



Attachment 2

THE CITY OF SAN DIEGO

November 22, 2010

California Department of Transportation
Attn: Shay Lynn Harrison
4050 Taylor Street, MS-242
San Diego, CA 92110

VIA EMAIL TO: 1-5_NCC_EIR_EIS@dot.ca.gov

Subject: **CITY OF SAN DIEGO COMMENTS ON THE INTERSTATE 5 NORTH COAST CORRIDOR PROJECT DRAFT ENVIRONMENTAL IMPACT REPORT/ENVIRONMENTAL IMPACT STATEMENT**

The City of San Diego ("City") has received and reviewed the Draft EIR/EIS for the above referenced project and appreciates this opportunity to provide comments to the California Department of Transportation ("Caltrans"). In response to the EIR/EIS, multiple departments at the City have identified the following issues.

City Planning and Community Investment Department – Long Range Planning: Contacts – Lesley Henegar (619.235.5208) and Tait Galloway (619.533-4550)

City of San Diego General Plan - General Comments

The City of San Diego's *Progress Guide and General Plan* is discussed in the Draft EIR for Interstate 5 North Coast Corridor Project (DEIR) (on page 3.1-20). The DEIR discusses a draft that was circulated in 2006. The discussion should be updated, to refer to the current General Plan which was adopted in 2008.

The DEIR states (on page 3.1-23) that the City of San Diego General Plan is currently in draft form. Since the DEIR was recently issued, it would be correct to state that the City of San Diego General Plan was adopted in 2008. Please revise this statement.

City of San Diego General Plan - Mobility Element

The DEIR states (on page 3.1-23) that "The Mobility Element of the San Diego General Plan explicitly outlines an increase in capacity and a reduction in congestion along the freeway system as a primary goal. Additionally, applicable community plans within San Diego reflect this larger goal of the provision of a transportation system that provides convenient linkages to the rest of the metropolitan region." Please explain how the proposed project would be "generally consistent with the city and community plans and policies established for the City of San Diego."



Development Services

1222 First Avenue, MS 501 • San Diego, CA 92101-4155

Tel (619) 446-5460

The General Plan's Mobility Element outlines the City's strategy to improve mobility through the development of a balanced, multi-modal transportation network. The Mobility Element establishes many goals and policies. One goal is to put transit first. The goal states "an attractive and convenient transit system that is the first choice of travel for many of the trips made in the City." The discussion states that "a primary strategy of the General Plan is to reduce dependence on the automobile in order to achieve multiple and inter-related goals including: increasing mobility, preserving and enhancing neighborhood character, improving air quality, reducing storm water runoff, reducing paved surfaces, and fostering compact development and a more walkable city. Expanding transit services is an essential component of this strategy."

The General Plan also discusses the Regional Transportation Plan (RTP). It states "Under this vision, transit and land use will be tightly linked, with transit stations integrated into walkable, transit-oriented neighborhoods and centers."

The Mobility Element of the General Plan lists as the goals "A street and freeway system that balances the needs of multiple users of the public right-of-way. It also states "Safe and efficient street design that minimizes environmental and neighborhood impacts." Additionally, the Mobility Element also has a policy (page ME-24, ME-C.6.) that calls for the location and design of improvements to existing facilities to respect the natural environment and scenic character of the area traversed. The design of freeways should improve the visual aspects of roadways. Slopes should be contoured and blend with the natural topography. Landscaping should be employed to enhance or screen views. The I-5 corridor acts as a gateway to San Diego with many scenic vistas of the coastline, canyons and other open spaces. What impacts will the proposed sound walls and loss of vegetation have on this corridor but also at areas that open up to scenic views? Please provide detailed information about how the proposed project is consistent with the City's General Plan Policies in the Mobility Element of the General Plan, specifically ME-C.6.a-n.

City of San Diego General Plan - Conservation Element

The General Plan's Conservation Element has established goals and policies regarding air quality. The General Plan recommends as a goal that "Regional air quality which meet state and federal standards" and "Reduction in greenhouse gas emissions effecting climate change". The discussion in the General Plan states that "motor vehicles and other fossil-fuel burning vehicles are responsible for nearly 80 percent of the air pollution emissions in the San Diego region." "The Mobility Element contains policies designed to promote walking, bicycling, transit use, and car pooling to help achieve transportation and environmental goals." Please discuss how the proposed project meets these goals and policies of the General Plan.

