southeast sub-district to “step down” toward surrounding neighborhoods, as reflected in the proposed FARs.

- 18.15 [In addition, there is no reference to the visual impacts of the high-rise residential projects in the CCDC planning area that will overlook the adjacent industrial operations that include unsightly equipment, storage tanks, visible emissions, as well as having some bay views blocked by large cranes or other equipment.
- 18.16 [***Parking:** The EIR’s transportation, circulation and access study indicates that significant project-related parking impacts would occur when build-out of the proposed downtown community plan results in projected parking shortages in the downtown area and/or parking impacts on surrounding neighborhoods. Major events already create overflow parking in the surrounding neighborhood. These unmitigated significant parking impacts will adversely affect the existing residential community. The reference that the parking situation and the effect be evaluated every five years as a mitigation strategy does not address or mitigate the problem. A parking policy to work with the port to provide public parking in the waterfront/marina area, which is already congested, is not a mitigation. Due to the shift nature of the waterfront activities, transportation demand management strategies would be very difficult to implement.
- 18.17 [***Traffic:** Park Boulevard is considered a commercial truck corridor. Already, the industrial traffic and goods movement supply system are subject to levels of service that are of great concern to the surrounding neighborhoods. The build-out of the proposed downtown community plan, particularly with high-density residential projects, will further exacerbate the problems and represent cumulatively significant impacts. Designated corridors such as Park Boulevard must be preserved.
- 18.18 [***Military Readiness:** SB 1462 requires notice and consultation with the military to assess military preparedness issues. SB 926 further requires that land use elements of general plans consider the impact of new growth on military readiness activities carried out on military bases, installations and operating and training areas. The 10th Avenue Marine Terminal is used for military cargo, and the shipyards are daily engaged in the seaworthiness and readiness of military vessels. This law provides that community advocacy groups, such as IEA and WWG, can invoke a requirement that the local planning agency conduct a full readiness and operational assessment during this plan update process. With this letter, we are formally requesting such a review be conducted.

- 18.15 As adverse visual effects associated with any current industrial uses already exist, they are not considered a potentially significant impact on future residents because these residents would have a choice as to whether to accept these view elements at the time they purchase a residence. This condition is different from the potential effect of a new industrial development posing visual impacts to existing residents.
- 18.16 Due to the programmatic nature of the analysis of the Proposed Community Plan, it is not possible to quantify parking impacts which may occur within the surrounding neighborhoods. As indicated on page 5.2-43, “The extent of parking in the adjacent neighborhoods will be a function of cost and availability of parking as well as the specific uses developed in the adjacent sections of the downtown area.” Further complicating the specific quantification is the uncertainty as to the response of the developer to meeting the full parking demand of a project as well as the willingness of the public and/or private sector to provide independent parking facilities. Thus, the five-year monitoring of parking within surrounding neighborhoods is considered a reasonable mitigation. In recognition of the lack of definition and enforcement of any future actions which could be undertaken to reduce parking impacts on surrounding neighborhoods, the EIR concludes that the impact would not be mitigated to below a level of significance.
- 18.17 The discussion of traffic impacts on surrounding areas on page 5.2-30 of the EIR acknowledges that buildout of downtown under the Proposed Community Plan would have significant impacts on intersections within surrounding neighborhoods; some of which occur in Logan Heights, just northeast of Barrio Logan.
- 18.18 The issue of security is not an environmental issue under CEQA. Therefore, no response is necessary.

18.19

* **Homeland Security:** There have been substantial new security requirements with respect to marine terminals instituted since 2001. In addition, the Port of San Diego has been designated by the Federal Maritime Administration as a National Strategic Port.

Summary: In summary, we are respectfully requesting that his plan update process include a thorough and comprehensive review of the two very different planning areas which share a common boundary. In order for the industrial and ports area to reach their full potential, we feel that transition and separation of industrial and residential uses, with at least a 1,000 foot buffer is appropriate and necessary.

Thank you for your consideration of our comments.

Sincerely,



Patti Krebs
Executive Director

18.19 The issue of security is not an environmental issue under CEQA. Therefore, no response is necessary.

COMMENTS

RESPONSES

Center City Development Corporation
225 Broadway, Suite 1100
San Diego, CA 92101

Attention:
Alexander Elias, Senior Planner
Center City Community Plan [PDF 5.6]

Enclosure: Public Comment

SEP

Comments on Downtown Community Plan

These comments are limited to transportation portions of the Plan submitted by a Marina District resident who held and practiced with a California Professional Engineering registration for over forty years in forefront of conceptualizing and implementing state-of-the-art transportation products

The American Standard Dictionary defines "PLAN" as "A scheme, program, or method worked out beforehand for the accomplishment of an objective: a plan of attack." I question that the Downtown Community Plan document should be dignified by calling it a plan. The operative word "accomplishment" is not there. It is page after page of wish-list type objectives without specific actions or schedules to accomplish objectives. It is like looking at a Pottery Barn catalog choosing items to cover a cracked and broken plaster wall, but only if other controlling forces can be persuaded to agree and the items at sometime in future appear at a fire sale auction.

Many of the items are contradictory to other items and effectively canceling to itself or one or more of the contradicting items. Other items state objectives that have little to no possibility of being implemented.

Only a few of the examples are cited here.

"Prohibit and discourage any interruption to the street grid" (7.1.P.2 /3). Another section suggests that B Street be extended through the Civic Center. But in EIR, it states that MTS is considering closing both Second Avenue and Seventh Avenue at C Street to allow 4-car Trolleys. (Page 131) Is it the proposal that streets need be extended while avenues can be blocked? The main north/south access to city is on north/south avenues.

Estimates of build-out will, after all of the proposed attempts to reduce vehicle traffic, increase parking demand by 250%. (EIR P163/7.9) It is difficult to identify locations for this growth, especially when viewing the Pedestrian Priority Zones (Fig 7-2) Reaching these parking spaces is made more difficult by pedestrian navigation between these zones when separated by major traffic "Boulevards" such as Broadway. Will "traffic signal walk times" be lengthened (7.2-P-4) thus heavily impacting vehicle flow into and out of downtown?

"Work with relevant agencies to eliminate or mitigate adverse effects of freight train traffic on adjacent pedestrians, uses, and residents. Impacts include blocked intersections and horn noise." (7.3-P-4). The heavy rail line is a primary conduit enabling a major portion of the financial contribution from our harbor. It is the only heavy rail out of San Diego County. The Plan contradicts the efforts to increase Port of San Diego traffic that will surely increase street blockage that "relevant agencies" will be unable or unlikely to change. Economics must govern.

There are multiple platitudes like " Corporate with transit agency on public programs and campaigns to increase transit use for various types of trips, work, shopping, entertainment.

etc.” (7.3-P-8) These do not make a “plan”. Wish list or policy is a more appropriate identification

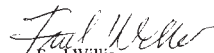
Bus Rapid Transit (BRT) has been touted in this “plan” as “a new philosophy in bus travel”.(7-9) It is not new, it was discussed in Los Angeles before the subway debacle. It is not often used as its disadvantages out way advantages. To achieve its potential, dedicated roadway must be provided. This means crossing gates and pedestrian security barriers that divide neighborhoods, and slow intersecting vehicle traffic. Traffic signal priority creates serious safety problems at high volume intersections unless exceedingly long priorities allow clearing the intersection of vehicles to lower the problem but not eliminating it. Any other system of sharing reduces the value of time gained.

