



Circulate San Diego

233 A Street, Suite 206
San Diego, CA 92101
Tel: (619) 544-9255
Fax: (619) 531-9255
www.circulatesd.org

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

Dear Mr. Bochenek:

On behalf of Circulate San Diego, whose mission is to create excellent mobility choices and vibrant, healthy neighborhoods, I write in response to the Navy's Draft Environmental Impact Statement (EIS) for the Navy Old Town Campus Revitalization.

The proposal is a bold and welcome contribution to the future of the built environment in San Diego. The Navy's preferred proposal will bring thousands of new homes, large amounts of office space, and secure a permanent home for an important piece of our national security infrastructure.

The location is prime for new development, with regional transit access via the Old Town Transit Center, including access to both UTC and the Downtown jobs centers. The site is located within the Midway-Pacific Highway planning area, where the City of San Diego's voters approved an elimination of a longstanding height limit, and the community plan calls for infill growth.

The EIS contains five Alternatives. Alternative 4 includes the highest intensity of development, and is the Navy's preferred alternative.

Circulate San Diego supports Alternative 4. We also recommend that the Navy establish requirements for affordability, parking, and transportation that reflect the region's goals. The Navy should consider the wisdom of SANDAG's proposed Airport connector, and should dedicate some of the revenue generated from the project to fund its fair share of transportation improvements.

The Opportunity:

The Navy Old Town Campus Revitalization is an opportunity for the Navy to be a part of a shift that is shaping the future of San Diego's development. If done correctly, it will be a regional model of a beautiful, livable, and walkable community. Not only will this type of design give the greatest benefit to the region, it would also give the greatest benefit to the Navy. In order to maximize the value of the Navy's asset, the development needs to be desirable and attractive.

This means that maximizing square footage cannot be the only consideration. Modern tenants demand transit access, pedestrian amenities, bicycle facilities, park space, community gathering spaces, walkable retail, restaurants, and bars. Recent development proposals in San Diego such as Riverwalk,¹ the Brookfield Sports Arena proposal,² and the IQHQ Research and Development District³ imagine multi-use buildings with aesthetically pleasing designs, an orientation towards the street, publicly accessible plazas and parks, incorporation and revitalization of natural resources, and a focus on bicycle, pedestrian, and transit connections.

The NAVWAR site is perfectly located for just this sort of development. It is only a short walk away from the Old Town Transit Center, a regional transit hub. The Midway-Pacific Highway community plan envisions urban activity nodes connected by “pedestrian- and bicycle-oriented streets that link to parks within the community and to the recreational amenities at Mission Bay, the San Diego River, and San Diego Bay.”⁴ Moreover, it is centrally located in close proximity to beaches, attractions, and nightlife. The existing and envisioned transportation connections mean that the site will be accessible for an entire region without needing a car. Design should therefore focus on creating a vibrant, pedestrian-oriented community, without the constraints of a car-oriented development.

Affordability:

San Diego sorely needs more affordable homes. In 2018, 57 percent of San Diego renters were cost-burdened, and 31 percent were severely cost burdened.⁵ Cost burdened is defined as spending more than 30 percent of income on rent, and severely cost burdened is defined as spending more than 50 percent of income on rent. Constructing affordable homes on the NAVWAR site will give low-income residents access to good schools, jobs, and other opportunities. In addition, residents of affordable homes near transit are more likely to use transit than residents of market rate homes, so an affordable component will help achieve the region’s climate goals.⁶

The EIS mentions no affordability requirement. The Navy projects “400+” affordable units are likely to be developed under Alternatives 2-5, based on developers “likely taking advantage of State of California

¹ <https://riverwalksd.com/>

² <https://revitalizesdsa.com/>

³ <https://iqhqreit.com/project/radd/>

⁴ *Midway-Pacific Highway Community Plan*, CITY OF SAN DIEGO (2018) LU-14, available at https://www.sandiego.gov/sites/default/files/midway_-_pacific_highway_community_plan_sept_2018_0.pdf.

⁵ “Cost Burdens Rise for Middle-Income Households in Most Metros,” JOINT CENTER FOR HOUSING STUDIES OF HARVARD UNIVERSITY (accessed 6/23/2021) <https://www.jchs.harvard.edu/cost-burdens-rise-middle-income-households-most-metros>.

