

CALIFORNIA COASTAL COMMISSION

SAN DIEGO AREA

METROPOLITAN DRIVE, SUITE 103
SAN DIEGO, CA 92108-4402
(619) 767-2370**RECORD PACKET COPY**

June 28, 2001

Wed 10c

TO: COMMISSIONERS AND INTERESTED PERSONS

**FROM: DEBORAH LEE, SOUTH COAST DEPUTY DIRECTOR
SHERILYN SARB, DISTRICT MANAGER, SAN DIEGO AREA OFFICE
DIANA LILLY, COASTAL PROGRAM ANALYST, SAN DIEGO OFFICE**

**SUBJECT: REVISED FINDINGS ON CITY OF SAN DIEGO MAJOR LOCAL
COASTAL PROGRAM AMENDMENT #4-2000 (CENTRE CITY—NORTH
EMBARCADERO OVERLAY DISTRICT)**

SYNOPSIS**SUMMARY OF COMMISSION ACTION**

At the Commission meeting of March 14, 2001, the Commission reviewed the City of San Diego LCP Amendment #4-2000 pertaining to the creation of a new "North Embarcadero Overlay District" within the existing Waterfront district. In its action, the Commission denied as submitted, then approved both the land use plan and implementation ordinances with suggested modifications that address view corridors and view corridor setbacks, the designation of building heights on land outside the City's jurisdiction, the Midway aircraft carrier, and the Plan's consistency with the Port Master Plan, the existing Marina PDO, and the Commission's previous action on the County Administration Center.

At the Commission hearing, revisions were made to the staff recommendation that were agreed to by the City, thus requiring revised findings. The revisions include: changing the required setback on Pacific Highway from 15 feet to 25 feet and the required setback elevation from 50 feet to a range of 30 to 130 feet; removing the designated height limits from the small pier west of the extension of Ash Street, and from Navy Pier; placing a height range of 200-400 feet on the Lane Field parcel; and, adding text to the proposed Figure 4 that indicates that height designations on land west of the Mean High Tide Line are for planning purposes only. These changes are intended to make the Centre City LCP consistent with the approved Port Master Plan for the North Embarcadero area, and the setbacks tables contained in the Community plan and PDO consistent.

COMMISSION VOTES

City of San Diego LCPA 4-2000, approve if modified:

Commissioners Voting "Yes": Desser, Dettloff, Estolano, Hart, Kruer, McClain-Hill, McCoy, Nava, Potter, Reilly, Woolley, and Chairperson Wan

Commissioners Voting "No": None

SUMMARY OF AMENDMENT REQUEST

The proposed amendment involves changes to the Centre City Community Plan, the Centre City Planned District Ordinance (PDO) and the Marina PDO. The changes to the Centre City Community Plan and PDO include creation of a new "North Embarcadero Overlay District" within the existing Waterfront district. The new overlay, which applies to the area bayward of California Street, will serve as the geographic boundary within which new design guidelines and height limitations will be applied, and where parking maximums will be removed and minimum parking requirements for hotel, office, residential, restaurant and retail uses will be established. Other proposed changes include revisions to allowable setbacks and setbacks, the removal of Pacific Highway as a view corridor, and the designation of Ivy Street as a view corridor.

The only change in land use proposed is the addition of "Research and Development Services" and "Wholesaling, Distribution & Storage" as permitted uses in the existing Recreation/Visitor/Marine Land Use District. The amendment also includes minor updates and corrections to the existing plan language.

Only one change is proposed to the Marina PDO; the plan would limit heights on the block between Harbor Drive, G Street, Kettner Boulevard and California Street, to 500 feet. Currently, the height limit on this block is 120 feet with exceptions to the height limit permitted under certain conditions where the height could be increased without any maximum. The proposed change would add an upper limit of 500 feet to the height exception.

The proposed changes to the Centre City Community Plan and PDO are intended to implement the North Embarcadero Visionary Plan. The North Embarcadero Visionary Plan is a result of a coordinated planning effort by the North Embarcadero Alliance, a planning body made up of officials from the Port District, City of San Diego, County of San Diego, Centre City Development Corporation, and U.S. Navy. The Alliance developed a Visionary Plan in 1998 to guide the development of the North Embarcadero area. While the proposed amendment is intended to implement the Visionary Plan's design concepts and goals, the Visionary Plan itself has not been incorporated into the LCP and would not be the standard of review for coastal development permits issued by the City.

The effect of the proposed amendment will be limited, as the majority of the land in Centre City within the coastal zone, including the land along the waterfront, is not under the coastal permit authority of the City of San Diego. Those areas west of Pacific Highway are within the jurisdiction of the Port of San Diego and are covered by the certified Port Master Plan. A limited area is within the federal government's jurisdiction (Broadway Complex and Navy Pier), and the County Administration Center was excluded from the City's LCP and remains within the coastal permit jurisdiction of the

Commission. Thus, the only area within the City's permit jurisdiction covered by the subject LCPA is the one to two-block wide, approximately 2 mile long area bounded by Harbor Drive on the south, Pacific Highway on the west, Laurel Street to the north, and Kettner Boulevard to the east as far north as Ash Street, and then California Street north of Ash Street (see Exhibit #1).

Although the City's coastal permit jurisdiction covers only a few blocks, the entire waterfront is shown in the City's LCP and given land use designations for planning purposes. Port Master Plan Amendment (PMPA) #27, which proposes redevelopment of the North Embarcadero area, has been scheduled on the same agenda as the subject LCPA. The subject LCPA is intended to update the City's LCP consistent with the proposed Port Master Plan Amendment #27.

The appropriate resolutions and motions begin on page 5. The suggested modifications begin on page 5. The findings for denial of the Land Use Plan Amendment as submitted begin on page 11. The findings for approval of the plan, if modified, begin on page 17. The findings for denial of the Implementation Plan Amendment as submitted begin on page 19. The findings for approval of the plan, if modified, begin on page 24.

ADDITIONAL INFORMATION

Further information on the City of San Diego LCP amendment 4-2000 may be obtained from Diana Lilly, Coastal Planner, at (619) 767-2370.

PART I. OVERVIEW

A. LCP HISTORY

The City of San Diego has a long history of involvement with the community planning process; as a result, in 1977, the City requested that the Coastal Commission permit segmentation of its Land Use Plan (LUP) into twelve parts in order to have the LCP process conform, to the maximum extent feasible, with the City's various community plan boundaries. In the intervening years, the City has intermittently submitted all of its LUP segments, which are all presently certified, in whole or in part. The earliest LUP approval occurred in May 1979, with others occurring in 1988, in concert with the implementation plan. The final segment, Mission Bay Park, was certified in November 1996.

When the Commission approved segmentation of the LUP, it found that the implementation phase of the City's LCP would represent a single unifying element. This was achieved in January 1988, and the City of San Diego assumed permit authority on October 17, 1988 for the majority of its coastal zone. Several isolated areas of deferred certification remained at that time; some of these have been certified since through the LCP amendment process. Other areas of deferred certification remain today and are completing planning at a local level; they will be acted on by the Coastal Commission in the future.

Since effective certification of the City's LCP, there have been numerous major and minor amendments processed. These have included everything from land use revisions in several segments, to the rezoning of single properties, and to modifications of citywide ordinances. While it is difficult to calculate the number of land use plan revisions or implementation plan modifications, because the amendments often involve multiple changes to a single land use plan segment or ordinance, the Commission has reviewed a significant number of both land use plan revisions and ordinance amendments. Most amendment requests have been approved, some as submitted and some with suggested modifications; further details can be obtained from the previous staff reports and findings on specific amendment requests.

B. STANDARD OF REVIEW

The standard of review for land use plans, or their amendments, is found in Section 30512 of the Coastal Act. This section requires the Commission to certify an LUP or LUP amendment if it finds that it meets the requirements of Chapter 3 of the Coastal Act. Specifically, it states:

Section 30512

(c) The Commission shall certify a land use plan, or any amendments thereto, if it finds that a land use plan meets the requirements of, and is in conformity with, the policies of Chapter 3 (commencing with Section 30200). Except as provided in paragraph (1) of subdivision (a), a decision to certify shall require a majority vote of the appointed membership of the Commission.

Pursuant to Section 30513 of the Coastal Act, the Commission may only reject zoning ordinances or other implementing actions, as well as their amendments, on the grounds that they do not conform with, or are inadequate to carry out, the provisions of the certified land use plan. The Commission shall take action by a majority vote of the Commissioners present.

C. PUBLIC PARTICIPATION

The City has held Planning Commission and City Council meetings with regard to the subject amendment request. All of those local hearings were duly noticed to the public. Notice of the subject amendment has been distributed to all known interested parties.

PART II. LOCAL COASTAL PROGRAM SUBMITTAL - RESOLUTIONS

Following a public hearing, staff recommends the Commission adopt the following resolutions and findings. The appropriate motion to introduce the resolution and a staff recommendation are provided just prior to each resolution.

- I. **MOTION:** *I move that the Commission adopt the revised findings in support of the Commission's action on March 14, 2001 concerning City of San Diego LCPA 4-2000.*

STAFF RECOMMENDATION OF APPROVAL:

Staff recommends a **YES** vote on the motion. Passage of this motion will result in the adoption of revised findings as set forth in this staff report. The motion requires a majority vote of the members from the prevailing side present at the March 14, 2001 hearing, with at least three of the prevailing members voting. Only those Commissioners on the prevailing side of the Commission's action are eligible to vote on the revised findings.

RESOLUTION TO ADOPT REVISED FINDINGS:

The Commission hereby adopts the findings set forth below for denial of the Local Coastal Program Amendment as submitted, and approval as modified on the ground that the findings support the Commission's decision made on March 14, 2001 and accurately reflect the reasons for it.

PART III. SUGGESTED MODIFICATIONS

The underlined sections represent language that the Commission suggests be added, and the ~~struck-out~~ sections represent language that the Commission suggests be deleted from the language as originally submitted.

In the Centre City Community Plan:

1. Within the proposed **NORTH EMBARCADERO OVERLAY DISTRICT**, the following revisions shall be made to the second paragraph under the section titled *Places & Destinations*:

Broadway Landing – Broadway Landing is intended to be one of San Diego's most important civic spaces, commanding a prominent position at the foot of Broadway. Framed by the active edges of B Street, Broadway and Navy Piers, Broadway Landing is an expansive public space ~~that reaches from the grand oval-shaped landscaped park on the Bayfront Esplanade out over the water.~~ Broadway Landing is envisioned to include a public boardwalk lined with outdoor cafés, kiosks, and cultural attractions.

2. Within the proposed **NORTH EMBARCADERO OVERLAY DISTRICT**, the following revisions shall be made to the section titled *Navy Broadway Complex*:

Navy Broadway Complex

Situated on the waterfront of San Diego Bay, between Broadway and Market Street and Pacific Highway and Harbor Drive, the Navy Broadway Complex includes approximately 15 acres of downtown's most unique and sensitive real estate.

The Navy Broadway Complex functions as the headquarters for the Naval Supply Center, San Diego; the Commander, Naval Base, San Diego; as well as several other activities. The Complex consists of approximately 400,000 square feet of administrative offices and 600,000 sq.ft. of warehouse uses most of which were constructed between 1921 and 1944.

In 1982, the Navy reviewed a plan to provide a centralized, upgraded, and efficient administrative facility for many Navy installations in the San Diego area. This regional facility would require approximately one million square feet of Navy office space.

The Navy Broadway Complex site was selected to serve as this administrative facility because of its central location, available land area, location to the Navy Pier (which will continue to operate a key military asset), and existing land constraints on area Navy operational bases.

The redevelopment program includes up to one million square feet of commercial, office, hotel and retail uses. Development of the Navy Broadway Complex is an

important component of the development of the North Embarcadero District. Every effort should be made to conform to the guidelines and goals established in the plans for this district.

The Port Master Plan may allow for the docking of the aircraft carrier Midway on the south side of the Navy Pier to operate as a museum. Interim parking for the Midway may be located on Navy Pier; however, the ultimate goal for the area in the Port Master Plan is to relocate any parking on the Pier to inland of Harbor Drive and convert the Pier into a public memorial park associated with the Midway museum. Relocation of the parking and conversion of the park should occur as part of the Navy's plan to vacate its use of Navy Pier prior to or concurrent with the redevelopment of the Navy Broadway Complex.

3. Within the proposed **NORTH EMBARCADERO OVERLAY DISTRICT**, the following revisions shall be made to the section titled **Parking**:

The parking supply in North Embarcadero should accommodate both the general public and development. Development in the area should construct parking to accommodate demand, and provisions will be made, where possible, for shared public use during off hours. High priority shall be given to accommodating the parking required for the Midway aircraft carrier inland of Harbor Drive.

4. Figure 19, **VIEW CORRIDOR STREETS**, shall be revised to graphically depict Pacific Highway as a View Corridor Street from Date Street south to Pacific Highway's terminus (as shown on the existing Figure 19).

5. The **VIEW CORRIDORS** table on page 45 of the certified LCP that includes stepbacks and stepback elevations shall be revised as follows to be identical with the View Corridors table in PDO (as modified herein):

<u>STREET</u>	<u>STEPBACK</u>	<u>STEPBACK ELEVATION</u>
Laurel	15'	30'
Juniper	15'	30'
Hawthorn	15'	30'
Grape	15'	30'
Fir	15'	30'
Date— <u>West of Pacific Highway</u>	<u>20'</u>	<u>Ground Level</u>
<u>East of Pacific Highway</u>	15'	30'
Cedar	15'	Ground Level
Beech— <u>West of Pacific Highway</u>	<u>20'</u>	<u>Ground Level</u>
<u>East of Pacific Highway</u>	15'	30'
Ash	25'	50'
A	25'	50'
B	25'	50'
C	<u>15' 25'</u>	50'
Broadway**	15'	<u>Ground Level</u>
<u>West of Kettner</u>	<u>40'</u>	<u>Ground Level</u>
<u>East of Kettner</u>	15'	<u>Ground Level</u>
<u>East of Kettner</u>	<u>10'</u>	<u>90'</u>
E	25'	50'
F	25'	50'
G	25'	50'
Market	25'	50'
Fifth Avenue	15'	65'
Sixth Avenue	15'	65'
Seventh Avenue	15'	65'
Eighth Avenue	15'	65'
Ninth Avenue	15'	65'
Pacific Highway	<u>15' 25'</u>	50' <u>30'-130'</u>

* See PDO for Special Setbacks

** Street Wall and Building Bulk Requirements (25' stepback above the building base) apply.

In the Centre City Planned District Ordinance:

6. Section 103.1903 Boundaries and Applicable Districts shall be revised as follows:

This Division applies to all property located in the Centre City Community Planning Area shown in Figure 1 of Chapter X, Article 3, Division 19, except for lands within the jurisdiction of the San Diego Unified Port District which are subject to the provisions of the San Diego Port District Act, the Tidelands Trust and the California Coastal Act of 1976, the Navy Broadway Complex, ~~the County Administration Center property (except in the case of private use of the property),~~ and land within the jurisdiction of the Gaslamp Quarter Planned District Ordinance and Marina Planned District Ordinance codified in the San Diego Municipal Code as Chapter X, Article 3 Division 4 et seq., and Chapter X, Division 20 et seq., respectively.