“Cyclists will benefit from designated lanes and paths, throughout downtown. (7.2) How this can be accomplished on existing downtown streets is not described. Surely not replacing sidewalk space. Would the bike lanes replace a parking lane and be two-way? Would they be between parked vehicles and curb? Would they be between moving traffic and parked vehicles? (No safety there) First hand experience: I rode a bike for United Parcel’s Red arrow Messenger service in Hollywood for two years when traffic was 1939 pace. My most serious accident was a motorist opening his car door as I passed, spilling me into moving auto traffic. This element of the plan needs a lot of definition or it cannot be called a “plan”

The examples here are only representative of the contradictions, impossible dreams and an abundance of platitudes that do not constitute a plan.

With over 150 pages in the Transportation section, there is no proposed effort to attack the traffic directly with a comprehensive high speed commuter system that will attract riders with speed, safety and frequency. The systems of elevated monorails are popular in Pacific Rim countries to solve transit problems made difficult by already dense build-out of residential and business structures. The air above pedestrians, autos, buses, trolleys and trains is real estate cost free and is positively cost competitive to operate against trolleys, especially in the San Diego topography of terrain change. It has flexible scheduling and has load accommodation operations on 3-minute schedules without the costs or schedule complexities of drivers. The system is handicapped rider friendly with platform level loading, and provides added safety of an elevated waiting area requiring ticket holder access.

The writer has a website addressing a “plan” for San Diego using this twenty first century technology. <http://www.sdmonorail.com>


Fred Willis
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(619) 231-5970

September 12, 2005

TO: Alexandra Elias
CCDC

FROM: Michael Yee *MY*
President
San Diego Chinese Historical Society & Museum

SUBJECT: PDO and EIR Historical Resources Report – Asian Pacific Thematic Historic District Master Plan - Updated

19.1 [This is express concern about the lack of mention of the Asian Pacific Thematic Historic District Master (APTHD) plan (1995). That focus plan has some valuable details that are not included in the Historic Resources Report section of the Downtown Community Plan EIR and the PDO.

19.2 [The plan, or the historic and future development planning that it describes, should be mentioned as it shows the buildings and historic impacts in more detail than the EIR version dated June 2005. Other planning areas have their own planning documents, the APTHD has only one and is easily overlooked. We acknowledge the EIR may have new information which is appreciated.

Many people, including the San Diego Chinese Historical Museum, the Asian Pacific Historic Collaborative, Asian Business Association, and community members including Tom Fat, are concerned with the lack of mention in the community plan and the EIR. Comments and suggestions were submitted at the last meeting of the Community Plan committee earlier in 2005, and again brought up to Beverly Schroeder on August 22, 2005.

19.3 [We realize the level of detail in the community plan and the PDO and EIR cannot include the level of detail in the district master plan. We ask however, that some reference to the master plan be in the new governing documents of the updated community plan and EIR, so they can be applied when needed.

Your help in meshing the plans in the Asian Pacific Thematic Historic District with the new downtown community plan is appreciated. Thank you.

19.1 References to the Asian Pacific Thematic Historic District Master Plan have been added to pages 4-34 and 5.3-15 of the Final EIR. The addition on page 4-34 acknowledges the fact that the District Master Plan would continue to provide historic context to the neighborhood. On page 5.3-15, a statement has been added that confirms that the Master Plan was adopted by the Redevelopment Agency in 1995.

19.2 The information on historic resources used in the analysis contained in Chapter 5.3 of the EIR is considered adequate. As indicated on page 5.3-1 of the EIR, the baseline for historic structures was based on four separate surveys of downtown by well-qualified consultants.

19.3 See response to comment 19.1.



San Diego County Archaeological Society, Inc.

Environmental Review Committee

10 September 2005

To: Ms. Alexandra Elias, Senior Planner
Centre City Development Corporation
225 Broadway, Suite 1100
San Diego, California 92101-5074
Subject: Draft Environmental Impact Report
Proposed San Diego Downtown Community Plan, Redevelopment Plan for the
Centre City Project Area and Centre City Planned District Ordinance

Dear Ms. Elias:

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

Based on the information contained in the DEIR, we have the following comments on the mitigation measures as presented in Table 1.3-1:

- 20.1 Mitigation Measure CUL-A.1-1 states that "If the building/structure has been previously determined not to meet any of these four criteria, no additional action will be required." It needs to be considered that the resource may have become significant since that previous determination was made.
20.2 In Mitigation Measure CIL-B.1-1, the statement at the end of "Step 1 - Initial Evaluation", "No further action is required..." applies to historical archaeological potential, not prehistoric potential.
20.3 In "Step 3 - Data Recovery" of that same mitigation measure, there is a need to set a reasonable deadline for submittal of the report and curation of any resulting collections.

P.O. Box 81106 • San Diego, CA 92138-1106 • (658) 538-0935

SEP 20 2005

20.1 The Historical Resources Guidelines of the Land Development Code state: "Evaluations will not be required if the resource has been evaluated for CEQA significance or for National Register eligibility within the last five years if there has been no change in the conditions which contributed to the determination of significance or eligibility. A property should be re-evaluated if its condition or setting has either improved or deteriorated, if new information is available, or if the resource is becoming increasing rare due to the loss of other similar resources."

Furthermore, as discussed on page 5.3.22 of the EIR, prior to the issuance of any permit that would directly or indirectly affect a building/structure in excess of 45 years of age, (the CEQA threshold age), CCDC shall determine whether the building/structure meets any one of four criteria: National Register listed or determined eligible, California listed or determined eligible, San Diego Register listed or determined eligible, or the CEQA criteria for historical resources. If the building/structure meets any one of these four criteria, it is treated and protected as a historic resource under the City's regulatory process. If it meets none of these criteria, but is in excess of 45 years of age, it follows the same process that applies in the rest of the City of San Diego, as is more extensively discussed in response to comment 23.3.

As discussed in Section 5.3.1.1, extensive historical survey activity in the Centre City Redevelopment Project area has transpired over the past 17 years. And, as the result of this activity, the historical building/structure database is both extensive and thorough. Several hundred properties have been evaluated and cleared by the Historic Resource Board (HRB) or have been designated by the HRB as a local landmark. Structures that have as yet not been evaluated will be reviewed by CCDC if they are more than 45 years of age at the time that a redevelopment proposal is presented which could affect them. Since City of San Diego permits voluntary and involuntary designation applications and re-initiation of designation applications based new information, if a property, which was not found eligible under national, state, local or CEQA standards, is later found to possess significance, a designation action may be pursued.