⁶ *Why Creating and Preserving Affordable Homes Near Transit is a Highly Effective Climate Protection Strategy*, TRANSFORM AND THE CALIFORNIA HOUSING PARTNERSHIP CORPORATION (2014), available at <http://www.transformca.org/transform-report/why-creating-and-preserving-affordable-homes-near-transit-highly-effective-climate>; *Location Matters*, SAN DIEGO HOUSING FEDERATION (September 2016), available at <http://housingsandiego.org/advocacy/climate-action>.

incentives to develop affordable units as a percentage of total units being developed.”⁷ Alternatives include between 4,400 and 10,000 total residential units.⁸

It is not clear whether state or local zoning requirements or incentives will apply to this project. The Navy should set its own affordable housing target regardless. At minimum, the Project should offer affordable housing at the amount set by Assembly Bill 2345 (2020) in order to receive the maximum density bonus.⁹ That requirement would be satisfied by making 15 percent of units affordable to very low income families. This would result in 660-1,500 affordable homes at full buildout, depending on project alternative. The affordable homes should be spread across residential buildings and residents should be given access to the same amenities as residents of market rate homes. The Navy could meet some of its affordable housing component by providing homes for enlisted servicemembers and their families.

Parking:

Right-sizing parking is important to create an attractive development. Parking takes up valuable space that could be used for retail, commercial, or residential uses. It greatly increases costs of construction, resulting in a less-affordable space or reduced profits. It also encourages increased on- and off-site car traffic, making the space less safe for pedestrians and cyclists and slowing down neighborhood traffic, all while increasing greenhouse gas emissions. Given the site’s proximity to a transit hub with connections to important locations all over San Diego, this is a prime location for San Diegans who do not wish to own a car.

Alternatives 2-5 plan for 35% of total square footage to be dedicated to parking. Alternative 1 (NAVWAR only) would dedicate 43% of total square footage to parking. Total parking for the preferred alternative is 19,900 stalls, taking up 6,895,000 square feet. Parking ratios are the same across all Alternatives 2–5, and are as follows: residential parking is 1.44 spaces per unit, office parking is 1.5 spaces per 1,000 square feet, retail parking is 2.1 spaces per 1,000 square feet, hotel parking is 1 space per room, NAVWAR parking is 1.88 stalls per 1,000 square feet, and Alternatives 4 and 5 include 500 parking spaces for the 140,000 square foot transit center.

The amount of parking planned for the site should be dramatically reduced. The EIS recommends adopting Transportation Demand Management solutions that include reduced parking.¹⁰ This recommendation has not been seriously considered in the creation of the Project Alternatives. Notably, the NAVWAR site is in a transit priority area and therefore the San Diego municipal code imposes no

⁷ Draft Environmental Impact Statement, Navy Old Town Campus Revitalization, 3-275 (May 2021), available at <https://navwar-revitalization.com/assets/uploads/47%20-%20Navy%20OTC%20Draft%20EIS%20MAY%202021.pdf>.

⁸ *Id.* at 2-7.

⁹ CAL. GOV. CODE § 65915.

¹⁰ Draft Environmental Impact Statement, Navy Old Town Campus Revitalization, Appx. E., 375 (May 2021) available at <https://navwar-revitalization.com/assets/uploads/48%20-%20Navy%20OTC%20Revitalization%20Draft%20EIS%20MAY%202021%20Appendices-Volume%20I.pdf>.

minimum residential parking requirement. If current parking reform efforts in the City of San Diego or the California legislature succeed, there will be no minimum parking requirement for commercial, office, or hotel uses either.

Additionally, the Navy should require that residential parking be unbundled from homes, such that residents have to rent or purchase their parking separately. This is consistent with the City of San Diego's Climate Action Plan, allows residents to right-size their parking needs, and ensures that residents will pay only for the parking that they actually use. To the extent possible, parking should be shared between uses to minimize waste.

Bicycle, Pedestrian, and Transit Infrastructure:

Although the EIS offers some good pedestrian and bicycle improvements, it lacks a comprehensive plan for how it will support bicycle, pedestrian, and transit connections in the area. These connections are sorely needed to meet the requirements of the Community Plan, and to make the new development one of the best-connected locations in the region. Currently, Old Town Transit Center is one of the best transit connections in the city. There, travelers can take a short trolley ride to the Downtown and UTC jobs centers, or to San Diego's two major public universities. In addition, coastal cities like Solana Beach and Oceanside are accessible via the Coaster, and Orange County and Los Angeles are accessible via Amtrak. Yet local infrastructure prevents comfortable access to the Transit Center by pedestrians and bicyclists. The Navy should make itself a part of the solution to this problem.

