

CALIFORNIA COASTAL COMMISSION

455 MARKET STREET, SUITE 228
SAN FRANCISCO, CA 94105-2219
FAX (415) 904-5400
Voice (415) 904-5200



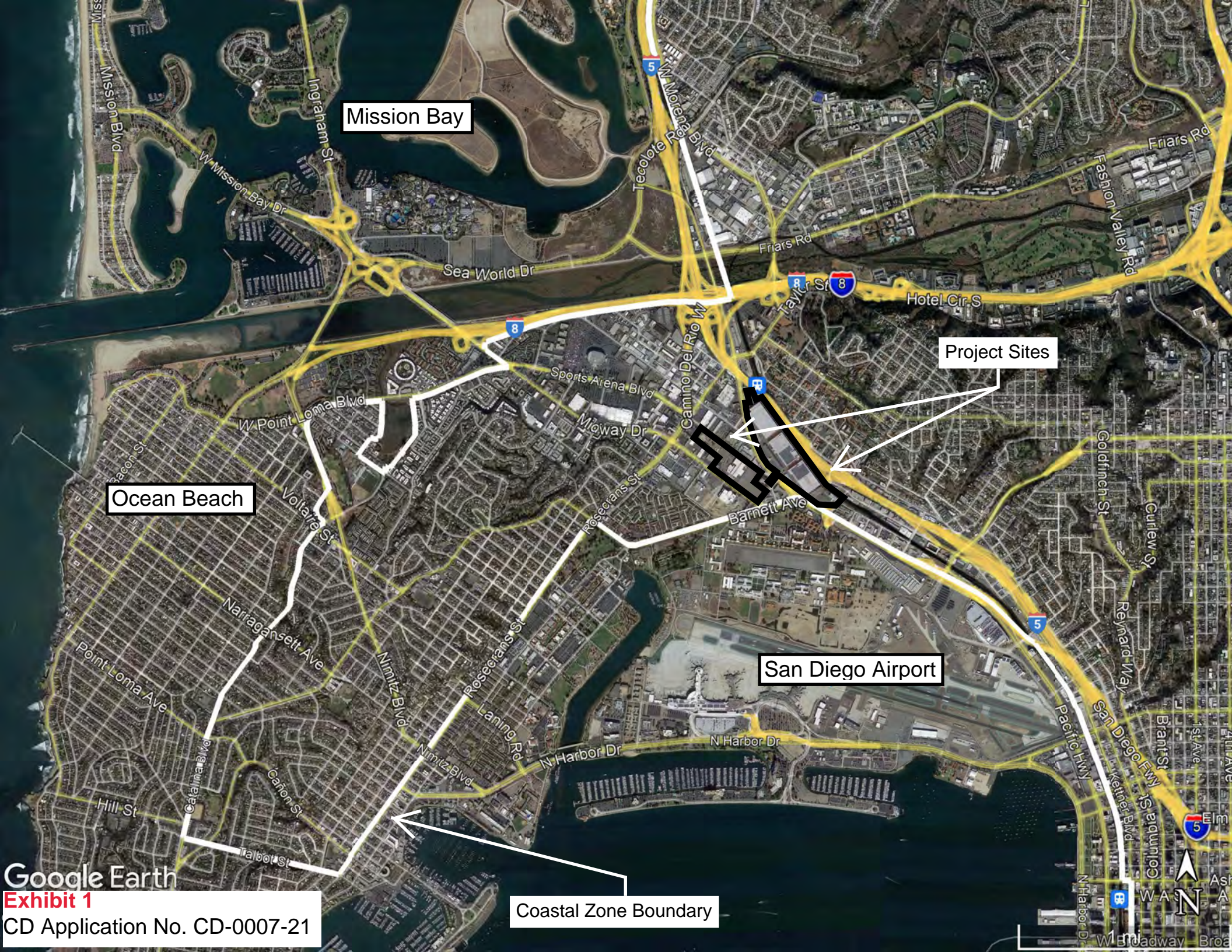
F12b

CD-0007-21 (Department of the Navy)

October 15, 2021

EXHIBITS

EXHIBIT 1 (VICINITY MAP)	2
EXHIBIT 2 (AERIAL OVERVIEW).....	3
EXHIBIT 3 (PROJECT DESCRIPTION).....	4
EXHIBIT 4 (PROJECT ALTERNATIVES DEVELOPMENT TOTALS)	8
EXHIBIT 5 (PROJECT ALTERNATIVES SIMULATIONS)	10
EXHIBIT 6 (LETTER FROM CCC TO NAVY)	11
EXHIBIT 7 (KEY OBSERVATION POINTS)	18



Mission Bay

Ocean Beach

Project Sites

San Diego Airport

Coastal Zone Boundary



MIDWAY DISTRICT
Pacific Coast Highway

Interstate 5

OTC Site 1

OTC Site 2

Coastal Zone Boundary

San Diego Midway-Pacific Highway Community Planning Area, which is an urbanized neighborhood situated north of downtown San Diego, between the Old Town and Point Loma communities.