Torrey Pines Community Plan

The Torrey Pines Community Plan is discussed (on page 3.1-20 in the DEIR). The DEIR cites some of the Goals stated in the Torrey Pines Community Plan. It should also mention the section that addresses State Route 56/I-5/I-805 Widening Projects (on pages 58-9 of the Torrey Pines Community Plan). This section in particular discusses that "visual impact from retaining walls

will be mitigated by incorporating crib walls where feasible, special wall treatment utilizing texture, color and design elements, and new bridges with slender aesthetically pleasing design.” Also include: “A detailed erosion control plan has been prepared. This plan includes immediately seeding new slopes and other abatement measures. Due to the sensitivity of Los Penasquitos Lagoon, every reasonable precaution will be taken to protect watershed flow into the lagoon to avoid or minimize muddying and silting, before, during and after construction.”

The following are specific goals or policies within the Torrey Pines Community Plan that address the proposed project. They are as follows:

Page 46, Goal 7. Provide a transportation system that encourages the use of mass transit, rather than building and/or widening roads and freeways. Please explain how the proposed project is consistent with the Torrey Pines Community Plan given the stated goal.

Page 58, Visual Impacts. As part of the State Route 56/I-5/I-805 Widening Projects description, the community plan states “Visual impacts include permanent landform changes as a result of new cut slopes, fill slopes, bridge structures, traffic movement, and retaining walls. Newly planted slopes will be compatible with surrounding landforms.” Please confirm that the visual impacts of the proposed new slopes will be below a level of significance, and for erosion control measures.

Page 118, Visual Resources. The community plan on page 118, states “The State Coastal Act states that the scenic and visual qualities of the coastal areas shall be considered and protected as a resource of public importance. The Torrey Pines Community Planning Area possesses many highly scenic open space areas and dramatic vistas.” Please explain how the proposed project will protect these resources.

Del Mar Heights Road The community plan on page 44 designates Del Mar Heights Road as a four lane major. Please explain how the EIR is consistent with the community plan for Del Mar Heights Road.

Page 45, of the Torrey Pines Community Plan states as one of the Goals: 3. “Provide a system of bikeways and pedestrian facilities that will encourage bicycling and walking as a means of transportation.” Also Goal: 7. “Provide a transportation system that encourages the use of mass transit, rather than building and/or widening roads and freeways.” Please discuss and evaluate how the proposed project is consistent with these community plan goals. Please evaluate whether the proposed bridge crossing from Torrey Pines to Carmel Valley Community Plan areas is located in the best possible location to promote this goal.

Page 46, of the Torrey Pines Community Plan states as one of the Policies: 11: “The construction of new roads or improvements to existing roads adjacent to open space areas shall mitigate impacts through the restoration and enhancement of the open space system to the maximum extent feasible.” Also Policy: 5. “Provide improvements to the road

network that will facilitate traffic circulation without negatively impacting adjacent open space areas and residential neighborhoods." Please discuss and evaluate how the proposed project is consistent with these community plan policies.

Torrey Hills Community Plan

The Torrey Hills Community Plan discussion (on page 3.1-20 in the DEIR) accurately reflects the Plan Vision for the community, to "develop the community with land uses that complement surrounding developing areas and maximize mobility opportunities; that reflect the variety of landforms characterizing the community; that protect and enhance important wildlife habitats; and that provide for a high-quality urban form reflective of the area's unique location and natural attributes."

The following are specific goals or policies within the Torrey Hills Community Plan that address the proposed project. They are as follows:

Page 52, Goals, no. 3, "Provide a transportation system that maximizes the opportunities for public transit." of the community plan

The Public Transportation discussion (in the community plan on page 52) discusses that the Metropolitan Transit District Board (MTDB) considered a northerly extension of a LRT line that would run immediately east of I-5 along the western edge of Torrey Hills. This extension is designated as a possible future rail extension in MTDB's Rail Transit Plan. The DEIR should include these goals and policies along with an analysis and evaluation of how the DEIR is consistent or not with the Torrey Hills Community Plan.