The EIS divides its bicycle and pedestrian mobility improvements into Tier 1 and Tier 2 improvements. Tier 1 improvements are improvements that the EIS states shall be implemented as mitigation measures.¹¹ Tier 2 improvements are improvements recommended in the EIS to be considered to enhance offsite accessibility.¹² Tier 1 improvements for bicycle and pedestrian infrastructure include only improvements on roads immediately adjacent to the proposed project, including Pacific Highway, Sports Arena Boulevard, Midway Drive, and Enterprise Street.

Tier 2 pedestrian improvements include meaningful sidewalk connections on Kurtz Street, Pacific Highway, and Hancock Street. These improvements should be implemented in the final project. Pedestrian improvements should provide safe and attractive connections to transit and surrounding neighborhoods.

In contrast, Tier 2 bicycle improvements include only class II and class III bike lanes, even for high volume, high speed roads like Rosecrans. These are inadequate. The project should include dedicated, protected right of way for bicycles in the area surrounding the NAVWAR site, including Pacific Highway from Washington Street to Rosecrans Street, and along Barnett Avenue and Rosecrans Street. In addition, the project should include a protected bicycle connection from the NAVWAR site across I-5 at Old Town Avenue. Tier 1 bicycle improvements should be implemented and a new plan should be

¹¹ *Id.* at 328.

¹² *Id.* at 329.

developed for further bicycle improvements that connect the NAVWAR site to the larger community via protected bicycle right of way. In addition, the project should offer secure bicycle storage facilities.

Protected bicycle right of way would match the efforts of the City of San Diego and SANDAG in developing a bicycle network. Several protected bike lanes have recently been built or are in development in San Diego, including on 4th and 5th avenue in Hillcrest and Bankers Hill, and throughout Downtown.

Transit improvements discussed in the EIS include only signal priority improvements and the creation of a Transit Mobility Plan. The Navy should create a new transit plan, in coordination with SANDAG and MTS, to maximize the connection to the Old Town Transit Center, with particular attention to maximizing the use of bus routes.

The EIS also recommends implementing a Transportation Demand Management (TDM) program, but merely copies a list of possible strategies from the City of San Diego's draft *Transportation Study Manual*, June 2020.¹³ This is not a serious consideration of TDM. Future Navy plans should include a more fully developed TDM program.

It is worth noting that bicycle, pedestrian, and transit infrastructure have not been given due consideration in the EIS. The Transportation Impact Assessment has 312 pages dedicated to vehicle mobility, excluding over 1,000 pages of additional appendices, the vast majority of which are vehicle transportation calculations.¹⁴ It has only nine pages for pedestrian mobility, seven pages for bicycle mobility, and 10 pages for transit mobility.¹⁵ Vehicle impacts consider all project alternatives, but differences between project alternatives are not considered for pedestrian, bicycle, or transit mobility. Moreover, bicycle and pedestrian impacts are only considered within one half mile biking or walking distance from the project.¹⁶ In contrast, for automobile traffic, the EIS considers locations as far as away as Linda Vista, the Hotel Circle exits on I-8, and I-5 all the way to its intersection with SR 163 in Downtown/Bankers Hill.¹⁷

Project Design:

The Navy should make it clear to applicant developers that it is seeking a project design that incorporates pedestrian friendly, human-scaled design principles. This means including public gathering spaces, encouraging engagement between the building and the street, encouraging interaction between the building interior and the sidewalk, and ensuring that pedestrian access is convenient and free of barriers.

¹³ *Id.* at 375.

¹⁴ See *Id.* at 12–324, appendices A-CC

¹⁵ See *Id.* at 325–333 (pedestrian mobility), 334–340 (bicycle mobility), 341–250 (transit mobility).

¹⁶ *Id.* at p. 325, 334.

¹⁷ See, e.g., *Id.* at p. 324.