The Midway-Pacific Highway Community Planning Area has a commercial core containing numerous shopping centers, institutional facilities, multifamily residential developments, visitor-oriented uses, older industrial areas, and a varied mixture of auto-oriented large and small commercial developments. The Pacific Highway corridor, located between Interstate 5 on the east and Marine Corps Recruit Depot and San Diego International Airport on the west, contains commercial and industrial uses, multifamily residential developments, and airport-related commercial uses.

OTC Site 1 includes three former World War II (WWII)-era aircraft assembly plants (Buildings 1, 2, and 3) and other buildings that are now used by NAVWAR as administrative offices, laboratory, and warehouse spaces. Paved access roads interweave between the buildings. Paved vehicle parking and materials storage areas are located throughout the remainder of the site.

OTC Site 2 is located west of OTC Site 1 and is bordered by Midway Drive to the west, Rosecrans Street to the north, Pacific Highway to the east, and Barnett Avenue to the south. OTC Site 2 includes an operational supply building (Building 2555), surface parking, and a few small outbuildings.

NAVWAR is the primary tenant at OTC. NAVWAR's mission incorporates advanced technologies that enable new operational concepts to provide a competitive edge in the cyber, information warfare, and space domains. NAVWAR requires secure, safe, efficient, state-of-the-art facilities to meet information technology, artificial intelligence, and cyber warfare operational needs as a central component to NAVWAR's mission in defense of our nation. Existing facilities at OTC are beyond their useful life and their deteriorated condition is adversely impacting NAVWAR's cyber warfare mission, security, and workforce safety.

During the Navy's initial review of potential modernization alternatives, SANDAG expressed interest in OTC as a potential location for a new transit center that could provide a direct mass transit connection to the San Diego International Airport. The Navy and SANDAG signed agreements to collaborate on the development potential of OTC. This collaboration led to the Proposed Project that includes a transit center. SANDAG, as a regional planning organization, is serving as a cooperating agency for the EIS.

PROJECT DESCRIPTION

The current development plan for the Proposed Project, described below, is considered representative. Public-private development plans for the OTC property may deviate from the assumptions and descriptions analyzed in the EIS. In this case, additional environmental review under NEPA and/or California Environmental Quality Act may be required. The Proposed Project would demolish the existing facilities and construct new facilities, utilities, and infrastructure through a public-private development agreement. The Proposed Project would develop both OTC Site 1 and OTC Site 2.

OTC Site 1

OTC Site 1 would include parking integrated into each building development with a few standalone parking structures. No NAVWAR facilities would be located on OTC Site 1 and all development would be new public-private development. The new public-private development would be a mix of residential, office and retail space represented by 9 mid-rise buildings, 33 mid-high-rise buildings, and 18 high-rise buildings. OTC Site 1 would also include one mid-high-rise hotel, and one high-rise hotel. In general,

retail space would be located on the ground floor of some residential and office buildings. OTC Site 1 would also include the transit center.

OTC Site 2

NAVWAR would occupy five buildings on OTC Site 2, including two low-rise buildings, one mid-rise building, and two mid-high-rise buildings. NAVWAR would also use two standalone parking structures on OTC Site 2. The NAVWAR facilities would be constructed with appropriate security requirements such as stand-off distances, controlled access, and independent utility systems. The remainder of OTC Site 2 would be developed with a mix of residential, office, and retail space represented by 1 mid-rise building, 18 mid-high-rise buildings, and 9 high-rise buildings. In general, retail space would be located on the ground floor of some residential and office buildings.

Development Process

Operationally, the transit center constructed on OTC would be the functional equivalent of moving the existing Old Town Transit Center to OTC Site 1. The existing Old Town Transit Center serves 11 bus routes and the trolley operated by San Diego Metropolitan Transit Center, the COASTER commuter rail service operated by the North County Transit District, and Amtrak train service. A similar number of parking spaces currently provided at the Old Town Transit Center would be provided for the transit center on OTC. Potential future actions could include expanding the transit center to become a Central Mobility Hub at OTC that provides a connection to the San Diego International Airport. This would also include increased transit capacity resulting from the 2021 Regional Plan and associated infrastructure improvements to highways and freeways. Once the concept is more clearly defined, SANDAG would conduct a separate environmental planning process under the California Environmental Quality Act to address this connection.

Table 2-1 presents details of the development assumptions for the Proposed Project.

Table 2-1 Project Development Assumptions

<i>Development Details</i>	<i>Development Details</i>
Navy Development	Total Square Feet (Equivalent Unit)
Office	845,326
Laboratory	165,614
Secure Conference/Auditorium	29,156
Warehouse/Storage	24,172
Open Storage	N/A
Parking	630,000 (2,000 stalls)
NAVWAR Development Total	1,694,268
Public-Private Development	Total Square Feet (Equivalent Unit)
Residential	9,600,000 (10,000 units)
Residential-Parking	5,040,000 (14,400 stalls)
Office	1,350,000
Office-Parking	708,750 (2,025 stalls)
Hotel	290,000 (2 hotels, 450 rooms)
Hotel-Parking	157,500 (450 stalls)
Retail	250,000
Retail-Parking	183,750 (525 stalls)
Transit Center	140,000

<i>Development Details</i>	<i>Development Details</i>
Transit Center-Parking	175,000 (500 stalls)
Public-Private Development Total	17,895,000
GRAND TOTAL	19,589,268

Legend: N/A = not applicable.

