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STATE OF CALIFORNIA

Governor's Office of Planning and Research

State Clearinghouse and Planning Unit

Arnold Schwarzenegger
Governor

Jan Boel
Acting Director

January 27, 2005

Mr. Tracy Reed
City of San Diego Redevelopment Agency
600 B Street, Fourth Floor
MS 904
San Diego, CA 92101

Subject: Grantville Redevelopment Project
SCH#: 2004071122

Dear Mr. Tracy Reed:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on January 26, 2005, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

OPR1

> "A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Terry Roberts

Terry Roberts
Director, State Clearinghouse

Enclosures
cc: Resources Agency

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

RESPONSE TO COMMENT LETTER FROM THE STATE OF CALIFORNIA, GOVERNOR'S OFFICE OF PLANNING AND RESEARCH, STATE CLEARINGHOUSE, SIGNED BY TERRY ROBERTS, DATED FEBRUARY 14, 2005

Response to Comment OPR1:

This letter acknowledges that the City of San Diego Redevelopment Agency has complied with the State Clearinghouse public review requirements for the Grantville Redevelopment Project Draft Program EIR.

The statutorily required Draft EIR public review period is 45 days. The original 45-day public review period for the Grantville Redevelopment Project Draft Program EIR extended from December 13, 2004 to January 31, 2005. However, the City extended the public review period to February 14, 2005. The total public review period was 64 days.

Document Details Report
State Clearinghouse Data Base

SCH# 2004071122
Project Title Grantville Redevelopment Project
Lead Agency San Diego, City of

Type EIR Draft EIR
Description Adoption of a redevelopment project area to promote land use, improve traffic flow, parking, and services, and eliminate physical and economic blight.

Lead Agency Contact

Name Mr. Tracy Reed
Agency City of San Diego Redevelopment Agency
Phone 619-533-7519 **Fax**
email
Address 600 B Street, Fourth Floor
MS 904
City San Diego **State** CA **Zip** 92101

Project Location

County San Diego
City San Diego
Region
Cross Streets Friars Road, Mission Gorge Road
Parcel No. Various
Township **Range** **Section** **Base**

Proximity to:

Highways I-15, I-8
Airports None
Railways None
Waterways San Diego River
Schools Five
Land Use Commercial, office, industrial, parks, open space, community facilities, and mining.

Project Issues Agricultural Land; Air Quality; Archaeologic-Historic; Drainage/Absorption; Flood Plain/Flooding; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife; Growth Inducing; Landuse; Cumulative Effects; Aesthetic/Visual

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Reviewing Agencies Resources Agency; Department of Conservation; Department of Fish and Game, Region 5; Department of Water Resources; Department of Parks and Recreation; California Highway Patrol; Caltrans, District 11; Department of Housing and Community Development; Native American Heritage Commission; Department of Toxic Substances Control; Regional Water Quality Control Board, Region 9; Integrated Waste Management Board

---

Date Received 12/13/2004 **Start of Review** 12/13/2004 **End of Review** 01/26/2005

Note: Blanks in data fields result from insufficient information provided by lead agency.

DIVISION OF OIL, GAS, & GEOTHERMAL RESOURCES

5816 CORPORATE AVE.
SUITE 200
CYPRESS
CALIFORNIA
90630-4731

PHONE
714/816-6847

FAX
714/816-6853

INTERNET
consrv.ca.gov

ARNOLD SCHWARZENEGGER
GOVENOR

DOC1

DEPARTMENT OF CONSERVATION
STATE OF CALIFORNIA

RECEIVED
JAN 18 2005
COMMUNITY & ECONOMIC DEV DEPARTMENT

January 12, 2005

Mr. Tracy Reed
City of San Diego Redevelopment Agency
600 B Street, Fourth Floor, MS904
San Diego, California 92101

Subject: Draft Environmental Impact Report for the Grantville Redevelopment Project, SCH#2004071122

Dear Mr. Reed:

The Department of Conservation's (Department) Division of Oil, Gas, and Geothermal Resources (Division) has reviewed the above referenced project. The Division supervises the drilling, maintenance, and plugging and abandonment of oil, gas, and geothermal wells in California.

The proposed project is located beyond the administrative boundaries of any oil or gas field. There are no oil, gas, or injection wells within the boundaries of the project. However, if excavation or grading operations uncovers a previously unrecorded well, the Division district office in Cypress must be notified, as the discovery of any unrecorded well may require remedial operations.

Thank you for the opportunity to comment on the Draft Environmental Impact Report. If you have questions on our comments, or require technical assistance or information, please call me at the Cypress district office: 5816 Corporate Avenue, Suite 200, Cypress, CA 90630-4731; phone (714) 816-6847.

Sincerely,

Paul Frost
Associate Oil & Gas Engineer

RESPONSE TO COMMENT LETTER FROM THE DEPARTMENT OF CONSERVATION, STATE OF CALIFORNIA, SIGNED BY PAUL FROST, DATED JANUARY 12, 2005

Response to Comment DOC1:
Comment noted. The Draft Program EIR addresses the adoption of a redevelopment project area; no specific development is proposed at this time. Future redevelopment activities would comply with federal, state, and local agency disclosure requirements in the event a previously unrecorded well is encountered during grading of any future redevelopment project.

STATE OF CALIFORNIA
Governor

Arnold Schwarzenegger

NATIVE AMERICAN HERITAGE COMMISSION
915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-4082
(916) 657-5390 – Fax

January 26, 2005

clear
1-26-05
late

RECEIVED
FEB 03 2005
STATE CLEARING HOUSE

Mr. Tracy Reed
City of San Diego Redevelopment Agency
600 B St., Fourth Floor, MS 904
San Diego, CA 92101

Re: DEIR; Grantville Redevelopment Project
SCH# ~~2004081122~~ 2004071122

Dear Mr. Reed:

NAHC1 Thank you for the opportunity to comment on the above-mentioned document. In order to enable the Commission to verify that your project will not impact a site recorded on the Native American Heritage Commission's Sacred Lands File, please provide us with the following information:

✓ Please provide U.S.G.S. location information for the project site, including Quadrangle, Township, Section, and Range.

NAHC2 Early consultation with tribes in your area is the best way to avoid unanticipated discoveries once a project is underway. Enclosed is a list of Native Americans individuals/organizations that may have knowledge of cultural resources in the project area. The Commission makes no recommendation of a single individual or group over another. Please contact all those listed; if they cannot supply you with specific information, they may be able to recommend others with specific knowledge. By contacting all those listed, your organization will be better able to respond to claims of failure to consult with the appropriate tribe or group. If you have not received a response within two weeks' time, we recommend that you follow-up with a telephone call to make sure that the information was received.