7. Figure 1, **Centre City Planned District Boundary**, the legend for the County Administration Center shall be revised as follows:

Private Use of County Administration Center is subject to the PDO (LCP Deferred Certification Area)

8. The proposed Figure 4, **Building Height-North Embarcadero**, shall be revised as follows:

- a) Per the City's request, the three height limits (120, 160 and 500) designated on the blocks bounded by F Street, Pacific Highway, North Harbor Drive, and California Street shall be eliminated.
- b) Per the City's request, the designated height limit on the block bounded by F Street, Pacific Highway, E Street, and California Street shall be 450 feet.
- c) Height limits will be removed from the small pier west of the extension of Ash Street, from and Navy Pier.
- d) A height range of 200-400 feet will be placed on the Lane Field parcel (between Pacific Highway, Harbor Drive, C Street and Broadway).
- e) The following language shall be added on the figure: Height designations on land west of the Mean High Tide Line are for planning purposes only.

9. The following changes shall be made to the proposed Figure 8, **View Corridor Stepbacks**:

a) Per the City's request, Beech Street west of Pacific Highway shall be shown as a view corridor, and the view corridor on F Street shall be extended from Pacific Highway east to Kettner Boulevard.

b) Pacific Highway shall remain a designated view corridor as shown in the existing certified PDO.

10. The proposed Figure 9, **Waterfront District**, shall be corrected to include a graphic depiction of both the Waterfront District, as shown on the existing Waterfront District figure, and the new North Embarcadero Overlay District (as proposed).
11. Table II of Section 103.1915 **VIEW CORRIDORS**, shall be revised as to increase the setback on Date and Beech Streets west of Pacific Highway, and increase the setback on C Street. As revised, the table will be identical with the View Corridors table in the Community Plan (as modified herein):

STREET	STEPBACK	STEPBACK ELEVATION
Laurel	15'	30'
Juniper	15'	30'
Hawthorn	15'	30'
Grape	15'	30'
Fir	15'	30'
<u>*Date—West of Pacific Highway</u>	<u>20'</u>	<u>Ground Level</u>
<u>East of Pacific Highway</u>	15'	30'
<u>*Cedar</u>	15'	Ground Level
<u>*Beech—West of Pacific Highway</u>	<u>20'</u>	<u>Ground Level</u>
<u>East of Pacific Highway</u>	15'	30'
Ash	25'	50'
A	25'	50'
B	25'	50'
C	15' <u>25'</u>	50'
Broadway**		
West of Kettner	40' <u>50'</u>	Ground Level
East of Kettner	15'	Ground Level
East of Kettner	10'	90'
E	25'	50'
F	25'	50'
G	25'	50'
Market	25'	50'
Fifth Avenue	15'	65'
Sixth Avenue	15'	65'
Seventh Avenue	15'	65'
Eighth Avenue	15'	65'
Ninth Avenue	15'	65'
Pacific Highway	15' <u>25'</u>	50" <u>30'-130'</u>

* See also Figure 13 "Special Setbacks"

** Street Wall and Building Bulk Requirements (25' setback above the building base) apply.

12. Table IV of Section 103.1925 **LAND USE CLASSIFICATIONS PERMITTED BY LAND USE DISTRICTS**, shall be revised as follows:

Under LAND USE CLASSIFICATIONS, **D. COMMERCIAL SERVICES**, the proposed "X" indicating that Research and Development Services is a "Permitted" use in the Recreation/Visitor/Marine Land Use District shall be deleted and the use shall remain designated a "Not Permitted" use.

PART IV. FINDINGS FOR DENIAL OF CERTIFICATION OF THE CITY OF SAN DIEGO LAND USE PLAN AMENDMENT, AS SUBMITTED

A. AMENDMENT DESCRIPTION

The proposed amendment is intended to implement the North Embarcadero Visionary Plan by making a number of changes to the Centre City Community Plan. Most of the changes to the Community Plan consist of replacing the existing exhibits in the plan with identical exhibits changing only the graphical representation of the waterfront area to show the proposed removal of three existing industrial piers and their replacement with a new public pier at Grape Street. This graphic change is consistent with the proposed Port Master Plan Amendment (PMPA) #27, which is being reviewed concurrently with the subject amendment by the Commission.

The area that is under the City's coastal permit jurisdiction is quite limited, consisting of the blocks bounded by Harbor Drive on the south, Pacific Highway on the west, Laurel Street on the north, and to the east, Kettner Boulevard as far north as Ash Street, and then California Street north of Ash Street (see Exhibit 1). However, for planning purposes, the entire waterfront is included in the City's LCP and given land use designations.

The amendment would create a new North Embarcadero Overlay that would be applied to the area west of California Street between Harbor Drive and Laurel Street. The overlay would cover almost all the area of Centre City that is within the coastal zone. The proposed Figure 9 of the PDO shows the North Embarcadero Overlay District.

The proposed North Embarcadero Overlay District section in the Community Plan contains a general description of the area as envisioned in the North Embarcadero Visionary Plan. The proposed language contains goals for the development of the area including stepping down development intensity as development approaches the County Administration Center and San Diego Bay, promoting a mix of hotel, office, retail and entertainment uses throughout the North Embarcadero, establishment of a Bayfront Esplanade and creation of an oval-shaped landscaped park reaching out over the water at Broadway Landing.

Other language in the proposed Overlay District establishes that development surrounding the County Administration Center should complement this landmark structure, that North Harbor Drive should be more pedestrian oriented, and traffic

concentrated on Pacific Highway. Most of this language refers to areas that are within the Port's jurisdiction, and these goals are consistent with the proposed PMPA #27. The plan also establishes design guidelines, with the number of lanes, sidewalk widths, etc., for Pacific Highway, North Harbor Drive, Broadway, and east-west streets in the North Embarcadero. These specific descriptions are intended to replace the more general Figure 10, HIERARCHY OF STREETS exhibit in the existing Centre City Community Plan, which contains such designations as "District Center Streets" and "Crosstown Links", but as proposed, these designations would be removed from all streets within the North Embarcadero Overlay. The proposed language is generally consistent with the existing designations and does not remove any public access or visual protections currently provided by the existing plan.

The plan would also make several changes to the existing View Corridors Streets shown on Figure 19. Ivy Street would be added as a View Corridor Street, and Pacific Highway is proposed to be removed as a view corridor. Designated view corridor streets are afforded special "stepback" protection to ensure that views from and along these streets are maintained. The City had originally proposed amending the View Corridors stepback table on page 45 of the LUP plan to alter the required stepbacks for several streets west of California Street, including Juniper, Hawthorn, Grape, Cedar, Ash, A, B, C, Broadway (both east and west of Kettner), E, F, and G. Since that time, the City has requested that the View Corridors table simply be deleted from the LUP, such that only the View Corridors stepback table in the PDO (as amended) would contain the required stepback distances and elevations (see Exhibit #15).

As defined in the Centre City PDO, a "stepback" means "a separation between a specified plane or line (such as a property line) and structural or building elements." In practical terms, the stepback requirement involves both a particular distance which a building must be set back from the street, and a stepback elevation where the set back must begin. For example, a 25-foot stepback at a 50-foot elevation means that the portion of the building above 50 feet in height is required to be set back 25 feet from the street. A "ground-level" stepback, is what is more commonly know as a building setback—the distance the entire building must be set back from the street. The intent of stepbacks is to provide visual relief from tall, monolithic structures that go straight up from street level. Stepbacks provide a varied street appearance and open up views along the street corridors. In general, the larger the stepback, and the lower the elevation of the stepback, the less bulky the building will be and the greater the view protection.

Other minor changes, updates, and clarifications to the plan language can be seen in the attached Exhibit #3.

B. CONFORMANCE WITH SECTION 30001.5 OF THE COASTAL ACT

The Commission finds, pursuant to Section 30512.2(b) of the Coastal Act, that portions of the Land Use Plan as set forth in the preceding resolutions, are not in conformance with the policies and requirements of Chapter 3 of the Coastal Act to the extent necessary

to achieve the basic state goals specified in Section 30001.5 of the Coastal Act which states:

The legislature further finds and declares that the basic goals of the state for the Coastal Zone are to:

- a) Protect, maintain and, where feasible, enhance and restore the overall quality of the coastal zone environment and its natural and manmade resources.
- b) Assure orderly, balanced utilization and conservation of coastal zone resources taking into account the social and economic needs of the people of the state.
- c) Maximize public access to and along the coast and maximize public recreational opportunities in the coastal zone consistent with sound resource conservation principles and constitutionally protected rights of private property owners.
- d) Assure priority for coastal-dependent and coastal-related development over other development on the coast.
- e) Encourage state and local initiatives and cooperation in preparing procedures to implement coordinated planning and development for mutually beneficial uses, including educational uses, in the coastal zone.

The Commission therefore finds, for the specific reasons detailed below, that the land use plan does not conform with Chapter 3 of the Coastal Act or the goals of the state for the coastal zone.

C. NONCONFORMITY OF THE CENTRE CITY COMMUNITY PLAN WITH CHAPTER 3

The Chapter 3 policies most applicable to this planning area are as follows, and state, in part:

Section 30210.

In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.

Section 30211.

Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited

to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.

Section 30212.

(a) Public access from the nearest public roadway to the shoreline and along the coast shall be provided in new development projects except where:

(1) it is inconsistent with public safety, military security needs, or the protection of fragile coastal resources,

(2) adequate access exists nearby, or,

[...]

Section 30213.

Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided. Developments providing public recreational opportunities are preferred.

Section 30231

The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.

Section 30251.

The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas....

Section 30252.

The location and amount of new development should maintain and enhance public access to the coast by (1) facilitating the provision or extension of transit service, (2) providing commercial facilities within or adjoining residential

development or in other areas that will minimize the use of coastal access roads, (3) providing non-automobile circulation within the development, (4) providing adequate parking facilities or providing substitute means of serving the development with public transportation, (5) assuring the potential for public transit for high intensity uses such as high-rise office buildings.

In general, the amendment is consistent with the goals of the Coastal Act regarding the promotion of public access and recreational opportunities. Most of the area involved in the North Embarcadero Overlay District is actually within the Port of San Diego's jurisdiction, and the plan is also generally consistent with the proposed Port Master Plan Amendment (PMPA) #27 being reviewed by the Commission at the same hearing as the subject LCP amendment.

However, the Port District has removed any reference in its PMPA to a landscaped park that extends out over the water at Broadway Landing. The Port has determined that the project has not undergone sufficient planning and environmental review to go forward at this time. Thus, the Centre City Community Plan amendment as submitted includes a project that has not received adequate environmental review (e.g. a review of filling or shading impacts, mitigation, etc.), and is inconsistent with the proposed Port Master Plan (which is the standard of review at Broadway Landing).

The existing Community Plan contains language describing the future development at the Navy Broadway Complex. This 15-acre site, located between Broadway and Market Street and Pacific Highway and Harbor Drive is currently operated by the Navy and functions as the headquarters for the Naval Supply Center. However, the site is planned for redevelopment with commercial, office, hotel and retail uses.

The Broadway Complex site is located on the inland side of Harbor Drive, across from Navy Pier. The Port District is proposing to dock the U.S.S. Midway at Navy Pier for use as an aircraft carrier museum. Parking for the Midway would be located on Navy Pier until such time the parking can be relocated and the Pier turned into a memorial park. Representatives of the Midway have indicated that this conversion would most likely occur when the Broadway Complex is redeveloped.

The Midway development is reviewed in detail in the Commission's review of PMPA#27; however, in brief, the carrier is expected to have a significant adverse impact on public views protected under the Coastal Act. Creation of a public park at Navy Pier and relocation of the parking could mitigate these impacts. However, the City's Community Plan does not contain any policy goals supporting the conversion of Navy Pier to a park or relocation of the Midway parking. Thus, as submitted, the Community Plan does not protect and preserve public views, public access and recreational opportunities consistent with the requirements of the Coastal Act.

The proposed amendment includes the removal of Pacific Highway as a view corridor. Removal of the designation would also remove the requirement that development along Pacific Highway maintain a 15-foot stepback at elevation 50 feet. The City has

suggested the impact of this removal would be minimal, since the western side of Pacific Highway (under the Port of San Diego's jurisdiction) does not currently have setback requirements, provision of a setback of 25 feet between elevation 30 and 130 feet would remain a requirement in the PDO, and the existing street width of 130 feet is one of the widest downtown and naturally results in a significant view corridor without additional setback requirements.

Nevertheless, the intent of both the proposed LCPA and the proposed PMPA #27 is to shift traffic from Harbor Drive onto Pacific Highway. Harbor Drive will become a narrower, more pedestrian-oriented street, while Pacific Highway will be the main thoroughfare for moving traffic alongside downtown and the waterfront. The removal of Pacific Highway as a view corridor would reduce setback and setback requirements and the view protection policies in the LCP, just when a more intense nature is proposed for the street, and setbacks become even more important.

The ocean and bay views from Pacific Highway are via the cross-streets leading to the water perpendicular to the Pacific Highway, which will remain designated view corridors. However, Pacific Highway is and will remain a major coastal accessway, and in fact, will support more traffic than it currently does. The Commission has traditionally designated major coastal access routes as view corridors even if direct water views are not available down the corridor because of the value of maintaining a relatively open and uncluttered viewshed on these heavily used coastal accessways. For example, Interstate 5 is designated as a scenic corridor in many coastal cities, although water views are limited from Interstate 5.

Very little of downtown San Diego is within the Coastal Zone, but those streets that are major coastal accessways should be afforded the protection of the view corridor designation. Pacific Highway, in particular, is the southernmost stretch of the Pacific Coast Highway that runs the length of much of California. While hardly the narrow, scenic corridor that PCH is in northern California, Pacific Highway will still be the street most people travel along the bayfront in downtown. Given that the Port Master Plan does not contain the setback protections typically afforded a major coastal access route, it becomes especially important that setbacks are preserved on the eastern side of the street. Thus, removal of Pacific Highway as a view corridor is not consistent with the visual protection policies of the Coastal Act.

As described above, the Community Plan would be revised to eliminate the View Corridors table on page 45 listing the required setbacks on designated view corridors. The purpose of a community plan (or Land Use Plan) is to provide overarching policies and goals which are then implemented through specific standards contained in the PDO (or implementing ordinances). Although implementation plans can be and usually are more detailed than LUPs, the policy language in an LUP must be fairly specific in order to be found consistent with the Coastal Act, since the LUP, in turn, will become the standard of review for all implementing ordinances. For example, in biologically sensitive areas, an LUP must have strict policies regarding allowable uses in a wetland to be found consistent with the resource protection policies of the Coastal Act. Then, the

detailed development language in the implementing ordinances would be required to conform to the language in the LUP (and thus, the Coastal Act). If the LUP were silent on allowable uses, or contained only vague goals regarding resource protection, then any number of allowable uses in wetlands could potentially be considered consistent with the LUP.

Similarly, the Centre City Community Plan currently requires setbacks on designated View Corridors. The required setback distance and elevation for each view corridor is contained in the View Corridors table. If this table were removed, the Commission would have no assurance in the future that specific implementing ordinances in the PDO will be adequate to protect view corridors in the Coastal Zone and towards the water. Specific setbacks, or at the least, minimum setbacks, are required to be in the Community Plan, to ensure development along designated view corridors is consistent with the view protection policies of the Coastal Act.

In summary, the LUP as submitted references a Port project (the Broadway Landing park over the water) which has been removed from the proposed PMPA because insufficient environmental review. Inclusion of this project in the plan at this time is inconsistent with the resource protection policies of the Coastal Act. The plan does not contain any language supporting the removal of parking and the conversion of Navy Pier to a park in association with the docking of the Midway, inconsistent with the view protection and public access policies of the Coastal Act. The removal of Pacific Highway as a designated view corridor would have an adverse impact on the quality of the public viewshed, inconsistent with the visual protection policies of the Coastal Act. Similarly, if specific setback standards are removed from the Community Plan, the Commission cannot be assured that adequate setbacks will be implemented on view corridors in the future. Therefore, the amendment cannot be found consistent with the Chapter 3 policies of the Coastal Act, and must be denied.