A general representation of the development is shown in Figure 2-1. The Proposed Project would include construction of approximately 95 buildings and 2 standalone parking structures. The tallest buildings would be approximately 350 feet.

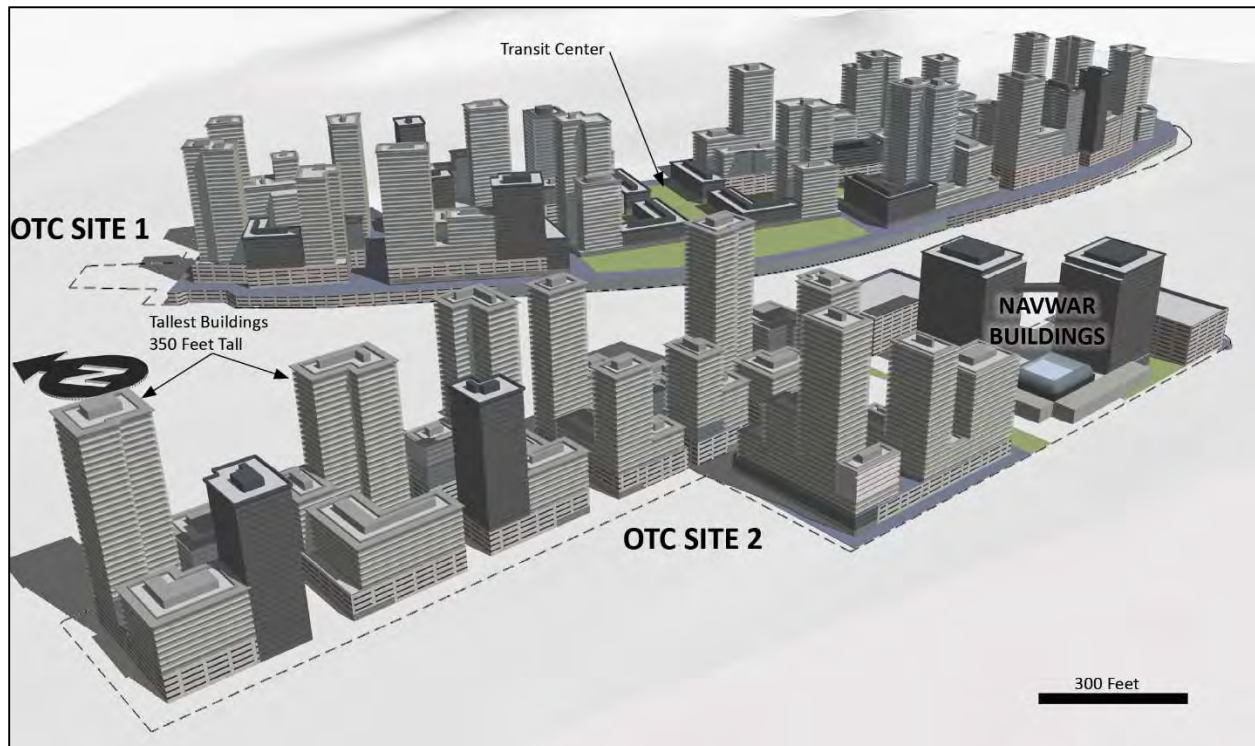


Figure 2-1 Representative Development for OTC Modernization

Construction would be completed in phases starting in 2021/2022, with full build out by 2050. The NAVWAR facilities would be constructed first, between 2021/2022 and 2025, and the additional private development would start construction in 2026 and achieve full buildout by 2049, with full operations beginning in 2050. Transit center construction would begin in 2026 and would be completed in 2034, with operations beginning in 2035.

The NAVWAR facilities would be constructed to applicable Department of Defense Design Criteria, including applicable Unified Facility Criteria. Construction would include appropriate seismic design, low impact development features to minimize stormwater runoff, and sustainable green building certification under Leadership in Energy and Environmental Design guidelines.

PURPOSE OF AND NEED FOR THE PROPOSED PROJECT

The purpose of and need for the Proposed Project is to address OTC's existing substandard, inefficient, and obsolete facilities that are incapable of meeting and sustaining NAVWAR's mission requirements. NAVWAR requires secure, safe, efficient, modern, state-of-the-art facilities to meet information

technology, artificial intelligence, and cyber warfare operational needs as a central component to NAVWAR's mission in defense of our nation. The existing facilities at OTC are beyond their useful life, and their deteriorated condition is negatively affecting NAVWAR's ability to successfully accomplish its mission and to adequately provide for program security and workforce safety.