- 20.2 The potential for subsurface prehistoric resources is inherent in Mitigation Measure CUL-B.1. A determination that no further action would be required after Step 1 would be based on clear and convincing evidence that the potential for subsurface material is sufficiently low as to negate the need for testing. Such evidence could include proof that the subsurface soil had been previously disturbed to sufficient depth. In the interest of clarity, the last sentence of Step 1-Initial Evaluation has been revised in the FEIR to read as follows: "Historical and existing land uses shall also be reviewed to assess the potential for significant prehistoric and historic archaeological resources to be present".
- 20.3 CCDC recognizes the importance of setting time limits. To this end, Step 3 of Mitigation Measure CUL-B.1 already contains a deadline for submitting a report summarizing the data recovery program. The requirement for submittal of the report within 12 months of the date the data recovery was initiated is considered appropriate to allow the recovery, cataloguing and research to be completed in a timely fashion. With respect to Step 4, the measure already requires monitoring summary reports to be submitted to CCDC within 30 days of the completion of monitoring. Similarly, proof of curation of artifacts must be submitted to CCDC within 30 days of curation.

COMMENTS

RESPONSES

Thank you for providing SDCAS with this opportunity to participate in the public review of this project's environmental documents.

Sincerely,


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

cc: SDCAS President
File



Mr Peter Hall
 President
 Centre City Development Corporation
 225 Broadway Suite 1100
 San Diego, CA 92101-5074

SEP 2 2005

Dear President Hall,

We have reviewed the "Draft Environmental Impact Report for the Proposed San Diego Downtown Community Plan, Redevelopment Plan For the Centre City Project Area and the Centre City Planned District Ordinance" and your letter dated 28 July 2005 regarding the Draft EIR.

Our Comments as follows are in order from the Draft EIR and not in order of importance.

21.1

Table 1.3-1 "Significant Impacts and Mitigation Measures:
 Page 1-13 Impact LU-B.1/B.4: Noise. Mitigation should include mandatory disclosure to renters and buyers that a mixed use urban environment by its nature will have more noise than a purely residential area. Reasoning that some people are more sensitive to noise, they should be made aware before renting or buying that the area has significant noise levels that can not be mitigated. The ability of the Agency to require covenants on all properties which require a Permit should enable implementation.
 Page 1-14 Impact NOI-A.1/D.2: Noise. Same as LU-B.1,...B.4.

21.2

Table 1.3-1 "Significant Impacts and Mitigation Measures"
 Page 1-18 Impact TRF-A.1.2/D.1 Recommend study at five year intervals in connection with Parking Mitigation Study. See Section 5.2.3.2 below.

21.3

Table 1.3-2 "Relevant Goals and Policies from the Downtown Community Plan".
 Page 1-21 "Transportation, Circulation, Access and Parking" Policy 7.1-P-1 "cross section(s)" were not carried forward from first draft to Public Hearing Draft of the Community Plan. Insert in Community Plan or Delete from EIR.

21.4

Table 5.2-10 "Parking Demand"
 Page 5.2-23 Parking. "For purposes of this assessment, baseline parking demand ratios used by the City of San Diego were assumed." The

21.1 As indicated in response to comment 14.4, the disclosure of the existence of noise in the downtown urban area does not mitigate the noise produced by the railroad activities.

21.2 Studies of traffic and parking conditions at five-year intervals are required by Mitigation Measures TRF-A.1.1 and TRF-D.1.

21.3 The reference to street sections in the FEIR has been eliminated.

21.4 The parking shortfall identified in the EIR is based on a comparison the parking demand based on the City's demand factors and the parking requirements imposed by the proposed PDO. Thus, the EIR does reflect the basis of comparison suggested in this comment.

21.4
Cont.

values as set forth in the Table are between 35% and 110% above the minimums established in the Planned District Ordinance (PDO). If the City's Demand Ratios were used for calculating parking shortfalls and the PDO will be used to implement building, then the shortfall predicted and its impacts are severely understated. We agree wholeheartedly with the five year reviews of parking impacts.


21.5

Section 5.2.3.2 "Trip Generation" and associated impacts in Table 1.3-1 "Significant Impacts and Mitigation Measures" TRF-A.1.2/D.1

Page 5.2-23 The trip generation model based on a study by S. Pazagadi, August 1990 as noted in the PDO is extremely dated and does not reflect the current denser use in the Centre City. In the last 15 years a large number of residential orientated retail and commercial establishments have begun operating in the Centre City promoting significantly more trips by other modes than private auto. A new study needs to be done to more accurately reflect the current trends in the Centre City. Recommend that such a study be included as part of the five year reviews of parking impacts such that parking and traffic would both be reviewed at these intervals. A more accurate assessment will affect the impacts on circulation within and in and out of the area.

Thank you for your consideration of our input.

Sincerely,



Gary Smith
President

San Diego Downtown Residents Group
PO Box 124715
San Diego, CA 92112
www.sddrg.org/president@sddrg.org

21.5 As indicated on page 5.2-16 of the EIR, the traffic generation at buildout was based on a Regional Transportation Model developed by SANDAG. This is a highly complex computer model which encompasses a number of factors which can influence trip generation. Most notably, it specifically considers the availability of mass transit which is a major component of the downtown transportation system. This model is not based on 1990 information. To avoid confusion, the trip generation rates in the PDO will only be included as necessary to serve as a basis for calculating the traffic generated within the Sports/Entertainment District to assure that the total trips do not exceed the maximum cap established for the District.



SAN DIEGO & IMPERIAL VALLEY RAILROAD COMPANY, INC.

1501 National Avenue • Suite 200 • San Diego, CA 92113-1029 • 619-239-7348 • Fax 619-239-7128

9/9 Alex Bostrom

September 4, 2005

Mr. Peter Hall, President
Centre City Development Corporation
225 Broadway, Suite 1100
San Diego, CA 92101

Subject: Environmental Impact Report for the San Diego Downtown Community Plan

Dear Mr. Hall,

San Diego and Imperial Valley Railroad (SDIV) is the operator of the San Diego & Arizona Eastern Railway routes between San Diego & El Cajon, and San Diego and San Ysidro. The San Diego & Arizona Eastern Railway is owned by the Metropolitan Transit system (MTS). Freight cars are delivered from the BNSF Railway to the SDIV rail yard located just east of Harbor Drive near PETCO Park. In 2004, SDIV moved more than 8000 carloads resulting in the reduction of at least 50,000 regional truck trips on San Diego area freeways.

SDIV has similar issues to waterfront industries in that we are geographically constrained, and there are no economically viable options for relocation. Freight rail growth continues, and is important to ensure that the rail infrastructure has the ability to accommodate this growth. Incompatible land uses could lead to the curtailment of some operations, and a loss of options for future growth.

The update of the Downtown Community Plan could allow the introduction of residential projects in close proximity to the SDIV rail operations. The concerns of this rail operator regard emissions and noise levels which are part of the routine operations. The SDIV has an additional issue in the fact that its operations must occur at night due to the limited freight operating window on the Trolley line. This is where the incompatibility lies, and is the fundamental issue our railroad. The specific issues of items of interest to SDIV in the EIR involve land use, noise, and air quality.

Land Use

The SDIV railroad yard and mainline should not be considered as a buffer between residential and industrial, as our operations generate some of the same noise and emissions that would make industrial and residential proximity incompatible. As stated in the EIR, noise generated by railroad activity would significantly impact noise sensitive uses located nearby. Railroad noise includes not just horn noise at crossings, but engine, wheel, and car coupling noises. Although the average noise levels generated by railroad activities would not exceed 24-hour average standards, SDIV operates at night in order to use the Trolley tracks during off hours,

A RailAmerica Company

22.1

22.2

22.1 The potential for land use conflicts related to noise from railroad operations near residential development is identified on page 5.1-19 of the EIR and further described on page 5.7-14. Air quality impacts are discussed on pages 5.8-10 and 11 of the EIR.