Property Acquisition

Please explain for what purpose Caltrans will use the properties itemized in the list of partial acquisition and full acquisition for the City of San Diego. There appears to be only one full property acquisition within the City of San Diego, located in the Carmel Valley Community Plan area. The remainder of the partial lot acquisitions appears to be directly adjacent to I-5 and appear to be in open space designations. If the land uses are to be other than what they are currently designated for this should be indicated. An analysis should be conducted and a determination made as to whether or not a community plan amendment will be required to amend the city and state jurisdictional line. A discussion of these issues should be included in the DEIR as well.

University Community Plan

The proposed project runs through the University Community Planning area beginning at La Jolla Village Drive and extending north to the northern boundary of the community just south of the I-5/I-805 merge. The University Community Plan's Open Space and Recreation Element provides goals and proposals for open space preservation and trail connections throughout the plan's designated open space areas.

Specifically, Section IV (4) – Sorrento Valley – Soledad Canyon Open Space. This open space system includes 1) the Torrey Pines State Reserve, east of North Torrey Pines Road, 2) slopes with a 25 percent or greater gradient on the edge of the Torrey Pines Science Park, Campus Point and adjacent properties, 3) the branch canyon adjacent to Interstate 5 and penetrating the UCSD campus, and 4) the slopes on the south side of the AT&SF Railroad right-of-way, 5) Torrey Pines Science Center. The specific goals include:

- A. These areas should be retained in an open and natural state and should either be preserved as natural open space easements or deeded to the City of San Diego for open space.
- B. Any disturbance of the hillsides should be mitigated by contour grading and revegetation with native species.
- C. Steep hillsides facing the canyons should be preserved by establishing open space easements in conjunction with new development.

The open space areas identified above are depicted in Figure 37 of the University Community Plan.

Page 3.1-20, University Community Plan; this section states that no relevant goals from this community plan were identified for the proposed project. As outlined above, there are relevant goals within this community plan which may be impacted by the proposed project. Please include these as relevant goals identified for the proposed project for this community plan and how the proposed project would implement these goals. The University Community Plan can be accessed via the Internet at:

<http://www.sandiego.gov/planning/community/profiles/university/plan.shtml>

Mira Mesa Community Plan

The Draft ED did not include the Mira Mesa community planning area as a community that the proposed project traverses through nor analyze relevant policies from the Mira Mesa Community Plan. The proposed project traverses the Mira Mesa Community Planning area's eastern boundary which extends north from the AT&SF railroad to Sorrento Valley Road. Please include the Mira Mesa Community Planning area and Mira Mesa Community Plan as one of the relevant policy documents identified for the proposed project.

During the last update of the Mira Mesa Community Plan, the goals and policies of the North City Local Coastal Program were incorporated into the community plan. The Coastal Commission certified the Mira Mesa Community Plan and Local Coastal Program on November 18, 1993.

Please include the applicable goals and proposals which may be affected by the proposed project in the Draft ED. These can be found in the Mira Mesa Community Plan's Sensitive Resources and Open Space System Element. The Mira Mesa Community Plan can be accessed via the internet at: <http://www.sandiego.gov/planning/community/profiles/miramesa/plan.shtml>

The main goals are located on page 25 of the Sensitive Resources & Open Space System Element and the applicable proposals are located on pages 33 and 34.

I-5 Managed Lanes

It is our understanding that the purpose of a corridor system management plan (CSMP) is to provide one unified concept for managing, operating, improving, and preserving a corridor across all modes and jurisdictions for highest productivity, mobility, reliability, accessibility, safety and preservation outcomes. It is also our understanding that the project's purpose and need statement addresses the need to provide a facility that is compatible with future bus rapid transit and other modal options. The project alternatives primarily focus on adding additional HOV and general purpose lanes with the purpose of increasing capacity. The project alternatives do not appear to meet the purpose of the CSMP or the project's purpose and need statement related to transit.

While the City understands that the HOV lanes can be used by BRT, the DEIR/DEIS does not identify BRT station facilities including platform locations and station and HOV parking.