NAHC3 Lack of surface evidence of archeological resources does not preclude the existence of archeological resources. Lead agencies should consider avoidance, as defined in Section 15370 of the CEQA Guidelines, when significant cultural resources could be affected by a project. Provisions should also be included for accidentally discovered archeological resources during construction per California Environmental Quality Act (CEQA), Public Resources Code §15064.5 (f). Health and Safety Code §7050.5; and Public Resources Code §5097.98 mandate the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery and should be included in all environmental documents. If you have any questions, please contact me at (916) 653-6251.

Sincerely,

Carol Gaubatz
Program Analyst

Cc: State Clearinghouse

RESPONSE TO COMMENT LETTER FROM THE NATIVE AMERICAN HERITAGE COMMISSION, STATE OF CALIFORNIA, SIGNED BY CAROL GAUBATZ, DATED JANUARY 26, 2005

Response to Comment NAHC1:

Comment noted. The project area is located in Township 16S, Range 2W in an unsectioned part of the City of San Diego. It is located on the USGS 7.5' La Mesa quadrangle. A more detailed verbal description of the boundaries of the three sub-areas is provided in EIR sections Executive Summary and Project Description, as well as on page 1 of the cultural resources report provided in EIR Volume II Appendix E. Figures ES-1, and 3-2, and cultural resources report pages 1 and 2 provide location maps of the project area.

The proposed project is the adoption of a redevelopment project area; no specific development is proposed at this time. Mitigation Measure CR1 (EIR, page 4.5-5), requires the implementation of measures that address the potential presence of cultural resources, prior to subsequent redevelopment activity in the Project Area. Cultural resources reports prepared for future redevelopment activities would need to comply with City of San Diego Cultural Resource Guidelines.

Response to Comment NAHC2:

ASM Affiliates conducted Native American Consultation as described on page 22 of the cultural resources report (EIR Appendix E). A letter was sent to Ms. Gaubatz and she responded with a list of organizations and individuals to contact. ASM Affiliates then contacted each of the Native American contacts requesting information regarding traditional cultural properties in the project area. The letters were followed by a phone call. Appendix B of the cultural resources report (EIR Appendix E) provides copies of the Native American consultation letters. Native American consultation will be conducted as necessary as part of future cultural resource evaluations for specific redevelopment activities in the Project Area.

Response to Comment NAHC3:

The comment is acknowledged. As indicated by this comment, the EIR recognizes that lack of surface evidence of archaeological resources does not preclude the existence of archaeological resources. The City of San Diego has developed a detailed protocol to be followed in the event of accidental discoveries during construction, which would be followed as part of any subsequent redevelopment activities in the Project Area. Mitigation Measure CR1 (EIR, page 4.5-5) requires, "Any proposed development which may disturb subsurface soils, including removal of existing buildings or construction activities located adjacent to the San Diego River, shall include archaeological monitoring."

RESPONSE TO COMMENT LETTER FROM THE NATIVE AMERICAN HERITAGE COMMISSION, STATE OF CALIFORNIA, SIGNED BY CAROL GAUBATZ, DATED JANUARY 26, 2005 (cont.d)

Response to Comment NAHC3 (cont'd.):

Additionally, Mitigation Measure CR1 requires that avoidance be considered for significant sites. Mitigation Measure CR1 (EIR, page 4.5-5) requires, "Alternative options for significant sites under the City of San Diego and CEQA Guidelines can include: 1) avoidance, and preservation, or 2) mitigation of impacts from proposed development through completion of a data recovery program in compliance with CEQA Guidelines."

Project specific cultural resource recommendations are not made in the EIR as specific redevelopment activities and cultural resource impacts are not known. Detailed recommendations for mitigation would be made as appropriate depending on the type and extent of cultural resources potentially impacted. Subsequent redevelopment activities will be reviewed for potential impacts to cultural resources and will be required to comply with mitigation measures identified in the Program EIR as well as applicable measures based on site-specific cultural resources studies for subsequent redevelopment activities.

Native American Contacts
San Diego County
January 26, 2005

Barona Group of the Capitan Grande
Rhonda Welch-Scalco, Chairperson
1095 Barona Road Diegueno
Lakeside , CA 92040
(619) 443-6612

Barona Group of the Capitan Grande
ATTN: David Baron
1095 Barona Road Diegueno
Lakeside , CA 92040
(619) 443-6612

Barona Group of the Capitan Grande
Steve Banegas, Cultural Resources Coordinator
1095 Barona Road Diegueno
Lakeside , CA 92040
(619) 443-6612

Barona Group of the Capitan Grande
ATTN: EPA Specialist
1095 Barona Road Diegueno
Lakeside , CA 92040
(619) 443-6612

Coastal Gabrieleno Diegueno
Jim Velasques
5776 42nd Street Gabrielino
Riverside , CA 92509 Kumeyaay
(909) 784-6660

Jamul Indian Village
Leon Acevedo, Chairperson
P.O. Box 612 Diegueno/Kumeyaay
Jamul , CA 91935
(619) 669-4785
Fax: (619) 669-4817

Kumeyaay Cultural Historic Committee
Ron Christman
56 Viejas Grade Road Diegueno/Kumeyaay
Alpine , CA 92001
(619) 445-0385

Kumeyaay Cultural Repatriation Committee
Steve Banegas, Spokesperson
1095 Barona Road Diegueno/Kumeyaay
Lakeside , CA 92040
(619) 443-6612
(619) 443-0681 FAX

San Pasqual Band of Mission Indians
Allen E. Lawson, Chairperson
PO Box 365 Diegueno
Valley Center , CA 92082
(760) 749-3200
(760) 749-3876 Fax

Santa Ysabel Band of Diegueno Indians
Johnny Hernandez, Spokesman
PO Box 130 Diegueno
Santa Ysabel , CA 92070
(760) 765-0845
(760) 765-0320 Fax

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resource assessment for the proposed DEIR; Grantville Redevelopment Project, SCH# 2004071122, San Diego County.

Native American Contacts
San Diego County
January 26, 2005

Sycuan Band of Mission Indians
Danny Tucker, Chairperson
5459 Dehesa Road Diegueno/Kumeyaay
El Cajon , CA 92021
619 445-2613
619 445-1927 Fax

Viejas Band of Mission Indians
Anthony Pico, Chairperson
PO Box 908 Diegueno/Kumeyaay
Alpine , CA 91903
(619) 445-3810
(619) 445-5337 Fax

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resource assessment for the proposed DEIR; Grantville Redevelopment Project, SCH# 2004071122, San Diego County.

