

CITY OF SAN DIEGO'S DRAFT GENERAL PLAN

FINAL

PROGRAM ENVIRONMENTAL IMPACT REPORT

APPENDICES A, B & C

Project No. 104495
SCH No. 2006091032
September 28, 2007

Appendix A:
NOP, Scoping Letter and Responses



THE CITY OF SAN DIEGO

DEVELOPMENT SERVICES DEPARTMENT

Date of Notice: September 7, 2006

PUBLIC NOTICE OF THE PREPARATION OF A DRAFT PROGRAM ENVIRONMENTAL IMPACT
REPORT AND PUBLIC NOTICE OF A SCOPING MEETING

JO: 6090

PUBLIC NOTICE: The City of San Diego will be the Lead Agency and will prepare a Program Environmental Impact Report (PEIR) in compliance with the California Environmental Quality Act (CEQA). This Notice of Preparation of a Program Environmental Impact Report and Scoping Meeting was publicly noticed and distributed on September 7, 2006.

SCOPING MEETINGS: Two scoping meetings will be held by the City of San Diego Land Development Review Division. One will be held on Wednesday, September 13, 2006, from 5:30 to 7:30 pm at the Mira Mesa Library, 8405 New Salem St., San Diego, CA 92126-2398, and the other meeting will be held on Monday, September 25, 2006 from 5:30 to 7:30 pm at the Valencia Park/Malcolm X Library, 5148 Market Street, San Diego, CA, 92114. Verbal and written comments regarding the scope and alternatives of the proposed Environmental Impact Report (EER) will be accepted at the meetings. Written comments may also be sent to Marilyn Mirrasoul, City of San Diego Development Services Center, 1222 First Avenue, MS 501, San Diego, CA 92101, or e-mailed to mmirrasoul@sandiego.gov referencing Project Number 104495 in the subject line within 30 days of the receipt of this notice (by October 7, 2006). A draft PEIR incorporating public input will then be prepared and distributed for public review and comment.

SUBJECT: General Plan Update: The City of San Diego General Plan Update is proposed to replace the existing 1979 *Progress Guide and General Plan* (1979 General Plan). The General Plan sets out a long-range, comprehensive framework for how the city will grow and develop, provide public services and maintain the qualities that define San Diego over the next 20-30 years. The proposed update has been guided by the City of Villages growth strategy and citywide policy direction contained within the General Plan Strategic Framework Element (adopted by the City Council on October 22, 2002) and would consolidate the existing thirteen elements in the 1979 *General Plan* into the following ten elements: Land Use and Community Planning; Mobility; Urban Design; Public Facilities, Services and Safety; Economic Prosperity; Recreation; Conservation; Historic Preservation; Noise; and, Housing (under separate cover).

Applicant: City Planning and Community Investment Department

PROJECT No. 104495 COMMUNITY PLAN AREA: All COUNCIL DISTRICT: All

Recommended Finding: Pursuant to Section 15060 (d) of the CEQA Guidelines, it appears that the proposed project could potentially result in significant environmental impacts in the following areas: Air Quality and Odor, Agricultural Resources, Biological Resources, Geologic Conditions, Growth Inducement, Health and Safety, Historical Resources, Hydrology, Land Use, Mineral Resources, Noise, Paleontological Resources, Public Services, Public Utilities, Transportation/Circulation/Parking, Visual Effects and Neighborhood Character, and Water Quality.

Availability in Alternative Format: To request the City's letter to the applicant detailing the required scope of work (EIR Scoping Letter) in alternative format, call the Development Services Department at (619) 446-5460 immediately to ensure availability. This information is ALSO available in alternative formats for persons with disabilities. To request this notice in alternative format, call (619) 446-5446 or (800) 735-2929 (TEXT TELEPHONE).

Additional Information: For environmental review information, contact Marilyn Mirrasoul at (619) 446-5380. For information regarding public meetings/hearings and/or other information regarding this project, contact the General Plan Update Acting Program Manager Nancy Bragado, at (619)533-4549 and/or the EIR Project Manager Randy Rodriguez at 619-533-4524. This notice was published in the San Diego Union Tribune and the San Diego Transcript, placed on City of San Diego websites (see below) and distributed on September 7, 2006.

<http://clerkdoc.sannet.gov/Website/publicnotice/pubnotcega.html>

<http://www.sandiego.gov/planning/genplan/index.shtml>

Robert J. Manis, Assistant Deputy Director
Development Services Department

DISTRIBUTION: For General Plan Update NOP of Draft EIR (September 7, 2006)
*** (Public Notice Only)**

City of San Diego

Mayor Sanders
Council President Peters, District 1
Councilmember Faulconer, District 2
Councilmember Atkins, District 3
Councilmember Young, District 4
Councilmember Maienschein, District 5
Councilmember Frye, District 6
Councilmember Madaffer, District 7
Councilmember Hueso, District 8
City Attorney, Shirley Edwards
Development Services Department (78, 78A)
Library Department (81) Balboa Branch Library (81B)
Beckwourth Branch Library (81C)
Benjamin Branch Library (81D)
Cannel Mountain ranch Branch (81E)
Carmel Valley Branch Library (81F)
City Heights/Weingart Branch Library (81G)
Clairemont Branch Library (81H)
College-Rolando Branch Library (81I)
Kensington-Normal Heights Branch Library (81K)
La Jolla/Riford branch Library (81L)
Linda Vista Branch Library (81M)
Logan Heights Branch Library (81N)
Malcolm X Library & Performing Arts Center (81O)
Mira Mesa Branch Library (81P)
Mission Hills Branch Library (81Q)
Mission Valley Branch Library (81R)
North Clairemont Branch Library (81S)
North Park Branch Library (81T)
Oak Park Branch Library (81U)
Ocean Beach Branch Library (81V)
Otay Mesa-Nestor Branch Library (81W)
Pacific Beach/Taylor Branch Library (81V)
Paradise Hills Branch Library (81Y)
Point Loma/Hervey Branch Library (81Z)
Rancho Bernardo Branch Library (81AA)
Rancho Penasquitos Branch Library (81BB)
San Carlos Branch Library (81DD)
San Ysidro Branch Library (81EE)
Scripps Miramar Ranch Branch Library (81FF)
Serra Mesa Branch Library (81GG)
Skyline Hills Branch Library (81HH)
Tierrasanta Branch Library (81II)
University Community Branch Library (81JJ)
University Heights Branch Library (81KK)
Noise Analysis (82)
Real Estate Assets Department (85)
Engineering and Capital Projects Department (86)
Historical Resources Board (87)
Park and Recreation Department (89)

Wetland Advisory Board (91 A)
Water Department (MS 908A)
Metropolitan Wastewater Department (MS 922)
Facilities Financing (MS 606F)
Park Development (93)
Environmental Services Department (93A)
San Diego Housing Commission (MS 49N)
City of San Diego Redevelopment Agency (MS 904)
Centre City Development Corporation (MS 51 D)
Southeastern Economic Development Corporation (SEDC) (MS 68)
Fire-Rescue Department, Samuel Oates, Fire Marshall (MS 603)
Governmental Relations Department (MS 51M)
Neighborhood Code Compliance (MS 51N)
Police Department (84)
Transportation Development (MS 501)
City Planning and Community Investment Department (MS 5A)

Community Service Centers:

Clairemont (274)
Navajo (337)
Peninsula (389)
Rancho Bernardo (399)
San Ysidro (435)
Scripps Ranch (442)

Other Cities

City of Chula Vista (94)
City of Coronado
City of Del Mar (96)
City of El Cajon (97)
City of Escondido (98)
City of Imperial Beach (99)
City of La Mesa (100)
City of Lemon Grove (101)
City of National City (102)
City of Poway (103)
City of Santee (104)
City of Solana Beach (105)

Federal Agencies

Federal Aviation Administration (1)*
Naval Facilities Engineering Command, SW Division, Environmental Planning (12)*
MCAS Miramar (13)*
U. S. Environmental Protection Agency (19)*
U. S. Fish and Wildlife Service (23)*
U. S. Army Corps of Engineers (26)*
U. S. Department of Agriculture (25)*

Native Americans

Ron Christman (215)*
Louie Guassac (215A)*
Clint Linton (215B)*
Kumeyaay Cultural Repatriation Committee (225)*
Native American Bands and Groups (225A - Q)*

State of California

CALTRANS, District 11 (33)*
Department of Fish and Game (32)*
Department of Parks and Recreation (40)*
Department of Parks and Recreation, Office of Historic Preservation (41)*
Resources Agency (43)*
Regional Water Quality Control Board, Region 9 (44)*
State Clearinghouse (46A)
California Coastal Commission (47)
Native American Heritage Commission (56)*
University of San Diego (251)
San Diego State University (455)
Malcolm A. Love Library (457)
University of California, San Diego (134)
San Diego Unified Port District (109)
California Integrated Waste Management Board (35)
California Environmental Protection Agency (37)
Housing and Community Development Department (38)
Department of Water Resources (45)*
California Boating and Waterways (52)*
California State Coastal Conservancy (54)*
Office of Planning and Research (57)*
California Energy Commission (59)*
California Department of Conservation (60)
California State Lands Commission (62)*

San Diego County

Department of Planning and Land Use (68)
County Water Authority (73)
Department of Environmental Health (75 & 76)
Department of Parks and Recreation (69)
Department of Agriculture (64)
Air Pollution Control District (65)
Department of Education (66)*
Department of Public Works (72)*

Other Agencies

San Diego Association of Governments (108)
San Diego Transit Corporation (112)
Sempra (114)
Metropolitan Transit Systems (115)
San Diego County Regional Airport Authority (110)
San Diego County Water Authority (73)
Local Agency Formation Commission (LAFCO) (111)
Otay River Park Joint Powers Authority
San Dieguito River Park Joint Power Authority (425A)

Community Groups, Associations, Boards, Committees and Councils

Community Planners Committee (194)
Otay Mesa - Nestor Planning Committee (228)
Otay Mesa Planning Committee (235)
Clairemont Mesa Planning Committee (248)
Greater Golden Hill Planning Committee (259)

Serra Mesa Planning Group (263A)
Kearny Mesa Community Planning Group (265)
Linda Vista Community Planning Committee (267)
La Jolla Community Planning Association (275)
City Heights Area Planning Committee (287)
Kensington-Talmadge Planning Committee (290)
Normal Heights Community Planning Committee (291)
Eastern Area Planning Committee (302)
Midway Community Planning Advisory Committee (307)
Mira Mesa Community Planning Group (310)
Mission Beach Precise Planning Board (325)
Mission Valley Unified Planning Organization (331)
Navajo Community Planners Inc. (336)
Carmel Mountain Ranch Community Council (344)
Carmel Valley Community Planning Board (350)
Del Mar Mesa Community Planning Board (361)
Greater North Park Planning Committee (363)
Ocean Beach Planning Board (367)
Old Town Community Planning Committee (368)
Pacific Beach Community Planning Committee (375)
Rancho Penasquitos Planning Board (380)
Peninsula Community Planning Board (390)
Rancho Bernardo Community Planning Board (400)
Sabre Springs Planning Group (406B)
San Pasqual - Lake Hodges Planning Group (426)
San Ysidro Planning and Development Group (433)
Scripps Ranch Community Planning Group (437)
Miramar Ranch North Planning Committee (439)
Skyline - Paradise Hills Planning Committee (443)
Torrey Hills Community Planning Board (444A)
Southeastern San Diego Planning Committee (449)
Encanto Neighborhoods Community Planning Group (449A)
College Area Community Council (456)
Tierrasanta Community Council (462)
Torrey Pines Community Planning Group (469)
University City Community Planning Group (480)
Uptown Planners (498)
Clairemont Town Council (257)
Greater Golden Hill Planning Committee (259)
Golden Hill Community News (260)
Kearny Mesa Town Council (263)
Serra Mesa Planning Group (263 A)
Serra Mesa Community Council (264)
Marian Bear Natural Park Recreation Council (267 A)
Rolando Community Council (288)
Normal Heights Community Association (292)
Normal Heights Community Center (293)
Oak Park Community Council (298)
Webster Community Council (301)
Marshall Community Council (304)
Darnell Community Council (306)
Mira Mesa Town Council (311)
La Jolla Shores Association (272)
La Jolla Town Council (273)

La Jolla Shores PDO Advisory Board (279)
La Jollans for Responsible Planning (282)
Mission Bay Park Committee (320)
Mission Beach Town Council (326)
Mission Hills Association (327)
Mission Valley Community Council (328 C)
San Carlos Area Council (338)
North Park Community Association (366)
Ocean Beach Town Council, Inc. (376 A)
Pacific Beach Town Council (374)
Rancho Penasquitos Community Council (378)Rancho Bernardo Community Council, Inc. (398)
Sabre Springs Community Planning Group (407)
Rancho Penasquitos Town Council (383)
San Dieguito Planning Group (412)
San Pasqual-Lake Hodges Planning Group (426)
San Ysidro Planning and Development Group (433)
United Border Community Town Council (434)
Skyline/Paradise Hills Planning Committee (443)
Sorrento Hills Community Planning Board (444 A)
Southeastern San Diego Development Committee (449)
Encanto Neighborhoods Community Planning Group (449 A)
Skyline/Paradise Hills Planning Committee (443)
Sorrento Hills Community Planning Board (444 A)
Southeastern San Diego Development Committee (449)
Encanto Neighborhoods Community Planning Group (449 A)
Arroyo Sorrento Homeowners Association (356)
Burlingame Homeowners Association (364)
Crown Point Association (376)
Torrey Pines Association (379)
The San Dieguito Lagoon Committee (409)
Scripps Ranch Civic Association (440)
Murphy Canyon Community Council (463)
Torrey Pines Association (472)
Crest Canyon Citizens Advisory Committee (475)
University City Community Association (486)
Hillside Protection Association (501)
Allen Canyon Committee (504)