22.2 The conclusions of the EIR reflect those of this comment. Railroad operations (including engine and wheel noise) are identified as a significant land use conflict with residential uses. Furthermore, due to lack of certainty that adequate measures can be enforced to alleviate this potential conflict, the EIR concludes that the land use conflict would be significant and not mitigated to below a level of significance.

22.2 Cont. and the railroad noise would disturb sleep patterns of persons living nearby to the railroad tracks and rail yard.

22.3 The Downtown Community Plan would include a policy which would seek establishment of quiet zones and enforce ban on sounding of horns (Policy 13.4-P-2). However, this policy would not address the rail noise which is produced for normal operations such as switching, and train movement. Additional measures should be taken to ensure that any development land use does not experience unacceptable noise impacts from rail.

Noise

22.4 The Noise Impact Analysis Appendix to the EIR stated that use of horns is discretionary with the engineer. In fact, the CPUC code requires operation of the horn. Failure by the engineer to do so has been a misdemeanor (Section 7678). The FRA final ruling on the use of train horns now preempts local and state jurisdiction on the use of train horns. This Federal regulation requires the operation of the horn unless an FRA approved quiet zone is in place. The use of a quiet zone does mitigate the noise impact of train horn noise in the areas of heavy residential use. But safety cannot be compromised. SDIV looks forward to working with CCDC on the establishment of the proposed quiet zone in the downtown area.

22.5 The EIR does state that some train noise is not mitigatable. For this reason, every effort should be made to evaluate, measure, and mitigate the impacts of rail noise to residential projects prior to those projects being approved. Noise from railway operations is governed by the Federal Noise control Act of 1972. Maximum noise levels for rail operations are contained in 40 CFR 201. With noise from rail operations not being subject to the City Noise Ordinance, the assumption cannot be made that exterior noise levels from rail operations at residential sites can be controlled by that Ordinance. A procedure should be in place to determine to projected exterior noise level at any residential site, and if this level is exceeded, the use of the site for residential should be discouraged. In addition, prior to issuing a building permit, the project should maintain noise levels to conform to the General Plan Noise Element and the California Noise Insulation Standards. Land Use Impact LU-B.4 should be expanded to include rail yards, and yard switching activities as noise sources. Land Use Mitigation Measure LU-B.4-1 is appropriate for evaluating the impact on train noise on residential projects.

Air Quality

22.8 The California Air Resources Board (CARB) released guidelines to address the relationship between common stationary source emission generators and residential areas in 2005. These guidelines are based on the impacts related to diesel-powered equipment such as locomotives. Although CARB emphasizes that the guidelines are "advisory and should not be interpreted as defined "buffer zones." But the 1000 ft. advisory separation between residential and rail yards should be used as a point at which to begin to evaluate the impacts to specific proposed

22.3 The train horns and crossing bells are considered the primary source of land use compatibility conflicts between railroad operations and residential uses due their sudden occurrence and stark contrast with ambient noise conditions. Wheel noise and engine noise is considered less disruptive and not considered worthy of additional mitigation.

22.4 Comment noted. However, this distinction does not affect the validity of the analysis because the analysis assumed that the use of train horns does regularly occur within the downtown area.

22.5 Comment noted. The analysis in the acoustical study did not assume that trains would be subject to the City's Noise Ordinance.

22.6 As indicated in response to comment 14.1, train noise is not expected to exceed the exterior significance threshold of 65 dB CNEL at nearby sensitive uses. In addition, in accordance with Title 24 of the State Code, no development would be allowed which could expose persons to noise levels in excess of 45 dBA L_{eq} within habitable rooms.

22.7 This information has been added to the FEIR on page 5.1-19.

22.8 As indicated on page 5.8-10, the proximity of the rail yards to future residential uses within the Proposed Community Plan would not constitute a significant impact due to the long-term exposure required to produce a significant human health risk.

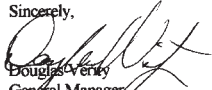
22.8
Cont.

projects. Each proposed sensitive land use project within 1000 ft. of the rail yard should be evaluated for impacts from rail related mobile emission sources.

We remain concerned about the possible long term impacts of the Community Plan to industrial, rail and port operations. By establishing a baseline from which to evaluate the impact to each residential project from our rail operations, we can the properly address and possibly mitigate the impacts to the future residents. The operations of this railroad are important in regional freight transportation efforts to reduce freeway congestion, and reduce emissions, and enable economic growth. We hope to partner with CCDC in establishing a vibrant an economically strong community with compatible land uses, while maintaining a strong industrial base and providing quality jobs.

San Diego & Imperial Valley Railroad appreciates the opportunity to respond to the Environmental Impact Report for the San Diego Downtown Community Plan

Sincerely,



Douglas Verity
General Manager
San Diego & Imperial Valley Railroad



Save Our Heritage Organisation

2476 San Diego Avenue · San Diego CA 92110 · www.sohosandiego.org
619/297-9327 · 619/291-3576 fax

September 9, 2005

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- Barry Hager
- Allen Hazard
- Susan Hector, PhD

Alexandra Elias
Senior Planner
Centre City Development Corporation
225 Broadway, Suite 1100
San Diego, CA 92101-5074

Re: Draft EIR Downtown Community Plan
PDO & Redevelopment Plan for Centre City Project Area
SCH No. 2003041001

Thank you for the opportunity to comment on this important document. While it has gone a long way to address concerns related to environmental impacts associated with the adoption and implementation of the plan, there are still several mitigation measures that need to be incorporated in the section dealing with Cultural Resources.

CUL-A.1: To encourage the retention, restoration, and adaptive reuse of state, federal and locally designated sites on site. TDR's (Transfer of Development Rights) should be made available to affected property owners and these rights shall be transferable within the Greater Centre City PDO.

Additionally a receiver site should be set up for the relocation of smaller historically designated buildings consistent with overall goals set out in the City of San Diego General Plan. The best area for this to occur is on 17th Street from Market Street South to "J" Street. This area currently has a very high concentration of small historic sites with room for many more on sites now occupied by single-story cinder block warehouses. This area was originally part of Sherman Heights and should be incorporated into the Sherman Heights Historic District. Not only would this meet the goals of the San Diego General Plan, it would facilitate the redevelopment of parcels that include smaller resources while mitigating impacts to historic resources. This will also provide a height and density buffer not only desirable from an aesthetic and livability point of view, but is consistent with the proposed Downtown Community Plan. The infrastructure should be prepared and upgraded along the 17th street corridor to make this a very desirable and attractive area. Other historic resources could also be relocated on the freeway lids proposed in the Sherman Heights area.

Projects involving San Diego Registered sites designated under criteria A, B, C & D and any sites that have not been reviewed in the last five years must be reviewed by HRB staff and if not consistent with the Secretary of the Interior's

23.1

- Welton Jones
- Mike Kelly
- Carmen Pauli
- Christopher Pro

23.2

- Tim Rudolph
- David Swarens
- Bruce Coons,
Executive Director

23.3

SEP 10 2005
12:30 p.m.