PART V. FINDINGS FOR APPROVAL OF THE CITY OF SAN DIEGO LAND USE PLAN, IF MODIFIED

A. SUMMARY FINDING/CONFORMANCE WITH SECTION 30001.5 OF THE COASTAL ACT

The Commission finds that the proposed Land Use Plan amendment for the City of San Diego LCP is approvable, if modified. These modifications are addressed in detail below. The Commission therefore finds the amendment, as recommended for modification, would be consistent with applicable Chapter 3 policies to the extent necessary to achieve the statewide goals as set forth in Section 30001.5 of the Act, as previously cited.

B. SPECIFIC FINDINGS FOR APPROVAL

Because the plan is largely consistent with the Coastal Act, only several modifications are required. Suggested Modification #1 eliminates the reference to a landscaped park located out over the water at Broadway Landing. This project has been removed from the proposed PMPA #27 and removing it from the Community Plan will ensure the plan is consistent with the Port Master Plan and the resource protection policies of the Coastal Act.

Suggested Modification #2 adds language to the plan regarding the U.S.S. Midway aircraft carrier museum, the future conversion of Navy Pier to a public memorial park, and the relocation of the Midway parking from the pier to a nearby location. The Commission can only find docking the Midway at Navy Pier consistent with the Coastal Act if there is some assurance that Navy Pier will be opened for public use through removal of the parking and conversion to a park to offset the visual and access impacts of the Midway. Thus, the modification adds language indicating that a goal for the area is that prior to or concurrent with the redevelopment of the Navy Broadway Complex, the Midway parking be relocated, and Navy Pier developed as a park. To ensure that relocation of the parking is a high priority in the City's planning for the North Embarcadero area, Suggested Modification #3 adds language to the Parking section of the Overlay stating that accommodating the required parking for the Midway is a high priority goal for the area. Relocating the parking east of Harbor Drive on Port property would also be consistent with this goal. Only as modified to add these goals can the Commission find the plan consistent with the visual, public access, and recreation policies of the Coastal Act.

Suggested Modification #4 eliminates the City's proposal to remove Pacific Highway as a designated view corridor in the Community Plan. Pacific Highway is currently a major coastal access route. As a result of the proposed amendment and the proposed PMPA #27, even greater amounts of traffic will be diverted onto Pacific Highway. Thus, it is particularly important that the visual quality of Pacific Highway be preserved. However, the suggested modification changes the minimum stepback amount from 15 feet to 25 feet, and allows the stepback to occur anywhere from 30 feet to 130 feet in elevation. This will allow the City some flexibility in designing buildings consistent with the stepback requirements of the Port District (which has jurisdiction over the western side of Pacific Highway) while still maintaining the view corridor designation as appropriate for a major coastal access route. As modified to retain the view corridor designation for Pacific Highway, the Commission finds the plan consistent with visual protection policies of the Coastal Act.

The amendment to the Community Plan would eliminate the View Corridors stepback table. As proposed, there would be no policies in the LUP that would specify how great, or at what height stepbacks must be provided; only that a stepback be provided. This is not sufficient to ensure that view corridors will be preserved and enhanced. Therefore, Suggested Modification #5 maintains the View Corridors table mostly as it is in the current certified LUP. The further modifications to the table that are required will make

the setbacks consistent with those in the PDO View Corridors table, as revised herein. All of the changes contained in Suggested Modification #5 are consistent with those proposed by the City or approved by the Commission for the PDO, and will increase setbacks and view protection. (However, it is important to note that Suggested Modification #11 would make several changes to the PDO table that are not proposed by the City, and these are discussed in greater detail below). Therefore, as modified, the amendment can be found consistent with the Chapter 3 policies of the Coastal Act.

The remaining portion of the amendment is consistent with the Coastal Act as submitted. The new North Embarcadero Overlay District contains language providing for height and building intensity to "step down" as development approaches the County Administration Center and San Diego Bay. Public access, public recreation, pedestrian orientation of streets along the waterfront, the protection of the scenic and historic County Administration Center, minimizing view blockage, and locating parking lots away from the water's edge, are emphasized, consistent with the view protection, public access and recreation policies of the Coastal Act.

As noted, the proposed amendment does involve directing additional traffic onto Pacific Highway. Although the subject amendment itself would not alter the amount, type, or intensity of development in the North Embarcadero area, combined with the new development that is proposed in the PMPA #27, a substantial increase in traffic in the area is expected. Short-range traffic projections done for the Visionary Plan project indicate that the proposed improvements to Harbor Drive, Pacific Highway and the North Embarcadero area will adequately accommodate the increased traffic which will be diverted onto Pacific Highway, without an adverse impact on public access. Long-range traffic projections done for the North Embarcadero redevelopment assumed that direct airport access would be available to I-5 at a point between Washington Street and Old Town Avenue. Without this assumption, the volumes along Laurel Street, Grape Street, Hawthorn Street and North Harbor Drive would be much greater. The short-term traffic projections are not affected by this assumption. If this airport connection is not approved, the Port District and the City of San Diego will have to revisit traffic and circulation issues in the North Embarcadero area. With the proposed narrowing of Harbor Drive, Pacific Highway will become the most attractive commuter alternative between downtown and the airport, not Harbor Drive, which is appropriate and consistent with the public access and recreation policies of Chapter 3 of the Coastal Act, regardless of the airport access to I-5.

**PART VI. FINDINGS FOR REJECTION OF THE CITY OF SAN DIEGO LCP
IMPLEMENTATION PLAN AMENDMENT, (CENTRE CITY PDO)
AS SUBMITTED**

A. AMENDMENT DESCRIPTION

Centre City Planned District Ordinance

The proposed PDO amendment implements the Centre City Community Plan, which is intended to implement the North Embarcadero Visionary Plan. As with the Community Plan, the graphic figures in the PDO would be updated to reflect changes in the appearance of the waterfront resulting from the proposed PMPA #27.

The amendment would create a new North Embarcadero Overlay District that would be applied to the area west of California Street between Harbor Drive and Laurel Street. The proposed Figure 9 of the PDO shows the North Embarcadero Overlay District. However, the exhibit was supposed to show both the existing Waterfront District and the new North Embarcadero Overlay, but a printing error deleted the shading showing the Waterfront District. Suggested Modification #10 would correct the figure to show the boundaries of the Waterfront District (as shown on the current figure), and the proposed boundaries of the new North Embarcadero Overlay District.

The PDO also involves changes to View Corridor Stepbacks. The proposed changes are shown on two separate exhibits, because since the initial submittal, the City has revised its proposal. The City's revised amendment request is attached as an Exhibit to this staff report. The required stepback on Broadway west of Kettner would be reduced from 50 feet to 40 feet. The changes the City initially proposed for E, F and G Streets, west of California, are no longer desired, and no changes to these street setbacks are now proposed. The City is now requesting that the stepbacks on Date and Beech Streets west of California be increased from 15 feet at elevation 30 feet, to 20 feet at Ground Level. The City is also requesting that Pacific Highway be removed from the list of view corridor streets, and that the notation at the bottom of the table that Street Wall and Building Bulk requirements for Broadway would be deleted.

The City is also proposing several changes to the View Corridor Stepback exhibit, currently Exhibit 7 in the PDO, proposed to be Exhibit 8. These proposed changes have been requested by the City since their initial amendment request, and are shown as an attachment to this staff report. The changes include adding Beech Street west of Pacific Highway as a view corridor (and thus subject to the stepback requirements) and extending the view corridor on F Street from Pacific Highway east to Kettner Boulevard. In addition, although not shown on the Attachment, the City is requesting that Pacific Highway be removed as a view corridor.

The PDO also includes changes to the existing parking requirements for the North Embarcadero Overlay District. The existing PDO contains parking maximums. For example, hotels and motels are permitted to provide no more than 0.7 parking spaces per

room and restaurants can provide only up to 5 spaces per 1,000 sq.ft. of lot area. The proposed amendment would establish the following parking minimums for the North Embarcadero Overlay District only:

Office – 2 spaces/1000 square feet

Hotel – .5 spaces/room

Retail – 2.5 spaces/1000 square feet

Residential – 1 space/per bedroom. No more than 2 spaces per unit will be required.

Restaurant – 5 spaces/1000 square feet

However, the proposed language also states that if the City's adopted "Shared Parking Requirements" would require less parking, then those standards would apply.

The amendment would add a new exhibit, "Building Height-North Embarcadero" as Figure 4 to the PDO. The figure includes proposed height maximums for the North Embarcadero area, including four blocks which fall under the Marina PDO, and the blocks west of Pacific Avenue, which are under the jurisdiction of the Port District (or in the case of federal lands, are white-holed areas not covered by any certified LCP). Currently, there are no height limits in the Centre City PDO, only Floor Area Ratios, which are not proposed to be changed with the subject amendment.

There are existing height limits designated for the four affected blocks located within in the Marina PDO, which are not identical to the proposed heights. To resolve this internal inconsistency, the City has requested that the PDO be modified to delete the proposed height designations on the four blocks currently regulated under the existing Marina PDO height limits. Suggested Modification #8(a) addresses this issue.

The amendment would also add two permitted uses to the existing Land Use District "Recreation/Visitor/Marine". The new permitted uses are "Research & Development Services" and "Wholesaling, Distribution & Storage."

Marina Planned District Ordinance

Only one change is proposed for the Marina PDO. One sentence would be added to Section 103.2012(B)(2)(b)(1)(c) stating that the heights for buildings on the block bounded by Harbor Drive, G Street, Kettner and California Streets shall not exceed 500 feet. Currently, the height limits on this block is 120 feet with an exception in the existing plan that under certain conditions, the height at that location can be increased without any maximum. The proposed change would put an upper limit of 500 feet to the height exception.

B. SPECIFIC FINDINGS FOR REJECTION

The standard of review for LCP implementation submittals or amendments is their consistency with and ability to carry out the provisions of the certified LUP.

The majority of the proposed amendment to the Centre City PDO and Marina PDO is consistent with the policies of the Coastal Act. The plan is largely consistent with the proposed PMPA #27, which, if certified by the Commission, will be the standard of review for the majority of the North Embarcadero area.

The proposed PDO contains two references to the standard of review for development at the County Administration Center that do not fully reflect the status of the certified LCP. Both the proposed Section 103.1903 and Figure 1, Centre City Planned District Boundary in the PDO contain language stating that private development at the location of the County Administration Center would be subject to the provisions of the PDO. (The County and the City have entered into an agreement excluding public development of the site from the provisions of the PDO). However, although private development is subject to the PDO, it is important to make clear that when the Commission certified the Centre City/Pacific Highway Corridor segment of the City's Land Use Plan in January 1988, the Commission deferred certification of the County Administration Center area, finding that the zoning proposed for the area at the time (Central Business District), was not consistent with the certified Land Use Plan. The Commission also noted that there are jurisdictional questions raised about the City and County planning and regulatory roles on this site that supported deferred action and further study.

Thus, the area was excluded from the certified LCP, and remains in the Commission's jurisdiction. The standard of review for coastal development permits issued for development on the site would be the Chapter 3 policies of the Coastal Act, not the PDO. Therefore, the language in the proposed PDO amendment is not complete and cannot adequately implement the certified Land Use Plan.

The amendment involves a number of changes to the required setbacks on designated view corridors. In general, these changes would be consistent with and would implement the view protection policies of the Community Plan. As described above, suggested modifications would change the setback requirements in the Community Plan to match exactly the proposed changes in the PDO. The PDO changes would increase setback requirements on Date and Beech Streets west of Pacific Highway, and on C Street. These would increase the view protection on these streets. However, the amendment would also remove Pacific Highway from the list of designated view corridors, and remove the notation on the bottom of the table describing the street wall and building bulk requirements along Broadway.

As described above, Pacific Highway is currently designated as a view corridor in the Community Plan, and retention of this designation is necessary to protect the visual quality of this major coastal access route. Thus, in this case, the PDO as submitted, would not be adequate to implement the provisions of the Community Plan, and the amendment must be denied.

The PDO involves two changes to allowable uses in the North Embarcadero Overlay District. "Research & Development Services" and "Wholesaling, Distribution & Storage" would be added as allowable uses in the "Recreation/Visitor/Marine" Land Use

District. Although only a very small area of the Recreation/Visitor/Marine Land Use District is actually within the City's coastal permit jurisdiction, the designation is applied to the entire downtown waterfront area. Research and development services could allow a wide range of office type uses not typically permitted in visitor-serving designated areas, which are reserved for uses such as public areas, restaurant, overnight accommodations, and other visitor oriented development. Visitor-serving uses are one of the highest-priority uses in the Coastal Act, thus, allowing office type uses in a visitor-serving designated area would set a significant adverse precedent, and would not be consistent with the policies of the Community Plan promoting tourism and visitor uses. Therefore, the amendment must be denied as submitted.

The amendment includes a new exhibit, "Figure 4, Building Height-North Embarcadero." The heights apply to the entire Waterfront District, including the blocks west of Pacific Avenue, which are under the jurisdiction of the Port District (or in the case of federal lands, are white-holed areas not covered by any certified LCP). Currently, there are no height limits in the Centre City PDO, only Floor Area Ratios, which are not proposed to be changed with the subject amendment.

As previously noted, much of the subject amendment refers to areas outside the City's jurisdiction. For planning purposes, graphically portraying the entire North Embarcadero region in the LCP is appropriate, as are the inclusion of general goals and policies for development of the area, as long as those policies are consistent with those in the Port Master Plan. However, placement of specific height limitations on particular blocks appears to go beyond adopting region wide planning goals.

As noted above, the purpose of an implementation plan is to provide detailed, specific standards by which the policies of the land use plan are realized. The standard of review by which these implementation standards are evaluated is consistency with the certified land use plan. In this case, the City's land use plan does not apply to most of the area where the height limitations are proposed. Thus, there are no standards by which to judge the appropriateness of the proposed height limits. In addition, the height limitations would not be binding in any case, since the City does not issue permits for development on Port property.

Furthermore, a number of the heights proposed in the new exhibit in the Centre City PDO are not consistent with those proposed in the PMPA. The existing Port Master Plan does not have height limitations for buildings in the North Embarcadero region. The proposed PMPA for the North Embarcadero states that building height limits for the Lane Field parcel "range from 400 feet to 200 feet sloping towards the bay." The Centre City PDO's proposed heights for this parcel are 350 feet to 200 feet (north of C Street), and 400 feet to 300 feet (south of C Street), sloping towards the bay. The City's proposal would impose height limitations for the blocks north of B Street where the PMPA does not impose any height restrictions. The City's proposal places a 50 foot height limit on Navy Pier and an existing pier north of Ash Street, which would conflict with the proposed PMPA's height limitation of 12 feet for this area, and would be inconsistent with the view

protection policies of the Coastal Act. Thus, the proposed height restrictions on areas outside the City's jurisdiction cannot be found consistent with the Community Plan.