Other Interested Parties

San Diego Apartment Association (152)*
San Diego Chamber of Commerce (157)
Building Industry Association/Federation (158)
San Diego River Park Foundation (163)*
Sierra Club (165)*
San Diego Natural History Museum (166)*
San Diego Audubon Society (167, 167A)*
California Native Plant Society (170)*
Center for Biological Diversity (176)*
San Diego River Conservancy (168)*
Environmental Health Coalition (169)*
Endangered Habitats League (182 & 182A)*
Carmel Mountain Conservancy (184)*
Torrey Pines Association (186)*
Carmen Lucas (206)*

Dr. Jerry Schaefer (208A)*
South Coastal Information Center (210)*
San Diego Historical Society (211)*
San Diego Archaeological Center (212)*
Save Our Heritage Organisation (214)*
San Diego County Archaeological Society Inc. (218)*
La Jolla Historical Society (221)*
University of San Diego (251)*
Tecolote Canyon Citizens Advisory Committee (254)*
Friends of Tecolote Canyon (255)*
Tecolote Canyon Rim Owner's Protection Association (256)*
UCSD Natural Reserve System (284)*Friends of the Mission Valley Preserve (330)*
Mission Trails Regional Park Citizens Advisory Committee (341)*
Los Penasquitos Canyon Preserve Citizens Advisory Committee (360)*
Friends of Rose Canyon (386)*
Pacific Beach Historical Society (377)*
Sunset Cliffs Natural Park Recreation Council (388)*
San Dieguito Lagoon Committee (409)*
San Dieguito River Park CAC (415)*
San Dieguito River Valley Conservancy (421)*
RVR PARC (423)*
Beeler Canyon Conservancy (436)*
Mission Trails Regional Park (465)*
Community Planners Committee (194)
Friends of Los Penasquitos Canyon Preserve, Inc., (313)*
Tijuana River National Estuarine Reserve (229)*
San Dieguito River Park (116)*
San Diego Regulatory Alert (174)*
League of Conservation Voters (322)
Citizens Coordinate for Century III (324 A)
River Valley Preservation Project (334)*
Friends of Adobe Falls (335)*
Carmel Valley Trail Riders Coalition (351)*
Carmel Mountain Conservancy (354)*
Friends of San Dieguito River Valley (419)*
Beeler Canyon Conservancy (436)*San Diego Board of Realtors (155)
San Diego Convention and Visitors Bureau (159)*
CalPIRG (154)
San Diego Baykeeper (173)
Surfrider Foundation (183)
San Diego Civic Solutions (*Canyonlands*)

School Districts

Chula Vista School District (118)*
Del Mar Union School District (119)*
Poway Unified School District (124)*
San Diego Unified School District (132)*
Solana Beach School District (129)*
South Bay Unified School District (130)*
Grossmont Union High School District (120)*
La Mesa-Spring Valley School District (121)*
Lemon Grove School District (122)*
National City School District (123)*
San Dieguito Union High School District (126)*

San Ysidro School District (127)*
Santee School District (128)*
Solana Beach School District (129)*
South Bay Unified School District (130)*
Sweetwater Union High School District (131)*
San Diego City Schools (132)
San Diego Community College District (133)
San Diego Mesa College (268)

General Plan E-mail Distribution List (All of those listed below received the public notice via e-mail.)

ACCORD (Center on Policy Initiatives, environmental interest groups, and San Diego Labor Council)
Association of Environmental Professionals (AEP)
BioCom
Bicycle Coalition representatives
Center on Policy Initiatives
Community Forest Advisory Board (90)
Community Planners Advisory Committee on Transportation (COMPACT)
Council of Design Professionals
Economic Research Associates
Industrial Environmental Association (IEA)
Kiwanis Club of Old San Diego
Manager's Parking Task Force
National Association of Industrial and Office Properties (NAIOP)
New School of Architecture & Design
Park and Recreation Board
Pedestrian Master Plan Working Group
Redevelopment Project Area Committee Chairs
San Diego Highway Development Association
San Diego Housing Federation
San Diego Organizing Project
San Diego Port Tenants Association
San Diego Regional Economic Development Corporation (EDC)
San Diego Unified Port District representatives
San Diego Workforce Partnership
Science and Technology Commission
Small Business Advisory Board
Society of American Military Engineers
Society of Architecture and Engineering
Technical Advisory Board for Development Services
Uptown Partnership (Parking Summit)
Urban Council
U.S. Green Building Council
Walk San Diego Representatives
City of San Diego Planning Department Housing Issues Interest List



THE CITY OF SAN DIEGO

September 7, 2006

Mr. Bill Anderson, Director
City Planning and Community Investment Department
202 C Street, MS 4A
San Diego, CA 92101

Subject: Scope of Work for a Program Environmental Impact Report (PEIR) for the General Plan Update (Project No. 104495)

Dear Mr. Anderson:

Pursuant to Section 15060(d) of the California Environmental Quality Act (CEQA), the Environmental Analysis Section (EAS) of the City's Development Services Department has determined that the proposed project may have significant effects on the environment, and the preparation of an Environmental Impact Report (EIR) is required. Staff has determined that a program EIR (PEIR) is the appropriate environmental document for this project because the General Plan Update can be characterized as one large project that governs the interconnected and continued planning of the entire City.

The purpose of this letter is to identify the specific issues to be addressed in the PEIR. The PEIR should be prepared in accordance with the attached "City of San Diego Technical Report and Environmental Impact Report Guidelines" (Updated May 2005). A Notice of Preparation will be distributed to the Responsible Agencies and others who may have an interest in the project. Changes or additions to the scope of work may be required as a result of input received in response to the Notice of Preparation.

The Notice of Preparation will also include an announcement of the date of a scoping meeting which will be held to allow interested parties to help define the scope of the PEIR or, in other words, comment on the issues they believe should be included within the PEIR. Scoping meetings are required by CEQA Section 21083.9 (a) (2) for projects that may have statewide, regional or area-wide environmental impacts. The City's environmental review staff has determined that this project meets this threshold. Two scoping meetings will be held by the City of San Diego Land Development Review Division. One will be held on Wednesday, September 13, 2006, from 5:30 to 7:30 pm at the Mira Mesa Library, 8405 New Salem St., San Diego, CA 92126-2398, and the other meeting will be held on Monday, September 25, 2006 from 5:30 to 7:30 pm at the Valencia Park/Malcolm X Library, 5148 Market Street, San Diego, CA, 92114.

The project that will be the subject of the PEIR is briefly described as follows:

Project Location: The General Plan Update encompasses the entire City of San Diego (Please see Figure 1).



Development Services

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

Tel (619) 446-5460

Proposed Project:

On October 22, 2002, the City Council adopted the Strategic Framework Element as an amendment to the City's 1979 *Progress Guide and General Plan*. This action initiated the comprehensive update of the 1979 Progress Guide and General Plan. The Strategic Framework Element provided a new strategy for the City's future growth and development, a basis for a new Land Use Element, and a general policy framework for updating the existing elements in the General Plan.

California requires each city and county to adopt a general plan to guide the growth and development of a community, usually over a twenty-year horizon. A general plan provides the basis for local government decision making particularly related to legislative and regulatory land use and development, serves as a vehicle for citizens to participate in planning and decision-making for the community, and establishes the ground rules, to be easily understood by everyone, regarding how and where a community can grow. The state mandates the inclusion of seven elements: land use, circulation, housing (updated every five years), conservation, open space, noise, and safety. Interrelated and of equal status, each of the elements is an integral part of the General Plan. Elements can be combined, however, and the existing thirteen elements in the 1979 *Progress Guide and General Plan* together with the Guidelines for Future Development were combined and reduced to ten: Strategic Framework and Land Use and Community Planning; Mobility; Urban Design; Economic Prosperity; Public Facilities, Services, and Safety; Recreation; Conservation; Historic Preservation; Noise; and Housing (under separate cover, and evaluated separately).

Introductory Sections

A new Strategic Framework section is proposed as an introduction to the General Plan. This section includes the Vision and Core Values adopted as a part of the Strategic Framework Element, and provides a summary of each of the ten elements of the General Plan.

Land Use and Community Planning Element

The proposed new Land Use and Community Planning Element (Land Use Element) incorporates the adopted Strategic Framework Element City of Villages strategy and provides policy direction in the areas of community planning, zoning and policy consistency, plan amendment process, coastal planning, airport land use planning, balanced communities, equitable development, environmental justice, and annexations. The element includes the General Plan Land Use and Street Systems Map, a generalized land use and streets composite map based upon adopted community plans.

The City of Villages strategy is a major component of the Land Use Element. This strategy calls for new growth to be targeted in mixed-use village centers in order to create lively activity centers, provide housing, improve walkability, help support a state-of-the-art transit system, and provide an alternative to the development of outlying areas. Combined with the citywide

policies, the strategy helps to ensure that growth and redevelopment will contribute towards long-term healthy environmental, social, and economic conditions within the city and its communities.

In addition, the Land Use Element clarifies the roles of the General Plan and community plans and their relationships. It establishes community plans as integral components of the General Plan, as the community plans provide the parcel-level detail regarding land use designations, density and intensity that is required by state law. Further, Land Use Element policies require that all projects conform to community plan policies, and that zoning is established which is consistent with the community plan.

Mobility Element

An overall goal of the Mobility Element is to further the attainment of a balanced, multi-modal transportation network that improves mobility and minimizes environmental and neighborhood impacts. The element includes a wide range of policies which advance a strategy for congestion relief and increased transportation choices in a manner that strengthens the City of Villages land use vision. The Mobility and Land Use Elements of the draft General Plan are closely linked. The Land Use Element identifies existing and planned land uses, and the Mobility Element identifies the proposed transportation network and strategies which have been designed to meet the future transportation needs generated by the land uses.

Urban Design Element

The purpose of the Urban Design Element is to establish a set of design principles from which future physical design decisions can be based. Urban design is the visual and sensory relationship between people and the built environment. The built environment includes not only buildings and streets, but also the natural environment as it is incorporated into the urban context. Urban design describes the physical features which define the character or image of a street, neighborhood, community, or the city as a whole. The Urban Design Element contains policies that are intended to be responsive to the core values and recommendations on urban form identified in the Strategic Framework Element. These include allowing the City's urban form to be defined and shaped by the natural environment, and creating diverse village centers where commercial and residential development is concentrated.

The policies continue the 1979 General Plan's emphasis on respecting San Diego's natural topography and distinctive neighborhoods, and incorporate components of the city's Transit-Oriented Development Design Guidelines. New sections are proposed on Public Art and Cultural Amenities, and Safety and Security.

Recreation Element

The Recreation Element contains policies which are intended to result in increased and enhanced public recreation opportunities and facilities throughout the City of San Diego for all users.

The Recreation Element is divided into six issue areas containing goals and policies addressing: 1) public access and recreational opportunities; 2) preservation of existing recreational facilities, and cultural, historic and open space resources; 3) accessibility of facilities and services; 4) cooperative efforts to attain parkland and facilities; 5) preservation and management of open space and resource-based parks; and 6) guidelines for the provision of park and recreation facilities.

Economic Prosperity

This draft element proposes a balanced approach to economic prosperity through both economic diversity and protection of industries which contribute the most to the local economy. It emphasizes the importance of maintaining a diversity of industries in creating a stable economy but focuses on the manufacturing, research and development, and support functions since they are base-sector industries which also produce needed middle-income employment. Base sector industries bring new wealth to the area by exporting goods and intellectual property. In San Diego, the economic base is primarily composed of industries in the manufacturing, visitor industries, and national security and international relations sectors or subsectors. Manufacturing, research and development, technology services, and support uses are the key to providing middle-income employment.

Conservation Element

The Conservation Element focuses on conserving natural resources; protecting unique landforms; preserving and managing open space systems, beaches and watercourses; preventing and reducing pollution; and ensuring preservation of quality of life in San Diego. A wide range of policies are proposed in the General Plan update to help guide development and provide a conservation "blueprint" so that San Diego's environmental quality and natural resources are preserved, maintained, improved and can be sustained for current and future generations. Many of the policies described in the element are already being implemented throughout the city, via specific programs and plans administered by various city departments, such as the Storm Water Pollution Prevention Program, the Sustainable Communities Program, and the Multiple Species Conservation Program (MSCP). The General Plan provides the broad overall context to view the purpose and interrelationships of these and additional programs, and to establish citywide goals for conservation of resources that will be refined based on individual community's conservation goals.

Historic Preservation Element

The purpose of the Historic Preservation Element is to guide the preservation, protection and restoration of historical and cultural resources so that a clear sense of how the city gained its present form and substance can be maintained. Preservation of important historical resources enhances the quality of life in San Diego. It improves the quality of the built environment,

encourages appreciation for the city's history and culture, maintains the character and identity of communities, and contributes to the city's economic vitality. Related policies addressing cultural heritage tourism are included in the Economic Prosperity Element.

Noise Element

The Noise Element provides goals and policies to guide compatible land uses and the incorporation of noise abatement measures for new uses to protect people living and working in the city of San Diego from an excessive noise environment. This purpose becomes more relevant as the city continues to grow with infill, mixed use, and transit-oriented development. Recent revisions to the element include expanded Land Use - Noise Compatibility Guidelines that use a matrix to identify compatible, conditionally compatible, and incompatible land uses by noise decibel level.

Public Facilities, Service and Safety Element

The need to improve existing infrastructure deficiencies in San Diego's older urbanized communities is one of the most pressing and persistent issues faced by the city of San Diego. The city must also ensure that adequate facilities and levels of service are maintained over time throughout the city, and that new growth pays its fair share of costs. The Public Facilities, Service and Safety Element provides a public facilities financing approach oriented to infill development that was not included in the 1979 General Plan.

Facilities and services addressed include: Fire-Rescue, Police, Wastewater, Storm Water, Water Infrastructure, Waste Management, Libraries, Schools, Information Infrastructure, Disaster Preparedness, and Seismic Safety. The policies within the PFSSE also apply to transportation and park and recreation facilities and services, with additional guidance found in other elements. In addition, policies calling for greater collaboration with providers of Public Utilities, Regional Facilities, and Healthcare Facilities are included in this element, as they too affect land uses and overall quality of life.