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 11
P. O. BOX 85406, MS 50
SAN DIEGO, CA 92186-5406
PHONE (619) 688-6954
FAX (619) 688-4299
TTY (619) 688-6670

Flex your power!
Be energy efficient!

January 25, 2005

11-SD-8
PM 6.3

Mr. Tracy Reed
City of San Diego Development Agency
600 B Street, 4th Floor, MS 904
San Diego, CA 92101

Dear Mr. Reed:

DEIR – Grantville Redevelopment Project – SCH 2004071122

The California Department of Transportation (Caltrans) District 11 has the following comments:

- Several of the State intersections analyzed are improperly coded (Technical Appendix B) and hence under report predicted LOS. For example:

  Intersection #1 Interstate 15 (I-15) SB ramps at Friars Road: The SB approach is coded as two left turns and a dedicated right. In fact, the existing SB off ramp is only two lanes with a dedicated left and combination left/right turn lane. Only the last hundred feet or so widens to accommodate a free right turn lane. In addition, this intersection is currently being reconstructed. The future scenarios (assuming no further improvements are made) should code the SB off ramp as two left turn lanes and two right turn lanes. Furthermore, a WB left turn lane is being added to accommodate SB I-15 traffic and the EB right turn lane that is currently free moving will now be signal controlled.

  DOT1

  Intersection #12 Interstate 8 (I-8) WB off at Camino del Rio North/Alvarado Canyon Road: The SB left turn is coded as only one lane. In fact, there are two left turn lanes here. However, this should not affect predicted LOS much.

  Intersection #14 I-8 EB off at Fairmount: The EB right turn is coded as a free right turn. In fact, this move is signal controlled as it conflicts with the SB through movement. This results in a serious underreporting of LOS, particularly in the pm peak.

- The report does not address the signalized intersection of I-8 EB ramps and Waring Road. This intersection has been reconstructed due to trolley impacts and signalized. Since it falls clearly within sub area A, and is most influenced by the proposed development of sub area C, it should probably be analyzed.

  DOT2

- Although identified improvements are contingent upon specific development, the document states as a project objective, to "improve the flow of traffic within the Redevelopment Project Area and otherwise enhance the quality of pedestrian and vehicular mobility" [3.4.1 (3)]. The community plan proposes to add approximately 17,000 daily trips above the no-build alternative in the horizon year and the alternative plan project, 19,000 daily trips above the no-build alternative on Fairmount Avenue in the vicinity of the I-8 interchange (tables 6a and 6b respectively of appendix B).

  DOT3

"Caltrans improves mobility across California"

RESPONSE TO COMMENT LETTER FROM THE DEPARTMENT OF TRANSPORTATION, STATE OF CALIFORNIA, SIGNED BY MARIO H. ORSO, DATED JANUARY 26, 2005

Response to Comment DOT1:

Intersection #1. A field review indicates that the southbound approach at Interstate 15 (I-15) and Friars Road has a right turn lane approximately 300 feet in length, which provides ample storage capacity for right-turning vehicles to turn right without being blocked by the left-turning vehicles. The additional improvements to this intersection (future scenarios of the southbound ramp as two left turn lanes and two right turn lanes, as well as the addition of a westbound left turn lane) as identified by the commentor would improve traffic LOS at this location beyond the LOS that is assumed. As such, the traffic analysis is considered conservative (worst-case).

Intersection #12. Comment noted. Because the existing Interstate 8 westbound offramp at Camino del Rio North/Alvarado Canyon Road actually contains two left turn lanes, whereas only one left turn lane is assumed in the traffic study, the analysis is considered conservative (worst-case). As noted by the commentor, the existence of the second left turn lane at this location should not affected predicted LOS significantly.

Intersection #14. The eastbound movement reference by the commentor is misrepresented in the figure depicting this intersection location configuration; however, the analysis is based on a signal that has three eastbound right-turn lanes, which corresponds to existing conditions.

Response to Comment DOT2:

Interstate 8 eastbound ramps at Waring Road were under construction at the time of the preparation of the traffic analysis, and therefore were not included in the analysis. However, the improvements would improve LOS in the area, and are based on traffic improvement recommendations as analyzed in the Mission Valley East Corridor Project Final Environmental Impact Statement (FTA, MTDB, June 1998). Project Area intersections analyzed in the FEIS included Fairmount Avenue/Camino Del Rio North-Alvarado Canyon Road, Fairmount Avenue/Mission Gorge Road, Mission Gorge Road/Mission Gorge Place, Waring Road/Adobe Falls Road. As stated by the commentor, the I-8 eastbound ramps/Waring Road intersection is most influenced by Subarea C. Subarea C is currently developed with a commercial center, school and park. It is not likely that the school and park would be redeveloped; however, the commercial center may be revitalized. Pursuant to City of San Diego Traffic Impact Analysis Guidelines, a traffic impact study would be required for any future redevelopment within Subarea C (as well as the entire Project Area) for any project

RESPONSE TO COMMENT LETTER FROM THE DEPARTMENT OF TRANSPORTATION, STATE OF CALIFORNIA, SIGNED BY MARIO H. ORSO, DATED JANUARY 26, 2005 (cont.d)

Response to Comment DOT2 (cont.d):
that generates traffic greater than 1,000 total average daily trips, or 100 peak-hour trips if the project is consistent with the land use element of the community plan, or 500 total average daily trips, or 50 peak-hour trips if the project is not in conformance with the land use element of the community plan.

Response to Comment DOT3:
As the comment acknowledges, identified traffic improvements are contingent upon specific development and a project-level traffic analysis as required by City of San Diego Traffic Impact Analysis Guidelines. The EIR recognizes that existing and projected traffic conditions within and surrounding the Project Area currently, and will continue to exceed City LOS standards. However, no specific development is proposed. Appropriate mitigation at each impacted location will be analyzed on a project-by-project basis. Individual development will be required to evaluate environmental impacts and implement appropriate mitigation where necessary.

The Agency acknowledges and concurs that the problems associated with the Fairmount Avenue/Mission Gorge/I-8 interchange are of regional significance and will not likely be addressed absent a concerted redevelopment effort in the area. A primary purpose of the Grantville Redevelopment Plan will be to correct traffic circulation problems that impact the area and surrounding neighborhoods, and the subject interchange was included in the Redevelopment Project Area for that reason. The study, design and construction of improvements to the I-8 Interchange within the Project Area are included in the proposed Five-Year Implementation Plan. Absent the adoption of the Redevelopment Plan, it is unlikely that these problems will be addressed in the foreseeable future and thus they will continue to cause a significant safety and economic burden to the surrounding community.