23.1 The Proposed Community Plan will be revised to allow TDRs to be made available to projects within a one-block radius of an historic structure.

23.2 The concept of a receiver site has been discussed in the past, especially lately with reference to mitigation of specific buildings in the East Village. While concentration of historic buildings which cannot be preserved in place would be better than recordation and demolition, the feasibility of such a proposal is doubtful because of land costs and space availability.

23.3 Comment noted. The City of San Diego Historical Resources Guidelines in the Land Development Code requires evaluations if one has not been undertaken in the last five years. In addition, the Historical Resources Board (HRB) is required to review any Site Development Permit where a historic resource is present, or the site lies within a historical district, unless such proposal is exempt as consistent with the Secretary of the Interior's Standards. A Site Development Permit may not be considered

COMMENTS

RESPONSES

by the decisionmaker until the Historical Resources Board has reviewed the Permit application and made a recommendation on its approval. As discussed in response to comment 20.1, CCDC would review the status of any building over 45 years of age.

COMMENTS

RESPONSES

23.3
Cont.

Standards for Rehabilitation must go to the full HRB for review and comment. Failure to follow this procedure should result in preparation of a focused EIR to review the specific impacts to the affected historic resources.

23.4

Stronger language should be used in the plan to encourage the retention, restoration, and adaptive reuse of historic buildings within the plan area. This language should be consistent with the conservation element of the City of San Diego General Plan now circulating in draft form.

SOHO's goals are to preserve enough of the historic fabric and character of San Diego to maintain our unique sense of place while we build the San Diego of the future. We believe this is an issue important to the majority of San Diegans.

Thank you again for the opportunity to help with this important process.

Sincerely,



Bruce Coons
Executive Director

23.4 Comment noted. The Proposed Community Plan does seek to preserve historic resources through policies encouraging preservation and a TDR program intended to make preservation more economically viable for historic building owners. As the language in the referenced Conservation Element is not formally adopted, conformance is not required.

September 12, 2005

Alexandra Elias, Senior Planner
 Centre City Development Corporation
 225 Broadway, Suite 1100
 San Diego, CA 92101

RE: Draft EIR for the San Diego Downtown Community Plan, Centre City PDO
 Air Quality Analysis performed by Giroux & Associates

Dear Ms Elias:

For the most part, the analysis appears to document that the portion of the air basin bounded by the Community Plan is currently reasonably good and that air quality shouldn't deteriorate greatly under the several scenarios considered. However, the existing data cited for PM-10 coupled with projections made for increased traffic within the development area should be a cause for serious concern. Table 3 of the Giroux report shows that there were 11 days in 2003 that exceeded California standards for "Inhalable Particulates (PM-10)," and the data for the 6 year span beginning in 1998 suggest an increasing trend, though the number of data points is perhaps too small to remove any doubt that a increasing trend exists. Table 4 (p. 19) provides a summary of regional emissions for 2005 and estimates of what might reasonably be expected for 2030 under the 1992 plan and under the proposed plan. Table 3 does not provide data for 2004 or for 2005, but because figures are given for 2005 in Table 4 it seems reasonable to assume that the data do exist (although 2005 is not yet over and thus we cannot know how many days exceeded California's standard). Moreover, Table 4 shows total PM-10 for 2005 in pounds/day, which is not directly comparable to the figures in Table 3. Thus, in the absence of appropriate data for 2004 and 2005, we cannot see whether what appears to be an increasing trend through time is verified.

More importantly, a comparison of the figures for PM-10 for 2005 with projected estimates under the two plans considered shows an alarming increase in PM-10. The increase between 2005 and 2030 (1992 Plan) is 70%, which should be cause of concern, but the increase between 2005 and 2030 (Proposed Plan) is even higher: 110%.

As the Giroux report points out (p. 18), "PM-10 emissions primarily derive from roadway dust and tire or break wear. ... PM-10 emission rates will grow in direct proportion to downtown development without benefiting from continued emission reductions from a cleaner vehicle fleet. Future PM-10 emissions associated with planning area traffic will therefore be significantly higher for both the 1992 Plan or the proposed Community Plan alternatives." What the report does not point out, however, is that the projected figure for the proposed plan is 23% higher than for the 1992 plan.

Given the detrimental health affects of PM-10 (Table 2), I urge CCDC not to underestimate the importance of the large increases in PM-10 that are likely to occur under the proposed plan, or to presume that the detrimental effects will somehow be ameliorated because the proposed plan constitutes "smart growth" (Giroux report, p.22).

24.1

24.2

24.3

24.1 The analysis of PM₁₀ impacts of development in accordance with the Proposed Community Plan is not dependent on past records. Rather, it is based on the anticipated PM₁₀ generated by future construction and mobile-source emissions. Therefore, no revisions to the EIR are required in response to this comment.

24.2 A comparison of the Proposed Community Plan with the adopted 1992 plan represents a plan to plan analysis. CEQA requires an evaluation of impacts based on a plan to ground condition which assesses the absolute condition rather than a comparison the net change. Consequently, the exact percentage of increase from the 1992 Plan is not relevant to the EIR analysis contained in Chapter 5.8. A qualitative, plan-to-plan comparison of air quality effects is contained in Chapter 10 on page 10-4. Although the percent reduction is not quantified as 23%, the discussion does note that the air emissions would be less under the adopted Community Plan due to the lower development potential.

24.3 The EIR recognizes the potential impact associated with PM₁₀ which is why it includes Mitigation Measure AQ-B.1.1 which is designed to minimize PM₁₀ generation.

24.4

Finally, I note that the Giroux report appears to rely entirely on air quality data provided by the San Diego Co. APCD for the development, and that all of these data appear to come from a single "APCD air quality monitoring station located on 12th Street in downtown San Diego" (p. 8). Admittedly, air pollutants are carried about throughout the development area, but we should not assume that they are stirred into a homogeneous mix. A more reasonable assumption is that there are and will be "hot spots" where air quality is significantly worse, on average, than air quality at the monitoring station on 12th Street (note that we are not told where the monitoring station is located on 12th Street). Under the proposed plan are there likely to be "hot spots" near schools? Near pocket parks? Near outdoor eating areas? Before proceeding with the favored plan, this question should be addressed.

Sincerely,



Boyd Collier, Ph.D.
Prof. of Ecology, Emeritus, SDSU
850 Beech Street, Unit 808
San Diego, CA 92101

24.4 Traditionally, air quality is considered to be adequately represented by local air quality monitoring stations. The station used for the EIR is considered particularly represented due to its proximity to downtown due to its location near the intersection of Twelfth Avenue and J Street. Normally, localized air quality impacts are limited to high carbon monoxide levels (known as "hot spots" related to traffic congestion. However, as indicated on page 5.8-8, no "hot spots" would occur within downtown with buildout in accordance with the Proposed Community Plan.



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Writer's Direct Line: 619-338-6524
djones@sheppardmullin.com

Our File Number: 0Y53-116851

September 12, 2005

Mr. Peter Hall
President, COO
Centre City Development Corporation
225 Broadway, Suite 1100
San Diego, CA 92101-5074

Ms. Alexandra Elias
Senior Planner
Centre City Development Corporation
225 Broadway, Suite 1100
San Diego, CA 92101-5074

Re: Comments on the Draft EIR for The Downtown Community Plan Update
– Retreat from Residential Development of Blighted Areas near Barrio
Logan (the "Unocal Site").