The DEIR/DEIS does not consider any options that include improving Coaster commuter rail options between Oceanside and Downtown San Diego beyond those considered in the Final Program EIR/EIS for LOSSAN corridor that was released in September 2007.

To reduce visual and noise impacts associated with the proposed alternatives and greenhouse gas emissions, it is the City's recommendation that additional alternatives be included that focus on improving transit service including commuter rail and BRT.

The EIR/EIS should consider an alternative DAR location at either Del Mar Heights Road or Carmel Valley Road to support the existing Carmel Valley residential and employment center.

***Development Services Department, Transportation Review: Contact - Victoria Huffman
(619.446.5396)***

1. The DEIR/DEIS indicates the project would have a less than significant effect on Traffic & Transportation under the California Environmental Quality Act. Additional information is needed to support this conclusion, as detailed in these comments.
2. The significance thresholds listed on Page 70 -71 of the *City of San Diego's Significance Determination Thresholds, January 2007* should be used to evaluate the significance of project traffic impacts on facilities in the City of San Diego.
3. The document should provide tables and text for roadway segments, intersections and metered freeway on-ramps clearly showing whether the project has significant impacts to City roadway facilities based on *City of San Diego's Significance Determination Thresholds, January 2007*.
4. Comparison between Near Term (Opening Day) without Project and Near Term (Opening Day) with Project should be provided to determine the project's direct impacts.

5. Comparison between Horizon Year without Project and Horizon Year with DAR should be provided to determine the project's cumulative impacts with the construction of the Voigt DAR rather than comparing Horizon Year with Project without DAR to Horizon Year with Project with DAR as was done in Technical Report #7, "Direct Access Ramps/Local Circulation System Operations Report."

6. Intersection analysis for intersections along the I-5 freeway corridor's adjacent arterial network within the City of San Diego should be provided to determine if the proposed project has any significant impacts to City intersections. Effects of queuing between closely spaced intersections should be included in this analysis. Mitigation should be provided for any such impacts.

7. Technical Report #7 states that intersection level of service and delay shown in the tables does not account for the effects of on-ramp traffic backing up into the upstream intersection. This should be accounted for in all appropriate analyses.

8. The information presented in the DEIR/DEIS's technical study, "A Summary of Traffic Reports November 2008," suggests the 10+4 with DAR project alternative would have cumulative impacts at the following intersections within the City of San Diego:

- Genesee Ave/I-5 NB Ramps
- Sorrento Valley Road/Sorrento Valley Blvd.
- Del Mar Heights Road/I-5 NB Ramps
- Roselle Street/I-5 SB on ramp
- Roselle Street/I-5 NB on ramp
- Roselle Street/Sorrento Valley Boulevard
- Carmel Mountain Road/I-5 Bypass SB Ramps

These impacts should be acknowledged in the DEIR/DEIS and mitigation proposed.

9. The information presented in the DEIR/DEIS's technical study, "A Summary of Traffic Reports November 2008," suggests the 8+4 project with DAR alternative would have cumulative impacts at the following intersections:

- Genesee Ave/I-5 NB Ramps
- Genesee Ave/I-5 SB Ramps
- Roselle Street/I-5 SB on ramp
- Roselle Street/I-5 NB on ramp
- Carmel Mountain Road/I-5 Bypass SB Ramps

These impacts should be acknowledged in the DEIR/DEIS and mitigation proposed.

10. The information presented in the DEIR/DEIS's technical study, "A Summary of Traffic Reports November 2008," indicates the 10+4 with DAR and 8 + 4 project alternatives would

have significant cumulative impacts at the ramp meter at eastbound Via de la Valle to southbound I-5 in the p.m. peak hour. This impact should be acknowledged in the DEIR/DEIS and mitigation proposed.

11. The information presented in the DEIR/DEIS's technical study, "A Summary of Traffic Reports November 2008," suggests the 8+4 with DAR project alternative would have a significant cumulative impact to the roadway segment of Via de la Valle between I-5 and San Andres Drive. This impact should be acknowledged in the DEIR/DEIS and mitigation proposed.

