

CALIFORNIA COASTAL COMMISSION

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February 27, 2019

Board of Port Commissioners
San Diego Unified Port District
3165 Pacific Highway
San Diego, CA 92101

Re: Port Master Plan Update Discussion Draft Review

Dear Chairman Bonelli and Commissioners:

The Port Master Plan Update Public Outreach Timeline and Drafting Process, included as Attachment G to the February 12, 2019 Port Master Plan Update (PMPU) Board of Port Commissioner's (Board) workshop, identifies a 30 day review period for the PMPU Discussion Draft. Given the size and importance of the PMPU, a 30 day review period does not provide California Coastal Commission (Commission) staff enough time to adequately review the Discussion Draft prior to initiation of the environmental review process. As such, we would like to formally request that the public review period for the Discussion Draft be extended to a minimum of 90 days.

Section 30711 of the Coastal Act states, in part, that a port master plan shall include all of the following: (1) the proposed uses of land and water areas, where known; (2) the proposed design and location of port land areas, water areas, berthing, and navigation ways and systems intended to serve commercial traffic within the area of jurisdiction of the port governing body; (3) an estimate of the effect of development on habitat areas and the marine environment, a review of existing water quality, habitat areas, and quantitative and qualitative biological inventories, and proposals to minimize and mitigate any substantial adverse impact; (4) proposed projects listed as appealable in Section 30715 in sufficient detail to be able to determine their consistency with the policies of Chapter 3 (commencing with Section 30200) of this division; and (5) provisions for adequate public hearings and public participation in port planning and development decisions.

While Commission staff has met several times with Port staff to discuss broad policy concepts, we have not yet had the opportunity to review the specific language proposed to be included in the PMPU. As such, review of the Discussion Draft would be the first opportunity for Commission staff to provide substantive comments on the PMPU's conformance to the Coastal Act. Additional time to conduct a thorough review would ensure that the Board has adequate information regarding Commission staff's evaluation of the policy language included in the Discussion Draft prior to directing Port staff to proceed with the Environmental Impact Report (EIR) process required by the California Environmental Quality Act (CEQA). An extended review period would also allow our office to circulate the draft internally to our technical staffs and provide more detailed feedback to Port staff, which would ultimately save time and resources if comments are

February 27, 2019

Page 2

able to be addressed before or during the CEQA process. If that is the case, the environmental analysis conducted as part of the CEQA process may also be used to support the PMPU's consistency with the Coastal Act.

Over the last several years, our offices have worked diligently to improve coordination efforts, including monthly coordination meetings to review both upcoming developments and this Port Master Plan Update. As the Board and Port staff is aware, the Coastal Act does not allow the Coastal Commission to adopt any suggested modifications to any Port Master Plan amendment or this update. Typically, our office has recommended that greater specificity be provided for resource protection measures or public access amenities in the plan and that requirements for critical public improvements be clearly detailed. Therefore, the time provided now will be extremely valuable in reducing issues later in the process. Thank you in advance for your consideration of this request. We will continue to work with Port staff and appreciate their coordination on this important update to the Port Master Plan. If you have any questions or require further clarification, please do not hesitate to contact me at the above office.

Sincerely,



Melody Lasiter
Coastal Program Analyst
California Coastal Commission

CC (via email):

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