Dear Mr. Hall and Ms. Elias:

As you may know, this firm represents Trammell Crow Residential in its efforts to restore the blighted Unocal Site in the East Village area near Barrio Logan. After three years of planning and discussion, a 35-member Steering Committee comprised of planners and stakeholders recommended an increase in residential densities within downtown San Diego and assigned the Unocal Site a FAR of 4, with the ability to increase to a FAR of 6 with implementation of certain incentives. The Community Plan update circulated in November 2004 included the FAR of 4 with an additional 2 FAR with incentives, which accomplished the goals of the City of San Diego General Plan and Progress Guide for increasing density and intensity of residential development downtown.

25.1

In an unfortunate retreat from this residential density increase policy, however, CCDC downgraded the FAR to the same FAR of 3 that has been in place on the site since the 1992 Community Plan. This came following private meetings between CCDC staff and some members of the Barrio Logan community, who apparently are concerned that tall residential skyscrapers would "wall off" Barrio Logan from downtown. Ironically, this proposed reduction in FAR will guarantee for Barrio Logan their worst fears because without an increase in the FAR, the "wall of environmental contamination" at the Unocal Site will drive away development and separate Barrio Logan from the benefits of downtown's redevelopment.

25.2

Should the CCDC decide not to restore the Steering Committee recommended FAR of 4, with the possibility of increasing that with incentives to an FAR of 6, then Trammell Crow Residential respectfully requests that the EIR's Alternative Analysis Section contain a full discussion of the FAR 4 option so the City Council can make an informed decision of the consequences of maintaining the existing FAR of 3. Such alternative analysis should include a discussion of the consequences stated below.

25.1 This comment does not raise any issues related to the adequacy of the EIR. Therefore, no response is necessary.

25.2 Consideration of an alternative FAR for the referenced property is not warranted in the EIR. Alternatives are only discussed when they may lessen a significant environmental impact. As no significant environmental impact would occur from the proposed FAR of 3.0, consideration of alternative FARs is not necessary.

SHEPPARD MULLIN RICHTER & HAMPTON LLP

Mr. Peter Hall
September 12, 2005
Page 2

First, a FAR of 4 or 6 does not require Trammell Crow Residential to build tall residential structures that leave Barrio Logan in the shadow of downtown's redevelopment. Many design options exist for Trammell Crow Residential to build mid-size structures, but only if an adequate FAR exists. The underground environmental contamination at the site escalates the cost of any project design, such as a building parking structure, that develops below ground. Therefore, an economically viable project is best achieved with a higher FAR.

Second, residential development makes the highest and best use of the land, which makes the extensive environmental cleanup costs at the Unocal Site more affordable. The short supply of housing relative to high demands in our growing region of the country have attracted a significant number of investors to the residential housing market in San Diego. This provides the resources to assist with the clean up of contaminated areas of the Unocal Site. In contrast, lower FARs may make any development infeasible at the site. Historically, the actual cost of environmental cleanups far exceeds their estimated cost. Per 2.1.2 of the Draft EIR, the purpose of the redevelopment plan is to eliminate blighted conditions. That goal will not be achieved by keeping the FAR at 3; the land will continue to sit vacant and contaminated for years unless an adequate FAR is placed on the property. Therefore, CCDC would be best served to increase FAR levels in a manner that will attract the type of development that is best suited to actually remove the contamination and blight now on the site.

Third, restoring the FAR to 4 to 6 at the Unocal Site is more consistent with San Diego's General Plan. Draft EIR Section 3.3.1.1, acknowledges that the City of San Diego Progress Guide and General Plan ("General Plan") is the comprehensive long-term plan for the physical development of the City of San Diego and that it considers downtown as the focus of metropolitan San Diego. The General Plan's Strategic Framework Element encourages the further intensification of downtown by developing it as a major urban residential center with the largest concentration of high density multifamily housing in the region. The General Plan's objectives call for strengthening the viability of downtown through renewal, redevelopment and new construction. Furthermore, Draft EIR Section 4.5.2.1 provides that the Community Plan Update is designed to "achieve building intensities that ensure efficient use of available land" using a strategy that "target[s] a residential buildout population of 90,000 people of diverse incomes to create a vitality, a market for a broad array of supporting stores and services, and opportunities for living close to jobs and transit." Abandoning the Steering Committee's recommendation to increase the Unocal Site's FAR to 4 and instead maintaining the FAR of 3 from the 1992 community plan is less consistent with the General Plan's goals and objectives.

Fourth, vacating the FAR increase at the Unocal Site is less consistent with the SANDAG Regional Comprehensive Plan ("RCP"). Draft EIR Section 3.3.2.1 acknowledges the RCP's goal of reducing the number of housing units and residents expected to be "exported" from the region by 2030 by directing growth instead to areas inside the San Diego region that constitute "Smart Growth Opportunity Areas." The Unocal Site is just such a Smart Growth Opportunity Area because it would replace a contaminated area with a multi-family structure

25.3

25.3 The economic feasibility of developing the subject property at a FAR of 3.0 is beyond the purview of the EIR. Thus, no conclusion may be drawn as to the potential for the existing hazardous materials to continue to exist on the property.

25.4

25.4 A FAR yield of 4.0 rather than 3.0 would not represent a substantial conflict with the land use goals of the City's General Plan.

COMMENTS

RESPONSES

SHEPPARD MULLIN RICHTER & HAMPTON LLP

Mr. Peter Hall
September 12, 2005
Page 3

25.5

along trolley lines, proposed regional transportation corridors and near employment uses. If the Draft EIR truly reflects a plan where "Downtown would *maximize* its infill development potential by encouraging multi-story residential ... in appropriate areas," then CCDC should support a FAR of 4 at the Unocal Site. (DEIR at p. 3-10, *emphasis added*).

There is no dispute that the need for residential housing in downtown San Diego remains great. The City Council of the City of San Diego has declared a housing crisis in San Diego. The General Plan, the SANDAG Regional Plan, and the goals and strategies of the Draft EIR require policymakers to maximize smart growth opportunities that increase residential densities in downtown San Diego. Vacating the Steering Committee's recommendation to set the FAR at 4 for the Unocal Site not only ignores the opinions of the Steering Committee but also is inconsistent with the mandate of the General Plan and other planning documents that call for increasing the density and intensity of residential development downtown, near transit. It also will result in leaving the property barren, contaminated, and unable to meet the region's housing needs.

25.6

The Unocal Site can be a redevelopment success story. Therefore, Trammell Crow Residential respectfully requests that the Downtown Community Plan restore the recommended FAR 4 with incentives allowing the FAR to increase to 6 at this site. At a minimum, the Final EIR's Alternative Analysis section should fully examine the FAR 4 option as discussed above so the City Council can make an informed decision as to the appropriate FAR.

