

Attachment G to Agenda File No 2015-1600

CALIFORNIA COASTAL COMMISSION

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January 15, 2015

San Diego Unified Port District
Environmental & Land Use Management Department
3165 Pacific Hwy
San Diego, CA 92101

Subject: Comments on the Notice of Preparation (NOP) of a Draft EIR for the National City Marine Terminal Tank Farm Paving and Street Closures Project and Port Master Plan Amendment

Dear Ms. Buzaitis,

Commission staff appreciates the opportunity to review and provide comment on the above-referenced environmental document which was received by our San Diego District Office on December 15, 2014. We offer the following initial comments regarding the Notice of Preparation (NOP) of a Draft Environmental Impact Report, dated December 2014, for the proposed project by Pasha Automotive Services (project proponent) which involves: paving the former National City Marine Terminal (NCMT) Tank Farm, closure of portions of Quay Avenue and 28th Street, a Port Master Plan Amendment (PMPA) to remove the streets from the Port Master Plan, and the potential renewal of four short-term use permits (i.e., Tideland Use and Occupancy Permits and Tideland Use Permits) in the vicinity of the NCMT. In addition, the policies of the Coastal Act should be incorporated into the environmental review of any development that would either directly or indirectly affect the resources of the California Coastal Zone. The NOP also identifies various development activities related to this proposal but fails to identify how those developments will be processed through the Port's regulatory review; the future regulatory review should be described. Additional and more thorough project review comments will be provided as part of ongoing environmental review and the future PMPA process.

The proposed tank farm and street closure site encompass approximately 9.7 acres in National City – generally bounded by Bay Marina Drive on the north, Quay Avenue on the east, 28th Street on the south, and the NCMT on the west. The short-term use permit sites are divided between four areas in National City that comprise approximately 47.3 acres. Combined, the overall project site is approximately 57 acres. The proposed site is located on land owned by the San Diego Unified Port District (District). Therefore, the proposed project will require a PMPA from the Port and certified by the Coastal Commission. The proposed project will provide additional space for marine terminal operations, including primarily import, export, handling, and storage of motor vehicles and may also include cargo transported by a Pasha Hawaii Transport Lines vessel.

According to the NOP, the proposed street closures are for non-dedicated District roadways between active terminal areas and, due to tenant consolidation and reconfiguration, are no longer necessary for access in this area of the NCMT. However, some marine terminal employees utilize these roadways for parking their personal vehicles during business hours; so, it is our understanding that these roadways remain open to the public. The tank farm site would remain designated as "Marine Related Industrial" by the Port Master Plan; however, a PMPA is

necessary to change the land use designation of the proposed street closure sites from “Street” to “Marine Related Industrial” for Quay Avenue between Bay Marina Drive and 28th Street, and 28th Street from Quay Avenue to the NCMT. The NOP further states:

The change from “Street” to “Marine-Related Industrial” will be evaluated in the EIR, including but not limited to the context of offsets associated with changing marine-related industrial uses to other future uses in the National City area.

Under the Coastal Act and Port District mandates, the reservation of land for coastal-dependent and maritime uses is clearly prioritized. Although Commission staff acknowledges that the assessment of lands needed to be reserved for these high priority uses will be more fully considered in the environmental impact report, initially, it would seem that the proposed street closures and associated land use designation change should not count towards any “offsets” or credits associated with changing Marine Related Industrial uses to other future uses in the National City area. The proposed street closures already serve as access for marine-related industrial uses and would continue to do so as part of the proposed project. The existing use of these roadways, including the identified loss of a significant amount of parking facilities, should be clearly documented and a long-term evaluation of the circulation needs of the marine terminal and maritime industry and broader public access issues must be considered. Such future assemblage of available lands would also need to consider priority land uses and how different land configurations could be viably used to support maritime industry. Any change in marine-related industrial uses to other future uses in the National City area at this time would be premature and should be evaluated without reliance on the proposed project.

Thank you again for the opportunity to provide review and comment on the proposed project. As mentioned previously, this letter contains our preliminary comments; however, additional and more thorough project review will be provided as this project continues to develop. If you have any questions or require further clarification, please do not hesitate to contact me at the above office.

Sincerely,



Kanani Brown
Coastal Program Analyst III

Cc (copies sent via e-mail):

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