12. Capacity analysis for Voigt Drive should be provided to show whether the proposed DAR has a significant impact to Voigt Drive and whether the proposed widening of Voigt Drive to four lanes would provide sufficient roadway capacity to mitigate any significant impacts.

Development Services Department, Environmental Analysis Section: Contact – Martha Blake (619.446.5375)

The DEIR/DEIS has identified a number of significant impacts that would result from the implementation of any of the 'project' scenarios. A number of significant impacts would result from the proposed project. Generally the City would like the document to rely on the City of San Diego's Significance Determination Thresholds for impacts within the City's boundaries. The Thresholds can be found online at: www.sandiego.gov/development-services/news/pdf/sdtceqa.pdf

In addition to specific issues identified by other city reviewers, EAS staff has the following concerns.

Biological Resources

Impacts to biological resources (per the DEIR/DEIS, "Natural Communities" and "Wetlands") should be quantified for each jurisdiction in order to assess the specific impacts to resources within the City of San Diego boundaries. Currently impacts areas are identified on the maps, but the tables quantifying the impacts do so on a corridor-wide basis. Mitigation for impacts within the City of San Diego should be provided to the maximum extent feasible in the City, preferably within the same geographic area (such as the same watershed) where the impacts occur, and should be provided, at a minimum, in accordance with the mitigation ratios established by the City of San Diego Biology Guidelines (July 2002).

The technical report (*Natural Environmental Study, June 2008*) that provides the basis for the natural communities/wetlands/biological resource impacts indicate that the majority of the surveys were conducted more than three years ago. These surveys should be updated given the lengthy period of time that has passed. The City of San Diego Guidelines for Conducting Biological Surveys (July 2002, p. 6) states that "if surveys for state or federally-listed sensitive or MSCP-covered species are completed more than 24 months before [an] application is submitted, then the surveys should be updated as appropriate". City Staff is concerned that, given the length of time between the surveys and the publication of the NES (2008) and the draft

document (2010), changes have occurred in the natural communities that are not reflected in the draft document.

Noise

The DEIR/DEIS identifies that a severe noise impact would occur when “predicted exterior noise levels equal or exceed 75dBA-Leq(h) or are 30 dB or more above existing noise levels” (p. S-12). This is inconsistent with both the City of San Diego Significance Thresholds and with the City’s General Plan Noise Element. The General Plan has no exterior uses that are compatible with noise levels exceeding 75 dBA (Table NE-3 of the City’s General Plan). For single-residential uses, mobile homes, senior housing, and a number of institutional uses such as hospitals, child care, kindergarten through grade 12, and libraries are ‘conditionally compatible’ with exterior noise levels of 60 – 65 dBA; while multiple units and mixed-use commercial/residential are ‘conditionally compatible’ with exterior noise levels of 60 – 70 dBA. Most commercial and office uses are ‘conditionally compatible’ with exterior noise levels of 65 – 75 dBA.

Staff notes that Caltrans considers an increase of 30 dB or more being the level at which severe noise impacts would result. At what level is the increase a significant or substantial impact requiring identification of mitigation? The healthy human ear notices a difference of 3 dB or more (as noted in the Noise Technical Report, p. 5), and “a change of 10 dB is perceived as being twice or half as loud”. So a change of 30 dB in existing noise volumes is truly a severe impact.

The Noise section, 3-15.3 identifies the areas where noise mitigation would be required, and notes if that mitigation is feasible and reasonable per Caltrans. Not all of the identified measures are determined to be reasonable, yet Table S.1 does not identify any significant unmitigated impacts due to noise. That table states that for noise, impacts are “Not Substantial with Abatement”. Please revise the Noise discussion to identify any additional impacts related to noise in accordance with the above information, and clearly identify if the project will result in significant impacts related to noise that will not be mitigated. Please note the City considers any increase in dB above the General Plan (GP) noise levels to be potentially significant, even if the existing noise level already exceeds the GP compatible levels.