The proposed sections of the draft General Plan Update can be found at the following web site: <http://www.sandiego.gov/planning/genplan/index.shtml>

Discretionary Approvals: The proposed project would require City Council approval.

I. PEIR Requirements

Each section and discussion area of the PEIR must provide a descriptive analysis of the project followed by an objective and comprehensive evaluation. The Draft PEIR must also include sufficient graphics and tables to provide a complete description. Please refer to the "Environmental Impact Report Guidelines," Updated May 2005, for additional details regarding the required information.

A. Introduction:

Introduce the project with a brief discussion of the intended use and purpose of the PEIR. Briefly describe the project and the necessity for any subsequent discretionary City actions/permits and any other local, state and/or federal approvals. Discuss how the PEIR may be used as the basis for subsequent approvals and/or environmental documents. Describe the parameters for the future use of the PEIR.

B. Environmental Setting:

Describe the physical features of the City and the regional setting. The intensification of land uses could increase the demand on existing and planned public services and facilities. Discuss the project's effect on the need for public facilities. Discuss the Fire Department's six-minute response time for fire crews and equipment, and the eight-minute emergency services response time, and the Police Department's goal of a seven-minute response time for priority calls.

C. Project Description:

Discuss the characteristics, goals, and objectives of the General Plan Update. Explain how the public would benefit from the project. Discuss how the GPU will address the provision of affordable housing. Describe the discretionary action(s) involved in the project. List and explain the requirements for approvals from federal, state, and local agencies.

D. History of Project Changes:

Chronicle the changes that have been made to the project in response to environmental concerns raised during the development of the plan, including any input received from the Planning Commission and Council committees.

II. Environmental Issues

The draft PEIR must include a complete discussion of the existing conditions, impact analysis, significance, and mitigation for all the environmental issue sections. The PEIR must represent the independent analysis of the Lead Agency. All impact analyses must be based on the City's current "Significance Determination Thresholds." Any technical reports must be included in the appendices to the PEIR and summarized in the text of the document. The GPU does not propose any land use designation changes; however, it is understood that subsequent actions may do so, and may result in significant environmental impacts. While it is likely that some of the impacts may be fully or partially mitigated, at the GPU level of review the potential future impacts are considered not fully mitigated.

Land Use

Issue 1: Would implementation of the GPU conflict with any adopted environmental plans, including applicable habitat conservation plans?

Issue 2: Would the implementation of the GPU conflict with adopted community plans, land use designations or any other applicable land use plans, policies or regulations of State or Federal agencies with jurisdiction over the City? Would the implementation of the GPU require the amendments to community plans?

Issue 3: Would the implementation of the GPU be consistent with the density calculations, design standards, use restrictions and any other development regulations of the City's Land Development Code related to the applicable zoning regulations?

Issue 4: Would the implementation of the GPU result in land uses that are not compatible with any applicable Airport Land Use Plans?

Discuss how the implementation of the GPU would directly or indirectly affect the City's community plans, and all other applicable environmental, and land development regulations. If there are potential impacts, describe whether or not these potential impacts would lead to physical effects.

Transportation/Traffic Circulation/Parking

Issue 1: What direct and/or cumulative traffic impacts would the GPU have on existing and planned community, and regional circulation networks?

Issue 2: Would implementation of the GPU result in any alterations to existing circulation?

Issue 3: Would implementation of the GPU impact the availability of parking?

Issue 4: Would the implementation of the GPU encourage the provision of alternative modes of travel?

Describe in this section any envisioned modifications and/or improvements to the existing circulation system, including City streets, intersections, freeways and interchanges. Discuss any potential traffic impacts within individual community plan areas. Describe whether or not the GPU would result in a substantial increase in trips associated with build-out. If applicable, describe what measures the GPU would include to mitigate significant traffic circulation impacts, and/or parking shortages. Discuss how potential change in uses would affect overall traffic patterns and congestion. Address cumulative traffic impacts including any regional impacts. Describe how alternative modes of travel would be addressed.

Visual Effects and Neighborhood Character

Issue 1: Would the implementation of the GPU result in a substantial change in the topography or ground surface relief features of any areas of the City?

Issue 2: Would the implementation of the GPU result in the blockage of public views from designated open space areas, roads, or to any significant visual landmarks or scenic vistas?

Issue 3: Would the implementation of the GPU affect the existing visual character of the City or community plan areas, particularly with respect to views from major roadways and public viewing areas?

Issue 4: Would implementation of the GPU result in projects with a bulk, scale, materials, or style that would be incompatible with the surrounding development or community?

Issue 5: Would the implementation of the GPU result in projects that would substantially alter the existing character of existing individual communities and/or the City?

Issue 6: Would the implementation of the GPU result in projects with negative aesthetics?

Issue 7: Would the implementation of the GPU result in projects that would substantially shade other properties or produce substantial amounts of light and glare?

This section should evaluate whether or not the GPU would result in a potential change in the visual environment. Address any potential visual impacts from public vantage points.

Describe how the neighborhood character and community-specific guidelines of the City's communities would be affected by the implementation of the General Plan Update. Would the project result in a homogenous style of architecture over the City or would varied architectural designs be encouraged?

Air Quality

Issue 1: Would implementation of the GPU result in an increased number of automobile trips which could potentially affect San Diego's ability to meet regional, state and federal clean air standards?

Issue 2: Would implementation of the GPU result in air emissions that would substantially deteriorate ambient air quality, including the exposure of sensitive receptors to substantial pollutant concentrations?

Discuss whether or not the GPU would result in an increase in the number of automobile trips within the City. An increase in auto emissions has the potential to affect air quality. Describe the climatological setting within the San Diego Air Basin and the basin's current attainment levels for State and Federal Ambient Air Quality Standards. Discuss short- and long-term and cumulative impacts on regional air quality, including construction and transportation-related sources of air pollutants. Discuss the impacts from any increase in trips to the Regional Air Quality Standards, and the overall air quality impacts from such trips, and any proposed mitigation measures. Discuss whether or not the implementation of the GPU would result in a significant decrease in the levels of service of any roadway or intersection and the resulting degradation of air quality.

Noise

Issue 1: Would the implementation of the GPU subject residential, recreational-use areas or other sensitive receptors to future traffic noise levels which would exceed the standards established in the Transportation Element of the General Plan?

Issue 2: Would the implementation of the GPU result in exposure of sensitive receptors to future noise levels which exceed those established in the adopted Airport Comprehensive Land Use Plans?

Issue 3: Would the implementation of the GPU be consistent with the City's adopted noise ordinance (Municipal Code) and Significance Thresholds for noise or would incompatible uses be sited adjacent to one another?

Issue 4: Would the implementation of the GPU result in a significant increase in the existing ambient noise levels?

The GPU proposes a change in the Land Use Compatibility Chart. Describe the potential environmental effects of this change. If a significant increase in existing ambient noise levels would be anticipated describe the appropriate mitigation.

Biological Resources

Issue 1: Would the implementation of the GPU result in the reduction in the number of any unique, rare, endangered, sensitive, or fully protected species of plants or animals?

Issue 2: Would the implementation of the GPU result in impacts to important habitat or result in interference with the movements of resident or migratory fish or wildlife species?

Issue 3: Would the implementation of the GPU affect the long-term conservation of biological resources? Would the GPU impact the Multi-Habitat Planning Area (MHPA)?

Issue 4: Would the revised Land Use Compatibility Chart result in noise impacts on sensitive species?

Discuss how any proposed land use changes within the GPU would impact the City's biological conservation goals either directly or indirectly. Describe how the Conservation Element would affect those goals.

Health and Safety

Issue 1: Are any land use changes proposed by the GPU that would result in the exposure of people/sensitive receptors to potential health hazards (i.e. exposing sensitive receptors to hazardous materials in Industrial areas)?

Describe whether or not the implementation of any proposed land uses or other changes would result in the increased or decreased exposure of sensitive receptors to hazardous materials.

Historical Resources

Issue 1: Would the implementation of the GPU adversely affect prehistoric or historic archaeological sites?

Issue 2: Would the implementation of the GPU result in adverse physical or aesthetic effects to prehistoric or historic buildings, structures, objects, or sites?

Issue 3: Would the implementation of the GPU result in adverse physical or aesthetic effects to architecturally significant buildings, structures, or objects?

Issue 4: Would the implementation of the GPU result in impacts to existing religious or sacred uses within the City or the disturbance of any human remains, including those interred outside formal cemeteries?

Describe whether or not the implementation of the GPU would negatively affect the preservation of archaeological or historical resources. While the GPU contains elements that would encourage preservation other GPU elements have different goals. Explain how competing goals would be resolved.

Hydrology

Issue 1: Would the implementation of the GPU result in an increase in impervious surfaces, increased runoff, and substantial alteration to existing drainage patterns?

Address any anticipated changes to existing drainage patterns and runoff volumes that may result with the implementation of the GPU.

Geologic Conditions

Issue 1: Would the implementation of the GPU result in the exposure of people or property to geologic hazards such as earthquakes, landslides, mudslide, ground failure, or similar hazards?

Issue 2: Would the implementation of the GPU result in a substantial increase in wind or water erosion of soils, either on or off the site?

The PEIR should include a discussion of the potential to aggravate or intensify the wind and water erosion or expose people or property to geologic hazards.

Paleontological Resources

Issue 1: Would the implementation of the GPU result in the loss of paleontological resources?

The PEIR should include a discussion of the potential for loss of sensitive paleontological resources in conjunction with the implementation of the GPU.

Public Services and Facilities

Issue 1: Would the implementation of the GPU result in the provision of additional public facilities? If so, would the construction of these public facilities cause significant environmental impacts?

Discuss whether or not the construction of public facilities would result in significant environmental impacts.

Public Utilities

Issue 1: Would the implementation of the GPU result in the need for new or expanded public facilities including those necessary for water, sewer, storm drains, solid waste disposal, and the provision of energy? If so, would the construction of these facilities cause significant environmental impacts?

Issue 2: Would the implementation of the GPU result in the use of excessive amounts of electrical power, fuel or other forms of energy?

Issue 3: Would the implementation of the GPU result in the use of excessive amounts of water?

Describe any measures/policies of the GPU which could potentially reduce the use of energy and water. Present measures included as part of the project or proposed as mitigation measures directed at conserving energy and reducing energy consumption consistent. Ensure this section addresses all

issues described within Appendix F of CEQA.

In the Existing Conditions section of this issue area, address water supply availability consistent with Senate Bill 610/221.

Discuss how the implementation of the GPU would affect the City's ability to handle solid waste. According to Assembly Bill 939, the City of San Diego is required to divert at least 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting by 2000.

Water Quality

Issue 1: Would the implementation of the GPU increase the amount of impervious surface in the City? Would the implementation of the GPU result in substantial alteration of on and offsite drainage patterns affecting the rate and volume of surface runoff within the City?

Issue 2: Would the implementation of the GPU result in an increase in pollutant discharge to receiving waters and increase discharge of identified pollutants to an already impaired water body?

Issue 3: How would the implementation of the GPU impact local and regional water quality?

Discuss whether or not the implementation of the GPU would have any potential impacts on regional and local water quality.

Agricultural Resources

Issue 1: Would the implementation of the GPU result in the conversion of agricultural lands to nonagricultural use or impair the agricultural productivity of agricultural lands?

Discuss whether or not the implementation of the GPU would result in the conversion of substantial amounts of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.

Mineral Resources

Issue 1: Would the project result in the loss of significant mineral resources (e.g. sand and gravel) that would be of value to the region and residents of the state?

The PEIR should explain to what extent implementation of the GPU could result in the loss of availability of mineral resources and state whether a cumulative impact would result.

Growth Inducement

Issue 1: Would the implementation of the GPU foster economic or population growth, or the construction of additional housing either directly or indirectly?

Address the potential for growth inducement through implementation of the GPU. Accelerated growth could further strain existing community facilities or encourage activities that could significantly affect the environment. It must not be assumed that growth is necessarily beneficial, detrimental or of little significance to the environment.

Cumulative Impacts

Issue 1: What are the cumulative impacts of this project?

Implementation of the GPU could result in significant environmental changes, which are individually limited but cumulatively considerable. Therefore, in accordance with Section 15130 of the CEQA Guidelines, potential cumulative impacts must be discussed in a separate section of the PEIR.

Other

In conformance with CEQA Section 15126.2(b) and (c), discuss the significant environmental effects which cannot be avoided if the GPU is implemented; and the significant irreversible changes that would result from the implementation of the GPU.

New Information/Project Amendments

If the project description changes, and/or supplementary information becomes available, the PEIR may need to be expanded to include additional issue areas. This must be determined in consultation with EAS staff.

Alternatives:

The PEIR must place major attention on reasonable feasible alternatives that avoid or mitigate the project's significant impacts. These alternatives should be identified and discussed in detail and should address all significant impacts. The alternatives analysis should be conducted in sufficient graphic and/or narrative detail to clearly assess the relative level of impacts and feasibility. See Section 15364 of the CEQA Guidelines for the CEQA definition of "feasible."

Preceding the detailed alternatives analysis, provide a section entitled "Alternatives Considered but Rejected." This section should include a discussion of preliminary alternatives that were considered but not analyzed in detail. The reasons for rejection must be explained in detail and demonstrate to the public the analytical route followed in rejecting certain alternatives.

The following alternatives must be considered for evaluation in the draft PEIR:

- A. No Project:** This alternative should describe a scenario that would continue the utilization of the existing 1979 General Plan, the Strategic Framework Element (as adopted by City Council without increased density), and community plans to guide future development in the City for the next 20-30 years.
- B. City of Villages Growth:** This alternative should evaluate the impacts of adding 17,000 to 37,000 multifamily dwelling units forecasted for the year 2030 for the City into the General Plan Update (as evaluated in the 2002 Strategic Framework Final EIR) in areas that have a propensity to develop village characteristics.
- C. General-Citywide Growth:** This alternative should evaluate the impacts of adding 17,000 to 37,000 multifamily dwelling units forecasted for the year 2030 for the City into the General Plan Update, similar to the City of Villages Growth Alternative, but the anticipated

growth would be spread equally throughout every community in the City resulting in smaller villages.

