

## CALIFORNIA COASTAL COMMISSION

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April 2, 2009

John Helmer  
Port of San Diego  
P.O. Box 120488  
San Diego, CA 92112-0488

Re: Addendum to the Master Environmental Impact Report and Initial Study and Proposed Coastal Development Permit for the North Embarcadero Visionary Plan Phase I Coastal Access Features Projects

Dear Mr. Helmer:

Staff has reviewed the above-referenced MEIR addendum and Draft Coastal Development Permit for the Phase I Coastal Access Features, and have the following comments.

Consistency with the Certified Port Master Plan

CCC1

In general, the Coastal Act supports the provision of new public access and recreational features, and the certified Port Master Plan (PMP) clearly provides for the redevelopment of the North Embarcadero Civic Zone with new landscape and streetscape improvements, including plazas, parks and recreational opportunities. The language of the PMP is fairly general about how and where these public improvements will be designed and located, with several significant exceptions: the plan requires plazas at Beech and Ash Streets, B Street Pier, and Broadway Piers; Harbor Drive will be narrowed to three lanes and curved at West Broadway Street to accommodate an oval-shaped park at the foot of Broadway Pier; parks must be located between the plazas on the esplanade; the promenade must be a continuous 25-foot wide paved area adjacent to the water's edge; the wharf side is to remain clear of objects or furnishings that would block Bay views and a 10-foot-wide bike path borders the landward side of the promenade, as shown in Figure 5.3 (Section of Bayfront Esplanade) of the North Embarcadero Visionary Plan (NEVP).

CCC2

However, Figure 3 of the EIR addendum shows a cross-section of North Harbor Drive that is significantly different than Figure 5.3. For example, the promenade is 29, not 25 feet wide; the bike path has been relocated next to Harbor Drive and has been reduced from 10 to 9 feet wide; the width of the esplanade from the inland curb of Harbor Drive to the western extent of the seawall would be 105.5 feet rather than 123 feet; the sidewalk on the inland side of Harbor Drive would be 15.5 feet wide instead of 20 feet wide.

CCC3

The curve in Harbor Drive at the intersection of West Broadway has been eliminated, and the oval-shaped park/plaza shown on the PMP Precise Plan has been redesigned to a smaller rectangular-shaped plaza that must also function as a driveway to the proposed

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new cruise ship terminal on Broadway Pier. There do not appear to be grassy parks between the proposed plazas.

- CCC4 There may be valid planning reasons for these revisions; no discussion of why these changes were made is included in the EIR addendum or findings for the coastal development permit. However, regardless of the appropriateness of the changes, the proposed project is different than the project described and approved in the Port Master Plan, and thus, staff feels the project cannot proceed without a Port Master Plan Amendment approving these changes.

MEIR Addendum and Coastal Development Permit

- CCC5 Overall, staff believes that the environmental document does not describe the project in a way that facilitates understanding of the project and the issues raised by the development. The text and exhibits should clearly describe the existing condition. For example, the project includes numerous roadway improvements such as realigning portions of North Harbor Drive east; re-striping; providing a 74-foot roadway; providing two travel lanes in each direction and a turn lane; removing existing on and off-street parking; lowering the crest in West Broadway, and so on. The document does not show or describe how far east North Harbor Drive will be realigned, how wide the existing roadway is, how many and what existing travel lanes are on Harbor Drive, how many parking spaces will be removed and where, how many new spaces will be provided, how far the crest in West Broadway will be lowered, and for what purpose. All of the existing conditions should be clearly documented and shown on exhibits, which as appropriate should also show the proposed revisions. As noted above, the addendum should explain why the promenade has been designed as proposed, in particular pointing out why the revisions from Figure 5.3 of the NEVP were made.
- CCC6 The proposed project does not include reducing the number of lanes on Harbor Drive to three lanes, because traffic improvements on Pacific Highway must occur first. However, the MEIR addendum should explain and show how the proposed promenade and roadway has been designed to be converted to three lanes in the future; for example, there should be a discussion and description of how the proposed promenade, sidewalks, landscaping, parking etc. would be changed or expanded when the roadway is eventually narrowed. The addendum should explain what the timeframe for these future planned improvements is.
- CCC7 The visual analysis provided in the addendum does not show any of the context of the area. There are existing features of the bayfront, such as the harbor cruise operations building and the locations where tour boats are typically moored, that should be taken into consideration when siting the proposed buildings. Ideally, new structures should be located where water views do not currently exist. An analysis of how the buildings were sited to minimize view impacts should be included. More information on the encroachment of the restroom into the view corridor at C Street must also be provided. There should be analysis of why the restroom is proposed in this location, along with a
- CCC8 discussion of alternatives that might avoid visual impacts, such as a different location,

size or design. An exhibit showing how the C Street view corridor is being defined (i.e., from the street or the sidewalk, etc.) that shows the extent of the proposed encroachment, should be provided.

- CCC9 The plan indicates that "existing kiosks and buildings within the limits of the proposed Esplanade" will be demolished. Please clarify if any existing structures are proposed to remain, and if there will be any demolition occurring for structures located on the water. If any changes are being made to structures in the water, impacts from sea-level should be considered.
- CCC10 Figure 7 of the addendum shows the proposed esplanade improvements from south of Broadway to C Street, but there are no exhibits showing the proposed improvements north of C Street, and this information needs to be included. The addendum should clearly indicate what areas will be hardscape and what will be green space, and if no open grassy areas are proposed as described in the existing PMP, this should be explained. More details on the plazas at the B Street Pier and Broadway, defining landscaped and hardscaped areas, public amenities, etc., must be provided.
- CCC11a With regard to the plaza at the foot of Broadway, the addendum does not contain any discussion of why it has been redesigned from the large oval approved in the PMP to a smaller rectangle. This feature is a major component of the esplanade in the certified plan, and there should be a detailed discussion of why this amenity has been scaled back. Staff is also very concerned that the plan does not include any discussion of how the redesigned Broadway plaza will function in conjunction with the proposed 100-foot-long cruise ship terminal on Broadway Pier. As proposed, it appears that the "plaza" will be little more than a driveway for the cruise ship terminal. Staff believes this is substantially different than the "destination" for Embarcadero visitors envisioned in the PMP, and additional analysis is warranted.
- CCC11b
- CCC12a In addition to identifying the amount and location of parking proposed to be removed, further detail on the parking management program is necessary. It is impossible to assess the adequacy of the parking mitigation measures without knowing how much parking will be lost. Further, the mitigation measure to "plan for shuttle stop-out locations on Harbor Drive within the Plan area such as at Ash Street and at Broadway" is unclear.
- CCC12b Staff assumes the shuttle referred to is the recently approved Lane Field shuttle, but this should be clarified. The phasing of the parking demand reduction strategies is also of concern. Requiring "approval of a parking management plan" prior to issuance of a grading permit is not sufficient; implementation of the measures should be required either prior to removal of the parking spaces where feasible, or immediately after project completion.
- CCC12c
- CCC13 In summary, staff believes the Coastal Access Features Project is not consistent with the certified Port Master Plan. Furthermore, while the overall goal of the project of improving public access and recreation is supported by the Coastal Act, at this point, the description and analysis of the project does not support a finding that the development is

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consistent with the public access, public recreation, and visual quality policies of the Coastal Act.

Please provide a copy of these comments to the Board of Port Commissioners for their April 7, 2009 hearing for the coastal development permit. I apologize for the lateness of these remarks, and thank you the opportunity to comment.

Sincerely,



Diana Lilly  
Coastal Planner

cc: Deborah Lee  
Sherilyn Sarb

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