PROJECT BACKGROUND

History of the OTC Property

Since 1940, the OTC property has primarily been dedicated to military and industrial uses. OTC historically was known as Consolidated Aircraft Plant 2 during WWII and Air Force Plant 19 during the Cold War. Consolidated Aircraft Plant 2 was completed in 1941 as a government-owned, contractor-operated facility used during WWII to build components of the B-24 "Liberator" bombers and "Catalina" flying boats. Following WWII, the property was declared surplus, and most of the plant was acquired by the Greater San Diego Development Company in 1947. In 1950, Consolidated Vultee's Guided Missile Division began leasing part of Plant 2 for manufacturing Navy Terrier missile prototypes. Manufacturing expanded to the U.S. Air Force's F-102s and F-106s at Plant 2, prompting the Air Force to reacquire the plant. By 1960, Plant 2 became the only plant that manufactured Atlas missile tanks, which were first used as Intercontinental Ballistic Missiles and then space launch vehicles that aided in project Mercury (1958–1962) and other space programs. During this time, Plant 2 became known as Air Force Plant 19. The plant continued to support aircraft manufacturing and made important contributions to space programs, such as manufacturing components of the Space Shuttle. Air Force Plant 19 was also the primary contractor for manufacturing components of the Tomahawk Cruise Missile. In 1988, the U.S. Air Force declared the site as "excess of Air Force ownership" and later transferred Plant 19 to the Navy in 1994. In 1997, as a result of a Base Realignment and Closure action, the facility became NAVWAR headquarters and it has been used since as laboratory, warehousing and storage, and office and administrative space.

NAVWAR History and Mission

NAVWAR is the Navy command responsible for the development, delivery, and maintenance of the Navy's communications, networks, information, and space capabilities that are vital to the Navy and to national security. With a mission to rapidly deliver information warfighting capability from seabed to space, NAVWAR pursues cutting-edge research and development for the Navy's growing cyberspace capabilities and provides the hardware and software that supports manned and unmanned systems at sea, on land, in the air, and in space. NAVWAR operates one of the world's largest intranets, with more than 700,000 users in 2,500 locations around the world, blocking more than 231 million unauthorized intrusion attempts per month, all while providing the essential communications the nation needs for strategic defense, communications, and deterrence.

NAVWAR's headquarters have been located at OTC since 1997 and it provides support for more than 150 separate Navy programs. Nearly half of NAVWAR's global employees are based in the San Diego region. NAVWAR has been an enduring and important fixture in the region for nearly a quarter century. NAVWAR's workforce provides a substantial economic, technology, and education benefit to the San Diego region. In return, San Diego provides a large resource of defense contractors, research firms, and academic institutions for technological collaboration. As a result, NAVWAR now provides more than half of all cybersecurity jobs in the San Diego region. The enduring and symbiotic relationship between

Table 2-3 Alternatives Summary Matrix

<i>Development Type</i>	<i>Alternative 1⁽¹⁾ (NAVWAR-Only Redevelopment)</i>	<i>Alternative 2 – Public- Private Development – NAVWAR and Higher Density Mixed Use</i>	<i>Alternative 3 – Public-Private Development – NAVWAR and Lower Density Mixed Use</i>	<i>Alternative 4 – Public- Private Development – NAVWAR and Higher Density Mixed Use with Transit Center</i>	<i>Alternative 5 – Public- Private Development – NAVWAR and Lower Density Mixed Use with Transit Center</i>
NAVWAR Redevelopment	Total Square Feet (Equivalent Unit)	Total Square Feet (Equivalent Unit)	Total Square Feet (Equivalent Unit)	Total Square Feet (Equivalent Unit)	Total Square Feet (Equivalent Unit)
Office	1,019,364	845,326	845,326	845,326	845,326
Laboratory	174,865	165,614	165,614	165,614	165,614
Secure Conference/Auditorium	26,156	29,156	29,156	29,156	29,156
Warehouse/Storage	481,941	24,172	24,172	24,172	24,172
Open Storage	174,267	Not applicable	Not applicable	Not applicable	Not applicable
Parking	1,430,415 (4,541 stalls)	630,000 (2,000 stalls)	630,000 (2,000 stalls)	630,000 (2,000 stalls)	630,000 (2,000 stalls)
NAVWAR Redevelopment Total	3,307,008	1,694,268	1,694,268	1,694,268	1,694,268
Mixed-Use Development	Total Square Feet (Equivalent Unit)	Total Square Feet (Equivalent Unit)	Total Square Feet (Equivalent Unit)	Total Square Feet (Equivalent Unit)	Total Square Feet (Equivalent Unit)
Residential	Not applicable	6,336,000 (6,600 units)	4,224,000 (4,400 units)	9,600,000 (10,000 units)	7,680,000 (8,000 units)
Residential-Parking	Not applicable	3,326,400 (9,504 stalls)	2,217,600 (6,336 stalls)	5,040,000 (14,400 stalls)	4,032,000 (11,520 stalls)
Office	Not applicable	1,000,000	650,000	1,350,000	850,000
Office-Parking	Not applicable	525,000 (1,500 stalls)	341,250 (975 stalls)	708,750 (2,025 stalls)	446,250 (1,275 stalls)
Hotel	Not applicable	260,000 (2 hotels, 400 rooms)	160,000 (1 hotel, 250 rooms)	290,000 (2 hotels, 450 rooms)	290,000 (2 hotels, 450 rooms)
Hotel-Parking	Not applicable	140,000 (400 stalls)	87,500 (250 stalls)	157,500 (450 stalls)	157,500 (450 stalls)
Retail	Not applicable	180,000	130,000	250,000	200,000