Pedestrian and Bicycle Facilities

The DEIR/DEIS (p. S-9) states that “during construction...the work can act as both a physical and psychological barrier to pedestrians and bicycle users” and that “access may be restricted or severed entirely” but that “temporary access would be provided where possible”. Voigt Drive provides a much-used connection from parking facilities and residential uses on the east side of Interstate 5 to the University of California, San Diego campus facilities, primarily located on the west side of I-5. Will this connection for vehicles, pedestrians, and cyclists be restricted or severed should the Voigt Drive DAR be selected? If so, for how long would the impacts last? Any restriction or severing of this access should be provided with some mitigation during the construction phase. If no such mitigation is feasible, the document should analyze what will

happen with this displaced access, including traffic increases at other access points to the University. The document should also demonstrate how safe pedestrian and bicycle access would be provided post-construction, given the increase levels of traffic anticipated to use the Voigt Drive with the proposed DAR.

Voigt Drive DAR

In addition to the issues note above, City Staff notes that p. 2-3 of the DEIR/DEIS would provide access to "Qualcaomm". This should be revised to Qualcomm. This section also notes that this DAR would provide access to coastal views. Given the location of this DAR and the geography of the area, with the elevations to the west higher than Voigt Drive, this view access seems incorrect. If the DAR is expected to provide vehicles with another way to access the coastal community for viewing opportunities, this access would be indirect as it would force vehicles through and/or around the UCSD campus before reaching the coast, while the Genesee Avenue or La Jolla Village Drive exits provide more direct access to the coastal areas.

Environmental Services Department: Contact – Lisa Wood (858.573.1236)

The draft EIR/EIS does not address solid waste management. Solid waste management is a public service, and solid waste generation contributes to greenhouse gas production. This project would produce significant amounts of construction waste. The impacts associated with the management, transportation, processing, and disposal of this waste should be addressed.

The CEQA Environmental Checklist included in this document located in appendix G section XVII Utilities and Service Systems identifies items F and G concerning landfill capacity and compliance with federal, state, and local statutes regarding solid waste as "No Impact." No rationale for this analysis is provided.

San Diego Police Department, Northwestern Division: Contact – Ted Parker (858.523.7049)

The SDPD has concerns regarding the proposed pedestrian bridge that would be located north of Del Mar Heights Road. The following suggests several ways to make the bridge safe for the public. They deal with the bridge location, design, and use. Some measures to prevent other crimes are also suggested.

Even if the bridge can be made safe to the public, it provides criminals with an additional path in and out of the connected neighborhoods. The possible effects of this to the residents and the personal safety risks to the public must be weighed against the benefits to them in determining whether the bridge should be built. We have no way of measuring these effects or risks, and have not attempted to determine who would use the bridge, what benefits the bridge would provide to the connected neighborhoods, or other negative effects such as the increased pedestrian traffic in the affected areas. The latter should be done by the planning boards on both sides of I-5. You should also consider the alternative of improving pedestrian and bicycle paths

along Del Mar Heights Rd., or building a pedestrian/bicycle bridge over the I-5 on- and off-ramps there.

Pedestrian bridges and their approaches are potential entrapment spots. A person on the bridge has nowhere to run if threatened by another person(s) on the bridge or its approaches. And a person on the bridge cannot be seen or heard by anyone else if threatened. People driving on I-5 should be watching the road and not looking up at the bridge, especially at night. And the freeway noise level will block out anyone calling or whistling for help. This paper suggests several ways to make the bridge safe for the public. They deal with the bridge location, design, and use. Some measures to prevent other crimes are also suggested.

PERSONAL SAFETY MEASURES IN BRIDGE LOCATION

Bridges should be located where their approaches are clearly visible to people in the area. A good example of this is the pedestrian bridge over Del Mar Heights Rd. just east of El Camino Real. People entering, leaving, and on the bridge can be seen by people in vehicles on these streets as well as people on the sidewalks.

The proposed location of the I-5 bridge does not meet this criterion. The eastern approach is down a narrow walled path between a single-family home at 3353 Lower Ridge Rd. and the East Bluff Condos. People on it can only be seen from the entrance to this path. The western approach is at the northeast corner of the parking lot of the Del Mar Hills Elementary School at 14085 Mango Dr. It can't be seen at all from the street.