The new height limits proposed in the Centre City PDO would also apply to four blocks in the Marina PDO which do currently have height limits. These proposed height limits would not be completely consistent with those allowed in the existing Marina PDO. Specifically, on the two blocks bounded by Harbor Drive, Pacific Highway, F Street, and California, the existing Marina PDO designates the height limit for the southern block at 160 feet, and the northern block at 120 feet, but with an exception that would allow buildings on both blocks to increase in height without any upper maximum. The proposed Centre City PDO height limit for the southern block would be 160 feet and 120 feet for the northern block, but without allowing for any exceptions. Similarly, on the block bounded by Harbor Drive, California, G Street, and Kettner, the existing Marina PDO designates the height as 120 feet, with the same exception allowing no upper height limit. The proposed Centre City PDO height limit for this block would be 500 feet, no exceptions. Thus, as proposed, the amendment would create an inconsistency between the two PDOs such that the Marina PDO would not be able to adequately and accurately implement the Community Plan, and therefore, must be denied.

**PART VII. FINDINGS FOR APPROVAL OF THE CITY OF SAN DIEGO
CENTRE CITY IMPLEMENTATION PLAN AMENDMENT, IF
MODIFIED**

The majority of the proposed amendment to the Centre City PDO and Marina PDO is consistent with the policies of the Coastal Act. The plan is largely consistent with the proposed PMPA #27, which if certified by the Commission, will be the standard of review for the majority of the North Embarcadero area.

The two references in the proposed PDO do not fully describe the standard of review for development at the County Administration Center. When the Centre City Implementation Plan was approved by the Commission in 1988, certification of the County Administration Center site was deferred and remains with the Commission's jurisdiction. Private development on the site is subject to the PDO, but approval of a coastal development permit on the site is subject to the Chapter 3 policies of the Coastal Act, with the PDO used only as guidance. Therefore, Suggested Modifications #6 and #7 revise both the proposed text and Figure 1 of the PDO to make it clear that the PDO does apply to the County Administration Center, but the site is an area of deferred certification.

The amendment involves a number of changes to the required setbacks on designated view corridors. Specifically, the setback on Broadway, west of Kettner, would be reduced from 50 feet to 40 feet. (Because the setback elevation in this area is "ground level", this setback would traditionally be described as a set back.) However, 40 feet is still a significantly larger setback or setback than required on any other view corridor street in Centre City. Most of the streets currently are required to provide 25 or 15-foot

stepbacks. The reduction in setback from 50 to 40 feet is not expected to have a significant adverse impact on public views.

The other changes proposed by the City are to increase the setback west of California on Date and Beech Streets from 15 feet at elevation 30 feet, to 20 feet at ground level. The setback on C Street would be increased from 15 feet to 25 feet. These changes will increase the view protection on these streets.

The amendment also removes Pacific Highway as a designated view corridor. As discussed in detail above, Pacific Highway is a major coastal access route. Removal of this designation and the setback requirements would be inconsistent with the certified Community Plan. Suggested Modification #11 shows the PDO table with the revisions requested by the City for Date, Beach, C, and Broadway. Pacific Highway remains a designated view corridor. However, the suggested modification changes the minimum setback amount from 15 feet to 25 feet, and allows the setback to occur anywhere from 30 feet to 130 feet in elevation. This will allow the City some flexibility in designing buildings consistent with the setback requires of the Port District (which has jurisdiction over the western side of Pacific Highway) while still maintaining the view corridor designation as appropriate for a major coastal access route. The requirements of the PDO will be identical to those in the Community Plan, as modified herein. Therefore, as modified, the PDO will implement the Community Plan and the visual protection policies of the Coastal Act.

The City has requested several changes to the View Corridor Stepback exhibit, shown on Attachment 3 of Exhibit #15, that were not included in the City's initial amendment submittal. The changes include adding Beech Street west of Pacific Highway as a view corridor (and thus subject to the setback requirements) and extending the view corridor on F Street from Pacific Highway east to Kettner Boulevard. These changes would increase the view protection on these streets, consistent with the policies of the Community Plan. Removal of Pacific Highway as a view corridor would be inconsistent with the Community Plan. Suggested Modification #9 includes the changes to the view corridors on Beech and F Streets, but requires that Pacific Highway remain a view corridor.

The proposed PDO amendment would eliminate the existing parking maximums contained in the PDO for the North Embarcadero Overlay District. The parking maximums were intended to promote the use of transit and the construction of new transit facilities in the downtown area. However, although the promotion of transit continues to be a goal of the City, to avoid impacts to public access, the City has added parking requirements for all new development in the North Embarcadero Overlay District. The parking standards proposed are generally consistent with the requirements of other coastal cities in the San Diego region. The proposed hotel parking requirement of .5 spaces per hotel room is less than the 1 space room that the Commission has typically required. However, the standard would most likely result in more parking than under the current PDO, which *prohibits* the provision of more than .7 parking spaces per room. More importantly, the North Embarcadero area is a densely developed downtown area

with reasonably good transit facilities including buses, train, trolley, and airport shuttles. In addition, the Commission has previously found that the shared parking standards in the City's Land Development Code, (which would apply in the North Embarcadero Area where less than the proposed parking minimums), are adequate. Thus, the provision of only .5 spaces per hotel room in the limited North Embarcadero corridor covered by the amendment is not expected to have any adverse impact on public access.

As discussed above, the proposed new Figure 4, "Building Height-North Embarcadero," (Figure 4) includes height limits for areas within the Port District's permit jurisdiction. In general, it is problematic to place specific development standards on properties outside the City's jurisdiction, since the standards cannot be implementing policies of a Land Use Plan which does not apply to the area. More importantly, several of the proposed heights are inconsistent with the proposed PMPA, which *is* the standard of review for the area. However, the City feels strongly that identifying height limits for the area will be a useful planning tool for coordinating development in the area with the Port jurisdiction. Thus, Suggested Modification #8 changes several of the height designations so that they do not conflict with the Port's standards. In addition, the exhibit will be labeled with a disclaimer stating that all height limitations west of Pacific Highway are for planning purposes only.

The remaining height limits proposed are located on the one-block wide area between Pacific Highway and California Street. The City has also asked that one revision be made to their original submittal to designate a height limit of 450 feet on the block between E and F Street, between Pacific Highway and California Street. The proposed limits have been designed to be consistent with the goals of the proposed plan that development along shoreline and Harbor Drive "be low in scale and intensity and increase in stepped building envelopes further upland...this concept of 'stepped intensity and scale' will be implemented through floor area ratios (FARs) and other development characteristics..." No revisions to the existing FARs are proposed. Currently, there are no height limits in the Centre City PDO. Thus, the proposed height limits could potentially affect the appearance of new buildings (with an upper height limit, a building would have to be bulkier to achieve the same FAR as a taller building), but as discussed, the proposed view corridor stepbacks, as modified, will adequately protect the visual quality of the area consistent with the proposed Community Plan. Suggested Modification #8 would revise the City's amendment to place a 450-foot height limit on the block between E and F Street, as requested by the City.

The new height limits in the Centre City PDO would also affect four blocks in the Marina PDO that currently have height limits. The proposed height limits would not allow any greater heights than currently allowed by the Marina PDO, and would actually lower the required heights on one block. Thus, as proposed, the height limits in the Centre City PDO would not be completely consistent with those allowed in the existing Marina PDO. The City recognizes this inconsistency, and has requested that the proposed height limitations in the Centre City PDO be removed from the four blocks in the Centre City PDO currently governed by the Marina PDO, such that the height limitations would remain as they currently exist in the Marina PDO. Therefore, Suggested Modification #8

removes the height designations from these four blocks. Thus, the two PDOs will not conflict and can be found adequate to carry out the Community Plan.

The PDO involves only two changes to allowable uses in the North Embarcadero Overlay District. "Research & Development Services" and "Wholesaling, Distribution & Storage" would be added as allowable uses in the "Recreation/Visitor/Marine" Land Use District. Only a very small area of the Recreation/Visitor/Marine Land Use District is actually within the City's coastal permit jurisdiction, although the designation is applied to the entire waterfront area downtown. Research and development services could allow a wide range of office type uses not typically permitted in visitor-serving designated areas, which are reserved for uses such as public areas, restaurant, overnight accommodations, and other visitor oriented development. Thus, Suggested Modification #12 removes Research & Development Services as a permitted use in the Recreation/Visitor/Marine Land Use District.

Although wholesaling, distribution, and storage are also not typical visitor-serving uses, in this particular case, the downtown waterfront area has traditionally served as a distribution point for goods and services. In particular, shipping and cargo associated with the Port and San Diego Bay has led to the development of rail transit lines and other infrastructure associated with the circulation of goods. Thus, the proposed land use can be found consistent with the policies of the Centre City Community Plan.

Suggested Modification #10 corrects a printing error on the proposed Figure 9, Waterfront District, to graphically depict both the existing Waterfront District and the proposed North Embarcadero Overlay District.

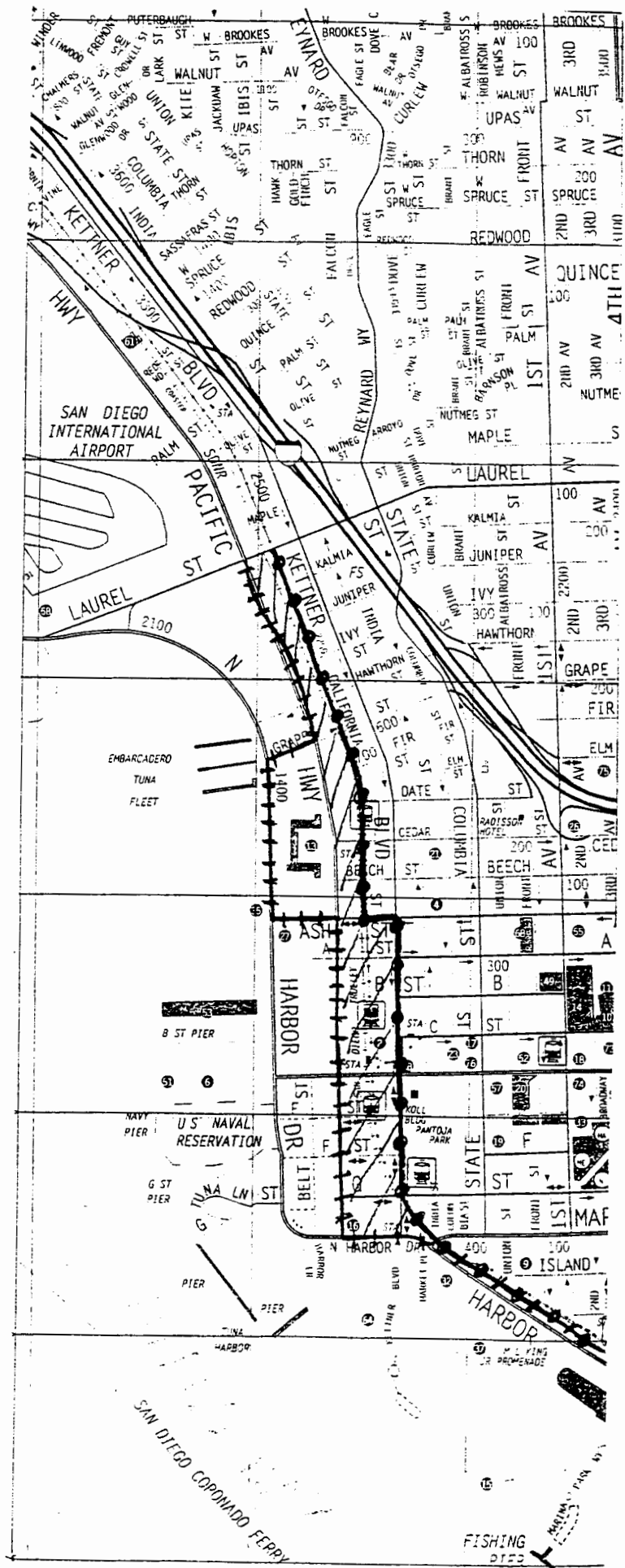
The one change to the Marina PDO would limit heights on the block between Harbor Drive, G Street, Kettner Boulevard and California Street, to 500 feet. Currently, the height limit on this block is 120 feet with exceptions to the height limit permitted under certain conditions where the height could be increased without any maximum. The proposed change would add an upper limit of 500 feet to the height exception. Placing this upper limit on building heights is not expected to have any adverse impact on heights or views, and can be found consistent with the Community Plan.

In summary, suggested modifications to the PDO are required to correctly identify the status of the County Administration Center, and to modify the Building Height and Waterfront Districts figures. Changes in the setback requirement for C Street west of California will ensure the PDO is consistent with the provisions of the setback requirements in the Community Plan. The removal of Research & Development as a permitted use will ensure that uses inconsistent with the Waterfront District are not permitted. Therefore, as modified, the PDO can be found adequate to carry out the provisions of the Community Plan.

PART VII. CONSISTENCY WITH THE CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

Section 21080.5 of the California Environmental Quality Act (CEQA) exempts local government from the requirement of preparing an environmental impact report (EIR) in connection with its local coastal program. Instead, the CEQA responsibilities are assigned to the Coastal Commission and the Commission's LCP review and approval program has been found by the Resources Agency to be functionally equivalent to the EIR process. Thus, under CEQA Section 21080.5, the Commission is relieved of the responsibility to prepare an EIR for each LCP.

Nevertheless, the Commission is required in an LCP submittal or, as in this case, an LCP amendment submittal, to find that the LCP, or LCP, as amended, does conform with CEQA provisions. As discussed above, as modified, the amendment can be found fully consistent with the resource protection, public access and recreation, and visual protection policies of the Coastal Act. As modified, the implementation plan will be adequate to carry out and implement the certified land use plan. No impacts to coastal resources are anticipated.