Exhibit 4

<i>Development Type</i>	<i>Alternative 1⁽¹⁾ (NAVWAR-Only Redevelopment)</i>	<i>Alternative 2 – Public- Private Development – NAVWAR and Higher Density Mixed Use</i>	<i>Alternative 3 – Public-Private Development – NAVWAR and Lower Density Mixed Use</i>	<i>Alternative 4 – Public- Private Development – NAVWAR and Higher Density Mixed Use with Transit Center</i>	<i>Alternative 5 – Public- Private Development – NAVWAR and Lower Density Mixed Use with Transit Center</i>
Retail-Parking	Not applicable	132,300 (378 stalls)	95,550 (273 stalls)	183,750 (525 stalls)	147,000 (420 stalls)
Transit Center	Not applicable	Not applicable	Not applicable	140,000	140,000
Transit Center-Parking	Not applicable	Not applicable	Not applicable	175,000 (500 stalls)	175,000 (500 stalls)
New Mixed-Use Development Total	Not applicable	11,899,700	7,905,900	17,895,000	14,117,750
GRAND TOTAL	3,307,008	13,593,968	9,600,168	19,589,268	15,812,018

Notes: ⁽¹⁾ Alternative 1 represents requirements identified by NAVWAR through a basic facility requirements document.

Exhibit 4

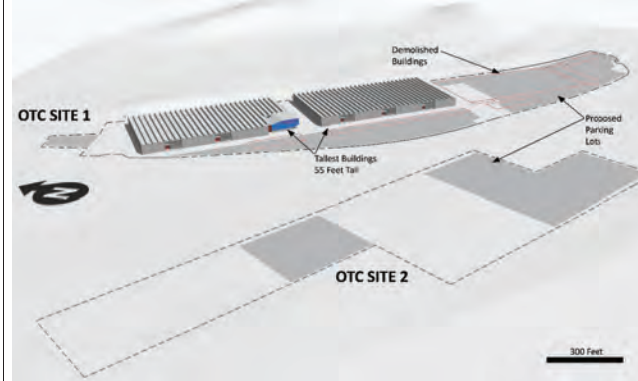
CD Application No. CD-0007-21

Page 2 of 2

Existing Development



Alternative 1



Alternative 2



Alternative 3



Alternative 4 (Preferred Alternative Identified in Draft EIS and CD)



Alternative 5



CALIFORNIA COASTAL COMMISSION

455 MARKET STREET, SUITE 300
SAN FRANCISCO, CA 94105-2219
VOICE (415) 904- 5200
FAX (415) 904-5400
WWW.COASTAL.CA.GOV



August 12, 2021

Navy OTC Revitalization EIS Project Manager
Attention: Ron Bochenek
750 Pacific Highway, Floor 12
San Diego, CA 92132-0058

Re: Navy Old Town Campus (OTC) Revitalization Draft Environmental Impact Statement

Dear Mr. Bochenek:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (EIS) for the Navy Old Town Campus Revitalization Project (project) within the City of San Diego's Midway-Pacific Highway Community Planning Area. Coastal Commission (Commission) staff supports the Naval Information Warfare Systems Command (NAVWAR) and its need for new modern facilities to support its cyber security mission. In addition to the construction of these facilities, the proposed project also includes over 60 acres of private residential, commercial and retail development.

The project would be located landward of the Coastal Zone within federally owned land and includes demolition and removal of three former World War II-era aircraft assembly plants and other buildings within two approximately 49 acre (OTC Site 1) and 22 acre (OTC Site 2) sites that are now used by the Naval Information Warfare Systems Command (NAVWAR) as administrative offices, laboratory, and warehouse spaces. Under the Navy's preferred alternative, these buildings would be replaced with private development comprised of a mix of residential, office and retail space represented by 9 mid-rise buildings, 33 mid-high-rise buildings, 18 high-rise buildings, one mid-high-rise hotel, one high-rise hotel, and a transit center on OTC Site 1 and one mid-rise building, 18 mid-high-rise buildings, and 9 high-rise buildings on OTC Site 2. The project would also include redevelopment of OTC Site 2 with a new NAVWAR facility that would include two low-rise buildings, one mid-rise building, two mid-high-rise buildings, and two standalone parking structures. The project is anticipated to occur over approximately 25 years and in total, the Navy proposes approximately one million square feet of office and laboratory space for its NAVWAR facility and 10,000 residential units, 1.3 million square feet of office space, 450 hotel rooms, 250,000 square feet of retail, and 140,000 square feet of transit facilities across the remainder of OTC Sites 1 and 2.