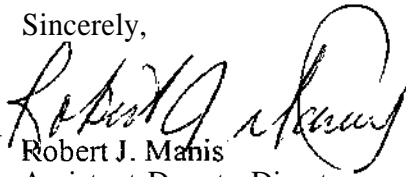
D. No Prime Industrial Lands: This alternative should describe a scenario that would not designate any lands within the City of San Diego as "prime industrial" lands.

E. No Reduction in Noise Standards: This alternative should describe the implementation of the proposed GPU without either of the proposed General Plan policies which would allow up to 70 dBA within the Airport Influence Area and 75 dBA elsewhere for multiple-family residences.

If through the environmental analysis process, other alternatives become apparent which would mitigate potentially significant impacts these alternatives must be discussed with EAS staff prior to including them in the PEIR. Note that the final formulation of alternatives may not conclude until late in the process, after staff has determined which project impacts are significant. It is important to emphasize that the alternatives section of the PEER should constitute a major part of the report. The timely processing of the environmental review will likely be dependent on the thoroughness of effort exhibited in the alternatives analysis.

Until a screen check PEIR is submitted which addresses all of the above issues, the environmental processing timeline for this project will be held in abeyance. If you have any questions or need clarification regarding the content of this letter, please contact Marilyn Mirrasoul, Associate Planner at (619) 446-5380.

Sincerely,

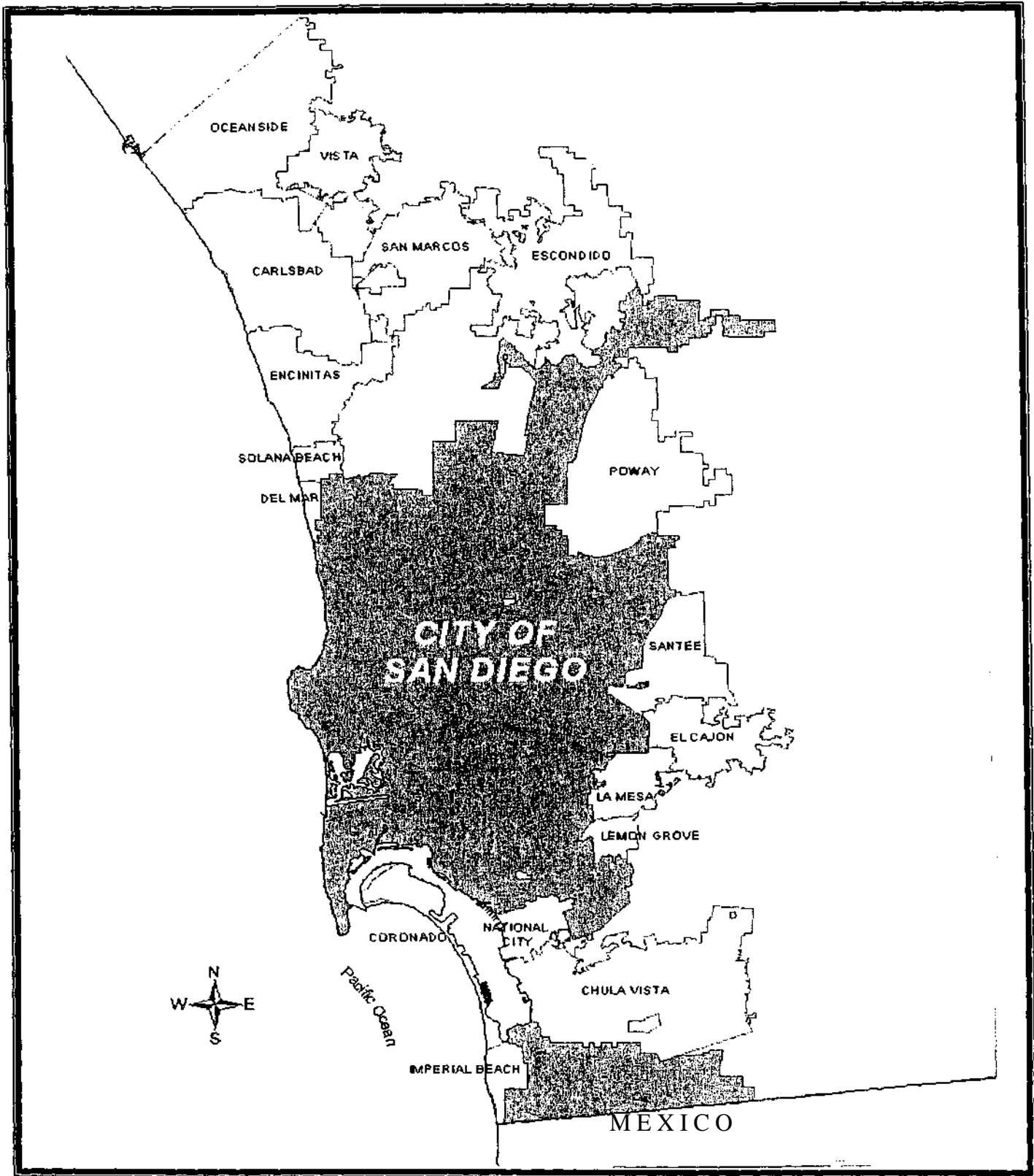


Robert J. Manis
Assistant Deputy Director
Development Services Department

RM/mm

Attachments: Figure 1, Location Map

cc: Nancy Bragado, General Plan Update Program Manager
Randy Rodriguez, EIR Project Manager
Eileen Lower, Senior Planner
Marilyn Mirrasoul, Associate Planner
EAS File
EAS Seniors



Location Map - General Plan Update
 Environmental Analysis Section Project No. 104495
 CITY OF SAN DIEGO • DEVELOPMENT SERVICES

Figure
1



Arnold Schwarzenegger
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Sean Walsh
Director

Notice of Preparation

September 8, 2006

To: Reviewing Agencies

Re: General Plan Update
SCH# 2006091032

Attached for your review and comment is the Notice of Preparation (NOP) for the General Plan Update draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Marilyn Mirrasoul
City of San Diego
1222 First Avenue
San Diego, CA 92101-4135

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Project Analyst, State Clearinghouse

Attachments
cc: Lead Agency

**DocumentDetailsReport
State Clearinghouse Data Base**

SCH# 2006091032
Project Title General Plan Update
Lead Agency San Diego, City of

Type **NOP** Notice of Preparation

Description The City of San Diego General Plan Update is proposed to replace the existing 1979 Progress Guide and General Plan. The General Plan sets out a long-range, comprehensive framework for how the city will grow and develop, provide public services, and maintain the qualities that define San Diego over the next 20-30 years. The proposed update has been guided by the City of Villages growth strategy and citywide policy direction contained within the General Plan Strategic Framework Element (adopted by the City Council on October 22, 2002) and would consolidate the existing thirteen elements in the 1979 General Plan into the following ten elements: Land Use and Community Planning; Mobility; Urban Design; Public Facilities, Services and Safety; Economic Prosperity; Recreation; Conservation; Historic Preservation; Noise and Housing (under separate cover).

Lead Agency Contact

Name Marilyn Mirrasoul
Agency City of San Diego
Phone (619) 446-5380 **Fax**
email
Address 1222 First Avenue
City San Diego **State** CA **Zip** 92101-4135

Project Location

County San Diego
City San Diego
Region
Cross Streets
Parcel No.
Township **Range** **Section** **Base**

Proximity to:

Highways
Airports
Railways
Waterways
Schools
Land Use

Project Issues

Reviewing Agencies Resources Agency; Regional Water Quality Control Board, Region 9; Department of Parks and Recreation; Native American Heritage Commission; Department of Housing and Community Development; Office of Historic Preservation; Department of Fish and Game, Region 5; Department of Water Resources; California Coastal Commission; California Highway Patrol; Caltrans, District 11; Caltrans, Division of Aeronautics; Air Resources Board, Airport Projects

Date Received 09/08/2006 **Start of Review** 09/08/2006 **End of Review** 10/10/2006

MOP Distribution List

County: San Diego

SCH#

0000091032

Resources Agency

- Resources Agency
Nadell Gayou
- Dept. of Boating & Waterways
David Johnson
- California Coastal Commission
Elizabeth A. Fuchs
- Colorado River Board
Gerald R. Zimmerman
- Dept. of Conservation
Roseanne Taylor
- California Energy Commission
Paul Richins
- Dept. of Forestry & Fire Protection
Allen Robertson
- Office of Historic Preservation
Wayne Donaldson
- Dept of Parks & Recreation
Environmental Stewardship Section
- Reclamation Board
DeeDee Jones
- S.F. Bay Conservation & Dev't. Comm.
Steve McAdam
- Dept. of Water Resources
Resources Agency
Nadell Gayou
- Conservancy

- Fish & Game Region 3
Robert Floerke
- Fish & Game Region 4
Julie Vance
- Fish & Game Region 5
Don Chadwick
Habitat Conservation Program
- Fish & Game Region 6
Gabrina Gatchel
Habitat Conservation Program
- Fish & Game Region 6 I/M
Tammy Allen
Inyo/Mono, Habitat Conservation Program
- Dept. of Fish & Game M
George Isaac
Marine Region

Other Departments

- Food & Agriculture
Steve Shaffer
Dept. of Food and Agriculture
- Dept. of General Services
Public School Construction
- Dept. of General Services
Robert Sleppy
Environmental Services Section
- Dept. of Health Services
Veronica Malloy
Dept. of Health/Drinking Water

Independent Commissions, Boards

- Delta Protection Commission
Debby Eddy
- Office of Emergency Services
Dennis Castrillo
- Governor's Office of Planning & Research
State Clearinghouse
- Native American Heritage Comm.
Debbie Treadway

Fish and Game

- Dept. of Fish & Game
Scott Flint
Environmental Services Division
- Fish & Game Region 1
Donald Koch
- Fish & Game Region 2
Banky Curtis

- Public Utilities Commission
Ken Lewis
- State Lands Commission
Jean Sarino
- Tahoe Regional Planning Agency (TRPA)
Cherry Jacques

Business, Trans & Housing

- Caltrans - Division of Aeronautics
Sandy Hesnard
- Caltrans - Planning
Terri Pencovic
- California Highway Patrol
Shirley Kelly
Office of Special Projects
- Housing & Community Development
Lisa Nichols
Housing Policy Division

Dept. of Transportation

- Caltrans, District 1
Rex Jackman
- Caltrans, District 2
Marcelino Gonzalez
- Caltrans, District 3
Jeff Pulverman
- Caltrans, District 4
Tim Sable
- Caltrans, District 5
David Murray
- Caltrans, District 6
Marc Bimbaum
- Caltrans, District 7
Cheryl J. Powell

- Caltrans, District 8
Dan Kopulsky
- Caltrans, District 9
Gayle Rosander
- Caltrans, District 10
Tom Dumas
- Caltrans, District 11
Mario Orso
- Caltrans, District 12
Bob Joseph

Cal EPA

Air Resources Board

- Airport Projects
Jim Lerner
- Transportation Projects
Ravi Ramalingam
- Industrial Projects
Mike Tollstrup

- California Integrated Waste Management Board
Sue O'Leary

- State Water Resources Control Board
Jim Hockenberry
Division of Financial Assistance

- State Water Resources Control Board
Student Intern, 401 Water Quality Certification Unit
Division of Water Quality

- State Water Resources Control Board
Steven Herrera
Division of Water Rights

- Dept. of Toxic Substances Control
CEQA Tracking Center

- Department of Pesticide Regulation

Regional Water Quality Control Board (RWQCB)

- RWQCB 1
Cathleen Hudson
North Coast Region (1)
- RWQCB 2
Environmental Document Coordinator
San Francisco Bay Region (2)
- RWQCB 3
Central Coast Region (3)
- RWQCB 4
Teresa Rodgers
Los Angeles Region (4)
- RWQCB 5S
Central Valley Region (5)
- RWQCB 5F
Central Valley Region (5)
Fresno Branch Office
- RWQCB 5R
Central Valley Region (5)
Redding Branch Office
- RWQCB 6
Lahontan Region (6)
- RWQCB 6V
Lahontan Region (6)
Victorville Branch Office
- RWQCB 7
Colorado River Basin Region (7)
- RWQCB 8
Santa Ana Region (8)
- RWQCB 9
San Diego Region (9)

a Other _____

**DEPARTMENT OF FISH AND GAME**<http://www.dfg.ca.gov>

4949 Viewridge Avenue

San Diego, CA 92123

(858) 467-4201



October 10, 2006

Ms. Marilyn Mirrasoul
City of San Diego Development Services Center
1222 First Avenue, Mail Station 501
San Diego, California 92101

**Notice of Preparation of a Draft Program Environmental Impact Report
for the City of San Diego General Plan Update (SCH # 2006091032)**

Dear Ms. Mirrasoul:

The California Department of Fish and Game (Department) has reviewed the above-referenced Notice of Preparation (NOP) of a Draft Program Environmental Impact Report (DPEIR) for the City of San Diego General Plan Update. The City of San Diego has an approved Subarea Plan and Implementing Agreement under the Natural Community Conservation Planning program. The DPEIR for the proposed project must ensure and verify that all requirements and conditions of the Subarea Plan and Implementing Agreement are met. The DPEIR should also address biological issues that are not addressed in the Subarea Plan and Implementing Agreement, such as specific impacts to and mitigation requirements for wetlands or sensitive species and habitats that are not covered by the Subarea Plan and Implementing Agreement.

Issue areas in the DEIR that may be influenced by the Subarea Plan and Implementing Agreement include "Land Use," "Landform Alteration/Visual Quality," "Traffic/Circulation," "Biological Resources," "Drainage/Urban Runoff/Water Quality," "Noise," and "Cumulative Effects." In addition, the environmental document should describe why the proposed project, irrespective of other alternatives to the project, is consistent with and appropriate in the context of the Subarea Plan.

Thank you for the opportunity to comment. Questions regarding this letter and further coordination on these issues should be directed to Pam Beare at pbeare@dfg.ca.gov or (858) 467-4229.