DOT3 (cont'd.) In either case, the total volumes (approximately 80,000) will greatly exceed the capacity of the existing 4 lane major road and even if it is widened to 6 lanes. It is clear, that if the problems associated with the Fairmount Avenue/Mission Gorge /I-8 interchange are ever to be addressed, it should be through this redevelopment effort. The proposed redevelopment appears to be large enough to accommodate improvements of this type and should be recommended as project mitigation.

DOT4
- The report under section 4.2.3.5 "Horizon Year (Year 2030) Conditions" states that "No new CIP improvements are planned for the study area under both the existing and horizon year scenarios". Is the City not undertaking a relocation of Alvarado Canyon Road away from the I-8 WB off ramp as mitigation for the extension of Alvarado Canyon Road to Waring Road?

DOT5
- Caltrans supports "fair share" contributions as mitigation from developers for improvement due to cumulative traffic impacts from all proposed development projects. It is our recommendation that a coordinated effort between all interested parties be achieved in order to address ultimate transportation needs for future development.

DOT6
- The developer is responsible for quantifying the environmental impacts of any improvements (project level analysis) and completing all appropriate mitigation measures for the impacts. The indirect effects of any mitigation within Caltrans right of way must also be addressed. The developer will also be responsible for procuring any necessary permits or approvals for the regulatory and resource agencies for the improvements.

If you have any questions, please contact Jim Buksa, Development Review Branch, at (619) 688-6968.

Sincerely,

MARIO H. ORSO, Chief
Development Review Branch

"Caltrans improves mobility across California"

RESPONSE TO COMMENT LETTER FROM THE DEPARTMENT OF TRANSPORTATION, STATE OF CALIFORNIA, SIGNED BY MARIO H. ORSO, DATED JANUARY 26, 2005 (cont.d)

Response to Comment DOT4:
Several improvements associated with the Grantville Trolley extension were under construction at the time of the preparation of the traffic analysis. The relocation of Alvarado Canyon Road and the I-8 westbound off-ramp intersection does not change the HCM calculation of level of service and delay at any study intersection. However, there are no additional improvements identified in the City's CIP (Navajo's A-list, i.e., CIP) for the study area at this time.

Response to Comment DOT5:
Comment noted.

Response to Comment DOT6:
Comment noted.

U.S. Fish and Wildlife Service
Carlsbad Fish and Wildlife Office
6010 Hidden Valley Road
Carlsbad, California 92009
(760) 431-9440
FAX (760) 431-5902 + 9618

CA Dept. of Fish & Game
South Coast Regional Office
4949 Viewridge Avenue
San Diego, California 92123
(858) 467-4201
FAX (858) 467-4299

In Reply Refer To:
FWS-SDG-4185.2

Mr. Tracy Reed
City of San Diego Redevelopment Agency
600 B Street, Fourth Floor, MS 904
San Diego, California 92101

FEB 14 2005

Re: Draft Program Environmental Impact Report for the Grantville Redevelopment Project (SCH# 2004071122)

Dear Mr. Reed:

DFG1 The U.S. Fish and Wildlife Service (Service) and the California Department of Fish and Game (Department), collectively the "Wildlife Agencies," have reviewed the above-referenced Draft Program Environmental Impact Report (DEIR) for the Grantville Redevelopment Project in the City of San Diego (City), County of San Diego, California. The City distributed the DEIR to the Wildlife Agencies in December, 2004, as did the State Clearinghouse to the Department. However, neither the Service nor the Department has record of receiving the DEIR until February 3, 2005, and January 31, 2005, respectively, after BRG Consulting and the City sent us additional copies. We commented on the Notice of Preparation of the DEIR in a joint letter dated August 30, 2004. We appreciate the City's extension of the comment period for the DEIR to February 14, 2005.

DFG2 The San Diego Redevelopment Agency is pursuing a redevelopment plan to promote a variety of land uses, improve traffic flow, parking, and services in, and eliminate physical and economic blight from, the project area over a period of 30 years. This project is the adoption of a redevelopment plan to accomplish these goals. The area proposed for inclusion in the Grantville Redevelopment Project is located in the north eastern portion of the City, primarily within the Navajo Community Plan, but also includes portions of the Tierrasanta and the College Area. The San Diego River runs through most of the proposed redevelopment area.

DFG3 The Wildlife Agencies concur with statements in the DEIR that the project could result in significant impacts to biological resources such as sensitive habitats and listed and otherwise sensitive species. We are especially concerned about potential impacts on: (1) the San Diego River and associated wetland and riparian habitats; (2) the federally and state-listed and otherwise sensitive species that occur therein; (3) the Multiple Habitat Planning Area (MHPA) of the City's Multiple Species Conservation Program (MSCP); (4) wildlife corridors; and (5)

TAKE PRIDE IN AMERICA

RESPONSE TO COMMENT LETTER FROM THE U.S. FISH AND WILDLIFE SERVICE (FEDERAL AGENCY), SIGNED BY THERESE O'ROURKE/CALIFORNIA DEPARTMENT OF FISH AND GAME, SIGNED BY DONALD CHADWICK (JOINT LETTER), DATED FEBRUARY 14, 2005

Response to Comment DFG1:
Comment noted.

Response to Comment DFG2:
Comment noted.

Response to Comment DFG3:
Comment noted. The Grantville Program EIR has been prepared pursuant to Sections 15168(a)(3) and 15180 of the CEQA Guidelines. The Program EIR address the anticipated environmental impacts associated with the adoption of the proposed redevelopment plan, and continued implementation of land uses pursuant to the existing adopted community plan land uses of the project area. No specific development project is proposed, and the Program EIR analyzes the potential environmental impacts based on the development potential of land uses in the Project Area. Subsequent redevelopment activities will be assessed for compliance with CEQA, including potential biological impacts.

narrow endemic species. The DEIR does not provide analyses of potential biological impacts from any specific redevelopment project that may occur pursuant to the DEIR. However, the DEIR indicates that additional environmental review will be conducted where specific actions would result in impacts to sensitive habitats and/or wildlife corridors or the MHPA. We offer many of the same comments that we provided in our NOP letter to assist us in our review of subsequent environmental documentation prepared for projects proposed as part of the Grantville Redevelopment Project, assist the City in compliance with pertinent Federal and state regulations and laws, ensure consistency with the MSCP, and ensure adequate protection in perpetuity of the biological resources associated with the San Diego River.

DFG3 (cont'd.)