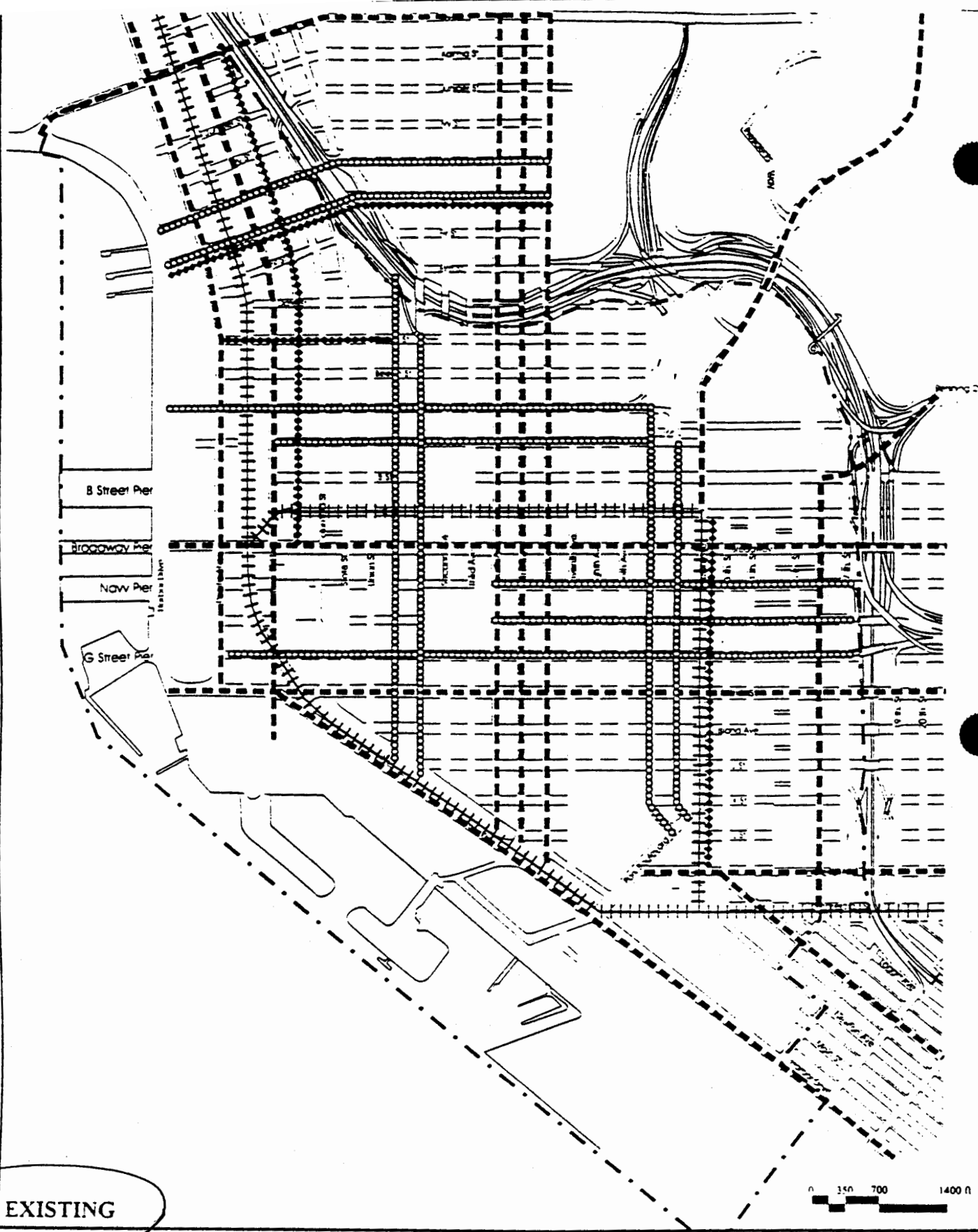


—●— COASTAL ZONE BOUNDARY

++++ PORT JURISDICTION INLAND BOUNDARY

 CITY OF SAN DIEGO COASTAL PERMIT JURISDICTION

SD LCPA #4-2000 (CENTRE CITY)
Selected Exhibits Relevant to
Revised Findings



EXISTING

HIERARCHY OF STREETS

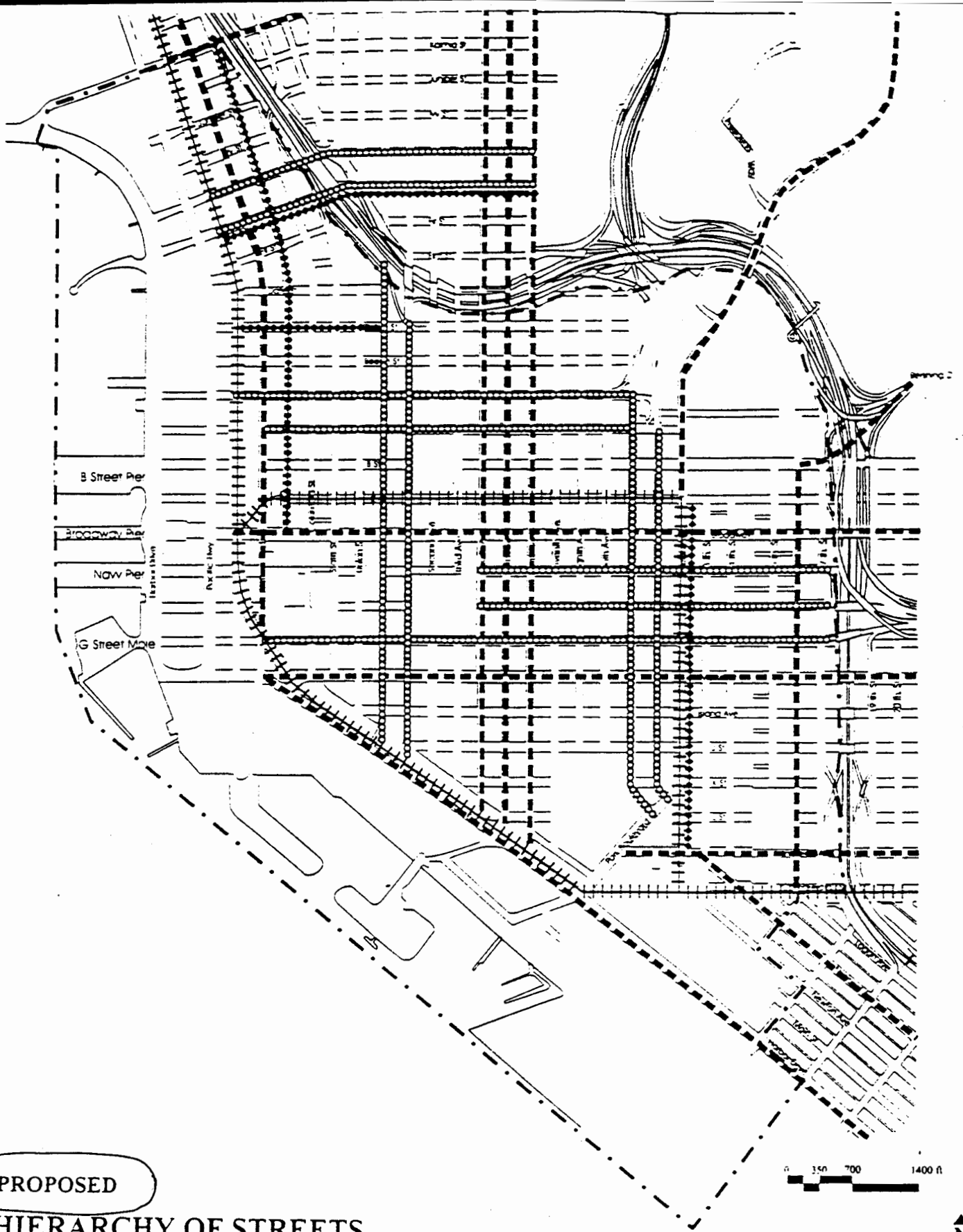
August 10, 1999

- District Center Streets
- ==== District Streets
- . - . - . Centre City Community Plan Boundary

- Freeway Coupiets
- Crosstown Links
- + + + + + Transit Streets



The Centre City Community Plan does not apply to lands within the jurisdiction of the San Diego Unified Port District.
CENTRE CITY SAN DIEGO COMMUNITY PLAN • City of San Diego • Planning Department



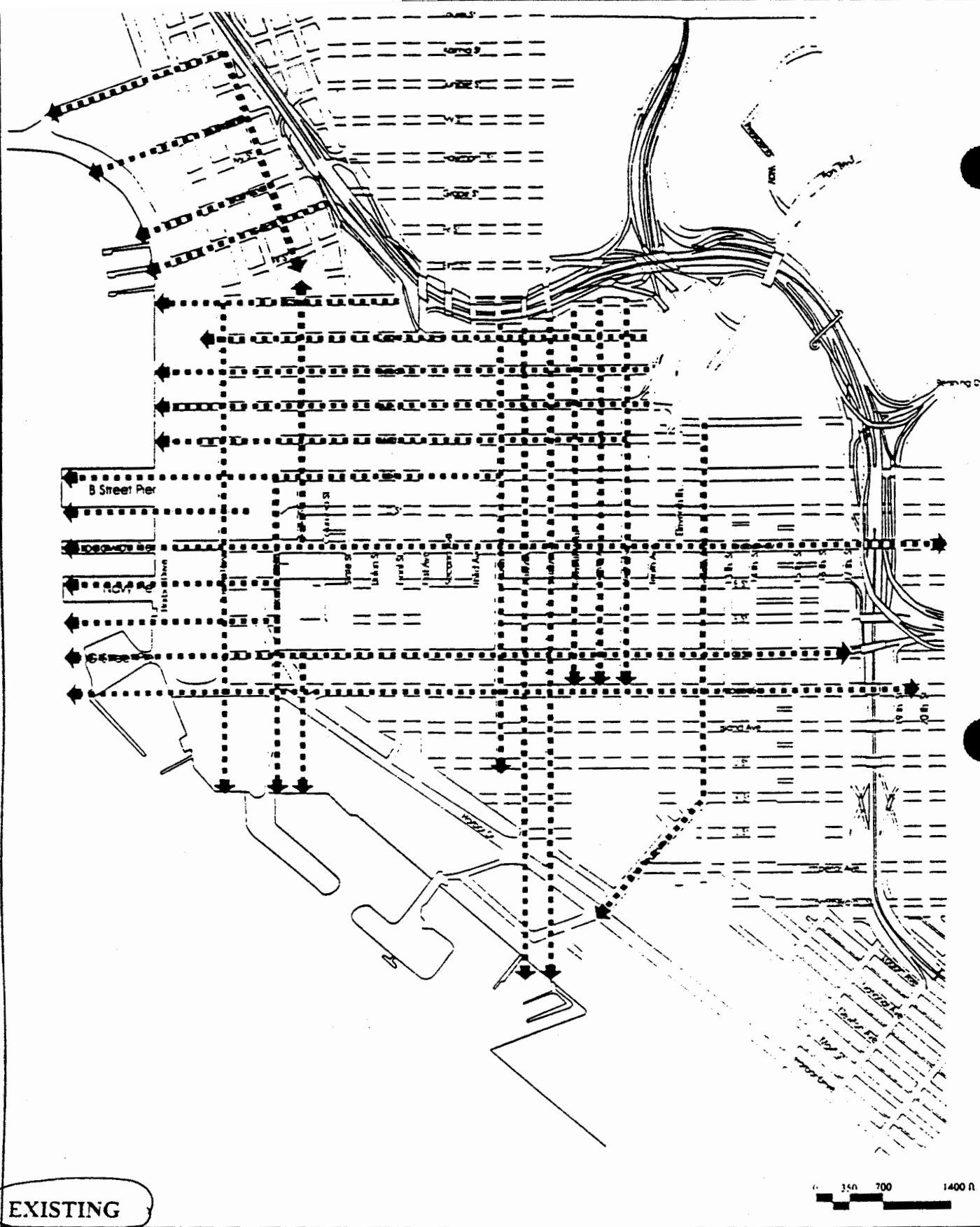
PROPOSED

HIERARCHY OF STREETS

- District Center Streets
- District Streets
- Centre City Community Plan Boundary
- Freeway Coupiets
- Crosstown Links
- Transit Streets



The Centre City Community Plan does not apply to lands within the jurisdiction of the San Diego Unified Port District.
CENTRE CITY SAN DIEGO COMMUNITY PLAN • City of San Diego • Planning Department



EXISTING

VIEW CORRIDOR STREETS

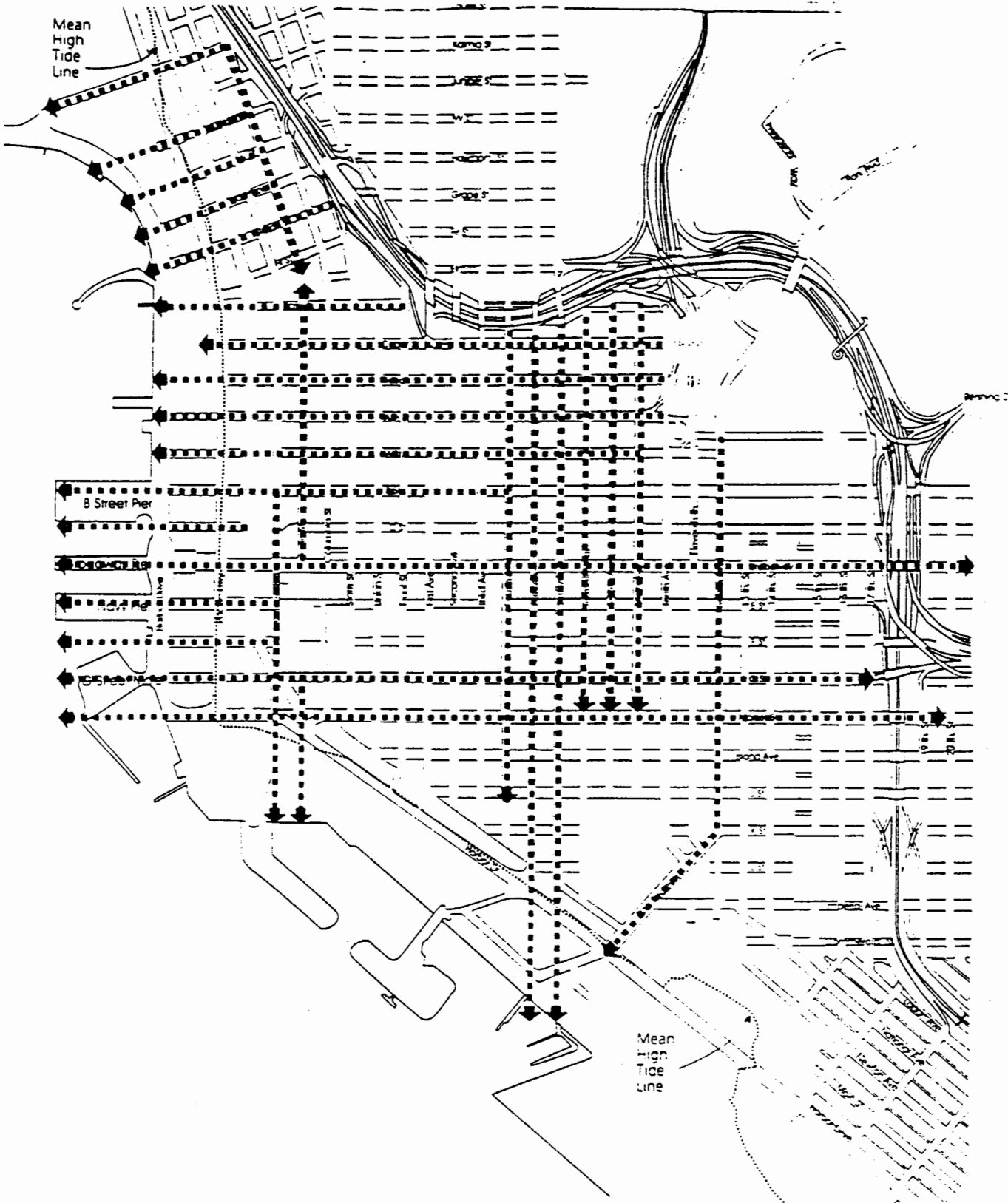
August 10, 1999

..... View Corridor Streets

FIG



The Centre City Community Plan does not apply to lands within the jurisdiction of the San Diego Unified Port District.
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PROPOSED