Sincerely,

A handwritten signature in black ink, appearing to read "Elizabeth Lucas".

Michael J. Mulligan
Deputy Regional Manager

cc: State Clearinghouse

PB:pb
CityofSDGeneralPlanUpdateNOPshort.doc

PUBLIC UTILITIES COMMISSION

320 WEST 4TH STREET, SUITE 500
LOS ANGELES, CA 90013



October 2, 2006

Marilyn Mirrasoul
City of San Diego
1222 First Ave
San Diego, CA 92101-4135

Dear Ms. Mirrasoul:

Re: SCH# 2006091032; General Plan Update

As the state agency responsible for rail safety within California, we recommend that any development projects planned adjacent to or near the North County Transit District right-of-way be planned with the safety of the rail corridor in mind. New developments may increase traffic volumes not only on streets and at intersections, but also at at-grade highway-rail crossings. This includes considering pedestrian circulation patterns/destinations with respect to railroad right-of-way.

Safety factors to consider include, but are not limited to, the planning for grade separations for major thoroughfares, improvements to existing at-grade highway-rail crossings due to increase in traffic volumes and appropriate fencing to limit the access of trespassers onto the railroad right-of-way.

The above-mentioned safety improvements should be considered when approval is sought for the new development. Working with Commission staff early in the conceptual design phase will help improve the safety to motorists and pedestrians.

Please advise us on the status of the project. If you have any questions in this matter, please contact me at (213) 576-7078 or at rxm@cpuc.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Rosa Muñoz".

Rosa Muñoz, PE
Utilities Engineer
Rail Crossings Engineering Section
Consumer Protection & Safety Division

C: Richard Walker, NCTD
John Shurson, BNSF Railway Company

DEPARTMENT OF TRANSPORTATION

District 11 • 4050 Taylor Street • M.S. 240
San Diego, CA 92110
PHONE (619) 688-6954
FAX (619) 688-4299



*Flex your power!
Be energy efficient!*

October 10, 2006

**11-SD-var.
PM var.**

Ms. Marilyn Mirrasoul
City of San Diego - Planning Dept.
1222 First Avenue, MS-501
San Diego, CA 92101-4135

RE: General Plan Update - NOP (Project # 104495, SCH 2006091032)

To Ms. Mirrasoul:

The California Department of Transportation (Caltrans) appreciates the opportunity to review the Notice of Preparation (NOP) of a Draft Environmental Impact Report (EIR) for the City of San Diego's General Plan update. We have the following comments.

Over the last few years, Caltrans has provided significant input into the General Plan's Strategic Framework Element. Caltrans supports the "City of Villages" concept which includes compact, mixed-use centers designed at a human (pedestrian) scale which enable residents and visitors to achieve a high level of mobility. Within a context of good urban design and "smart growth" principles, a "City of Villages" can help to increase mobility by providing functional alternatives to the automobile. For example, balancing housing and employment at a community scale enables residents to live and work in the same area, potentially decreasing demand on inter-regional transportation facilities. Another feature of "smart" development is the placement of buildings oriented to a street or transit stop instead of to a parking lot, in order to further encourage walkability. Linking Villages with a network of interconnected trails, bicycle paths, and/or transit routes allows residents to walk or ride to a variety of destinations instead of requiring use of an automobile for every trip.

While recognizing that topographic constraints may preclude a strict grid street network, **arterials** which are routed parallel to freeways and highways can provide an alternative to using the interregional facility, thereby helping to alleviate congestion on State facilities. A street system with minimal **interconnectedness** - where drivers are siphoned from local streets to collector streets to major streets and arterials - concentrates traffic leaving few choices to drivers. An interconnected grid street system offers the traveler multiple paths to reach any destination thereby alleviating potential congestion by providing alternative routes.

In the same manner, an interconnected, continuous trail network can help to increase mobility while having a positive effect on residents' "quality of life" by providing convenient and safe

Ms. Marilyn Mirrasoul
October 10, 2006
Page 2

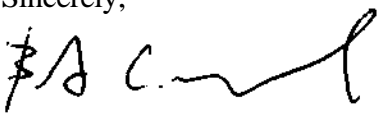
recreational opportunities as well as commuting routes. Paths, **greenways**, and other passive recreational uses such as linear parks are an appropriate fit along local rivers, creeks, and canyons, provided they are constructed in an environmentally conscientious manner. Continuity and connectivity across **jurisdictional** boundaries are important considerations that may necessitate additional coordination with adjoining jurisdictions (i.e.: San Diego County and adjoining Cities).

In accordance with the Strategic Framework, Caltrans encourages the City of San Diego to implement redevelopment activities which serve to target growth into existing areas (Villages) which can be more readily served by infrastructure improvements. However, there are impacts associated with growth which must be mitigated. While Caltrans is supportive of providing transportation choices via alternative modes, vehicular traffic will continue to be the predominant mode in the City for the immediately foreseeable future. Land use intensity changes have the potential to impact freeway segments as well as freeway on- and off-ramps / interchanges. Caltrans recommends the City work cooperatively with Caltrans and other local and regional agencies (e.g., SANDAG) in addressing and mitigating these impacts.

Caltrans endeavors that any direct impacts to the State Highway System be eliminated or reduced to a level of insignificance pursuant to CEQA standards. Mitigation measures must be included in a traffic impact analysis and environmental studies for the Draft EIR. Cumulative impacts must also be considered. A cumulative impact is the sum of the impacts of existing conditions, other projects, and the project itself. There is no minimum size limitation on projects which may be required to mitigate for cumulative impacts if contributing to a traffic problem in any amount. Caltrans supports the concept of "fair share" contributions to mitigate for direct or cumulative traffic impacts created by proposed development, including infill or redevelopment. Potential improvements may include - but not be limited to - transit improvements, future interchange projects, widening ramps, ramp metering, ramp signals, **and/or** freeway lane additions (e.g., auxiliary lanes).

Caltrans looks forward to continued cooperation with the City of San Diego on coordinating transportation and land use. For questions regarding the Department's comments, please contact Brent C. McDonald at (619) 688-6819.

Sincerely,


A= AL COX, Acting Chief
Development Review Branch



County of San Diego

GARY L. PRYOR
DIRECTOR

DEPARTMENT OF PLANNING AND LAND USE

5201 RUFFIN ROAD, SUITE B, SAN DIEGO, CALIFORNIA 92123-1666
INFORMATION (858) 694-2960
TOLL FREE (800) 411-0017

SAN MARCOS OFFICE
151 E Carmel
SAN MARCOS, CA 92078
(760) 471-0730

EL CAJON OFFICE
200 EAST MAIN ST. . SIXTH FLOOR
EL CAJON, CA 92020-3912
(619) 441-4030

November 3, 2006

Ms. Marilyn Mirrasoul
City of San Diego Development Services Center
1222 First Avenue, MS 501
San Diego, CA 92101

Dear Ms. Mirrasoul,

The County of San Diego (County) has received and reviewed the Notice of Preparation for the Program Environmental Impact Report (PEIR) dated September 7, 2006 for the City of San Diego General Plan Update (GPU) and appreciates this opportunity to comment. In response to the NOP, the County has identified environmental issues that may have a significant effect on the unincorporated lands of San Diego County. The PEIR should present thorough analysis and explore reasonable alternatives and mitigation measures.

The County is the land use authority for the unincorporated area of San Diego and our public constituency looks to us to guide reasonable and environmentally sensitive development in our jurisdiction. Staff from the Department of Planning and Land Use (DPLU) and the Department of Public Works have reviewed the NOP and have identified certain issues that should be analyzed in the PEIR.

COMMENTS:

1. Please clearly identify whether the GPU Program EIR will be used to approve subsequent development without further CEQA review. The County requests that PEIR identify "covered" projects near the County's jurisdictional boundary and, in that case, that the PEIR include appropriate project-level analysis.
2. The GPU has the potential to influence growth in the unincorporated communities of Rancho Santa Fe, Fairbanks Ranch, 4S Ranch, Bonita, La Presa, and East Otay Mesa. The County requests that a thorough analysis of growth induction be done and that resulting land use impacts that affect the unincorporated portion of the County be clearly identified. These impacts would require evaluation of compatibility and consistency with the County's General Plan and draft General Plan 2020.
3. The land use impacts resulting from GPU-proposed annexations of the Davis Ranch and Mount Hope Cemetery should be analyzed in detail to determine their impacts on

the unincorporated County land. In addition any other annexations of unincorporated land by the City of San Diego should also be subject to the same level of detailed analysis. If proposed annexations result in significant unmitigable impacts to emergency services (fire, sheriff, and ambulance), local community character (urban sprawl), traffic, or the County's ability to govern, they should not be pursued.

4. It is a County priority to maintain the recreational values of the Los Penasquitos Canyon Preserve, San Dieguito River Park, Otay Valley Regional Park, Tijuana River Valley Regional Park, Sycamore Canyon/Goodan Ranch Preserve and Sweetwater Regional Park. The PEIR should analyze all potential impacts and identify appropriate mitigation, especially where the GPU results in growth proximal to these parks.
5. Please note that planned development adjacent to preserved lands in the existing South County of San Diego Multiple Species Conservation Program (MSCP) Subarea and adjacent to proposed Pre-approved Mitigation Areas (PAMA) in the draft North County MSCP Plan area should follow the guidelines outlined in Section 1.10 (Land Uses Adjacent to the Preserve) of the adopted South County MSCP Subarea Plan (October 22, 1997).
6. The PEIR should analyze if there are conflicts with the County Trails Master Plan and Program. Regional trail as well as community trails should be connected with the City's trail system for maximum public benefit.
7. The County requests that the PEIR include a thorough analysis of the GPU's regional effects including air and water quality impacts, including a determination whether impacts will result in cumulatively considerable or significant impacts in our jurisdiction.
8. The PEIR should evaluate compliance with the San Diego National Pollution Discharge Elimination System (NPDES) Permit Number (CAS0108758) and the potential impacts on the Watershed Urban Runoff Management Programs jointly administered by the City the County and other regional co-permittees.
9. The NOP only provides a general project description. Coordination with County staff is recommended as each portion of the General Plan update is developed. Continuity and consistency between the City's and County's General Plans are recommended.
10. On August 2, 2006 the Board of Supervisors endorsed the General Plan 2020 road network recommendations. The PEIR should discuss the GP 2020 recommendations and assess what potential impacts the City's proposed Circulation Element Plan may have on the County's proposed General Plan.
11. City and County staff have initiated coordination efforts for the City's Otay Mesa Community Plan Update and the County's East Otay Mesa (EOM) Specific Plan Update. City and County staff should continue to coordinate in developing a consistent traffic model database that can be used in the long-range traffic assessments for both the City and County plan updates. County staff has provided the City with land use and roadway network database information from the County's General Plan 2020 Update for their

Otay Mesa Plan Update. County staff could provide similar GP 2020 data/information for the City's General Plan Update analysis.

12. The PEIR should provide a comparative and plan-to-ground assessment of the direct and cumulative impacts of the existing plan and the proposed land use scenarios to the county's Circulation Element roadway network and the City's network. The assessment of significant traffic impacts should also be provided for the buildout scenario. Feasible mitigation measures should be provided for all significant impacts.
13. The PEIR should identify the differences in projected LOS on County's Circulation Element roadways facilities for the proposed land use scenarios. The LOS assessment for County roadways should be based on the County's Public Road Standards criteria.
14. The PEIR should clearly identify the roadway network assumptions for the planned Caltrans freeways for the buildout scenario. The PEIR should identify any deviation from the SANDAG 2030 Regional Transportation Plan (RTP) for Caltrans freeways and regional arterials that traverse both the City and County's jurisdiction.
15. The PEIR should clearly identify proposed changes to the City's Circulation Element Plan (deletions, reclassifications, and alignment). The PEIR should clearly identify proposed circulation changes that will impact the County's Circulation Element network. Several existing and planned roads traverse both the City and County's jurisdiction.
16. The City should coordinate with the County to ensure consistency in the classification/design of Circulation Element roads, bicycle network corridors, and transit routes that traverse both jurisdictions.
17. The County has adopted Transportation Guidelines for the Determination of Significance ([www.sdcdplu.org/dplu/Resource/docs/3~pdf/Traffic Guidelines.pdf](http://www.sdcdplu.org/dplu/Resource/docs/3~pdf/Traffic%20Guidelines.pdf)) dated September 26, 2006. We recommend that they be a guide in the preparation of the traffic analysis.
18. CMP/SANTEC guidelines state that the project study area should extend to include road segments and intersections that receive 50 or more peak hour from the proposed project. County guidelines recommended extending the scope of analysis to 25 peak hour trips for roadways currently operating at LOS E/F.

The County of San Diego appreciates the opportunity to continue to participate in the environmental review process for this project. We look forward to receiving and future environmental documents related to this project the DEIR for review or providing additional assistance at your request. If you have any questions regarding these comments, please contact Maggie Loy at (858) 694-3736.