Exhibit 6

CD Application No. CD-0007-21

Page 1 of 7

The Navy is seeking concurrence from the Commission on the federal consistency determination (CD) it submitted for its preferred alternative project (Alternative 4 in the Draft EIS) on June 23, 2021. This CD was submitted consistent with Section 930.36 of the Coastal Zone Management Act (CZMA) implementing regulations (15 CFR 930). In its CD the Navy determined that while the proposed project is not located in the coastal zone, it would have reasonably foreseeable effects on coastal resources or uses.

While a variety of project elements and objectives are supported by policies in the California Coastal Management Program, including concentration of development and public transit, it is the Commission's responsibility to evaluate and consider the full range of potential project effects that may extend beyond the project site and affect coastal resources. Such "spillover" effects on coastal resources may occur due to causes such as: (1) project related increases in traffic on highways and arterial streets that provide essential coastal access throughout the region; (2) impairments to coastal water quality and the biological productivity of marine waters due to the flow of untreated stormwater and other contaminated materials into San Diego Bay from the project site; (3) the discharge of air contaminants and greenhouse gas emissions during project construction and use; and (4) the disturbance and loss of wildlife such as seabirds and migratory songbirds due to attraction and negative interactions with project elements such as night lighting and reflective surfaces. The Commission's consideration of this consistency determination is anticipated to conclude with a review and decision on the pending staff recommendation during the Commission's October 13-15, 2021 public hearing.

Commission staff appreciates the extended review period the Navy has provided for the development of this staff recommendation and the CD review process. We also appreciate the various meetings and discussions with Navy staff that have occurred subsequent to submittal of the CD. While we encourage the Navy, in the future, to engage in additional coordination with Commission staff during project development and well in advance of CD submittal for projects of this scale, complexity and magnitude, we nevertheless appreciate having been able to engage with the Navy in a productive dialogue about the project and the Commission's review process. As noted during previous discussions, Commission staff continues to strongly support consideration of the project under the phased review process provided in Section 930.36(d) of the CZMA implementing regulations and believes that this process is tailor-made for projects like this one that would occur over a lengthy and multi-step planning horizon and for which specific key details are unavailable at the outset.

This procedure allows (and encourages) "phased federal consistency reviews" in cases where federal decisions to implement an activity are also made in phases. Section 930.36(d) of the CZMA implementing regulations provides:

Phased consistency determinations. ... In cases where federal decisions related to a proposed development project or other activity will be made in phases based upon developing information that was not available at the time of the original consistency determination, with each subsequent phase subject to Federal

Exhibit 6

CD Application No. CD-0007-21

Page 2 of 7

agency discretion to implement alternative decisions based upon such information (e.g., planning, siting, and design decisions), a consistency determination will be required for each major decision.

Among other benefits of “phased” consistency review are that: (1) it provides the federal agency, in advance of specific project or plan implementation, notice of what issues are likely to arise under the California Coastal Management Plan; and (2) it provides the Commission with an overall planning context within which to review specific plans or projects subsequently proposed. Additionally, a phased review can facilitate expedited review and concurrence through the use of negative determinations for those project phases or elements – potentially including the proposed NAVWAR facility - that do not raise a risk of substantial adverse impacts to coastal resources.

However, we understand the Navy has decided not to pursue a phased review approach for this project and is instead seeking the Commission’s concurrence at this time for all of the development described as Alternative 4 in the Draft EIS. We therefore provide here an overview of the information, analyses, project plans and details that we believe are necessary in order to comprehensively and appropriately assess that project’s environmental effects and potential adverse impacts to coastal resources under the traffic and access (30210, 30211, 30252, 30253.d), air quality (30253.c), hazardous materials (30252), water quality and biological resources (30230, 30231, 30240), and environmental justice (March 2019 Environmental Justice Policy) policies of the Coastal Act:

1. Project Description

Please provide a detailed project description and project plans specifying the intensity of development proposed for the Public-Private Redevelopment-NAVWAR and Higher Density Mixed Use with a Transit Center (Alternative 4). The project description and project plans should include, but not be limited to, the following:

- Specific or anticipated development constraints, criteria, restrictions or requirements that would be included in future development agreements between the Navy and its private development partner(s);
- Siting for all of the individual development;
- Heights for all of the individual development;
- Uses for all of the individual development;
- Densities for all of the individual development;
- Architectural design, exterior surfaces and appurtenances (parapets, architectural features, navigational safety lighting and spotlights, telecommunications equipment, HVAC equipment, elevator housings, etc.);
- Utilities demand for individual development and how and utilities demand will be met;
- Transportation and streetscape improvements;