Human-scaled design does not mean that building size should be limited. Instead, it means ensuring that the building interacts with neighboring spaces in a way that gives pedestrians a sense of place and belonging. Features such as pedestrian plazas and green spaces can be arranged so they engage with and complement restaurants, retail, and childcare facilities. “Eyes on the street” principles give a sense of safety and social interaction. Building design can establish gateways that welcome the broader community into the project.

Particular attention should be paid to the ground level perspective. Architectural features should break up the space to avoid long stretches of uninterrupted, flat wall. The ground floors of buildings should be activated with street-facing retail, restaurants, or entrances to individual residential units. Ground level and on-street parking should be avoided.

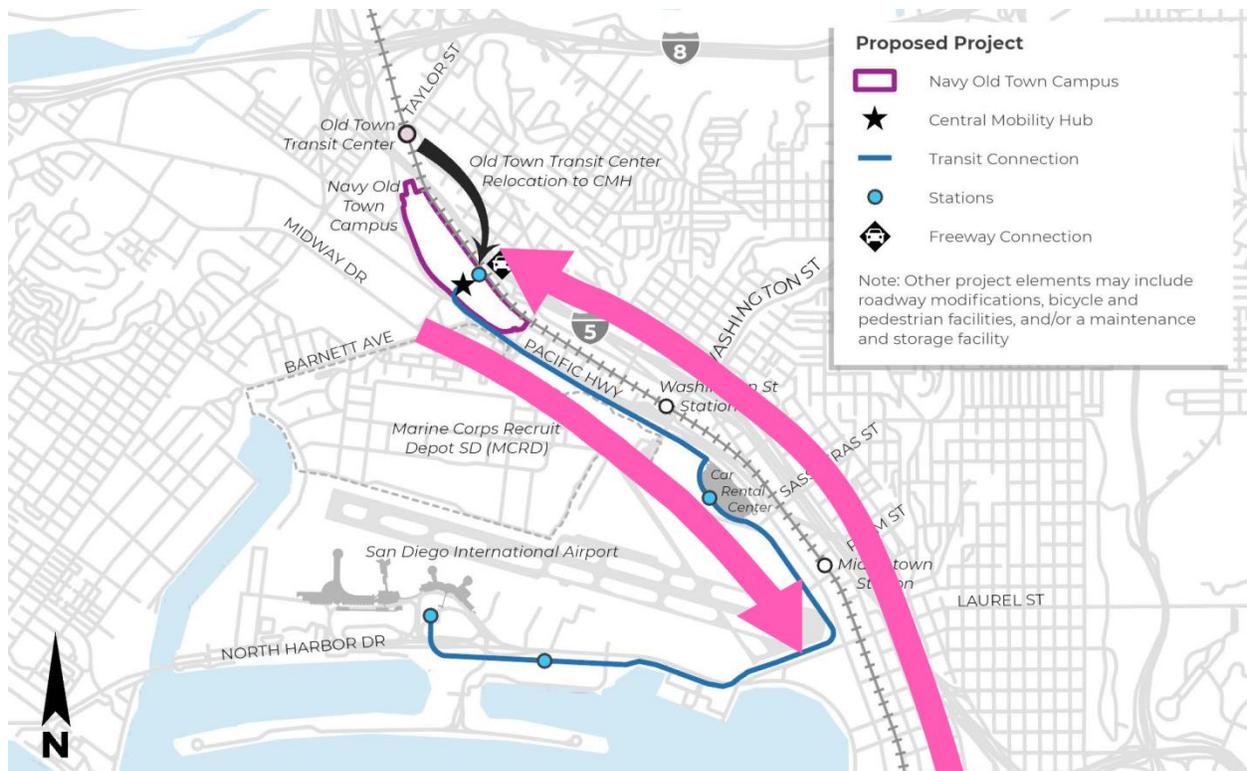
Without good design, the NAVWAR site redevelopment could be a series of bland, unattractive towers that feels hostile to pedestrians. This kind of space discourages pedestrians from lingering, driving away customers from retail spaces. Without street-level activity, the project site would fail to attract residents and office tenants who could afford space in a more vibrant neighborhood. Moreover, this kind of design would reinforce car dependency. This would create more traffic and more greenhouse gas emissions. Incorporating these recommendations can ensure that the community receives a vibrant new location, and can assure the Navy that they can maximize the income from their development.