1. The Wildlife Agencies are concerned about direct and indirect effects on the San Diego River and the sensitive habitats and species that it supports. We are particularly concerned about biological effects from construction and operational (i.e., long-term) disturbances of sensitive habitats and disruptions of wildlife movement and behavior (e.g., breeding) by human encroachment, noise, light, glare, and hydrological changes. The DEIR states that "the San Diego River riparian habitat and adjacent Diegan coastal sage scrub are still areas of relatively high species diversity and abundance and provide a regional wildlife corridor" between Mission Trails Park and Mission Bay Park, and that "these habitats and linkages are crucial for wildlife species survival and reproduction within the Redevelopment Area and surrounding region." The DEIR also explains that the much of the riparian habitat and adjacent upland vegetation communities are within the MHPA, and that the MSCP identifies the San Diego River corridor as a habitat linkage between core resource areas. We concur with these statements and cite them to emphasize that it is essential that every effort be made to protect these biological resources from additional direct and indirect impacts.

DFG4

Regarding direct impacts on wildlife corridors, the DEIR concludes that consistency with the MSCP and the City wetland regulations would generally avoid impacts to wildlife corridors (page 4.6-26). The DEIR also states, "redevelopment actions that are consistent with the City's MSCP would provide for the long-term viability of wildlife and sensitive habitats" and concludes that implementation of the nine mitigation measures identified in the DEIR would reduce the potential impacts to less than significant. The following excerpts comprise the pertinent language related to wetland buffers in the City's Environmentally Sensitive Lands Regulations (ESL Regs) and Biology Guidelines.

DFG5

a. *The applicant shall solicit input from the Resource Agencies on impact avoidance, minimization, mitigation and buffer requirements, including the need for upland transitional habitat. The applicant shall, to the maximum extent feasible, incorporate the Resource Agencies' recommendations prior to the first public hearing* [Section143.0141(a) of the ESL regs].

b. *A wetland buffer shall be maintained around all wetlands as appropriate to protect the functions and values of the wetland* [Section 143.0141(b) of the ESL regs; Section II, (a)(1)(b) of the Biology Guidelines].

RESPONSE TO COMMENT LETTER FROM THE U.S. FISH AND WILDLIFE SERVICE (FEDERAL AGENCY), SIGNED BY THERESE O'ROURKE/CALIFORNIA DEPARTMENT OF FISH AND GAME, SIGNED BY DONALD CHADWICK (JOINT LETTER), DATED FEBRUARY 14, 2005 (cont.d)

Response to Comment DFG4:

Comment noted.

Response to Comment DFG5:

As described in the EIR, a majority of the Project Area that contains sensitive habitats, including wetlands, is located within the MSCP Multiple Habitat Planning Area. All future redevelopment activities will be required to be in compliance with the City of San Diego MSCP Subarea Plan and its implementing regulations (EIR page 4.6-29). In addition to MSCP compliance, further environmental review will be required as specific development projects are proposed. As stated by the commentor, the City's Environmentally Sensitive Lands regulations require that, "A wetland buffer shall be maintained around all wetlands as appropriate to protect the functions and values of the wetlands." Additionally, all future development will be required to comply with the MSCP adjacency guidelines. Because the river is a component of the MHPA, it is anticipated that MHPA compliance will ensure that a viable wildlife corridor and river resources are maintained.

It will be relatively easy to determine whether the redevelopment projects comply with the City's specific requirements (e.g., mitigation ratios) intended to achieve consistency with the MSCP. However, depending on the application of the preceding excerpts, consistency with such specific requirements may or may not ensure adequate protection for the San Diego River and associated sensitive habitats and species. In fact, these regulations/guidelines provide no assurance that adequate buffers will be provided.

DFG5 (cont'd.)

Riparian buffers are crucial for the protection of riparian habitat in urban areas. They provide numerous functions, including providing additional foraging habitat for wildlife, and reducing edge effects[1] such as artificial noise and light, and invasive species encroachment. Buffers are an integral part of the complex ecosystems that provide food and habitat for the fish and wildlife in stream communities. As a component of an integrated management system, riparian buffers can also protect streams by managing natural levels of nutrients and sediment (i.e., they should not be burdened by anthropogenic pollutants which often represent levels beyond their natural assimilative capacity). Therefore, we recommend the following.

DFG6

a. An adequate buffer, as measured from the outside edge of the riparian habitat, should be established to protect the wetland habitats from edge effects, which can penetrate up to 200 meters from the actual reserve boundary (CBI 2000). The Fish and Game Commission Policy on the Retention of Wetland Acreage and Habitat Values states, "Buffers should be of sufficient width and should be designed to eliminate potential disturbance of fish and wildlife resources from noise, human activity, feral animal intrusion, and any other potential sources of disturbance. The size and character of buffers shall ultimately be determined by the requirements of the affected species most sensitive to such disturbances." Specific recommendations for the width of riparian buffers in published journals range from 10 to 240 meters, or approximately 33 to 787 feet, and the U.S. Army Corps of Engineers suggests that narrow strips of 100 feet may be adequate to provide many of the functions cited above (USACE 1991).

DFG7

b. In addition to the width of the biological buffer, the following measures should be taken to ensure that the buffer provides the protection for which it is intended. Subsequent

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1 Edge effects are defined as undesirable anthropogenic disturbances beyond urban boundaries into potential reserve habitat (Kelly and Rotenberry 1993). Edge effects, such as disturbance by humans and non-native predators (pets), exotic ants, trampling, noise, and lighting, and decreases in avian productivity (Andren and Angelstam 1988), are all documented effects that have negative impacts on sensitive biological resources in southern California. Surrounding natural habitat could be permanently destroyed by human or domestic animal encroachment, trampling, bushwhacking, and frequent fires; therefore, development and open space configurations should minimize adverse edge effects (Soulé 1991).

DFG6

Regarding artificial night lighting, illumination of riparian corridors by night lighting has the potential to adversely affect birds. Physiological, developmental, and behavioral effects of light intensity, wavelength, and photoperiod on bird species are well-documented. In the wild, urban lighting is associated with early daily initiation of avian song activity (Bergen and Abs 1997). Avian species are known to place their nests significantly farther from motorway lights than from unlighted controls (de Molenar et al, 2000). Placement of nests away from lighted areas implies that part of the home range is rendered less suitable for nesting by artificial light. If potential nest sites are limited within the bird's home range, reduction in available sites associated with artificial night lighting may cause the bird to use a suboptimal nest site, that is more vulnerable to predation, cowbird parasitism, or extremes of weather.

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Response to Comment DFG6:

The comment is acknowledged. The Agency concurs that the size and character of buffers shall ultimately be determined by the requirements of the affected species most sensitive to such disturbances and that specific recommendations for the width of the riparian buffers range between 33 and 787 feet. Because no specific developments are proposed, there is no specific buffer width identified in the EIR. It is acknowledged that subsequent environmental review will be required for specific projects, and that the appropriate buffer width and configuration would be determined based on the potential impact and potentially-impacted species.