- Parking requirements for individual development and how parking demand will be met;
- Construction timelines and schedules for all of the proposed development;
- Construction staging, materials storage, and waste disposal for all of the proposed development;
- What hazardous materials could be encountered for individual development and specific management practices proposed to avoid impacts from hazardous materials;
- Specific proposed construction Best Management Practices (BMPs);
- Low Impact Design (LID) features and whether development will be Leadership in Energy and Environmental Design (LEED) certified;
- The proportion of affordable and market rate housing proposed to be provided in both residential development and hotel accommodations;
- Lighting plans for the individual development features and overall project site during construction and upon completion;
- Landscaping plans, features and locations, including view corridors, open space areas and vegetation with the proposed development area;

2. Coastal Zone-Specific Traffic Analysis

Please provide an analysis of the traffic-related impacts to the existing transportation network specifically within the Coastal Zone of the City of San Diego, including major coastal accessways (Interstate 5, Interstate 8, and Pacific Highway) and surrounding areas generated by Alternative 4 for peak weekday traffic as well as peak times for visitors to the coastal areas of San Diego County (Summer Weekends or Summer Holidays). Additionally, please provide information on engagement and coordination efforts initiated by the Navy with the City of San Diego Planning Department, City of San Diego Transportation Department and the California Department of Transportation regarding the proposed project, potential traffic impacts, and measures to avoid and/or mitigate traffic impacts.

3. Transit Center

Alternative 4 includes the construction of a transit center with the public-private redevelopment envisioned on OTC Site 1; however, other than identifying a footprint of 140,000 square feet and construction period of 2026 to 2034, no other definite details are provided about the development of the transit center and how it will function within the San Diego area. Please provide additional information regarding the development of the transit center including, but not limited to, the following:

- The modes of transportation that the transit center service;
- The volume or intensity of transportation provided for each mode serviced by the transit center;
- Clarity on if there other transportation improvements or plans, including multi-modal transportation, anticipated within the San Diego area in the

- future and how the proposed transit center is intended to function with those improvements or plans;
- Additional clarity regarding the level of certainty that the transit center discussed in Alternative 4 would be developed and information regarding necessary steps for developing the transit center, including development agreements, memoranda of understanding or other types of agreements, between the Navy and the San Diego Association of Governments (SANDAG) or other agencies for its construction.

4. Greenhouse Gas Emissions

Please provide a GHG Reduction Plan (Plan) describing the proposed project elements for Alternative 4. The Plan should include, but not be limited to, the following:

- Identification and quantification of the types and amounts of GHG emissions that will be associated with the construction and operation of the project;
- Identification, evaluation and development of GHG emission reduction measures for incorporation into the design, construction and operation of the proposed project. Emission reduction goals should be consistent with the Final Guidance for Federal Departments and Agencies on Consideration of GHG Emissions and the Effects of Climate Change in National Environmental Policy Act Reviews, the San Diego Air Pollution Control District (APCD) and/or the City of San Diego Climate Action Plan;
- Identification of corrective actions or mitigation in the event that the project is not consistent with the Final Guidance for Federal Departments and Agencies on Consideration of GHG Emissions and the Effects of Climate Change in National Environmental Policy Act Reviews, the San Diego Air Pollution Control District (APCD), and/or the City of San Diego Climate Action Plan.

5. Other Air Emissions

Please provide an Air Emissions Reduction Plan (Plan) describing the proposed project elements for Alternative 4. The Plan should include, but not be limited to, the following:

- Identification and quantification of the types and amounts of air emissions that will be associated with the construction and operation of the project;
- Identification, evaluation and development of air emission reduction measures for incorporation into the design, construction and operation of the proposed project. Emission reduction goals should be consistent with the requirements of the San Diego Air Pollution Control District (APCD) and State Implementation Plan (SIP) for San Diego County;
- Identification of corrective actions or mitigation in the event that the project is not consistent with the requirements of the APCD and SIP.

6. Environmental Justice (EJ)

Please provide a more comprehensive analysis for Alternative 4 regarding consistency with the Commission's EJ policy and intersections with the enforceable policies of the California Coastal Management Program (CCMP). Specifically, the EJ analysis should consider EJ communities south of the project area along the Interstate 5 corridor that may use Interstate 5, Interstate 8, and Pacific Highway to access beaches north and west of the project site, San Diego Bay, and Mission Bay to recreate and what potential traffic impacts will have on coastal access and recreation for those communities.

The Draft EIS determined that the proposed project would result in significant impacts to EJ communities in the region of influence (ROI) due to increased traffic; however, an explanation of the process of determining the ROI was not included. Please provide additional information describing how the ROI was chosen, and why EJ communities outside of the ROI who may be affected by significant impacts of traffic are not included in the ROI.

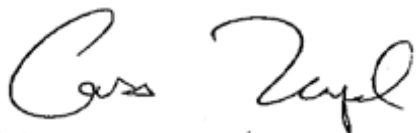
Finally, please provide information on how meaningful engagement of EJ communities was pursued in addition to general public outreach conducted for the current Draft EIS and how targeted engagement in affected EJ communities will be conducted in future development project proposals at the site (including minimum requirements for public engagement in EJ communities), for EJ communities both within the ROI as well as those outside the ROI who will be affected by traffic impacts while in transit to the coastal zone, whether for recreation or work.