Sincerely,



Donna D. Jones

for SHEPPARD MULLIN RICHTER & HAMPTON LLP

W02-SD-8/03/051392148.4

Cc: Brad Perozzi
Garry Papers
Barbara Warden
Kevin Casey

25.5 Support for any specific FAR is outside the role of an EIR.

25.6 See response to comment 25.2.

ASARO KEAGY FREELAND MCKINLEY & BARTZ LLP

ROSCOE D. KEAGY
RICHARD R. FREELAND
STEVEN A. MCKINLEY*
LINDA D. BARTZ
*ALSO ADMITTED IN NEVADA

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FRANK L. ASARO
OF COUNSEL
CHARLES F. CAMPBELL
OF COUNSEL

September 12, 2005

Centre City Development Corporation
225 Broadway, Suite 1100
Mail Station 51D
San Diego, CA 92101
Attn: Mr. Walter Rask

Re: Downtown Community Plan MEIR (Master Environmental Impact Report)

Dear Mr. Rask:

Our firm represents Smart & Final Stores Corporation in regard to the proposal to modify the Redevelopment Plan, Community Plan and Planned District Ordinance which govern the development of downtown San Diego.

This letter pertains to Smart & Final's property and retail store located at 720-15th Street, San Diego. This site is designated in the Centre City Community Plan Update as part of a community park.

Designation of this area as a community park is inappropriate due to the fact that the area is adequately served by existing park facilities at San Diego City College, San Diego High School and Balboa Park. In addition, the proposed park footprint is unnecessarily large for this portion of the community.

In addition, we believe that this site is not suitable for a park because it is located on two freeway couplers. The traffic and noise impacts are very significant at this site. The same traffic impacts make our site very suitable for our business, as well as other types of redevelopment.

It is our strong desire to continue to operate our retail store at this site. In the alternative, we would consider redeveloping our site as a residential/commercial mixed-use project consistent with the redevelopment plan. In this structure, we would remain both developer and tenant.

Therefore, we respectfully request that the plan be revised to omit the proposed community park designation from our property.

Very truly yours,

ASARO KEAGY FREELAND MCKINLEY & BARTZ LLP

Roscoe D. Keagy
Roscoe D. Keagy

CENTRE CITY
DEVELOPMENT
CORPORATION

SEP 13 2005

Orig. To: _____
Conv. To: _____

RDK:kmk
cc: Smart & Final Stores Corp.

26.1

26.2

26.1 As discussed in response to comment 7.1, the downtown area needs additional park land.

26.2 The potential for proposed parks to be impacted by traffic noise is identified on page 5.7-15 of the EIR. However, traffic volume, as an issue in and of itself, on adjacent streets would not be sufficient to make the proposed parks inappropriate for recreation.

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CORPORATION

SEP 12 2005

Orig. To: _____
Copy To: _____

www.petersonprice.com

File No.

6965.001

OF COUNSEL
PAUL A. PETERSON

September 12, 2005

Ms. Alexandra Elias, Senior Planner
CCDC
225 Broadway, Suite 1100
San Diego, CA 92101

Dear Alexandra:

We represent Ghods Builders Inc. and its principal, Ghasem Ghods, with regard to property which is located at 6th and 7th Avenues and "A" Street and 8th and 9th Avenues and Broadway and "C" Street.

27.1

Our client opposes the decrease in FAR that has been assigned to these sites and would request that the EIR address and respond to the attached letter to Joseph Wong Design Associates dated September 7, 2005.

Our client would request that the Plan be modified to allow the existing Base FAR for these properties and then provide the FAR Bonus above the current level.

27.1 As the attached letter raises no issues related to the adequacy of the EIR, no response is necessary.

COMMENTS

RESPONSES

Ms. Alexandra Elias, Senior Planner
CCDC
September 12, 2005
Page 2

Thank you for your courtesy.

Sincerely,

PETERSON & PRICE
A Professional Corporation



Matthew A. Peterson

Enclosure

cc: Gary Papers, Manager, Architecture & Planning
John Baumgardner, CEO, Ace Parking Management, Inc.
Ghasem Ghods, Ghods Builders Inc.

Ghods Builders Inc.

September 7, 2005

Joseph Wong Design Associates
2359 Fourth Avenue Suite 300
San Diego CA 92101

Sent Via Fax @ (619) 237-0541

Dear Joseph Wong

**Re: Development Sites at 6th and A Street and 8th 9th, and Broadway
Our Proposals regarding new PDO requirements for respective sites**

Please find enclosed two charts each one comparing the existing PDO to the Newly revised draft PDO requirements along with our proposal for changes for our development site at 6th and A Street and for our other development site located at 8th, 9th and Broadway.

With reference to our site located within the block of 6th A Street, 7th Street and Ash Street, the existing PDO entitles our site to have a total residential density of 10 and our site would be designed to have an additional 2.0 FAR bonus which would be applicable under the Street Level use incentive plan which we plan to implement.

Under the newly revised Draft plan PDO, our residential FAR has been reduced to 9.0 from a designated 10 Residential FAR plus an additional 2 FAR Street level use incentive making the total FAR to be 12, while the majority of the sites within the City Center Planned District have had their FAR increased. Specifically immediately adjacent to our site there is an area that has had their FAR increased to a maximum potential of 20 FAR including bonus and TDR entitlements. Upon further analysis of the newly revised Draft PDO we note that this particular site in question has a Base FAR of 12 plus 2.0 bonus FAR for specific amenities and an additional 6.0 FAR that they would be entitled to under parks TDR making it a total of 20 FAR. Since our site is centrally located within downtown San Diego and accessible to all amenities, and is in such close proximity to the areas which are entitled to a maximum residential FAR of 20, we are proposing that the CCDC at least grant us the base minimum FAR of 12 for this particular site along with the 3.0 FAR Bonus entitlements for specific amenities that would have to be achieved in addition to park TDR. In fact we would like both our sites to be entitled to receive or to have the ability to purchase additional density from other sites if required.

With reference to our site located within the Block at 8th, 9th Broadway and C Street, under the existing PDO, the Residential FAR is 12, as well as the additional 2.0 Street level use incentive that our site would be entitled to would bring it to a total of 14.0 FAR. However, under the newly revised PDO our FAR has been reduced to 10. We understand that there is an urban open space planned for the property immediately to the north of our site on C Street and we have every intention to comply with the Sun Access Height Limits however, we would respectfully request of the CCDC not to penalize our site for the development of a park area. Surely a park area would add to the beautification of the immediate area in terms of green space, recreational and pedestrian usage, however, we feel

695 Town Center Drive Suite 230 Costa Mesa, CA. 92626
Telephone: 714-751-9020 . Fax: 714-751-9028
www.Ghodsbuilders.com

COMMENTS

RESPONSES

that our site has been singled out in terms of not being able to take advantage of Bonus FAR entitlements because of the proximity of a proposed park area. We would like our Residential FAR to remain at 12, and at the same time we would like to have the opportunity to achieve the maximum 3.0 bonus entitlements that would have to be achieved based on our design plan, in addition we would request from the CCDC that we would be entitled to Parks TDR keeping in mind and complying with the sun access height limit while designing our project.

Development in the downtown San Diego Core should be encouraged by allowing developers to develop projects that are economically viable as opposed to setting obstacles which would discourage high rise residential development projects. We believe that our development projects which we have envisioned exemplifies the purpose of the newly revised draft PDO. We can certainly work with certain sun access height restrictions while at the same time designing residential projects that would add to the diversity of the streetscape as well as a diverse and unique skyline.