Response to Comment DFG7:

Comment noted. EIR Mitigation Measure BR 2 has been modified to incorporate the language recommended by the commentor so as to ensure that proposed buffers provide the protection as intended. Mitigation Measure BR 2 has been modified as follows:

BR2 Further environmental review shall be conducted in accordance with appropriate CEQA documentation requirements where specific actions would result in impacts to sensitive habitats and/or wildlife corridor/MHPA preserve areas. These reviews shall be conducted at the earliest possible period of tiered project review to ensure the most flexibility in planning and project design, and resolve conflicts with significant biological resources.

i. Trails should be kept out of the biological buffer except in areas of lower biological sensitivity. Trails within the buffer should be limited to trails that provide access to biological and /or cultural interpretive areas along the River, and aligned roughly perpendicular to the length of the buffer (i.e., spur trails). These interpretive areas and spur trails should be carefully chosen and should not be placed in biologically sensitive areas or areas with strong potential for effective habitat restoration and enhancement of species diversity.

ii. As required by the MSCP Subarea Plan, native vegetation should be restored as a condition of future development proposals along the Urban Habitat Areas of the San Diego River corridor.

environmental documentation should provide adequate information (e.g., restoration plan) for public review about how each of these measures will be implemented.

i. Trails should be kept out of the biological buffer except in areas of lower biological sensitivity. Trails within the buffer should be limited to trails that provide access to biological and/or cultural interpretive areas along the River, and aligned roughly perpendicular to the length of the buffer (i.e., spur trails). These interpretive areas and spur trails should be carefully chosen and should not be placed in biologically sensitive areas or areas with strong potential for effective habitat restoration and enhancement of species diversity.

ii. As required by the MSCP Subarea Plan, native vegetation should be restored as a condition of future development proposals along the Urban Habitat Areas of the San Diego River corridor.

iii. Permanent fencing and signage should be installed at the outside edge of the buffer areas. The limits of spur trails within the buffer should be effectively demarcated and/or fenced to avoid human encroachment into the adjacent habitat. The fencing should be designed to prevent encroachment by humans and domestic animals into the buffer areas and riparian corridor[2]. The signage should inform people that sensitive habitat (and, if appropriate, mitigation land) lie beyond the fencing and that entering the area is illegal.

DFG7 (cont'd.)

iv. All post-construction structural best management practices (BMPs) such as grass swales, filter strips, and energy dissipators, should be outside of the riparian buffer and the riparian corridor (i.e., they should be within the development footprint). All filtration and attenuation of surface flows provided by the proposed BMPs should occur prior to the discharge of the flows into the buffer areas.

v. Brush management zones should be outside the riparian buffer. The City's proposed brush management regulations state "no brush management is required in areas containing wetland vegetation."[3]

vi. No additional lighting should be added within the vicinity of both upland and wetland sensitive habitats, and where possible, existing lighting within such areas should be removed.

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2 The following web sites provide some information on fencing that exclude cats or that may exclude cats more effectively than simple chain link fencing; the Wildlife Agencies do not endorse the products/ideas on any of these web sites, but we suggest that they be considered to meet the project-related fencing needs: http://www.purrfectfence.com/; http://www.xcluder.co.nz/xkiwi.htm (this website is for a manufacturer in New Zealand... we do not know whether they have distributors in California); http://www.catfencein.com/; http://www.catfence.com/contact.htm; http://www.corporatevideo.com/klips/index.htm; http://www.omegafence.com/; http://www.coyoteroller.com/ (this website is for a product that is put on top of a chain link fence).

3 The Wildlife Agencies recommended in a joint comment letter (July 9, 2004) on the draft EIR for the proposed brush management revisions, that this requirement apply to both Zones 1 and 2, not only to Zone 2 as proposed.

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Response to Comment DFG7 (cont.d):

iii. Permanent fencing and signage should be installed at the outside edge of the buffer areas. The limits of spur trails within the buffer should be effectively demarcated and/or fenced to avoid human encroachment into the adjacent habitat. The fencing should be designed to prevent encroachment by humans and domestic animals into the buffer areas and riparian corridor. The signage should inform people that sensitive habitat (and, if appropriate, mitigation land) lie beyond the fencing and that entering the area is illegal.

iv. All post-construction structural best management practices (BMPs) such as grass swales, filter strips, and energy dissipaters, should be outside of the riparian buffer and the riparian corridor (i.e., they should be within the development footprint). All filtration and attenuation of surface flows provided by the proposed BMPs should occur prior to the discharge of the flows into the buffer areas.

v. Brush management zones should be outside the riparian buffer. The City's proposed brush management regulations state "no brush management is required in areas containing wetland vegetation."

vi. No additional lighting should be added within the vicinity of both upland and wetland sensitive habitats, and where possible, existing lighting within such areas should be removed.

vii. As to noise, methods should be employed to attenuate project-related construction and operational noise levels in excess of ambient levels at the edge of sensitive habitats to avoid or minimize further degradation by noise of conditions for wildlife, particularly, avian species. Where possible, existing sources of noise audible within the buffer should be removed.

viii. All areas within biological buffers should be added to the MHPA, if not already within it, and should be accordingly managed in perpetuity to maintain the biological functions and values the buffers are intended to protect.

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Response to Comment DFG7 (cont.d):
The Agency also agrees that the proposed project presents an opportunity to improve the protection of the San Diego River, which is, basis in part, as to the inclusion of these open space areas of the river as part of the redevelopment project area. The redevelopment plan recognizes the San Diego River as a significant resource, and includes the following goals related to the river:

- Address urban runoff and industrial pollution issues to minimize negative impacts on sensitive environmental resources and to optimize the environmental assets of the Project Area such as the San Diego River and Mission Trails Regional Park (Goal #11)

- Support habitat conservation and restoration along the San Diego River in coordination with developed plans for the area and in concert with other related municipal and private entity activities (Goal #13)

vii. As to noise, methods should be employed to attenuate project-related construction and operational noise levels in excess of ambient levels at the edge of sensitive habitats to avoid or minimize further degradation by noise of conditions for wildlife, particularly, avian species. Where possible, existing sources of noise audible within the buffer should be removed.

viii. All areas within biological buffers should be added to the MHPA, if not already within it, and should be accordingly managed in perpetuity to maintain the biological functions and values the buffers are intended to protect.

DFG7 (cont'd.)

We recognize that there is extant development that will remain and present constraints in some areas in providing uniformly adequate buffers for the riparian corridor. Nevertheless, we believe that the redevelopment project provides ample opportunity to improve the protection of the San Diego River and the biological resources it supports. We hope that, for all redevelopment projects adjacent or proximate to the San Diego River, the City (i.e., applicant) will solicit input from the Wildlife Agencies regarding the appropriate buffer width and requirements early in the design phase for each project, and will incorporate our recommendations into the project design so that the draft CEQA documents reflect the adequate buffers and measures to protect them in perpetuity.