Sincerely,



GARY L. PRYOR, Director
Department of Planning and Land Use

GLP:JEG:ml

cc: Eric Gibson, Deputy Director, Department of Planning and Land Use
Ivan Holler, Deputy Director, Department of Planning and Land Use
Vince Nicoletti, Staff Officer, Deputy Chief Administrative Office
Maggie Loy, Planner III, Department of Planning and Land Use
Joe DeStefano, Planning Manager, Department of Planning and Land Use
Priscilla Jaszkwiaak, Administrative Secretary, Department of Planning and
Land Use
Trish Boaz, Chief, County Department of Parks and Recreation
Ralph Steinhoff, County Fire Marshal, Department of Planning and Land Use
Lee Shick, Project Manager, Department of Public Works
Rob Reider, Supervising Air Resources Specialist, Air Pollution Control District



PLANNING & BUILDING DEPARTMENT

October 10, 2006

Marilyn Mirrasoul
City of San Diego Development Services Center
1222 First Avenue, Mail Station 501
San Diego, CA 92101

**SUBJECT: Notice of Preparation (NOP) for the City of San Diego General Plan Update
Draft Program Environmental Impact Report: Project Number: 104495**

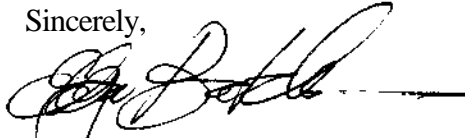
To Whom it May Concern:

Thank you for the opportunity to comment on the Notice of Preparation (NOP) for the City of San Diego General Plan Update Draft Program Environmental Impact Report (EIR). We offer the following comments:

- Each alternative analyzed in the Program EIR should use our recently adopted City of Chula Vista General Plan Update (December 13, 2005) for its background land use assumptions within Chula Vista's Planning Area. A copy of this document can be found on our web site at www.chulavistaca.gov. We would be happy to coordinate with you to ensure appropriate TAZ-level land use values are used.
- The traffic analysis should include circulation network alternatives that include La Media Road crossing Otay River Valley, as well as an alternative in which it does not cross the Otay River Valley
- The GPU PEIR proposed project and alternatives should analyze Heritage Road/ Otay Valley Road in its "existing" configuration, as well in the "buildout" condition as shown in the City of Chula Vista's current General Plan.
- The traffic analysis should closely examine potential impacts to nearby major arterials and intersections within the City of Chula Vista's jurisdiction, including Main Street and its intersection with Interstate 805.
- The potential reduction in employment lands on Otay Mesa should be analyzed against the amount of new residential on Otay Mesa, as well as residential planned within the Otay Ranch in Chula Vista, which had assumed employment attraction on the Mesa (Jobs/Housing analysis).

Please contact me at (619) 691-5005 if you have any questions regarding this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Ed Batchelder", with a horizontal line extending to the right from the end of the signature.

Ed Batchelder
Advance Planning Manager

cc: Jim Sandoval, Director of Planning and Building
Marisa Lundstedt, Environmental Projects Manager
Frank Herrera-A, Associate Planner

Environmental Health Coalition

COALICION de SALUD AMBIENTAL

401 Mile of Cars Way, Suite 310 ♦ National City, CA 91950 ♦ (619) 474-0220 * FAX: (619) 474-1210
ehc@environmentalhealth.org * www.environmentalhealth.org

October 2, 2006

Marilyn Mirrasoul
City of San Diego Development Services Center
1222 First Ave., MS 501
San Diego, CA 92101

RE: Project Number 104495

Dear Ms. Mirrasoul,

Thank you for the opportunity to provide comments on the scope of the Program Environmental Impact Report (PEIR) for the General Plan Update (GPU). Environmental Health Coalition (EHC) is a 26-year-old community-based organization working to achieve environmental and social justice. We work with over 3000 members primarily in the Logan neighborhoods of San Diego, Old Town National City, western Chula Vista and Colonia Cilpancingo, Tijuana.

EHC has worked with the city and other stakeholders throughout the GPU process to create land use policies that will promote environmental justice and protect public health. For example, we have worked to craft the collocation policy contained in the Economic Prosperity Element to protect sensitive receptors from exposure to toxic pollution and chemicals. As such, we believe it is critically important that the PEIR for the GPU provide the public with a clear analysis of environmental impacts—both positive and negative—that will result from the passage of this plan. Specific suggestions are detailed below.

1. Accurately represent impacts in the communities that make up the city of San Diego.

The PEIR's description of environmental issues should include descriptions of existing air and water quality impacts and identify which communities bear an unequal burden of toxic pollution. It should also describe where patterns of the incompatible mixing of toxic and/or industrial uses with sensitive receptor uses have resulted in public health hazards. This analysis should thread through the entire PEIR so that the analysis of the proposed plan's impacts accurately portrays potential detriments and benefits to each of San Diego's communities.

2. Use the California Air Resources Board (CARB) *Air Quality and Land Use Handbook* as a yardstick.

The CARB Handbook, published last year, sets forth clear land use and planning guidelines for protecting public health. The GPU and each alternative should be evaluated against these guidelines for land use decisions near freeways, industries and other uses. Through the PEIR, the public should be able to understand which alternatives, and which specific policies, do the best job of complying with CARB's guidance for protecting public health.

The importance of CARB's guidelines in planning point to the need for a more comprehensive air quality analysis in the PEIR. The scope of the PEIR's analysis must be broadened to include more than just traffic impacts. The CARB estimates that 70% of air pollution-related cancer risk in the state is caused by particulate matter, much of which comes from diesel emissions. Analysis of impacts from goods movement in general and diesel vehicles and equipment in particular must be analyzed separately from other vehicular sources. Additionally, industrial air pollution sources must be analyzed fully, as must highly hazardous low-level emissions within communities such as

hexavalent chromium from plating shops. In fact, it is reasonable to expect that land use restrictions may need to be more stringent in the most at-risk communities to ensure environmental health of those communities.

3. Conduct a full assessment of cumulative impacts.

The PEIR should use the California EPA's adopted definition of cumulative impacts so that the public may have an understandable picture of how the GPU could enhance and/or degrade the environment and their health.¹ Specifically, the analysis should identify existing and expected impacts from neighboring jurisdictions and describe how those compound GPU impacts at the community, city and regional level. For example, this section of the PEIR should identify air quality impacts from the Unified Port of San Diego and discuss how those, combined with GPU air quality impacts, will affect the air in neighboring communities like Barrio Logan, citywide and in the regional air basin.

4. Expand the analysis of the No Prime Industrial Lands alternative.


The proposed "No Prime Industrial Lands" alternative should include an analysis of the collocation policy which is a companion to the Prime Industrial Lands map in the Economic Prosperity Element. This analysis should describe a scenario without a collocation policy or Prime Industrial Lands. Furthermore, this alternative should use the Otay Mesa Community Planning Area as a test case. Because the Otay Mesa Community Plan Update is currently underway, the community has essentially been exempted from the GPU process and policy development. Since it is the only community with remaining vacant industrial lands, it must be analyzed as the primary example to demonstrate the impacts of the proposed GPU. It is equally important to use Otay Mesa to demonstrate the impacts of *not* including the collocation and Prime Industrial Lands policies.

5. Ensure broad public participation

The city should make every effort to ensure that the public has access to and understands the PEER. The GPU is a citywide plan, but, as always, many policies will affect some communities more than others. Especially in the realm of environmental quality, special effort should be made to reach out to those communities identified in the PEIR as disproportionately impacted.

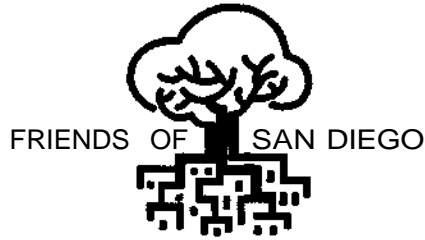
Thank you for considering EHC's comments. Please feel free to contact me with questions or concerns at (619) 474-0220 x107.

Sincerely,



Laura M. Benson
Policy Advocate

¹ As stated on California EPA's website, <http://www.calepa.ca.gov/EnvJustice/ActionPlan/> : "Cumulative impacts means exposures, public health or environmental effects from the combined emissions and discharges, in a geographic area, including environmental pollution from all sources, whether single or multi-media, routinely, accidentally, or otherwise released. Impacts will take into account sensitive populations and socio-economic factors, where applicable and to the extent data are available."



*Dedicated to preserving
the environment and
quality of life through
effective growth
management*

3636 4th Avenue, Suite 310
San Diego, CA 92103

Tel: 619-795-1753
Fax: 619-795-1756
email: FriendsofSD@aol.com
www.friendsofsandiego.org

October 6, 2007

City of San Diego
Development Services Center
Attn: Marilyn Mirrasoul
1222 First Avenue, MS 501
San Diego CA 92101

**Re: Comments on Scope of Work for Program EIR,
General Plan Update (Project 104495)**

Reference documents: Notice of Preparation dated 9/7/06 and
accompanying letter from Robert J. Manis regarding scope

Introduction

The following comments and questions are submitted for the purpose of encouraging a full and complete analysis of the impacts associated with the General Plan Update. Since this plan is intended to guide growth and development in the City of San Diego for up to 20 years, it must be analyzed thoroughly, with mitigation and project changes as required to prevent degradation in residents' quality of life.

The City Planning and Development Services staff ("staff") need to more carefully define the objectives of the new General Plan, with the draft now totaling about 500 pages. Is the goal to accommodate growth, increase growth or relocate growth from one area to another? The project and PEIR should eliminate nebulous goals like "increasing housing choices", since most communities have a variety of housing types already.

Will the General Plan assure public facilities and infrastructure at the time of need, or add to the deficiencies? Can small-scale villages be created to provide new gathering places while avoiding the harmful impacts of oversized projects? An intensive analysis based on a carefully-defined PEIR would increase the chance that the new General Plan improves residents' quality of life, and doesn't make it worse.

1. Remember the businesses. The proposed project and PEIR outline still place an inordinate emphasis on residential development. Housing units are easy to count, and the City gets lots of pressure from State officials regarding housing sites. In addition, City officials are prone to believe in a "housing shortage" and promises about "building our way to affordability". Nevertheless, the General Plan must consider the commercial and industrial development that will be needed to serve new residents.

If 6,000 more housing units are to be added to North Park, for example, the City must make sure that its policies don't drive out the auto repair shops, printers, and other businesses from the commercial and industrial areas. With other communities targeted for large increases in homes but little industrial development, especially Mission Valley and Centre City, the General Plan must acknowledge the pressure upon nearby communities to become service districts.

2. Review of 2002 PEIR. The staff is encouraged to review the Project EIR associated with the Strategic Framework Element in 2002. That year, the City received a comment letter from David Potter demonstrating that the PEIR did not address many of the items specified in the scope. For the General Plan and its new PEIR, the staff is requested to pay more attention to covering all the issues required by CEQA and City policies, and all the issues specified in the scope.

3. Consistency with Community Plans. In the 2002 PEIR, the authors skirted the issue of consistency between the General Plan and Community Plans by stating that community plans would have to be changed. This ignores the interim period between adoption of the General Plan and adoption of revised community plans, which could take up to 10 years to complete.

a. If some existing community plans are already consistent with the General Plan at the time of GP adoption, then there will be no reason to amend those community plans, except for reasons unrelated to the General Plan.

b. If other existing community plans are not consistent with the General Plan, then how will the City deal with the interim period, during which the General Plan and those community plans will be inconsistent?

4. Alternatives.

a. Obsolete targets. Why do proposed alternatives B and C use the same targets for additional housing units that were used in 2001-2002? SANDAG has created two new forecasts since then, and several community plans have been amended. So the figures of 17,000 to 37,000 dwelling units

have no current significance. The City might as well use the number 1,700 or 170,000, or use a random number generator to choose a target!

b. More housing sites than forecast demand. The draft Housing Element contains a site inventory totaling 122,233 units.¹ The SANDAG draft Series 11 Forecast projects demand of 78,884 units between 2005 and 2020. So the City already contains capacity for about 43,000 more homes than the projected need for 15 years. This should lead to a reevaluation of two underlying assumptions that seem prevalent among the staff:

- i. that the City needs more housing sites; and
- ii. that the City needs to encourage the building of more units than the market would otherwise require.

c. Sites or built units? Regarding the proposed figure of 37,000 additional units, and comparing this with the SANDAG forecast quoted above, I request a clarification: Is staff proposing an increase of up to 37,000 more housing sites than exist under current community plans and zoning, or an increase in up to 37,000 more units built than the forecast demand, or both?

d. More sites. If the proposal is for more housing sites, while assuming the same forecast demand, then the PEIR should analyze how this would lead to a change in the location of units built. Consider, for example, that Ocean Beach and Scripps Ranch follow the encouragement (or mandate) of the new General Plan. They amend their community plans to add Village and Transportation Corridor projects consisting of 1,000 housing sites each. As housing units get built on these sites, this would necessarily result in fewer units being built elsewhere, such as La Jolla, Mission Valley and Centre City. Is the staff prepared to analyze the impacts of such a locational shift in growth patterns?

e. More units. If the proposal is for more units built than the forecast demand, this raises new questions for the PEIR to analyze. Consider an alternative in which the City of San Diego government, by following its new General Plan, successfully encourages the building of 37,000 more units than would otherwise be built by 2020. This course of action would result in 115,884 new units being built, compared to the current forecast of 78,884. If so, this would necessitate the following issues to be analyzed in the PEIR:

- i. Is this alternative feasible?

¹ Some of the 122,000 sites have already had housing units constructed, which would lower the number of remaining sites. However, some housing sites were not included in the inventory because their zoning has not been finalized. These include the proposed addition of 5,000 to 8,000 units in Mission Valley.

ii. What actions would the City have to take to increase housing demand by 47%? Perhaps the City could waive property taxes and impact fees for new businesses; offer generous rent subsidies to anyone moving here; or fill-in some city-owned canyons and offer free land for businesses that relocate to our City.² The proposed actions would need an analysis of their environmental impacts, of course.

iii. The PEIR must acknowledge that the City has control over zoning, but not over when and where a developer will decide to build, or where a resident will decide to live. If the City were able, through new General Plan policies, to get tens of thousands more homes built than without the policies, and the resulting City population was increased above the forecast, then the PEIR must consider the likely shift in growth patterns from other cities to San Diego. City planners may wish that adding more urban homes will reduce long distance commuting, but there is no evidence that this would occur. If 1,000 housing units are added to Rancho Bernardo, there is no reason to think this would attract someone from Fallbrook, rather than a resident from Poway or La Mesa. Economist Richard Carson testified at SANDAG that people move to Fallbrook and Temecula to obtain a detached home at a lower price. So they are unlikely to change their decision because the City of San Diego adds attached housing in Mira Mesa or Mission Valley.

