Navy Broadway Complex
Summary of Comments
Appendix 7 Volume 1

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Appendix 7 - Environmental Impact Statement - Volume 1

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Final Environmental Impact Statement, Navy Broadway Complex Project, San Diego, California, October 1990.

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3.25 million square feet of mixed uses that include Navy and commercial offices, a museum, hotel and retail space, and public open space.

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Executive Summary
The study reaffirmed that the Navy Broadway Complex with the Navy Pier was essential for national security purposes.

A need for up to 1 million sf of upgraded office space has since been identified to accommodate Navy administrative personnel.

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The Department of the Navy proposes to redevelop the Navy Broadway Complex with 3,250,000 sf of mixed uses (including 300,000 sf of above-grade parking).
A 1.9 acre public open space area would be provided for community use at the foot of Broadway, adjacent the waterfront. This area could potentially be combined with adjacent properties to create an even larger open space that could be considered a new waterfront gateway to downtown San Diego.
Up to 55,000 sf of space for a museum, which would be completed and operated by a community-sponsored organization.
Ground level retail would be provided to encourage pedestrian use of the area.
Navy Office; 1 million sf Museum 55,000 sf Commercial Officer 650,000 sf Hotel 1,220,000 sf Retail 25,000 sf Above Grade parking 300,000 sf (800 spaces) Total parking spaces 3,105
Buildings would have a slender design to provide open view corridors.

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The site is considered to generally lie within the Rose Canyon fault zone. The project could be subjected to severe seismic shaking, with a potential onsite liquefaction hazard. Design measures to withstand geologic hazards would reduce adverse effects to less than significant.
Mirrored glass would be prohibited in buildings, reducing the possibility for bird strikes.
Substantial new vehicle trips would be generated. An extensive Travel Demand Management Program would be implemented to substantially reduce the use of single-occupancy vehicles.
The site is underlain with artifacts from waterfront development between the 1880's and 1910s. These materials are buried beneath the dredged fill placed onsite to create dry land for more development.

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Minor hazardous waste spills were located or may be located on the site. In addition, transformers that contain PCBs are located on the site although none are known to be leaking. Because the presence of hazardous waste can affect public health, this would be considered a significant impact with any of the alternatives.
Most of the existing buildings on the site contain asbestos.
A groundwater plume that has been contaminated with hydrocarbons is 1/3 mile (estimated) down gradient.

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Appendix F - Response to comments on the draft Environmental Impact Statement for the Navy Broadway Complex Project.

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Section 4 - Seismic Study = 4-1.

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This document, together with the DEIS, constitutes the final EIS (FEIS).
The final EIR incorporates by reference this document.

Page: 27
Public Comments C - Montague D. Griffin, 2034 Upas Street, San Diego, California 92104, May 25, 1990.

Page: 29
Comment C-12. Page 4-144, Geology and Seismicity. The DEIR does not provide an adequate discussion of site

geology, seismicity, identification of the fracture zone, or liquifaction potential. Core sample depths (44 feet) appears inadequate. Discussions of mitigations appear to be absent.

Page: 31
Port of San Diego Comments D-1. The District retains planning jurisdiction for its areas, and has not assumed responsibility to carry forward the Navy's general proposals on Port Lands.
Port of San Diego Comments D-3. The closure of Broadway to direct vehicular traffic will curtail access from downtown to Harbor Drive and the adjacent shoreline.

Page: 32
Port of San Diego Comments D-4. All of the Navy's proposed development alternatives contain severe deficiencies in on-site parking supply. Since the proposal only provide from 50 to 55 percent of the total on-site parking demand, an unusually heavy reliance is placed upon transportation demand management techniques and on adjacent areas to fully meet the parking demand generated by the proposed development. The Navy appears to be providing only about 21 percent of its total on-site parking demand, which has placed undue competition for available parking spaces in the surrounding streets, adjacent parking areas, and in those areas allocated for commercial activities at G Street Mole, Seaport Village, and Lane Field.