VIEW CORRIDOR STREETS

..... View Corridor Streets

FIG
19



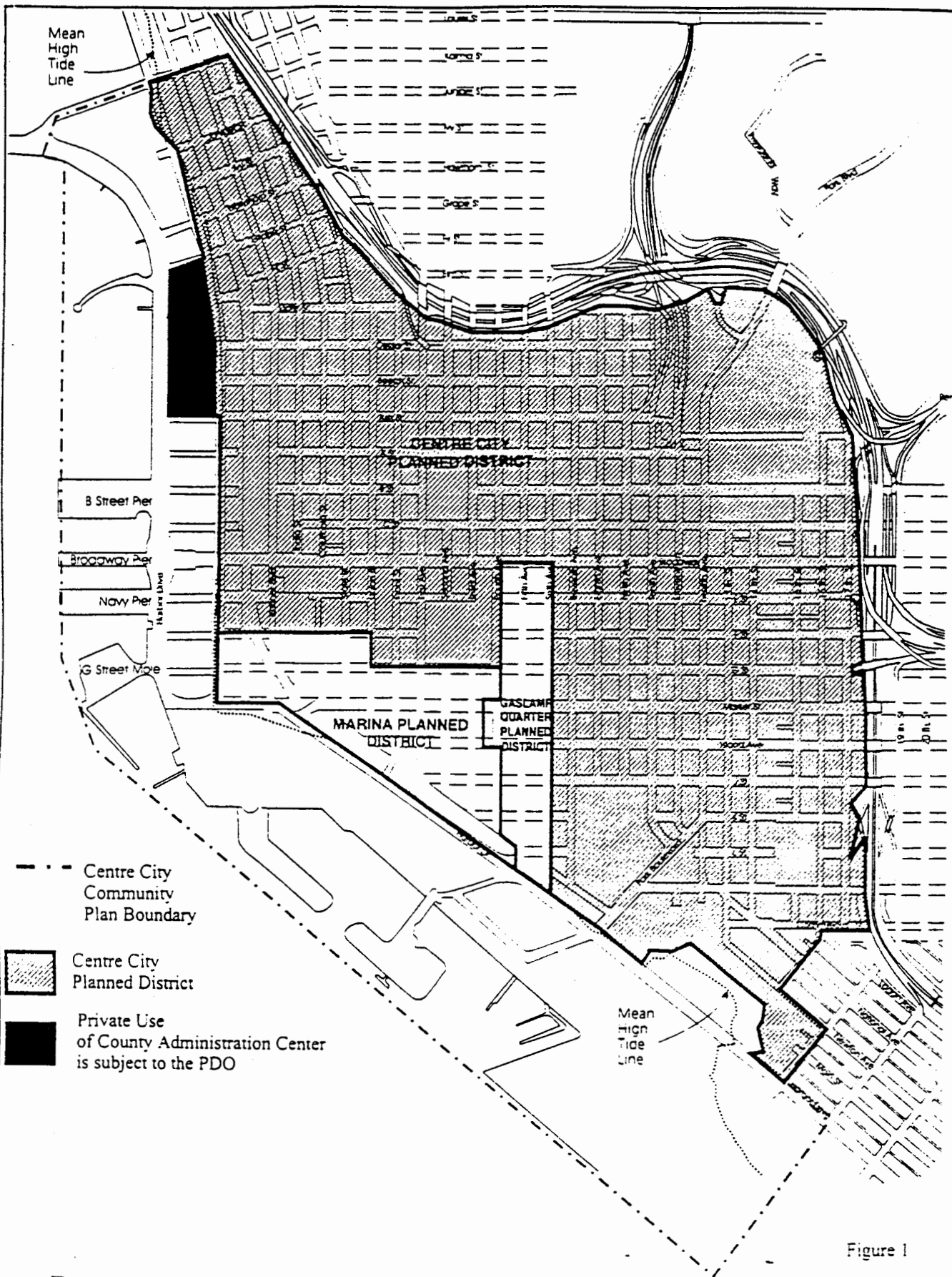
The Centre City Community Plan does not apply to lands within the jurisdiction of the San Diego Unified Port District.
CENTRE CITY SAN DIEGO COMMUNITY PLAN • City of San Diego • Planning Department



VIEW CORRIDORS

STREET	STEPBACK	STEPBACK ELEVATION
Laurel	15'	30'
Juniper	15'	30'
Juniper west of California	15'	30'-50'
Hawthorn	15'	30'
Hawthorn west of California	15'	30'-50'
Grape	15'	30'
Grape west of California	15'	30'-50'
*Date	15'	30'
*Cedar	15'	30'
Cedar west of California	15'	Ground Level
*Beech	15'	30'
Ash	25'	50'
Ash - west of California	15'	30'-50'
A	25'	50'
A - west of California	15'	30'-50'
B	25'	50'
B - west of California	15'	30'-50'
C	15'	50'
C - west of California	25'	30'-50'
Broadway**		
West of Kettner	40'	Ground Level
East of Kettner	15'	Ground Level
East of Kettner	10'	90'
E	25'	50'
E - west of California	25'	30'-50'
F	25'	50'
F - west of California	15'	30'-50'
G	25'	50'
G - west of California	15'	30'-50'
Market	25'	50'
Fifth	15'	65'
Sixth	15'	65'
Seventh	15'	65'
Eighth	15'	65'
Ninth	15'	65'
Pacific Highway	15'	50'

* See PDO for Special Setbacks

** Street Wall and Building Bulk requirements (25' stepback at 40-50-foot elevation) apply along the length of Broadway.



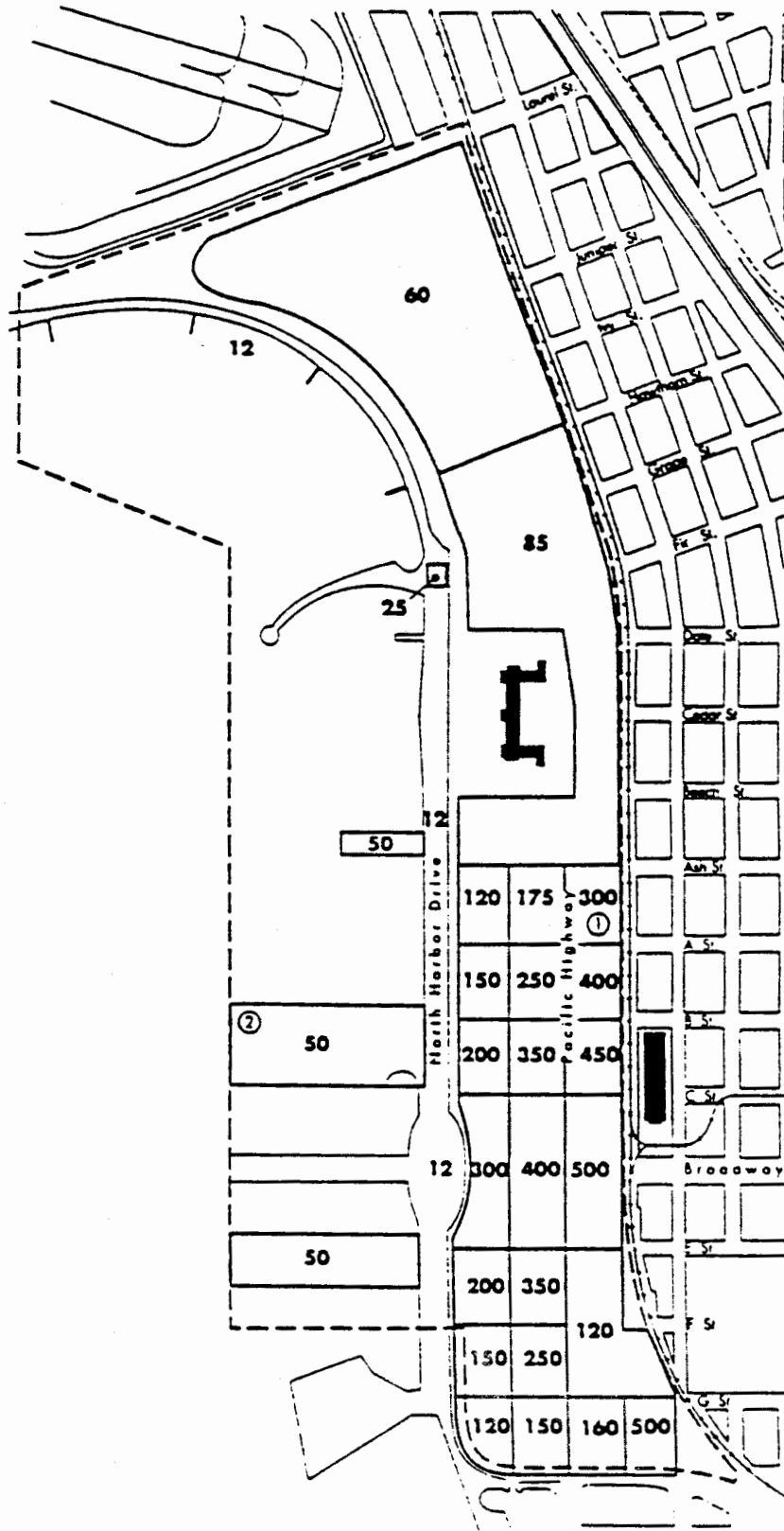
- - - Centre City Community Plan Boundary
-  Centre City Planned District
-  Private Use of County Administration Center is subject to the PDO