5. Objectives regarding growth.

The consideration of alternatives, as required by CEQA, necessarily causes a close examination of the project's objectives. The various alternatives must be measured by how well they meet the objectives, in addition to how they impact the environment. So I ask the staff, in relation to this PEIR:

a. Three growth objectives. Is the objective to increase growth, relocate growth from one area to another, or accommodate growth? All three objectives have been put forth in various city documents.

b. Increasing growth. Will the PEIR acknowledge the growth-inducing link between City of San Diego zoning and SANDAG growth forecasts? The staff is aware that SANDAG starts with regional growth forecasts, then allocates housing units to the county and cities based upon their general plan and zoning capacity. So increases in housing sites via

² This is serious! Trying to follow the consequences of the proposed alternatives is hard work! If the reader is skeptical of my ideas for incentives, then I encourage that reader to devise his own methods for filling 37,000 housing units in addition to the ones forecast to be needed. 37,000 more units would mean about 100,000 more residents. If that's too tough a goal for 2020, the target date could be moved to 2030. Remember that the City of San Diego can zone for more units, but would have to compete with the County of San Diego, Chula Vista, Poway, San Marcos, and other cities. About 10 cities have substantial land targeted for development.

upzoning will lead to higher forecasts in the future for the City. The higher forecasts lead to increased pressure from the State Housing and Community Development Dept (HCD) to add even more housing sites. A twenty year supply is needed, according to some officials. This system of "Forecast, upzone, build; forecast, upzone, build" is relevant to the Growth Inducement section, since increases in housing sites from new General Plan policies will predictably lead to new waves of growth pressures. In contrast, the cities within our region that have acknowledged they have reached buildout, or are close to buildout, are getting smaller allocations of forecast demand from SANDAG.

c. Relocating growth. The General Plan infill strategy follows the 20-year-old "Smart Growth" concept. This concept is based on channeling growth from less suitable areas to more suitable areas. Unfortunately, the City has waited to embrace Smart Growth until it has nearly completed the expansion into all its far-flung suburbs. With approvals already granted to develop most of the remaining vacant lands, the City has little ability to prevent growth in outlying areas of the City. The City does have the ability to shift growth from one community to another, but has not chosen to examine this option. For example, it's quite possible that current capacity of 7,000 housing units in North Park and 5,500 units in Uptown should be revised downward, in view of the recent tripling of housing capacity in Centre City. If the City is committed to channeling a large portion of growth to downtown, then staff should support attempts to reduce the competition from nearby communities, especially when those communities have substandard infrastructure.

d. Accommodating growth. The citizens committee made it clear during the period of 2000 to 2002 that the new General Plan should accommodate growth but not encourage or create it. The PEIR must clarify if this is still the policy, and explain how this is consistent with affirmative steps to induce growth of new Villages and other infill.

6. Transportation.

a. One of the stated goals is that the City of Villages strategy will "help support a state-of-the-art transit system". The PEIR should not venture into unsupportable illusions that overstate this link. If a community has 40,000 residents now, will adding another 2,000 to 4,000 residents turn an infeasible transit system into a feasible one?

b. The additional vehicle trips associated with new development projects must be faced squarely. If 500 housing units and 500,000 sq. ft. of commercial space are added to a particular block, we can anticipate 5,000 to 10,000 daily trips. Even if 20% of the new residents use mass transit, which would be an ambitious goal, the other 80% are adding to car traffic. Also, the mass transit vehicles themselves add to street traffic.

7. Public facilities and infrastructure- more than a wish-list.

a. The City has acknowledged that public facilities have not kept pace with development, especially in the older communities. Yet the draft Public Facilities Element still fails to provide mechanisms that firmly tie new development to the needed facilities. Seven years after the General Plan process was started, the project contains little more than a "wish-list" of needed public facilities, along with a list of potential tax increases.

b. Here's a proposal based on other cities which have Adequate Public Facilities Ordinances:

The General Plan scope should include a requirement that each community create a phasing plan (or concurrency plan) that ensures adequate public facilities before or concurrent with new development. Development cannot proceed if the public facility goals are not met.

c. The draft General Plan still contains only a weak commitment about new development paying a fair share. Something stronger is needed, for example:

"New development must pay the cost of providing all public facilities and infrastructure attributable to the new development." The logic is obvious: Existing residents will have to pay to cure existing deficiencies, and certainly can't be expected to subsidize new development also.

d. Regional facilities. SANDAG has stated in several reports that new development in our region is not covering the full costs of regional facilities. The main components are transportation and justice facilities (courthouses and jails). Chula Vista is an example of a city which authorized large-scale development without the needed facilities. They are now scrambling to catch up with the justice facilities to serve their self-induced population increase. The scope of the PEIR should include the issue of regional facilities.

e. Facility financing. Theoretically, quality of life can be maintained while a city grows rapidly, if unlimited money were available for public facilities. In reality, our city, like others in California, never gets enough money from the new development to cover the capital cost of all needed public facilities. A PEIR doesn't necessarily include detailed financial information regarding mitigation, but the cost issue can't be ignored. Proposing mitigation that can't feasibly be paid for will not meet CEQA requirements. Furthermore, it would be grossly unfair to residents to present sham mitigation that has no reasonable chance of being provided.

f. Operating costs. A city that is reeling from financial problems must avoid costly new entanglements. Our City officials and staff must question the myth about "increasing the tax base". Even if new development covers

the capital costs of new facilities, it seldom provides enough ongoing revenue to cover operations and maintenance costs.

The City's own reports acknowledge that residential development doesn't pay for itself, since the costs of park maintenance, police and fire coverage, road maintenance and other services are more than the added revenues. When the City counts all the ongoing costs, which include public employee salaries and benefits, equipment and materials, it is questionable whether commercial and industrial development pay their ongoing costs either. If growth and development brought in extra money, after decades of growth the City of San Diego would be rich! The PEIR must take a realistic approach to mitigation, and include, for example, how new parks will be acquired, and also how they will be maintained.

8. Meaningful alternatives.

The City should consider more meaningful alternatives, rather than the warmed-over ones from four years ago. Here are some new alternatives proposed for the PEIR:

a. Focus growth downtown. In view of the recent additions to housing capacity and commercial capacity in Centre City, the General Plan must acknowledge reduced needs for other communities to absorb new development. A viable alternative for the period 2006 to 2030 might be to focus 80% of the infill in Centre City.

b. Small villages. Without growth targets or quotas, communities can plan small-scale villages. These would be just big enough to provide "lively activity centers" and improve walkability, while avoiding grandiose mega-projects that will add to public facility deficiencies and degrade quality of life.

c. Large-scale growth. If the PEIR is to include a full range of alternatives, then it probably should include a "high growth" scenario. The most convenient model for this is the map which the Planning Department provided to SANDAG for use in the regional Smart Growth Concept Map. The map provided by the Planning Department includes speculative development that isn't included in the adopted community plans, and which is located in areas which the Planning Staff thinks that new development should go. This map is unburdened, at this point, by the need to demonstrate sufficient demand for the added housing, or the City's ability to provide adequate public facilities. That makes the unauthorized map the perfect candidate for the high-growth alternative, and the perfect comparison for better alternatives. If the map is good enough for the Planning Dept. to give

to SANDAG for use in regional transportation planning, then it should be good enough to use for a Program EIR alternative project.³

Thomas G. Mullaney, president

NOP_Scope_FOSD.doc

³ We must remember: Every unit of housing added will predictably increase the city's permanent population by about 2.7 people. Growth inducement carries a heavy responsibility.



501 West Broadway | 19th Floor | San Diego, CA 92101-3598
619-338-6500 office | 619-234-3815 fax | www.sheppardmullin.com

Writer's Direct Line: 619-338-6524
djones@sheppardmullin.com

October 6, 2006

Our File Number: 05FF-110431

VIA E-MAIL AND U.S. MAIL

Marilyn Mirrasoul
City of San Diego Development Services
1222 First Avenue, MS 501
San Diego, CA 92101

Re: Draft Program Environmental Impact Report - City of San Diego General
Plan Update - Project No. 104495

Dear Ms. Mirrasoul:

Thank you for the opportunity to review and comment on the Draft Program Environmental Impact Report - City of San Diego General Plan Update, Project No. 104495 ("PEIR"). This letter is written on behalf of the Otay Mesa Planning Coalition ("Coalition"), a consortium of seven landowners in the Otay Mesa area of the City of San Diego. Our comments are based on the last-available version of the General Plan Update, since the revised draft that was to be released this September has not yet been circulated for review.

On behalf of the Coalition, we have the following comments and requests for clarification on the PEIR.

PROJECT DESCRIPTION

The project description should be consistent and complete; as a result, please include the Housing Element in the PEIR's project description, even though the Housing Element is being processed separately. Inclusion of the Housing Element in the PEIR's project description and environmental impact analysis is essential to assuring internal consistency in the General Plan and adequacy of the PEIR itself.

In addition, if the various General Plan Elements are going to continue to include regulations (rather than policies and goals), then the impacts from imposition of such regulations also must be analyzed. (We suggest that for consistency and flexibility, among other reasons, the regulations should be removed from the body of the General Plan Update Elements and instead processed as part of an update to the Land Development Code or other portions of the City's municipal code, so that the General Plan Elements can be focused on policies and goals.)

Marilyn Mirrasoul
October 6, 2006
Page 2

As part of the description of the Economic Prosperity Element, the PEIR should address the fact that the Economic Prosperity Element does not accurately portray the existing Otay Mesa community. Instead, it assumes land uses that were planned in 1981 but never developed, creating the potential for inaccuracies in the baseline used for analysis. For example, the Economic Prosperity Element suggests that more industrial land is needed in Otay Mesa when in fact the market demand studies indicate that much less industrial land is required, and the shortfall is in residential land. In addition, the outdated description of the Otay Mesa community found in the current draft of the Economic Prosperity Element suggests a type of industrial land use exists that may have more negative environmental impacts than the industrial uses that are forecasted to comprise most of the economic growth through 2030. The uses assumed in Otay Mesa would result in air quality and traffic impacts that are unlikely to result when the existing or reasonably foreseeable uses are assumed. The inaccuracy of the assumptions used for the industrial land uses makes it difficult to assure an accurate analysis of the resulting impacts in all of the environmental issues areas.

LAND USE

The PEIR should discuss the impacts resulting from reserving land for industrial uses even when the manufacturing uses for which the land is being reserved are stagnant and, in fact, diminishing as a proportion of the local economy. Studies demonstrate that a substantial portion of the region's future growth will be in services and technology-related uses that have higher density workplaces on less land and in closer proximity to other land uses. The result of preserving land for manufacturing uses that never develop, while failing to set aside land for the residential and professional/services uses that do, will create land use conflicts that should be addressed in the PEIR. The basis for the Economic Prosperity Element's conclusions regarding economics associated with manufacturing also should be disclosed, because setting aside land for manufacturing uses due to a perceived but unsupported need for such land uses will have significant environmental consequences.

The PEIR also should address the impacts resulting from the shortage of residential land that that will continue to exist should the General Plan Update Elements as currently drafted ultimately be adopted. The PEIR must acknowledge the existing and anticipated housing crisis documented by, among others, SANDAG. The PEIR must address the land use conflict that arises from a Regional Growth Forecast that recognizes there will be a substantial housing shortage by 2030, but a General Plan Update that makes it more difficult to rezone land for residential uses and which instead preserves employment land which the Regional Growth Forecast concludes will be in oversupply in the future.

In addition, the 1000-footbuffer proposed as part of the Economic Prosperity Element creates potentially significant land use conflicts with the Strategic Framework Plan, the City of Villages, and other existing plans and policies calling for more residential density near employment uses. The buffer is derived from one particularly toxic air contaminant identified in

the California Air Resources Board ("CARB") guidelines, hexavalent chromium from chrome platers (CARB *Air Quality and Land Use Handbook: A Community Health Perspective*, page 4, published in April 2005). Chrome plating is not widespread in base sector industries, which hardly serves as justification for establishing a 1000-foot buffer from all industrial uses. The PEIR should analyze how imposition of a 1000-foot buffer not only increases the City's already existing housing crisis but also makes consistency with the above-mentioned "smart growth" policies more difficult to implement.

There are many measures by which impacts from locating residential near manufacturing or other industrial uses can be avoided or mitigated other than by imposition of a buffer, and those measures also should be addressed in the PEIR. The housing supply impacts of the buffer and other constraints on residential uses caused by the policies of the draft Economic Prosperity Element should be disclosed and analyzed.

Whether in the Land Use section or another section, the PEIR should discuss the impacts from adding a third port of entry into the United States from Mexico, and means by which processing and moving goods across the border can be made more efficient.

AIR QUALITY

The PEIR should discuss the toxic materials, emissions and emergency management services and plans that will be required if the current draft of the Economic Prosperity Element is adopted, including an identification of industrial clusters and the assumed emissions from such clusters. Relying on overly broad industrial categories is not sufficient for purposes of the CEQA analysis, which requires sufficient details to establish an accurate baseline for a thorough environmental analysis.

The impacts from imposition of a 1000-foot buffer between industrial and residential uses should be evaluated in the air quality section as well as the land use section of the PEIR. The buffer assumes that air emissions are generated by all industrial uses as a starting point. The PEIR should address how local conditions, including prevailing winds, topography and similar characteristics, effect air emissions and therefore should effect the need for any buffer imposed as part of a General Plan Update Element.

The PEIR should discuss the evolving science and regulations that reduce the impact of pollutants on human health. For example, substantial reductions in diesel particulate emissions will occur through implementation of cleaner fuels and engines, which are being phased in now by state agencies. The reduction in background emissions due to those and other means of reducing emissions should be taken into consideration in this PEIR.

PUBLIC SERVICES AND FACILITIES

In its discussion of the need for park land and land for schools and similar public facilities, the PEIR should recognize and discuss a range of equivalencies, including private recreational facilities being used to meet park requirements; smaller, frequently distributed pocket parks; and the contributions to park and recreational opportunities presented by regional open space and beaches. To assure accuracy in determining the need for park and recreational facilities, the PEIR should distinguish between single and multi-family households, since they have different population characteristics. Moreover, the PEIR should discuss the impacts that will result if the City is unable to require payment of fees or dedication of park lands due to failure to adopt enabling legislation under the Quimby Act. The PEIR also should address the impacts from housing shortages that would result from failure to allow joint use between park and recreational facilities and school facilities. If such joint use is prohibited, additional housing opportunities will be lost, and housing will be displaced to make room for parks, making the already existing housing shortage worse.