2. Though the DEIR identifies some potential edge effects (i.e., indirect impacts, page 4.2-28), subsequent environmental documentation should provide a thorough discussion of potential project-related edge effects and specific measures that would be implemented to avoid or minimize the effects. Although one of the principles of the City's Draft River Park Master Plan is to reorient development toward the San Diego River, we are concerned that situating development in such a manner will result in otherwise avoidable indirect impacts to the San Diego River and the associated biological resources and adjacent uplands. If this principle is pursued for the redevelopment projects subject to this DEIR, the subsequent environmental documentation should thoroughly describe how the projects are designed to avoid or minimize edge effects. DFG8

3. Citing the draft San Diego River Master Plan as the source of information, the DEIR describes six areas as potential sites for mitigation for project-related impacts (pages 4.6-30 through 4.6-32). We support restoration of all these areas and more, provided that: a) they are adjacent to areas of sensitive habitat that is intended to be preserved in perpetuity; b) adequate buffers are established; c) the mitigation areas and adjacent habitat are within the MHPA already or will be added to the MHPA; and, d) the mitigation areas and adjacent habitat will be adequately managed in perpetuity. DFG9

4. The DEIR includes statements about the MSCP which warrant elaboration. We discuss these below and request that the final EIR reflect the following comments.

DFG10

a. Page 4.6-19 of the DEIR states, the City "has take authority over many of the areas' State-listed species through the MSCP." While this is true, it should be clarified that the authority for take is contingent on the City's implementation of the MSCP, and in this

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Response to Comment DFG8:

It is anticipated that future redevelopment activities would need to be consistent with the City's River Park Master Plan, when adopted. The River Park Master Plan is currently a draft document, and adoption by the City will require environmental documentation pursuant to CEQA. It is anticipated that the concerns of the commentor regarding potential indirect effects associated with implementation of the River Park Master Plan would be evaluated by the City as part of the future adoption of the Master Plan. It is acknowledged that subsequent redevelopment activities will be required to be evaluated pursuant to CEQA, potential biological impacts, and consistency with other adopted plans and regulations.

Response to Comment DFG9:

The EIR analysis identifies potential biological mitigation opportunities, and demonstrates that there are feasible mitigation opportunities in the Project Area. The comment is acknowledged that potential mitigation sites, as identified in the EIR and the Draft River Park Master Plan, will be required to meet the criteria identified by the commentor.

Response to Comment DFG10:

EIR page 4.6-19 has been modified as follows:

> The Federal government also regulates impacts on rare plant and animal species through the Endangered Species Act. Federally listed species with potential to occur in the Project Area are listed in Tables 4.6-2 through 4.6-4. Note; however, that the City of San Diego has take authority over many of the areas' federally-listed species through the MSCP, contingent on the City's implementation of the MSCP, including the species-specific measures identified in Appendix A (i.e., Table 3-5) of the City's MSCP Subarea Plan. Impacts to MSCP-covered listed species outside the MHPA may also be ~~are~~ allowed through permits issued by the City of San Diego; however, in certain cases take may not be authorized, or conditions for coverage may require that impacts be avoided, even outside of the MHPA. Species-specific conditions required for coverage are included in Table 3-5 of the MSCP Plan, Appendix A of the City's Subarea Plan, and the Federal Fish and Wildlife Permit for Endangered/Threatened Species PRT-830421. Take of MSCP covered species within the MHPA is not allowed. Any impacts to non-covered listed species would require a Section 7 or 10 consultation before a permit may be issued by the U.S. Fish and Wildlife Service (USFWS).

DFG10 (cont'd.)

case, particularly the species-specific measures identified in Appendix A (commonly known as Table 3-5) of the City's MSCP Subarea Plan.

b. Page 4.6-19 of the DEIR states, "impacts to MSCP-covered species outside the MHPA are allowed through permits issued by the City." This statement is not entirely correct. Although a species may be covered under the City's Subarea Plan, take authorization may not be authorized, or conditions for coverage may require that impacts be avoided, even outside of the MHPA. Species-specific conditions required for coverage are included in Table 3-5 of the MSCP Plan, Appendix A of the City's Subarea Plan, and the Federal Fish and Wildlife Permit for Endangered/Threatened Species PRT-830421. For example, incidental take of covered species due to mortality or habitat loss within U.S. Army Corps of Engineers (Corps) jurisdictional wetlands and/or vernal pools is not authorized by the MSCP. Incidental take authorization for projects that affect federally listed species (1) that occur in Corps jurisdictional wetlands, (2) that are not covered under the MSCP (e.g., Quino checkerspot butterfly (*Euphydryas editha quino*, Quino), and/or (3) for which the City does not have take authorization (e.g., species that occur in vernal pools) will have to be obtained through consultation with the Service through section 7, provided there is a federal nexus, or section 10 of the federal Endangered Species Act (ESA). If, under any of these circumstances, the affected species is/are also a state-listed species, the City may (depending on whether the effects constitute take under the California ESA [CESA]) also need take authorization under either section 2081 or 2080.1 of CESA. It should be noted that because Subarea 2 of the project footprint is partially within the Service's Year 2002 Recommended Quino Survey Area, a qualified biologist should conduct a habitat assessment for Quino and, if appropriate, surveys for Quino, when a specific project is proposed for that area. Regarding the federally and state listed least Bell's vireo (*Vireo bellii pusillus*), a wetland dependent species likely to occur within the project's area of potential effect, it should be noted that the MSCP requires that loss of occupied habitat be avoided both inside and outside the MHPA during the breeding season.

DFG11

5. Page 4.6-20 of the DEIR states, "for projects that would not impact any of the City of San Diego Tier I-III habitats or wetlands (including wetland buffers), no biological resource impacts would be anticipated." Disturbed and agricultural areas (i.e., Tier IV areas) can support habitat for some listed and otherwise sensitive species. For example, the arroyo southwestern toad (*Bufo microscaphus californicus*) can use agricultural lands adjacent or proximate to occupied streams. In addition, trees within Tier IV areas can provide avian nesting habitat, particularly if the trees are near habitats that provide foraging opportunities for birds. Furthermore, disturbed and agricultural areas can serve to buffer sensitive habitats from edge effects and human and pet encroachment associated with development. While arroyo toads do not occupy the reach of the San Diego River within the proposed redevelopment area, the statement in the DEIR should be modified to reflect the potential for some biological resources to occur in Tier IV areas. While the redevelopment projects that occur in Tier IV areas would not be required to mitigate for loss of habitat, site-specific assessment should occur to determine whether there is potential for active avian nests on site. If there is potential, measures to avoid impacts on the nests should be implemented.