PERSONAL SAFETY MEASURES IN BRIDGE DESIGN

Clear Bridge Approaches

The bridge approaches should be cleared of all vegetation. All bushes along the path from Lower Ridge Rd. should be removed on the east side. A square that extends to rear wall of Bella Del Mar Apartments should be cleared on the west side.

Paint the curb red in front of the bridge approach on Lower Ridge Rd. to prohibit parking that would block views of the approach from the street.

Fencing around Bridge Approaches

Fencing should be installed on the sides of the approaches to secure those areas. It should be at least 8-feet high with a 1-inch mesh. CALTRANS has used this fencing for freeway abutment-protector cages. This fencing is especially important on the west side where transients live in the bushes behind the apartments and shopping center south of the bridge site. Gates in the fencing should be provided if access to the paths extending north and south of the approaches is needed.

PERSONAL SAFETY MEASURES IN BRIDGE USE

Nighttime Curfew

Prohibit use at night. Add a section to the San Diego Municipal Code (SDMC) that states the following: It is unlawful for any person to be on the bridge or its approaches from sunset to sunrise. And post signs for this. Note that there is a precedent for this in SDMC Sec. 63.0120(b) which states that "It is unlawful for any person to be on the Spruce Street Pedestrian Bridge from 10:00 p.m. until 6:00 a.m."

If this ordinance and the signs don't work, install gates that would be locked at night. This will require that a City worker to lock them at night and unlock them in the morning.

Another reason for a nighttime curfew is to keep the area around the approaches quiet at night so the residents who live next to them won't have their sleep disturbed.

Signs

Post NO LOITERING signs on the approaches to the bridge. Cite SDMC Sec. 52.30.2 for this. Also post a sign suggesting that people do not cross the bridge alone.

Emergency Phone Kiosks

Install emergency phone kiosks on the bridge approaches for persons to use to contact 911. The kiosks should have a light that will begin to flash when 911 is called. They should also be equipped with a GPS locator to aid SDPD officers in locating the caller.

Emergency Use of Cell Phones

Need to determine whether 911 dispatchers can hear callers over the freeway traffic noise.

Emergency Communications

The Public Safety Geofile Coordinator in the San Diego Fire Department's Communications Response Planning Division must be contacted about planning to enable emergency providers to know the location of the caller. Laura Brenner is the current Coordinator; her phone number is (858) 573-1325. This might involve the following:

- Call the bridge a "walkway" to be consistent with the terminology in the San Diego Graphic Information System (SanGIS).
- Install signposts at the bridge approaches telling people that in reporting an emergency they should give the dispatcher the name of the walkway, which would be on the sign, and the side of the freeway, which would be east or west.
- The dispatcher would have the coordinates of each signpost and be able to direct emergency vehicles to it.

OTHER CRIME PREVENTION MEASURES

Signs

Post signs to prohibit smoking, littering, use of alcoholic beverages, skateboarding, etc.

Trash Cans

Locate can on the bridge approaches and empty them regularly.

Bollards on Bridge Approaches

Bollards should be installed to prevent motor vehicles, including motor cycles, from going on the bridge.

Graffiti Prevention

Use graffiti-resistant paint or an anti-graffiti coating on any bridge elements that could be tagged. (The San Diego Park and Recreation Dept. specifies the use of VandlGuard Ten, a non-sacrificial anti-graffiti coating in a three-coat system by Rainguard International, or the equivalent on park furnishings and buildings.) Minimize the use of large surfaces that provide a canvas for graffiti.

Lights

Install vandal-proof lights and mount them beyond a vandal's reach.

Please contact the appropriate above-named individual(s) if you have any questions on the submitted comments. The City respectfully requests that you please address the above comments in the EIR.

Sincerely,



Cecilia Gallardo, AICP
Assistant Deputy Director
Development Services Department

cc: Victoria Huffman, Associate Traffic Engineer, Development Services Department
Lesley Henegar, Senior Planner, City Planning and Community Investment Department
Tait Galloway, Senior Planner, City Planning and Community Investment Department
Lisa Wood, Senior Planner, Environmental Services Department

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Ted Parker, San Diego Police Department, Northwestern Division
Martha Blake, Senior Planner, Development Services Department