Similarly, the PEIR should take into account Assembly Bill 2751 and how this will impact construction and financing of public infrastructure, and whether an inability to obtain funding will create deficiencies.

BIOLOGICAL IMPACTS

The Biological Impacts section of the PEIR should address the impacts associated with lack of funding required to maintain open space, including open space preserved in the MHPA.

ALTERNATIVES

The PEIR should address an alternative to setting aside of substantial blocks of land for manufacturing and similar industrial uses, and include an alternative that recognizes that economic studies indicate that in fact less land will be required for such uses in the future. It should describe an alternative that, instead of preserving land for manufacturing, designates the majority of that land for services that studies indicate will make up the bulk of economic growth in the City of San Diego over the next 20 years. This alternative can be based on SANDAG's conclusion that a surplus of planned employment land exists in the region, along with a corresponding shortage of planned residential land.

The PEIR should explain how growth alternatives are being analyzed and what the baseline for those alternatives will be for purposes of impact analysis, since the General Plan Update does not establish land uses and does not set growth targets.

Marilyn Mirrasoul

October 6, 2006

Page 5

An alternative to the imposition of a 1000-foot buffer also should be addressed in the PEIR. Rather than imposing a buffer, the PEIR should analyze how impacts from locating residential uses near industrial uses can be reduced to less-than-significant levels on a case-by-case basis, through CEQA review of individual projects. It is only at that stage of the process that the emissions from a particular industrial use and the mitigating measures available for that residential project are known. At a minimum, communities undergoing a community plan update should be exempt from the buffer requirements and should be able to take a comprehensive look at the best locations of industrial and residential uses, as well as other land uses, as part of the community plan update process, without being constrained by "prime industrial" designations or mandatory buffers. Thus, the PEIR should address an alternative that creates an exception from the buffer requirements for communities undergoing a community plan update.

We appreciate your consideration of our comments and look forward to seeing them addressed in the Final PEIR.

Very truly yours,

A handwritten signature in black ink, appearing to read "Donna".

Donna D. Jones

for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

W02-WEST:8DDJ1\400098624.1

cc: John Ponder, Esq.
David Nielsen, MNA Consulting



September 20, 2006

City of San Diego
Development Services
202 "C" Street
San Diego, CA 92101

Re: Preparation of Environmental Impact Report - City of San Diego
General Plan Update

Dear Development Services Staff:

The Industrial Environmental Association is an **organization of manufacturing**, technology and research and development companies. We have been active and engaged participants in the City of San Diego's General Plan Update.

In preparation of the environmental impact **report**, we respectfully ask that you consider the following:

***Guidance** from the California Office of Planning and Research regarding residential incompatibility with industrial areas;

***California** Air Resources Land Use Guidebook;

*Federal, state, and local required distance separations between industrial activities and sensitive receptors, including:

- adopted mandatory minimum distance separation for stationary source emissions and under study
- mandatory minimum distance separation with facilities using Drug Enforcement Agency controlled substances
- permitting agency distance separation reviews

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in cursive script, appearing to read "Patti Krebs".

Patti Krebs
Executive Director



From: "Shawna Anderson" <shawna@sdrp.org>
To: <mmirrasoul@sandiego.gov>
Date: 10/10/2006 10:31:00 AM
Subject: comment on General Plan update

Hi Marilyn,

Sorry this email is late and missed the Oct 7 deadline for comments for the General Plan EIR. I hope you can still consider our comment although it's really suggesting that the GP update incorporate the San Dieguito River Park Concept Plan as opposed to a comment regarding an EIR issue. The city council adopted our Concept Plan in June 2006 and it contains several goals and policies regarding preservation of the San Dieguito River Valley. I would like the EIR to address consistency between the General Plan update and the Concept Plan. Thank you!

Shawna

Shawna C. Anderson, AICP
Environmental Planner
San Dieguito River Park JPA
18372 Sycamore Creek Road
Escondido, CA 92025
(858)674-2275, ext. 13
(858)674-2280 FAX
www.sdrp.org



CITY OF SAN DIEGO

DEVELOPMENT SERVICES DEPARTMENT
ENVIRONMENTAL ANALYSIS SECTION (EAS)

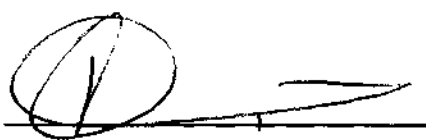
PUBLIC SCOPING MEETING

This meeting is being held to give the public and interested parties an opportunity to submit comments regarding the potential environmental impacts of the proposed project. This information will be used to develop the scope and content of the proposed Program Environmental Impact Report (PEIR) for the project to be described at this meeting. Please record your comments in the space provided below and submit this form to City staff at the conclusion of the meeting. Thank You.

Project: General Plan Update

Date: September 25, 2006

Comments: All traffic studios must study
pedestrian & non-motorized traffic
volumes & traffic patterns. Traffic
study results must accurately and
honestly assess impacts upon pedestrian
and non-motorized traffic

Name Jim VARNADORE **Signature** 

Address Postoffice box 5859 SD CA 92165

Use back of sheet if additional space is necessary.



CITY OF SAN DIEGO

DEVELOPMENT SERVICES DEPARTMENT
ENVIRONMENTAL ANALYSIS SECTION (EAS)

PUBLIC SCOPING MEETING

This meeting is being held to give the public and interested parties an opportunity to submit comments regarding the potential environmental impacts of the proposed project. This information will be used to develop the scope and content of the proposed Program Environmental Impact Report (PEIR) for the project to be described at this meeting. Please record your comments in the space provided below and submit this form to City staff at the conclusion of the meeting. Thank You.

Project: General Plan Update

Date: September 25, 2006

Comments: the GPU EIR must assess the
impact of the Village Strategy on
communities. The Strategic Framework
Element & many Element updates have
as their primary goals, the disproportionate
densification of poor communities, especially
poor communities of color, to the advantage
of wealthier, whiter communities.

Name Jim VARNADORE **Signature** 

Address _____

Use back of sheet if additional space is necessary.



CITY OF SAN DIEGO

DEVELOPMENT SERVICES DEPARTMENT
ENVIRONMENTAL ANALYSIS SECTION (EAS)

PUBLIC SCOPING MEETING

This meeting is being held to give the public and interested parties an opportunity to submit comments regarding the potential environmental impacts of the proposed project. This information will be used to develop the scope and content of the proposed Program Environmental Impact Report (PEIR) for the project to be described at this meeting. Please record your comments in the space provided below and submit this form to City staff at the conclusion of the meeting. Thank You.

Project: General Plan Update

Date: September 25, 2006

Comments: The GPU EIR Must Assess the Future
Effects of Adding Density in the Poor
Communities without Adding Infrastructure
Such as Sidewalks, Parks, Playgrounds,
Cultural Venues, Adequate on-site parking,
And other needed infrastructure.

Name

Jim VARNADORE

Signature



Address

Use back of sheet if additional space is necessary.



CITY OF SAN DIEGO

DEVELOPMENT SERVICES DEPARTMENT
ENVIRONMENTAL ANALYSIS SECTION (EAS)

PUBLIC SCOPING MEETING

This meeting is being held to give the public and interested parties an opportunity to submit comments regarding the potential environmental impacts of the proposed project. This information will be used to develop the scope and content of the proposed Program Environmental Impact Report (PEIR) for the project to be described at this meeting. Please record your comments in the space provided below and submit this form to City staff at the conclusion of the meeting. Thank You.

Project: General Plan Update

Date: September 25, 2006

Comments: The GPU EIR MUST ASSESS THE TRAFFIC EFFECTS OF REFUSING TO PROVIDE PUBLIC TRANSIT IN WEALTHIER NEIGHBORHOODS AND COMMUNITIES. INADEQUATE PUBLIC TRANSPORTATION RELEGATES POOR AND DISABLED CITIZENS TO THE POORER COMMUNITIES WHICH DO HAVE PUBLIC TRANSIT. THIS WORKS TO SUBVERT THE COUNCIL POLICY ON "BALANCED COMMUNITIES" WHICH CALLS FOR HAVING A RANGE OF FAMILY INCOMES IN EVERY COMMUNITY.

Name Jim VARNADORE

Signature 

Address _____

Use back of sheet if additional space is necessary.



CITY OF SAN DIEGO

DEVELOPMENT SERVICES DEPARTMENT
ENVIRONMENTAL ANALYSIS SECTION (EAS)

PUBLIC SCOPING MEETING

This meeting is being held to give the public and interested parties an opportunity to submit comments regarding the potential environmental impacts of the proposed project. This information will be used to develop the scope and content of the proposed Program Environmental Impact Report (PEIR) for the project to be described at this meeting. Please record your comments in the space provided below and submit this form to City staff at the conclusion of the meeting. Thank You.

Project: General Plan Update

Date: September 25, 2006

Comments: THE GPU EIR MUST ASSESS THE DIS-
PROPORTIONATE EFFECT OF AIR POLLUTION IN
POOR COMMUNITIES, WHICH ARE DENSELY POPULATED,
COMPARED TO WEALTHY COMMUNITIES WHICH ARE NOT.

Name

Jim VARNADORE

Signature

[Handwritten Signature]

Address

Use back of sheet if additional space is necessary.



CITY OF SAN DIEGO

DEVELOPMENT SERVICES DEPARTMENT
ENVIRONMENTAL ANALYSIS SECTION (EAS)

PUBLIC SCOPING MEETING

This meeting is being held to give the public and interested parties an opportunity to submit comments regarding the potential environmental impacts of the proposed project. This information will be used to develop the scope and content of the proposed Program Environmental Impact Report (PEIR) for the project to be described at this meeting. Please record your comments in the space provided below and submit this form to City staff at the conclusion of the meeting. Thank You.

Project: General Plan Update

Date: September 25, 2006

Comments: THE GPU EIR MUST TAKE ACCOUNT
OF THE "CHOLLAS CREEK ENHANCEMENT
PLAN" AND THE PEIR THAT WAS
PREPARED FOR THAT PLAN

Name Jim VARNADORE

Signature 

Address _____

Use back of sheet if additional space is necessary.



CITY OF SAN DIEGO

DEVELOPMENT SERVICES DEPARTMENT
ENVIRONMENTAL ANALYSIS SECTION (EAS)

PUBLIC SCOPING MEETING

This meeting is being held to give the public and interested parties an opportunity to submit comments regarding the potential environmental impacts of the proposed project. This information will be used to develop the scope and content of the proposed Program Environmental Impact Report (PEIR) for the project to be described at this meeting. Please record your comments in the space provided below and submit this form to City staff at the conclusion of the meeting. Thank You.

Project: General Plan Update

Date: September 25, 2006

Comments: THE GPU EIR MUST ASSESS THE IMPACTS OF THE CITY PARK & RECREATION DEPARTMENT'S CURRENT EFFORT TO FULFILL ITS DUTY TO PROVIDE ENOUGH PARK SPACE FOR THE POPULATION. THE DEPARTMENT IS TRYING TO ~~USE~~ ~~CONTRIBUTE~~ (1) REDUCE THE AVERAGE PER THOUSAND PEOPLE, (2) COUNT JOINT USE PARKS AGAINST THE REQUIREMENT, AND (3) COUNT REGIONAL PARKS AGAINST THE COMMUNITY AVERAGE REQUIREMENT. THAT HAS A HEALTH AND SAFETY IMPACT

Name Jim L'ARNAUD ARE **Signature** 

Address _____

Use back of sheet if additional space is necessary.

*Claudia Emerie's Comments for Speech
at 9/25/06 San Diego Convention*

The new General Plan needs to incorporate language regarding dog off-leash areas into the chapters involving Land Use and Community Planning, Noise, Traffic, Public Safety and especially Recreation.

The City is converting pre-existing neighborhood parkland into off-leash areas for dogs, without classifying off-leash areas in terms of whether they are passive or active use, exclusive use or shared use. Also, the City is not charging user fees, and there is no language to prevent the conversion of an entire park in response to the demands of politically-connected off-leash user groups. And in off-leash areas, dogs don't have to be licensed, or may not have received any of their shots. And **there's** insufficient funding for police, park rangers or animal control to effectively enforce these areas. The bottom line is that there this is insufficient enforcement for San Diego's off-leash areas, and its not right that all taxpayers pay for canine recreational areas.

Several parks have an off-leash areas that are 1 to 2 acres in size that are fenced. But we need language in the General Plan to protect neighborhood parks from being converted in their entirety by special interest groups. In 2002 and 2004, off-leash activists convinced City Council that their special canine children deserved all 5.4 acres of Grape Street Park in Golden Hill, making it the largest off-leash area in San Diego County, and the partial split rail fence **doesn't** prevent the dogs from leaving the park and impacting the homes right across the street. City Council allocated over **\$4,100** per acre per year for off-leash areas across the City, increasing Park & Rec's budget by about \$1- to \$200,000 annually .

So those who live in La Mesa or Carlsbad can off-leash their dogs in San Diego, they don't pay user fees, there's nobody to enforce the rules, and no **privilege** to take away when the rules are violated. So, in a City that can't keep swimming pools open year-round for children, dogs have free, year-round access. The City's parks have literally gone to the dogs.

We need **off-leash** areas to be defined in our General Plan - are they passive use or active use? Are they exclusive use or shared use? How close to homes should off-leash areas be? How much land is reasonable to convert to off-leash use in pre-existing neighborhood parks? What is a reasonable barrier to keep the dogs in the park? Who is primarily responsible for enforcing the rules when they are regularly broken? How much land should be available for off-leashing when the City's finances are in shambles? And why doesn't the city charge a fee for this activity?

The City needs to consider the creation of a regional, fee-based off-leash area, possibly siting it on Pershing Drive, on Balboa **Park's** Central Mesa. This would allow Grape St. Park, and all neighborhood parks, to be available primarily for people - especially in older, urban neighborhoods.