Please provide us with your comments to our proposed changes to the Newly Revised Draft PDO as it affects both of the above noted development sites. If you would like to discuss this matter further, you are welcome to contact the undersigned at (714) 751-9020.

Yours truly,

Ghasem Ghods
Ghods Builders Inc.

c.c. Chris Foster, Joseph Wong Design Associates

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MATTHEW A. PETERSON
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OF COUNSEL
PAUL A. PETERSON

File No.
4895.041

September 12, 2005

CENTRE CITY
DEVELOPMENT
CORPORATION

SEP 12 2005

Orig. To: _____
Copy To: _____

Ms. Alexandra Elias, Senior Planner
CCDC
225 Broadway, Suite 1100
San Diego, CA 92101

Re: Draft Downtown Community Plan Update &
Draft Environmental Impact Report

Dear Alexandra:

We represent Ace Parking Management, Inc. with regard to the block bounded by 3rd
and 4th Avenues, Ash and Beech Streets.

28.1

Our client has significant concerns over the designation of park land concerning the
above referenced block. Our client has a current leasehold interest of 52,500 sq. ft. of the block
and is in escrow concerning 15,000 square feet of this leasehold interest.

Our client and the adjoining property owners are cooperating with each other and will be
advancing a development plan on the block and hope to have a project in front of CCDC within
the very near future. With the exception of the existing SRO, all of the remaining owners that
have an interest to develop the block including the Roman Catholic Bishop of San Diego
(Archdiocese), the Louise E. Foulks Trust (which our client is in escrow to buy), and Jim Hall of

28.1 As the letter raises no issues related to the adequacy of the EIR, no response
is necessary.

Ms. Alexandra Elias, Senior Planner
CCDC
September 12, 2005
Page 2

Hall/Fish Investments Inc. These three properties comprise of 45,000 square feet of the existing block and the owners are cooperating on a joint development plan.

Our client opposes the designation of this site as a park based upon the following factors:

1. A park on this particular block would eliminate a number of affordable SRO units (our client's proposed development would retain the existing SRO).
2. The park concept would significantly damage the property owners' value and long term investment based expectations.
3. A park on this particular block would impact several adjacent prime development blocks in terms of shade and shadow and other impacts.
4. This particular site does not appear to be favorable for a park especially in light of its close proximity to Balboa Park.
5. The plan also proposes to build an additional park bridge over I-5 with connections to Balboa Park making this particular block at 3rd and Ash even less desirable.
6. The concept of building a park on this block with current land values is cost prohibitive.

While our client recognizes there may be a perceived shortage of parks, we question the ability of the City to purchase the property and build a park. Once built, will the City have the resources to maintain not only this, but other parks that are planned within the Downtown area?

In March of 2005, we spoke with CCDC Staff who indicated that CCDC does not currently have the money or the resources to acquire the various designated park sites. Staff

Ms. Alexandra Elias, Senior Planner
CCDC
September 12, 2005
Page 3

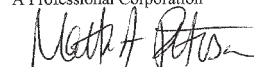
indicated that the underlying floor area ratio and development intensities are still applicable to all blocks even if they have a park designation.

Finally, Staff indicated to us that if a project was presented to CCDC prior to the formal adoption of the Community Plan Update, it would be processed consistent with the current Land Use Plan (including floor area ratio and development intensities).

The purpose of this letter is to put CCDC on notice that our client opposes a park designation on its property and would hope that CCDC would consider removing the park designation from this particular block.

Sincerely,

PETERSON & PRICE
A Professional Corporation



Matthew A. Peterson

cc: Gary Papers, Manager, Architecture & Planning
John Baumgardner, CEO, Ace Parking Management, Inc.

COMMENTS

RESPONSES

L. Amy Sung, Ph.D.
6017 Firwood Row
La Jolla, CA 92037

Sept. 10, 2005

The Centre City Development Corp
225 Broadway, Suite 1100
San Diego, CA 92101-5005
Dear Sir/Madam,

The San Diego Union-Tribune, Saturday, Sept. 10, 2005 said that the improvement plan that increase traffic downtown, and that the 45-day period for submitting written comments on the draft report to the Centre City Development Corp. ends at 5 p.m. Monday.

I am a resident of La Jolla for many years. My family and friends have always thought that leaving the San Diego International Airport for down town is very easy. But it is very cumbersome to get to north interstate highway 5, which is the highway connecting all towns along the coast.

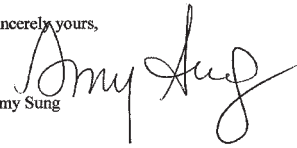
Currently all travelers including home coming residents going north have to go south on N Harbor Drive, dispersed into local streets through traffic lights, stop signs, making several turns around blocks, switching lanes within very short distance, and then finally merge with the 5N traffic.

These local maneuvers not only are stressful, waste all travelers' time and gas, and increase air and surface pollutions, but they also increased downtown traffic (unless the intension of such design is to lead all air travelers to wonder downtown for more business regardless they like or not). Without a direct smooth connection to a major highway going north is also a potentially great danger in the case of city emergency when large numbers of vehicles need to be evacuated into or out of the airport in very short time. (The south is very close to the border, not having much of the buffer capacity.)

29.1 My suggestion is to make a ramp from N Harbor Drive (near the intersection with W Laurel St) to 5N (see attached map with the drawing), giving travelers easy options to go to 5N, Pacific Highway, or downtown.

This relatively simple construction will benefit all San Diegans and visitors, solve all the problems mentioned above, and make San Diego an even finer city to be.

Sincerely yours,


Amy Sung

CENTRE CITY
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29.1 Comment noted. Suggestions for improving airport access are included in the I-5 corridor study.

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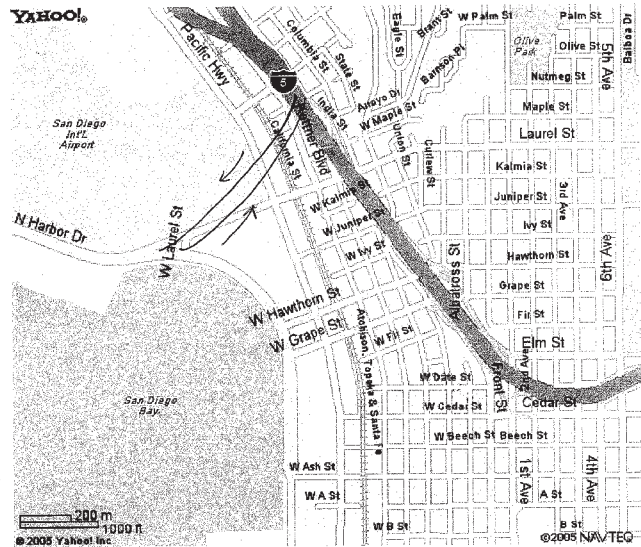
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When using any driving directions or map, it's a good idea to do a reality check and make sure the road still exists, watch out for construction, and follow all traffic safety precautions. This is only to be used as an aid in planning.

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suggested by Amy Sung of San Diego

http://maps.yahoo.com/pmaps?name=&ed=P2rAoOp_0TqY8Zs1peNYRtmTSI83PkIeYZ... 9/10/2005