Page: 34
Caltrans Comment D-1. Page 4-47. These highway improvements have not been programmed by Caltrans. Page 4-73 indicates that they are based on 1986 SANDAG information.
Caltrans Comment E-2. The Navy and the City of San Diego should provide financing for a southbound direct connections from Interstate Route 5 to Pacific Highway. That mitigation would help to provide additional capacity for the increased traffic in the Centre City area.

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City of San Diego Planning Department Comments - We are also aware that the City of San Diego is the lead agency on this EIR/ EIS.

Page: 36
City of San Diego Planning Department Comment F-2. Two areas which we feel warrant further clarifications are: 1) the expressed need in Alternative A for 800 above-grade parking spaces (depicted as 800 spaces in a five to six floor, 300,000 sf encapsulated above-grade structure).

Page: 38
Craig Adams Comment G-3. Depending on interpretation, there are a number of instances where the recommended project alternative might be in conflict with planning policies established by the State and the City. Specifically, these include the City's policy supporting a concentrated office and commercial core and stepped intensity and scale of development toward the waterfront and the State's management of tidelands which stresses the use of this scarce resource for directly ocean-related uses.
Craig Adams Comment G-4. The EIS does not highlight the fact that office development located literally on the waterfront is a break with previous planning policies in San Diego.

Page: 40
Craig Adams Comment G-10. As indicated in the EIS, the Draft Centre City Community Plan highlights that the waterfront is to "serve as its (the City's) major open space, its park and its playground."

Page: 46
State Lands Commission Comment H-2. For this and additional reasons which are discussed below, we contend that

the documents, as presently constituted and circulated, are wholly deficient and inadequate under the requirements and standards set forth in the CEQA, the NEPA, and related case law.
State Lands Commission Comments H-3. The State of California has claimed a potential reversionary interest by virtue of the Public Trust Doctrine in the filled tidelands comprising the Broadway Complex. The Navy has not resolved the issue of this claim. Specifically, our comments indicate the problems associated with the title to the property vis-a-vis the nature of the title to the Public Trusts land conveyed to the United States for certain limited purposes; i.e., "public defense, military purposes, and piers, landings and structures to be used by the United States Navy Department for a supply base and for landing purposes" The uses authorized for the State's property appear to be in direct conflict with the uses proposed for the property.

Page: 47
State Land Commission Comment H-8. On page 4-147, compliance with building codes is characterized as mitigation for geologic hazards in direct contradiction of the principle that compliance with existing law or regulations does not constitute mitigation.

Page: 62
Department of Conservation's Division of Mines and Geology Comments N-1. The draft EIS has not adequately described the extent and the mitigative measures for the geologic and seismic hazards affecting the project. No geotechnical data is provided to demonstrate that sufficient analysis of the project's geologic or seismic setting has been performed to assess the potential for ground shaking, surface rupture, liquefaction, lateral spreading, inundation, or settlement from seismic events on nearby faults... Although the draft EIS summarizes the results of the geotechnical study, no site-specific methods are given for mitigating the geologic and seismic hazards at the project site.

Page: 88
Don Woods, C3, and Broadway Coalition Comments HB-3. Does that fault run under or near the site? What are the potential impacts of an earthquake along the fault?

Page: 91
Section 3 - Responses to Comments.

Page: 101
Response to Comment C-12. An evaluation of site geology and geologic hazards was made in the previous geotechnical investigation by Woodward-Clyde Consultants (1988) (which is included in the Hirsch and Company report referenced in the draft EIS). Supplemental information regarding site geology, seismicity, evaluation of faulting, and liquefaction is presented in the report entitled "Additional Geologic, Seismic, and Geotechnical Studies" dated September 5, 1990 prepared by Woodward Clyde Consultants. This report is included in the appendix as Section 4. Additional test borings extending below proposed foundation depths will be required for design level geotechnical investigations, but the current borings are adequate for the current planning and environmental level investigations.

