

CALIFORNIA COASTAL COMMISSION

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Th19d

LCP-6-NLC-23-0012-1

(National City Balanced Land Use Plan)

August 10, 2023

CORRESPONDENCE



July 19, 2023

Melody Lasiter
California Coastal Commission
7575 Metropolitan Dr # 103
San Diego, CA 92108

RE: City of National City Balanced Plan Local Coastal Plan (LCP) Amendment Application

Dear Ms. Lasiter:

Thank you for your June 13, 2023 email to Martin Reeder stating that The City's LCP Amendment application has been filed. We appreciate your timely response to our follow-up letters to you clarifying issues relative to your questions about the Local Coastal Plan Amendment (LCPA).

Coastal Commission staff have asked if the City would be opposed to a one-year extension to coordinate the timing of the Commission hearing with the Port Master Plan Amendment (PMPA). To provide context to our answer on whether further delays would be acceptable, it is important to understand that our National City residents have long suffered toxic emissions from Port of San Diego marine operations; in fact, the Port's own Maritime Clean Air Strategy notes that the National City Marine Terminal generates a total of 36 tons of Nitric Oxide (NOx) and 13,894 tons of Carbon Dioxide (CO₂) by truck emission alone each year. No other community in the San Diego region bears the burden of these health risks from maritime emissions. Moreover, its residents have minimal coastal access due to waterside presence of the Port and Naval Base San Diego. The Balanced Plan process began in 2007 and our community members have been patiently awaiting its approval. As an environmental justice community, the Balanced Plan plays a pivotal role in mitigating historic impediments to gaining access to Port tideland resources. The Balanced Plan does what the Coastal Act is intended to do, namely carefully balance marine dependent industries with the recreational needs of its community.

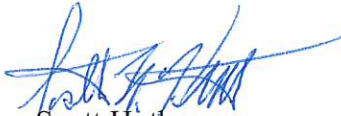
A yearlong extension is likely to cost our Community upwards of \$2,000,000 of unrealized projected future revenue. This revenue gain is critical to the City's ability to continue to provide basic services to our community members. Unlike other tideland cities, we do not have unlimited sales or visitor serving taxes that supplement our police, fire, and maintenance services. This future revenue would be the result of new affordable visitor serving accommodations located within the LCPA area. National City has the lowest income per capita of any municipality not only within the Port District, but within the whole of San Diego County.

It is within this context that we simply cannot accept another protracted delay in achieving the goals of the Balanced Plan. Therefore, the City respectfully opposes the request for a yearlong delay in having the Coastal Commission consider the merits of the Balanced Plan.

We are confident that the Commission and the Port can cooperatively resolve the Port's PMPA filing status and that the City and the Port can proceed towards a joint Commission hearing. It is our hope that this joint hearing would happen at the Commission's October meeting which is scheduled for San Diego.

If you have any questions or require any additional materials, please contact the City's planning consultant, John Helmer at jwhelmer4@gmail.com/760-415-2098 or Martin Reeder, Planning Manager, at mreeder@nationalcityca.gov/619-336-4313. We look forward to working with you and the Commission on this community critical LCPA.

Sincerely,



Scott Huth
Interim City Manager

cc: Barry Schultz
Martin Reeder
Ralph Hicks
Matthew Capuzzi
John Helmer
Rebecca Harrington
Anna Buzaitis
Robin Mayer