Connecting Transit to the Airport:

SANDAG’s proposed Airport People Mover could be a helpful connection to the Airport. However, if it is the primary or only transit connection to the Airport, that would create a geometrically inconvenient route for most of the region’s transit riders, who live south of the Airport.

Circulate San Diego recently expressed these concerns in a scoping letter to SANDAG for the Environmental Impact Report for the Central Mobility Hub.¹⁸ The inconvenience for most transit riders is illustrated by the pink arrows in the graphic below:

¹⁸ Colin Parent, “Central Mobility Hub Draft EIR – Analyzing for Airline Passengers and Airport Workers,” CIRCULATE SAN DIEGO (May 28, 2021), available at https://d3n8a8pro7vhm.cloudfront.net/circulatesd/pages/1533/attachments/original/1622232093/Circulate_San_Diego_Scoping_Letter_for_Central_Mobility_Hub_EIR.pdf?1622232093.



The Navy should coordinate with SANDAG to consider Airport connector alternatives. While it is important to help connect this new development with the region’s transit network, those improvements should not come at the expense of an Airport connector that is convenient and affordable to most transit riders, especially for the people that work at the Airport. In addition, the Navy should not make its plans contingent on SANDAG’s preferred proposal for the Central Mobility Hub.

Proposed Interchange Redesign:

The EIS proposes mitigating traffic impacts for Alternatives 2–5 by rebuilding and enlarging the I-5/Old Town Avenue interchange. This would include:

“a high-occupancy vehicle (HOV) direct access ramp into the future on-site transit center to/from southbound I-5 (assuming the transit center is consolidated on the OTC Site); direct access ramps to the OTC Site to/from I-5, the reconstruction and widening of the I-5/Old Town Avenue interchange; and the realignment and signalization of the Pacific Highway/Barnett Avenue intersection.”¹⁹

This expensive project could potentially undermine the bicycle and pedestrian infrastructure by creating a huge influx of cars onto the project site. Moreover, the interchange redesign represents a far greater

¹⁹ Draft Environmental Impact Statement, Navy Old Town Campus Revitalization, Appx. E., 382 (May 2021) available at https://navwar-revitalization.com/assets/uploads/48%20-%20Navy%20OTC%20Revitalization%20Draft%20EIS_May%202021_Appendices-Volume%20I.pdf.

investment in vehicle transportation than bicycle and pedestrian infrastructure. Given the project's location in one of San Diego's most transit-rich areas, priority should be given to transit, bicycle and pedestrian connections rather than car connections. Ideally, the new interchange would not be built, and the tens of millions of dollars required to build it would instead be spent on maximizing pedestrian, bicycle, and transit connectors. If a new interchange is built, any project design should be careful to ensure sufficient and separated bicycle and pedestrian infrastructure, and make sure that those systems are not undermined by vehicle traffic.

Funding Contributions for Transportation Projects:

The Navy anticipates that transportation improvements to facilitate the new development will be funded by local taxes and agencies. However, the proposed public-private partnership is likely to generate huge financial benefits to the Navy. The Navy should contribute its fair share to the local community through investment in transportation improvements.

In Alternatives 2–5, the NAVWAR redevelopment makes up between 9 percent (Alternative 5) and 18 percent (Alternative 3) of the total project square footage. That leaves between 82 and 91 percent of the project as private development. The proceeds from the private developments will be far more than sufficient to recover the costs of the NAVWAR redevelopment. Additional revenue generated by the public-private partnership should fund bicycle, pedestrian, and transit infrastructure.

Developments are ordinarily expected to contribute to the burden they place on public infrastructure. This project should be no different.

Conclusion:

The Navy Old Town Campus Revitalization is an exciting new project with the potential to be an exceptional addition to San Diego. The Navy should be sure to make the most of this opportunity by incorporating affordable housing, bicycle and pedestrian infrastructure, connections to transit, and design that incorporates a sense of place.

Sincerely,



Jesse O'Sullivan
Policy Counsel
Circulate San Diego

CC:
Senator Dianne Feinstein
Senator Alex Padilla
Congressmember Scott Peters

Congressmember Mike Levin
Congressmember Sara Jacobs
Congressmember Juan Vargas
Congressmember Darrell Issa
Mayor Todd Gloria, City of San Diego
Supervisor Nathan Fletcher, County of San Diego
Hasan Ikhata, SANDAG
Sharon Cooney, Metropolitan Transit System