Page: 106
Response to Comment F-3. The commentator's desire to reduce the amount of above-grade parking is noted. The Navy, in developing the project design states that "two levels of parking must be accommodated below-grade prior to accommodating parking above-grade." Parking is provided below grade on all four blocks of the project site. Only Block 2 includes above-grade parking, but only after the requisite 2 below-grade levels are provided. Thus, the project is consistent with the objectives of the referenced BCCG plans.

Page: 113
Response to Comment G-21. The FAR designated for the site in the draft plan are 7.0 for Block 1, 6.5 for Block 2, and 5.5 for Blocks 3 and 4 (as shown in Figure 14 of the plan).

Page: 118
Response to Comment H-8. The City of San Diego Municipal Code requires evaluation of geologic hazards and liquefaction potential... The Navy will require the developer to perform such as evaluation for all development at the Navy Broadway Complex. Measures to mitigate geologic/seismic hazards are discussed in Section 4 of this appendix. More specifically, all new buildings constructed on the site will be designed in accordance with UBC Seismic Zone 4 criteria, which are in excess of current City of San Diego building code requirements.

Page: 120
Response to Comment H-20. The first phase of the proposed development is currently planned to be completed in 1994.

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Response to Comment H-25. The geotechnical investigation performed by WWC (1988) indicates that the area soils are able to support properly designed foundations. The previous geotechnical investigation also indicates that below ground construction for underground parking is feasible. Construction of two-levels of underground parking will require: construction dewatering, pile foundations, and a structural floor system to support building loads. Because permanent dewatering systems with discharges to San Diego Bay are no longer allowed, the floor and walls below the water table will have to be designed to resist water pressures and will have to be waterproofed.
Response to Comment H-26. The bay deposits and hydraulic fill underlying the site are considered potentially liquefiable, and the previous geotechnical investigation by WCC indicates that potential effects from liquefaction should be considered for project design. The City of San Diego Building Code requires that an evaluation be made for areas identified on the Seismic Safety Element of the General Plan as being susceptible to liquefaction.

Page: 123
Response to Comment I-3. Note that the number of parking spaces proposed onsite is restricted below normal demand rates to encourage the use of mass transit, car pools, etc.

Page: 142
Response to Comment HB-3. The faults suspected to extend into the downtown area are typically mapped as "inferred or concealed" hence their specific locations is not known. Based on previous fault investigation in the west part of downtown San Diego by WWC and others, it appears unlikely that a significant fault like the Mission Bay fault extends under or near the site.

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Section 4 - Seismic Study by Woodward-Clyde Consultants

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Additional Geologic, Seismic and Geotechnical Studies - Navy Broadway Complex, September 5, 1990 by Woodward-Clyde Consultants.

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WCC conducted a preliminary geotechnical investigation for the site; a copy of our report entitled "Geotechnical Investigation for the Proposed Navy Broadway Complex, San Diego, California" prepared for Hirsch Company, dated February 4, 1988 is on file at the Navy Broadway Complex Detachment.

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Additional geotechnical analyses were performed utilizing information from our previous test borings and geotechnical laboratory analyses. No new subsurface explorations were performed for this study.

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The epicenter of the 1862 quake is not known. It is suggested the even could have been in or near San Diego Bay. Toppozada and others estimated the magnitude of the 1862 earthquake at M 5.9.
A 1985 series of earthquakes (largest event M 4.7) was centered generally within about 0.6 miles (1.0 km) south of the San Diego - Coronado Bay Bridge. A similar series of small earthquakes in 1964 was also generally located beneath southern San Diego Bay.

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In the vicinity of San Diego Bay and the project site, the Rose Canyon fault zone has been mapped as being comprised of several fault strands which include: the Old town fault, Spanish Bight fault, Coronado fault, and Silver Strand fault... The faults suspected to extend into the downtown area are typically mapped as "inferred" or "concealed" hence their specific location is not known. Because of the uncertainty in regard to fault locations, the project site is considered to be located about 0.5 to 1.0 miles from significant strands of the Rose Canyon fault zone.