Proposed
Centre City Planned District Boundary

Figure 1

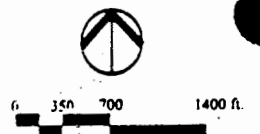


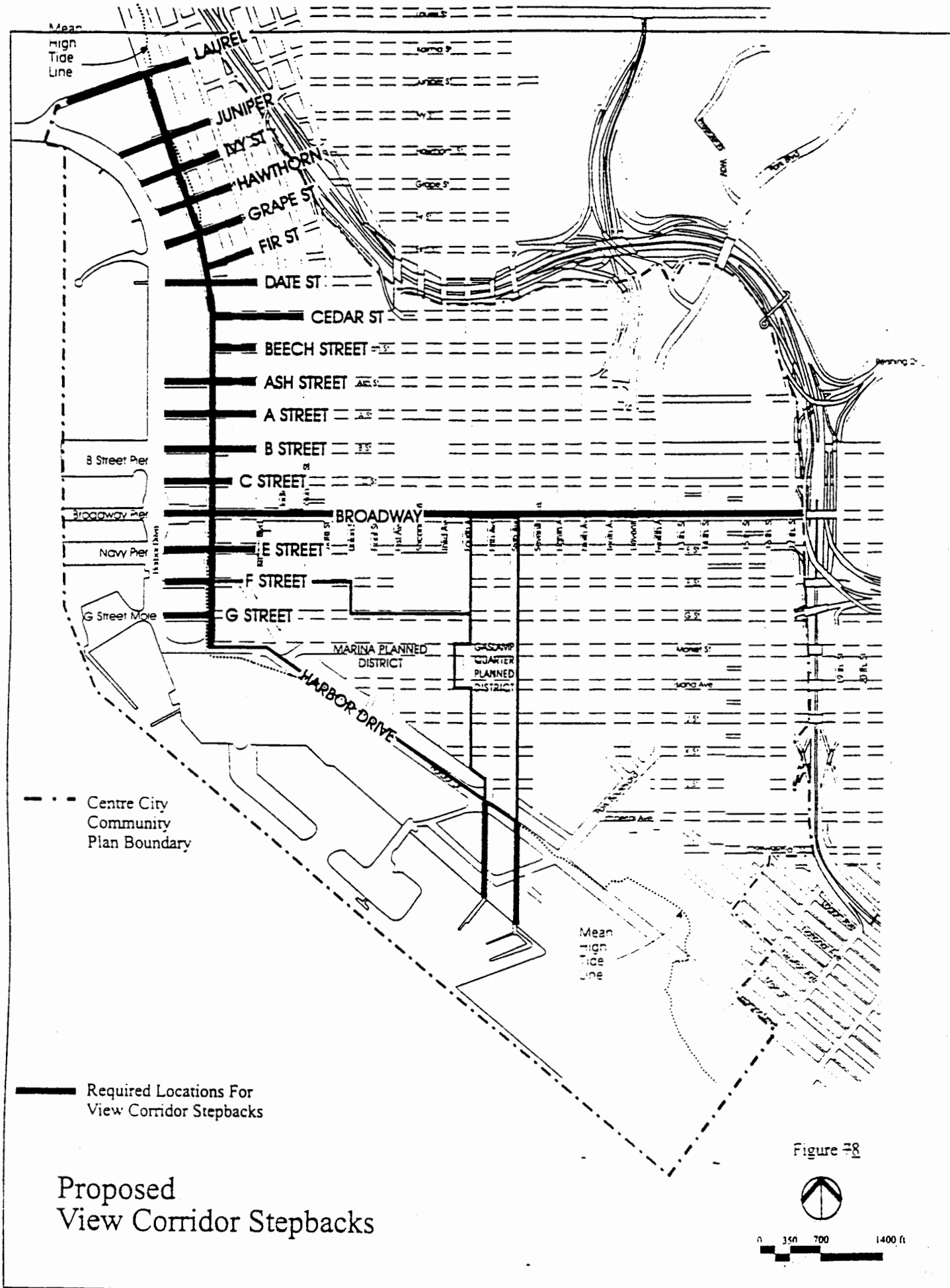
0 350 700 1400 ft

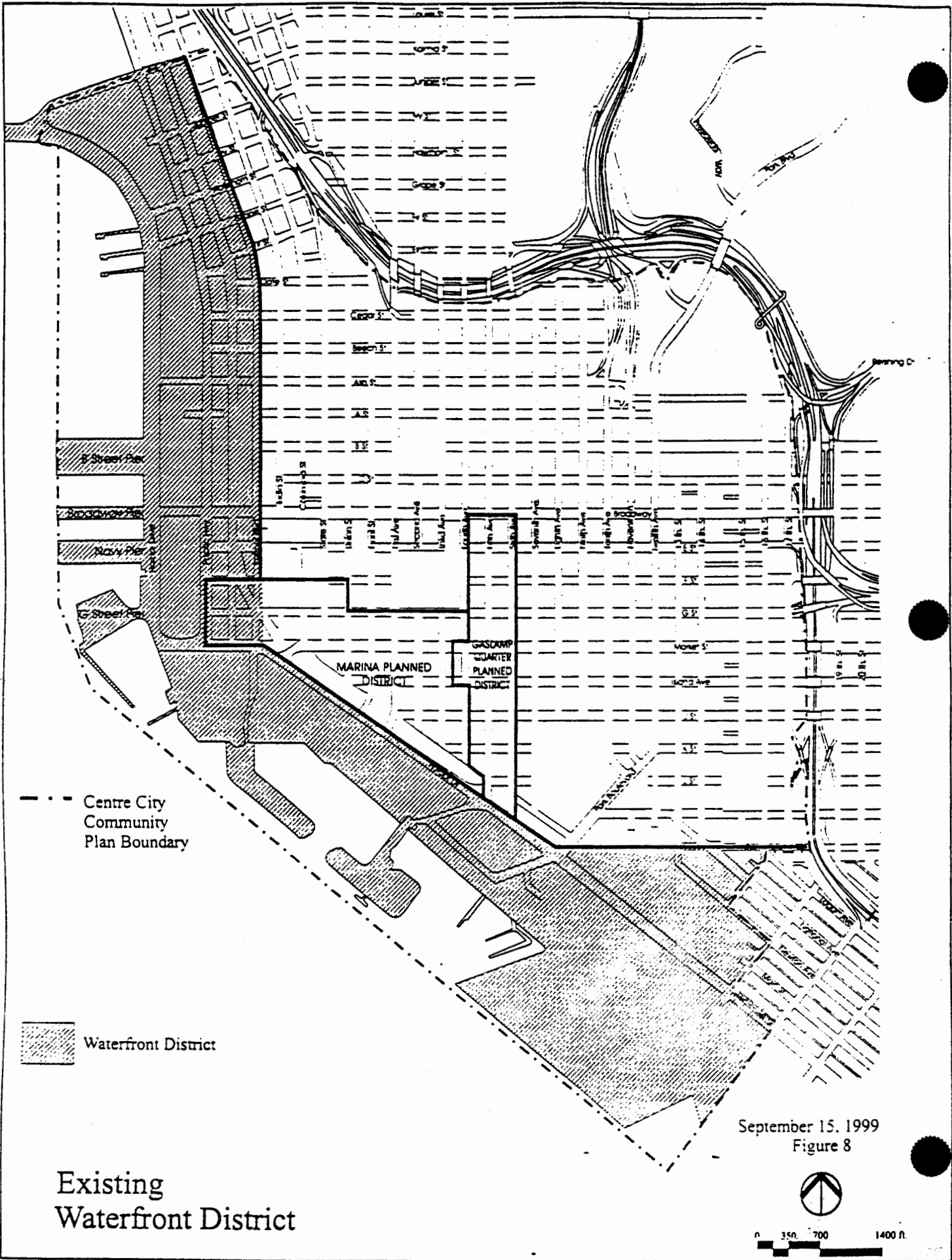


Proposed
Building Height-North Embarcadero

Figure 4

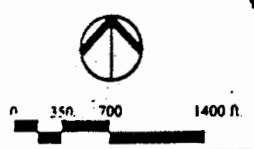






Existing Waterfront District

September 15, 1999
Figure 8



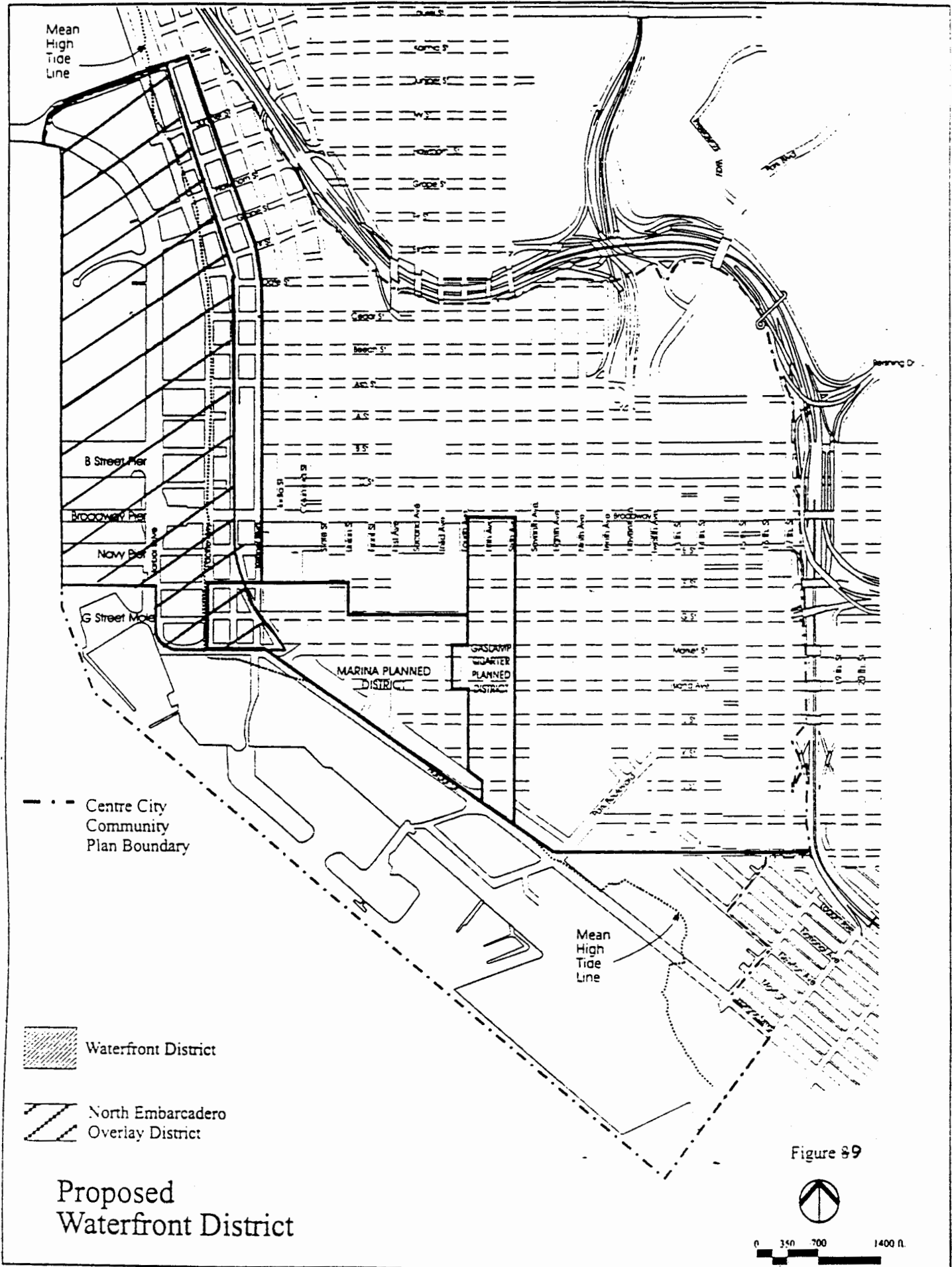


Figure 89

Proposed Waterfront District



TABLE II OF SECTION 103.1915
VIEW CORRIDORS

STREET	STEPBACK	STEPBACK ELEVATION
Laurel	15'	30'
Juniper	15'	30'
Hawthorn	15'	30'
Grape	15'	30'
*Date	15'	30'
Fir	15'	30'
*Cedar	15'	Ground Level
*Beech	15'	30'
Ash	25'	50'
A	25'	50'
B	25'	50'
C	15'	50'
Broadway**		
West of Kettner	40' 50'	Ground Level
East of Kettner	15'	Ground Level
East of Kettner	10'	90'
E	25'	50'
E - west of California	25'	30'
F	25'	50'
F - west of California	15'	30'
G	25'	50'
G - west of California	15'	30'
Market	25'	50'
Fifth	15'	65'
Sixth	15'	65'
Seventh	15'	65'
Eighth	15'	65'
Ninth	15'	65'
Pacific Highway	15'	50'

* See also Figure 13 "Special Setbacks"

** Street Wall and Building Bulk requirements (25' setback above the building base) apply along the length of Broadway.

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Centre City
Development
Corporation

RECEIVED

FEB 20 2001

CALIFORNIA
COASTAL COMMISSION
SAN DIEGO COAST DISTRICT

February 7, 2001

Ms. Diana Lilly
Coastal Analyst
California Coastal Commission
3111 Camino del Rio North, Suite 200
San Diego, CA 92018-1725

Dear Ms. Lilly:

We received the Coastal Commission staff's report and recommendation on our proposed Local Coastal Program (LCP) amendment. The purpose of this letter is to summarize our response to the suggested modifications to the proposed plan and ordinance amendments (numbers correspond to the proposed modifications in the staff report of December 21, 2000, page 7-10):

We agree with the following modifications as proposed:

1. Delete the "grand oval shaped landscaped park" that extends out over the water because it was deleted from the Port Master Plan Amendment (PMPA) for lack of environmental review (specifically with regard to shading and filling impacts).
8. The Waterfront District map, which contained a graphical mistake on the shading of the Waterfront area, will be corrected.
10. The research & development use that was added to the land use table in the B - Recreation Visitor Marine district will be changed back to a NON-PERMITTED use.

We agree in principle with the modification, but prefer an alternative "implementation":

2. Coastal staff would like language pertaining to a subsequent project, the docking of the U.S.S. Midway, to be inserted into the Community Plan (See p. 8 of staff report). We would propose that the following modifications be made to the language:

The Port Master Plan may allow for the docking of the aircraft carrier Midway on the south side of the Navy Pier to operate as a museum. Interim parking for the Midway may be located on Navy Pier; however, the ultimate goal for the area in the Port Master Plan is to relocate any parking on the Pier to inland of Harbor Drive and convert the Pier into a public memorial park associated with the Midway museum. ~~Relocation of the parking and conversion of the park should~~

**City's Response and
Revised Amendment Request**

Ms. Diana Lilly
February 7, 2001
Page 2

~~occur as part of the Navy's plan to vacate its use of Navy Pier prior to or concurrent with the redevelopment of the Navy Broadway Complex.~~

4. View Corridor exhibit in the Community Plan should be revised to reflect the proposed setbacks on Ash, A and B streets at 25 feet rather than 15 feet.

We would prefer to take the view corridor table out of the Community Plan for the following reasons:

- *There is no reference to the table in the text of the Community Plan,*
- *The table is currently inconsistent with the Centre City PDO, and*
- *The Centre City PDO—not the Community Plan—regulates view corridor setbacks and setbacks.*

Deleting the table in the Community Plan only will make the view corridor setback and setback standards clearer, with no effect on the substance of the regulations governing setbacks and setbacks. The paragraph preceding the table on page 45 of the Community Plan would be modified as such: "The following vView corridors are designated..." The table would be deleted, as well as the paragraph following the table "View Corridor access along..." and ending "right-of-way for each street, e.g. 80 feet." The remainder of the section will be retained, and the Centre City PDO will continue to regulate setbacks and setbacks.

5. The Coastal Commission proposed modification to the text and map in the PDO pertaining to the County Administration Center (CAC) property. In short, the proposed change would state that the PDO does not apply to the CAC property (see p. 8 of staff report). The Centre City PDO does apply to private development at the CAC property. Normally, developers applying for development permits within the Coastal Zone (but not in the Port District's jurisdiction) would also apply to CCDC for a Coastal Development Permit under the Centre City PDO functioning as the LCP. According to the Coastal Commission staff's report, development at the CAC property (public or private) would not be subject to the PDO.

In any case, all development at CAC is subject to review by the Coastal Commission for the purpose of issuing a Coastal Development Permit. This is because the CAC property is an "LCP Deferred Certification Area" within the Coastal Zone downtown (the only Deferred Certification Area in Centre City). Deferred certification means that the Coastal Commission issues the Coastal Development Permit instead of the local agency. It does not, however, mean that private development is not subject to the Centre City PDO.

Ms. Diana Lilly
February 7, 2001
Page 3

The PDO serves the function of both downtown zoning and as the LCP, which the Coastal Commission is exclusively concerned with. We would propose instead the following solution which accurately represents the dual role of the Centre City PDO:

- 1.) to modify the text in Section 103.1903 of the proposed PDO amendment to state that the County property is subject to the PDO, and;*
- 2.) clarify on the map that the property is an "LCP Deferred Certification Area", leaving the reference that "only private use of the property is subject to the PDO" in place.*

The description of the property as appeared in the staff report of December 21, 2000 was partially inaccurate. The City Attorney's office supplied a corrected version of the language contained in the staff report for use (see Attachment 1) in the staff report for the March 2001 hearing.

6. Coastal staff would also like the map revised to make the CAC property a "Deferred Certification Area".

See p. 9 of December 21, 2000 Coastal Commission staff report and comment above.

7. The Commission staff suggested revising the height limit map (See Attachment 2, "Proposed Building Heights - North Embarcadero") in the Centre City Planned District Ordinance (PDO) to only show height limits on property within CCDC's jurisdiction.

We would like to keep the map as shown in the proposed amendments for consistency. All other maps in the Centre City PDO encompass the entire Community Planning area. Also, the intent of this information is to show comprehensively the relationship of development—especially within North Embarcadero—to Centre City.

9. The Centre City PDO Table II of Section 103.1925, View Corridors Setbacks & Stepbacks has a number of problems that should have been caught earlier, but that we would like to resolve. By way of explanation, the stepbacks listed in the Centre City PDO View Corridor table (Attachment 3 is "PDO Table II of Section 103.1925") correspond to the View Corridor map (Attachment 4 is "Proposed View Corridor Stepbacks"). In the PDO, the view corridor map is "connected" to the table, unlike in the Community Plan. The following streets need correction for accuracy. Please use attachments 3 and 4 for reference:

Beech and Date streets - Beech Street view corridor does not currently fully extend west. We would propose to add the view corridor on Beech Street. Additionally, we proposed to add a 20' setback requirement to Beech and Date Streets on the PDO Table that regulates setbacks.

C Street - Note that the demarcation of view corridor setbacks begins at California Street. Therefore, the table should read simply "25 feet at 50 feet" rather than calling out "west of California" separately, because it only occurs west of California.

E Street - The setback requirement on E Street is currently west of Kettner. The Visionary Plan calls for a 25 foot setback at 50 feet, and not at 30 feet.

F Street - The setback at F Street should be extended on the map to Kettner, and should remain a 25-foot setback at 50 feet in height as prescribed in the Visionary Plan, not 30 feet. Also, the notation "west of California" should be deleted (See Attachment 5 from the Visionary Plan, "Setbacks").

G Street - "West of California" should be deleted for the same reason. We are not proposing to extend the view corridor notation on the map because the areas to the east are already developed.

Requested changes to staff's proposed modifications:

3. Coastal Commission staff report proposed that Figure 19 of the Community Plan remain as it exists—that is, indicating that the entire length of Pacific Highway should remain as a view corridor street.

We recognize the Coastal Commission staff's desire to retain Pacific Highway as a view corridor on the map. However, we would request Coastal Commission staff's consideration of a request to delete the View Corridor on Pacific Highway from the maps in both the Community Plan and Centre City PDO, and in the corresponding PDO table (Table II of Section 103.1925) for the following reasons:

- The Visionary Plan specifically noted that there should not be View Corridor setbacks on Pacific Highway because there are no existing or planned views southerly. The South Embarcadero Redevelopment Program 1 and Port Master Plan Amendment did not include a view corridor through Seaport Village.
- The Centre City PDO still contains "bulk criteria" that require buildings to step back between 25 feet at a height anywhere between 30 and 130 feet.
- The San Diego Unified Port District, which has regulatory authority over the west side of Pacific Highway, will not require a setback on Pacific Highway. Page 73 of the proposed PMPA—consistent with the Visionary

Plan—specifically states that “There are no setback requirements along Pacific Highway”.

- *The wide street width (130 feet) is one of the widest downtown and naturally results in a significant view corridor on its own.*

11. Coastal staff correctly points out that there was an inconsistency in the height limits table shown in the proposed amendment to the Centre City PDO and the height limits prescribed in the proposed amendment to the Marina PDO. The proposed modification would add language stating that height limits shall not exceed the limits in the Centre City PDO.

We would prefer to keep regulations in the Marina District self-contained and not have the Marina PDO refer to the Centre City PDO.

During the drafting of the Visionary Plan, there was confusion in the boundaries of the Marina District, and a misunderstanding of the height limits allowed through the bonus program contained in the Marina PDO. Base heights are allowed by right, with bonuses, there is no height limit except as required by the FAA. When the North Embarcadero map was drawn, a mistake was made in limiting the heights to the base allowable height. Heights should have been in the 400-500-foot range on the blocks south of E Street between Pacific Highway and California, consistent with the gradually declining heights from Broadway south and from east to west. Our proposal would be to delete the three height limits (120, 160 and 500) on Figure 4 (“Proposed Building Height - North Embarcadero”) from the map in favor of the existing Marina PDO since the blocks in question are developed or under construction.

Also, we would request consideration of a modification on the block between E, F, California streets and Pacific Highway for a height limit of 450 feet. This block is not currently at its highest use, and redevelopment opportunities would be more appropriate at a higher intensity. The request is consistent with blocks surrounding this site—see the height limit of 450 feet on the block between B, C, California streets and Pacific Highway; as well as E, F and the east side of Pacific Highway (see Attachment 2). The likelihood for redevelopment of this block was apparently overlooked during the Visionary Plan process.