7. Mitigation Measures

Please clarify which of the proposed mitigation measures and/or plans are specifically included and required for Alternative 4. Additionally, each of the required mitigation measures should include timelines and schedules for implementation as well as detailed analysis describing how impacts will be avoided and/or minimized through implementation of the mitigation measures.

Thank you for your consideration of the comments included above. If you have any questions, please do not hesitate to contact me at Cassidy.Teufel@coastal.ca.gov.

Sincerely,



Cassidy Teufel
Manager
Energy, Ocean Resources and Federal Consistency Division

Cc: Michael Hansen, Director Planning, City of San Diego
Kris McFadden, Director Transportation and Stormwater, City of San Diego
Ann Fox, Deputy District Director Planning and Local Assistance, Caltrans
District 11

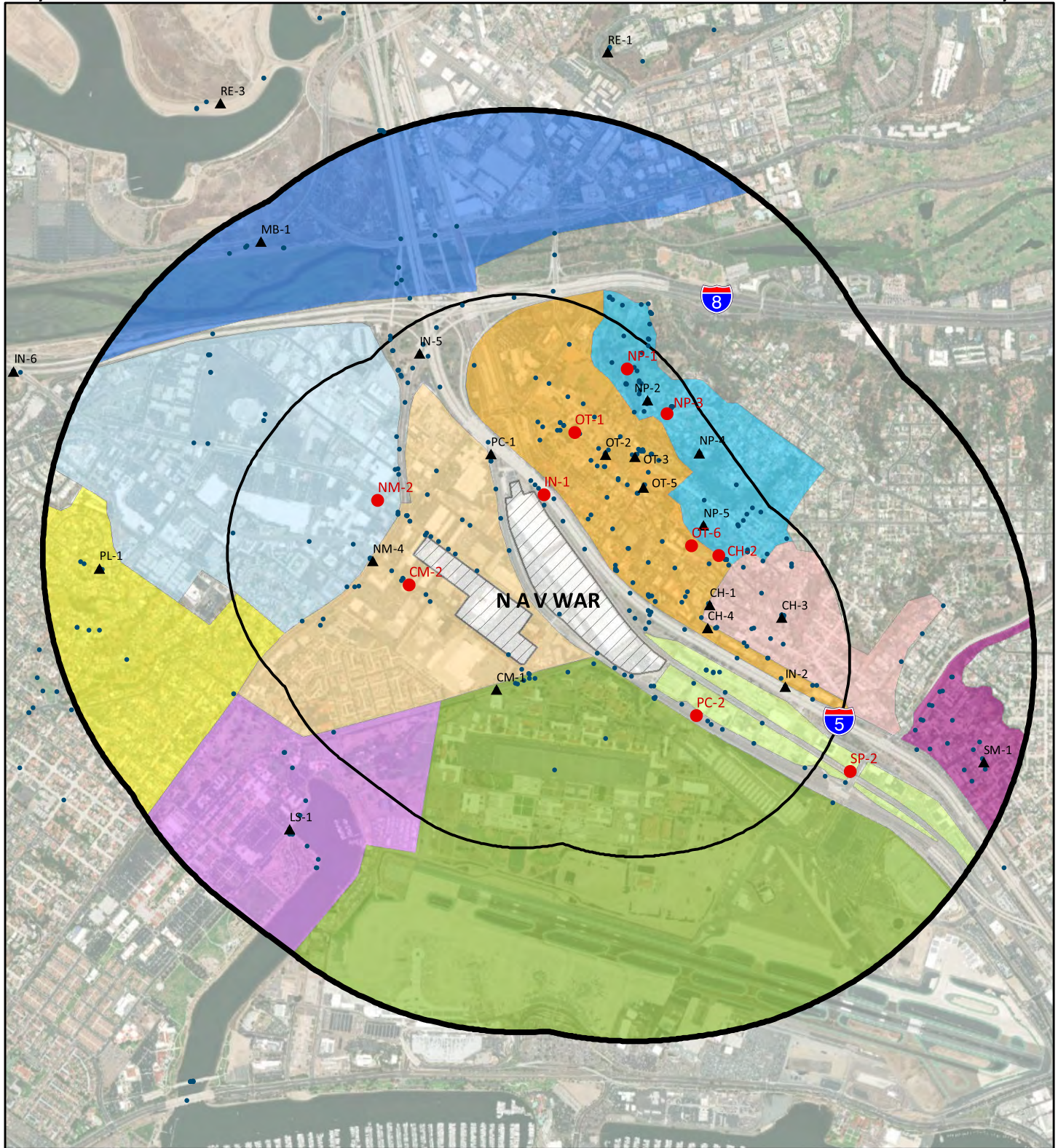


Figure 3.3-11. Candidate and Selected KOP Locations