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The Coronado fault is mapped as extending northerly across the Bay where it appears to project on land about 0.5 miles to the east of the project area (see Figure 6). Although the fault is suspected to extend beyond the Bay on land (Treiman, 1984) its location in the downtown area (east of the site) is not known.

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3.1 Fault Surface Rupture. The project site, like all of the downtown area, is considered to generally lie within the Rose Canyon fault zone. Some fault strands within this zone are considered active, and therefore present surface rupture hazards. Although portions of the Rose Canyon fault zone are being evaluated by the State Geologist and are to be included in an Alquist-Priolo Special Studies Zone, the west downtown San Diego area (and the project site) is not currently being considered for zonation. The City of San Diego Municipal Code includes a geologic hazards ordinance which requires geologic hazards investigations for new buildings over two stories in height in all of downtown San Diego.
A single fault in the vicinity of Front and First Streets about 0.5 miles east of the site. This fault is not considered active.
The faults shown on Figure 6 that are located in San Diego Bay were mapped by marine geophysical surveys that included traverses located generally parallel to the bay margins. These marine geophysical surveys conducted to date have not identified significant faults in the bay that appear to project through the Broadway Complex.

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Previous geologic investigations by WWC and others at these nearby sites immediately east of the Broadway Complex did not encountered significant faults. Therefore, it is believed that previously unrecognized, major active faults do not appear to extend through the west downtown area.
Based on previous geologic investigation conducted in San Diego Bay and land areas near the Broadway Complex, it appears unlikely that the site is traversed by a fault that would present a significant fault rupture hazard. Although it is our opinion that it is unlikely the site is traversed by a significant fault, the possibility of on-site faulting cannot be precluded based on the available geologic information.
The project site area is underlain by hydraulic fill soils placed over natural bay deposits. The geologically recent bay deposits extend down to elevations below Mean Sea Level, whereas groundwater typically occurs within several feet above MSL in the project area. Therefore, site subsurface and groundwater conditions generally preclude using typical geologic exploration methods such as trench excavations to evaluate possible faults. Other geologic investigative techniques are possible (such as geophysical profiling and/or deep, closely spaced test borings) which have been used to evaluate suspected faults at nearby project site and adjacent areas of the bay. However, these methods are somewhat indirect and can be inconclusive.

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Without being able to directly observe Pleistocene (Bay Point Formation) materials in below ground excavations, it is unlikely that a fault will be discovered on the site during construction. If a fault were observed in construction excavations or discovered during future investigations, it will be necessary to evaluate its recency of past displacements and surface rupture potential. If evaluation of the fault indicates a significant likelihood for renewed movement within the expected project lifetime, and in particular, if the fault was considered "active" 3 it would be inconsistent with current engineering and geologic practice to site structures directly across the fault. Therefore, development options would likely including relocating structures so that they are not sited across the fault.

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An earthquake of M7 on the Rose Canyon fault occurring at an approximate distance on the order of 0.5 to 1.0 miles from the study area can be considered the maximum earthquake for this site.

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The estimates of seismic ground shaking discussed above are intended to provide a general assessment of the site seismic hazards and are not intended for design purposes.
Zone 4.

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Using information from our previous geotechnical investigation, we have made a preliminary evaluation of liquefaction susceptibility.

Page: 161
Page 13 and Page 14 are out of order.

Page: 169
1982 City of San Diego Seismic Safety Study, by Leighton and Associates.

Page: 171
WCC 1985, Geologic Investigation for the Police Administration and Technical Center.

Page: 180
Figure 5 - Rose Canyon Fault Zone, San Diego Metropolitan Area.

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Figure 6 - Quaternary Faults Mapped in and around San Diego Bay. [The Coronado Fault locations is now showed trending exactly towards the site, not a couple of blocks east as shown on the WWC Figure 6 dated August 24, 1990]