Ms. Diana Lilly
February 7, 2001
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I would be happy to go over these proposed changes in person and could set up a meeting at your earliest convenience. We trust that the Coastal Commission staff will find our proposal reasonable, and we look forward to the successful resolution of these issues prior to or during the Coastal Commission's hearing on this subject. In the meantime, please call me at 619/533.7117 if we can be of further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read 'Alexandra Elias', written in a cursive style.

ALEXANDRA ELIAS
ASSOCIATE PLANNER

cc: Alliance staff members

Page 20, Paragraph B, SPECIFIC FINDINGS FOR REJECTION, third paragraph, suggested changes:

The proposed PDO contains two references to the standard of review for development at the County Administration Center that do not accurately fully reflect the status of the certified LCP. Both the proposed Section 103.1903 and Figure 1, Centre City Planned District Boundary in the PDO contain language implying say that private development at the location of the County Administration Center would be subject to the provisions of the PDO. However, in January 1988, the Commission certified the Centre City/Pacific Highway Corridor segment of the City's Land Use Plan. At this time, the Commission deferred certification of the County Administration Center, finding that the zoning proposed for the area at the time (Central Business District), was not consistent with the certified Land Use Plan. The Commission also noted that there are jurisdictional questions raised about the City and County planning and regulatory roles on this site that support deferred action and further study. Thus, the area was excluded from the certified LCP, and remains in the Commission's jurisdiction, subject to the Chapter 3 policies of the Coastal Act, not in addition to the PDO . Therefore, the language in the proposed PDO amendment is not accurate complete and cannot adequately implement the certified Land Use Plan.

Page 21, Part VII. FINDINGS FOR APPROVAL OF THE CITY OF SAN DIEGO IMPLEMENTATION PLAN AMENDMENT, IF MODIFIED, second paragraph, suggested changes:

The two references in the proposed PDO inaccurately do not fully describe the standard of review for development at the County Administration Center. When the Centre City

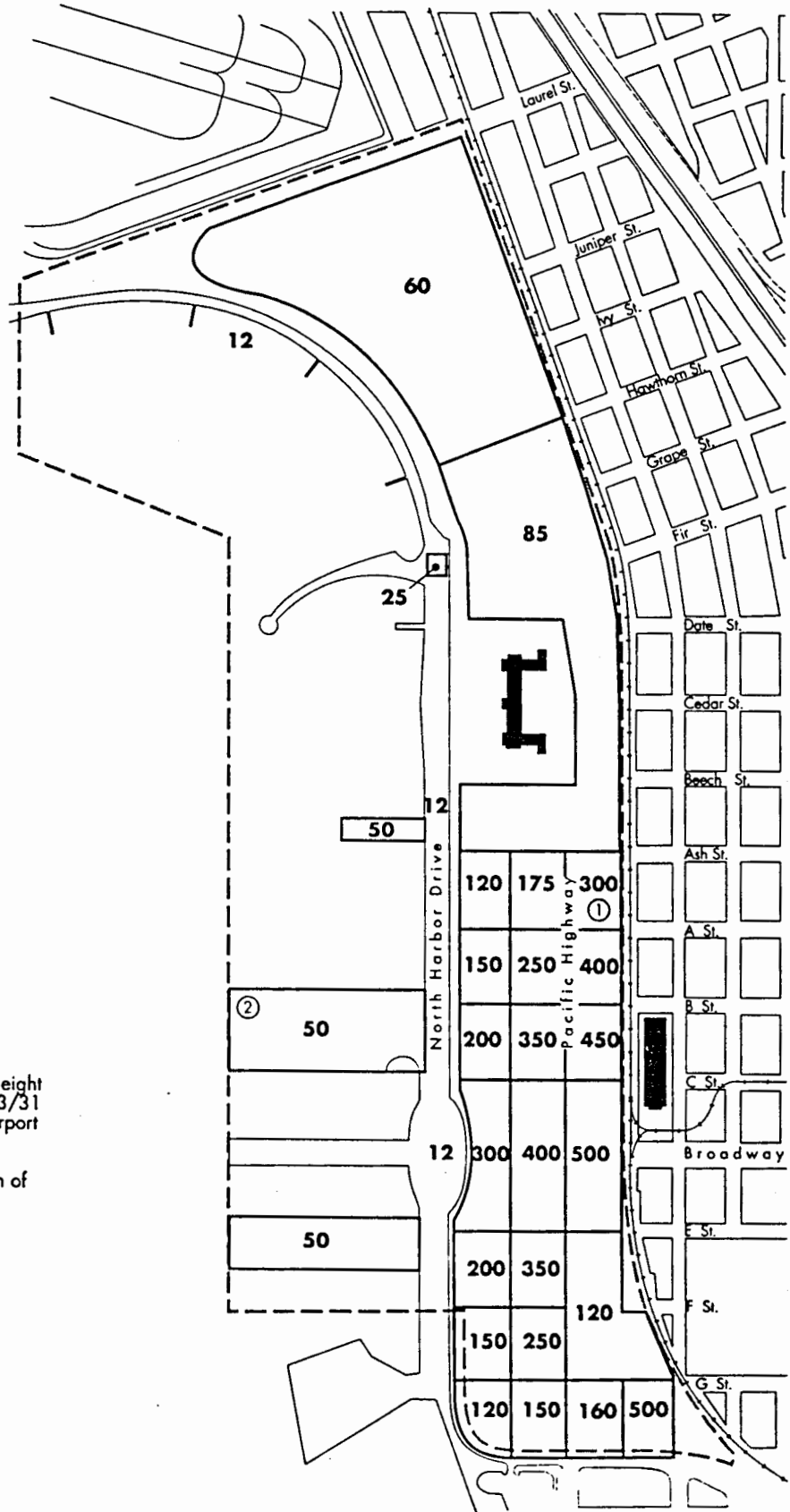
Implementation Plan was approved by the Commission in 1988, certification of the County Administration Center site was deferred and remains with the Commission's jurisdiction. Any development on the site is subject to the Chapter 3 policies of the Coastal Act, not in addition to the PDO. Therefore, Suggested Modifications #5 and #6 revises both the proposed text and Figure 1 of the PDO in order to correctly identify the County Administration Center as an area of deferred certification.

5. Section 103.1093 Boundaries and Applicable Districts shall be revised as follows:

"the County Administration Center property (except in the case of private use of the property) shall be deleted."

6. Figure 1, **Centre City Planned District Boundary**, the legend for the County Administration Center shall be revised as follows:

Private Use of County Administration Center is subject to the PDO (LCP Deferred Certification Area.)



- Notes:
- ① Height limit set at 225' until height restriction related to runway 13/31 at San Diego International Airport is lifted.
 - ② See text for further explanation of height limits at 'B' Street Pier.

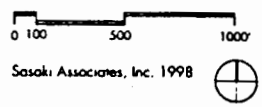
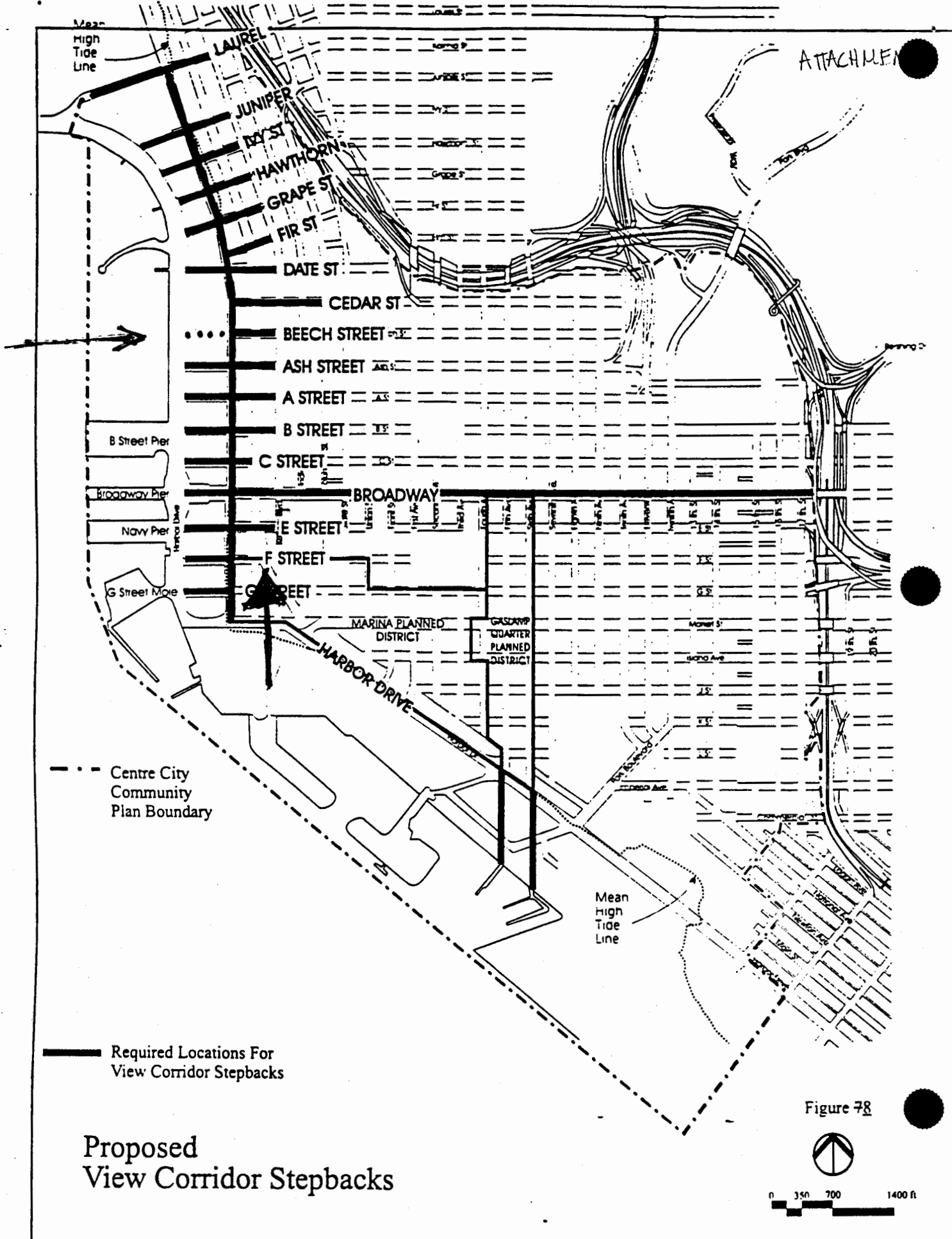


Figure 4.5
Maximum Building Heights



ATTACHMENT

Proposed View Corridor Stepbacks

Figure 78

TABLE II OF SECTION 103.1915
VIEW CORRIDORS

STREET	STEPBACK	STEPBACK ELEVATION
Laurel	15'	30'
Juniper	15'	30'
Hawthorn	15'	30'
Grape	15'	30'
*Date - <u>West of Pacific Highway</u>	20'	Ground Level
<u>East of Pacific Highway</u>	15'	30'
Fir	15'	30'
*Cedar	15'	Ground Level
*Beech - <u>West of Pacific Highway</u>	20'	Ground Level
<u>East of Pacific Highway</u>	15'	30'
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C	15' 25'	50'
Broadway**		
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G - west of California	15'	30'
Market	25'	50'
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Seventh	15'	65'
Eighth	15'	65'
Ninth	15'	65'
-Pacific Highway	15'	50'

* See also Figure 13 "Special Setbacks"

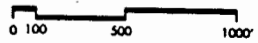
** Street Wall and Building Bulk requirements (25' stepback above the building base) apply along the length of Broadway.

— 25' min. @ 50'

----- 15' min. @ 50'

Notes:

- ① Guideline does not apply at Solar Turbines site until land use changes.



Sasaki Associates, Inc. 1998

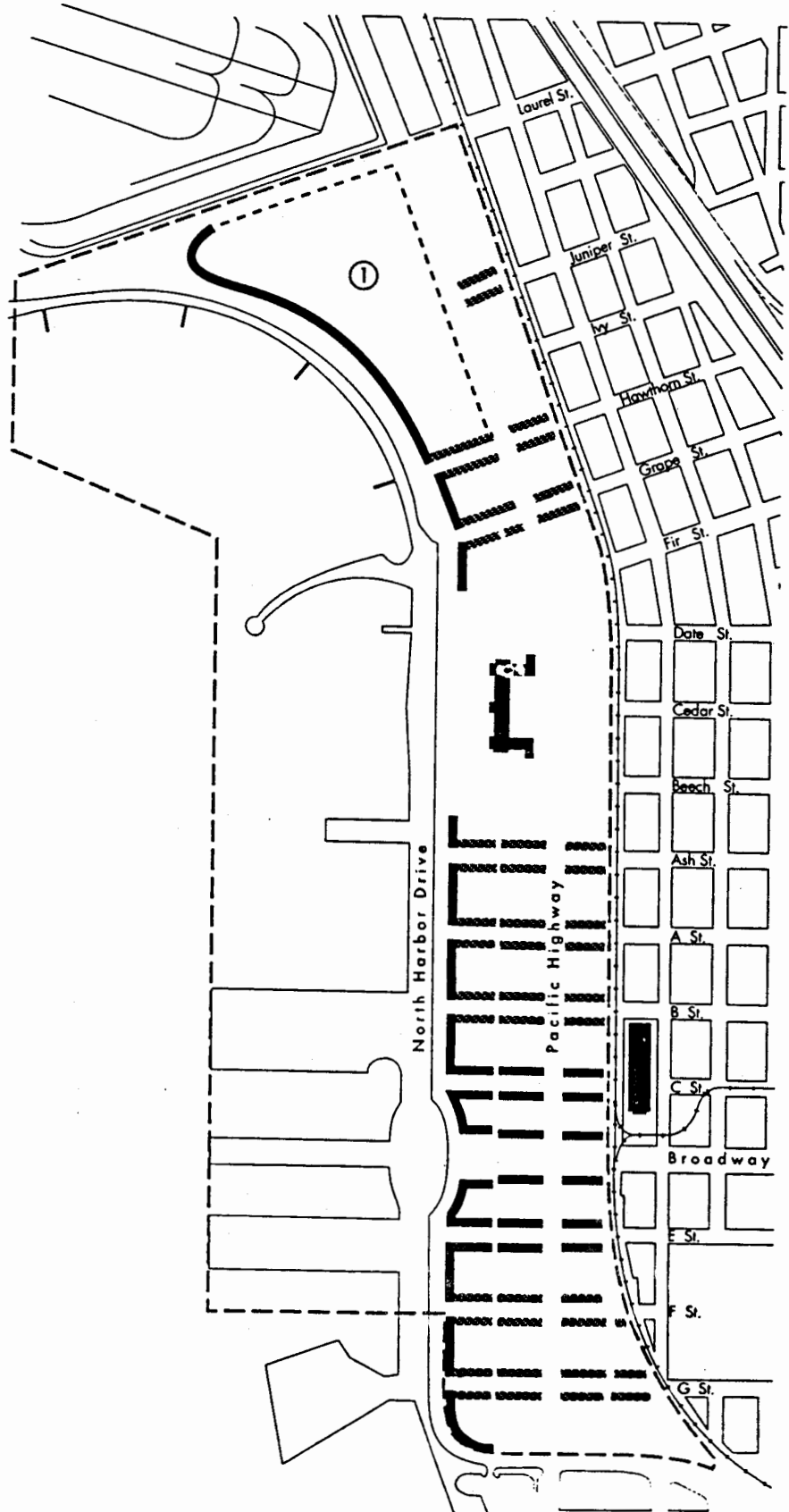


Figure 4.8
Stepbacks