DFG12

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Response to Comment DFG11:

Please refer to response to comment DFG10. It is acknowledged that a portion of the Project Area is partially located within the Service's Year 2002 Recommended Quino Survey Area. A habitat assessment, and possibly surveys would be required as part of the subsequent evaluation of a specific redevelopment activity.

It is also acknowledged that any future potential loss of least Bell's vireo occupied habitat be avoided both inside and outside of the MHPA during the breeding season.

Response to Comment DFG12:

EIR page 4.6-20 has been modified as follows:

> For projects that would not impact any City of San Diego Tier I-~~III~~IV habitats or wetlands (including wetland buffers), no biological resource impacts would be anticipated. For areas that ~~do have~~ contain Tier I, Tier II, Tier III and Tier IV habitats that would be impacted ~~and Tier II habitats~~, a site-specific analysis of biological resources should be conducted using the data included herein as a basis. Although Tier IV habitats are not considered sensitive, disturbed and agricultural areas could support sensitive species.

DFG13 6. The DEIR discusses, and depicts on figures the locations of, areas that support sensitive habitats (pages 4.6-22 through 4.6-28, figures 4.6-1 through 4.6-4). The final EIR should clarify whether this is an exhaustive list of the sensitive habitats within the redevelopment area or whether more may be revealed during project-specific analyses.

DFG14 7. Page 4.6-23 of the DEIR discusses the redevelopment area near Alvarado Canyon and Adobe Falls Road. The final EIR should clarify whether this area encompasses any locations where Supplemental Environmental Projects approved by the San Diego Regional Water Quality Control Board (e.g., Adobe Falls, San Diego River Invasive Exotic Weed Eradication Program) have occurred or are expected to occur.

DFG15 8. The DEIR states, "the redevelopment of the currently disturbed mining areas would not result in significant impact on biological resources" (page 4.6-25), and "the river corridor through the mine site is infested with exotic plant species" (page 4.11-8). Any subsequent environmental analyses conducted for redevelopment in this area should examine the impacts of the redevelopment on species diversity and abundance, and wildlife movement through the area. It may be that redevelopment of the mining areas would have significant impacts on biological resources, as birds can occupy areas infested by weeds, and some wildlife species may use the area as a movement corridor. While the mining operations cause significant indirect impacts that diminish the biological potential of the adjacent and proximate reaches of the San Diego River and associated habitats, future land uses could result in a continuation of significant negative biological impacts.

DFG16 9. The City's CEQA significance determination guidelines establish the following significance thresholds below which mitigation would not be required: a) loss of less than 0.10 acre of Tier I through Tier III; b) loss of less than 1.0 acre non-native grassland completely surrounded by existing urban development, and not associated with or mapped in close proximity to other habitats; and c) loss of less than 0.01 acre of wetlands, except vernal pools. One of the DEIR's proposed mitigation measures is the mitigation of the loss of Tier I-III habitats per the MSCP requirements. Program EIRs provide an occasion for a more exhaustive consideration of effects and alternatives than would be practical in an EIR on an individual action, and ensure consideration of cumulative impacts, that might be slighted in a case-by-case analysis (Section 15168[b][1&2] of the CEQA Guidelines). Accordingly, the City should use the estimated cumulative losses that will result from all the projects conducted under the final EIR in determining whether project-related habitat losses exceed the City's CEQA significance determination thresholds and require mitigation. If, as the projects are implemented, the estimated acreages change, the mitigation requirements would change accordingly.

DFG17 10. The NOP for the project indicated that the project area encompasses 831 acres. Table 4.6-1 indicates that the project area encompasses 970 acres, and the biological resources report (Rocks Biological Consulting, October 2004) indicates that the project area encompasses 1,400 acres (page 1), though the acreages identified for the habitat types add up to approximately 977 acres. Please reconcile these apparent discrepancies.

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Response to Comment DFG13:
A detailed biological survey of the Project Area was conducted in summer 2004 and the habitats and resources observed are depicted in the EIR and biology technical report figures. However, no focused surveys were conducted, as focused surveys are appropriately conducted at the time specific developments are proposed. It is not anticipated that more habitat communities would be revealed based on subsequent biology surveys; however it should be noted that the EIR evaluates potential impacts associated with continued implementation of the adopted community plan over a 30-year period. It is recognized that biological conditions are likely to change over the course of this period.

Response to Comment DFG14:
Arrondo was observed throughout the Alvarado Canyon area. It is not known what phase or stages any programs are in; however, future redevelopment projects would need to take into consideration these restoration activities.

Response to Comment DFG15:
Comment noted.

Response to Comment DFG16:
The comment is noted. Because no specific projects are proposed, it is not possible to provide a quantification of the potential cumulative loss of habitat within the Project Area at the Program EIR level of analysis. Pursuant to CEQA, any future redevelopment activities would be required to consider the potential cumulative effects and mandatory findings of significance.

Response to Comment DFG17:
The Project Area comprises approximately 970 acres. The biology report has been modified to reconcile the acreage discrepancies.

11. In addition to the items already discussed in this letter, subsequent environmental documentation, as needed for each redevelopment project, should provide the following information.

    a. A complete description of the proposed project.

    b. A range of practicable alternatives that have been considered to reduce project impacts to biological resources, including the MHPA.

    c. A thorough justification for any proposed River crossings. Proposed River crossings, if any, should be proposed for areas of lesser biological value, avoid direct impacts to the San Diego River and riparian habitats, retain the viability of the riparian habitat and adjacent uplands as a wildlife movement corridor, and preclude the need for ongoing maintenance (i.e., disturbance of the native habitat).

    d. Verification that all requirements and conditions of the MSCP Subarea Plan and Implementing Agreement are met.

    e. A discussion of the biological issues that are not addressed in, or covered by, the Subarea Plan and Implementing Agreement, such as specific impacts to and mitigation requirements for wetlands or sensitive species that occur therein.

DFG18

    f. If the project is in the 100-year floodplain of the San Diego River, a discussion of how the project will comply with the ESL regulations for development within the floodplain.[4]

    g. For the purpose of determining consistency among efforts to protect, restore, and/or enhance biological resources supported by the San Diego River within the redevelopment project area, a discussion of the organizations, agencies, jurisdictions, and other entities which are conducting such efforts. This discussion should include the following information.

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4 In particular, section 143.0145(a)(6) states, "Development shall not significantly adversely affect existing sensitive biological resources on-site or off-site," and section 143.0145(f) includes several provisions intended to protect biological resources, such as: (1) Within the *flood fringe* of a *Special Flood Hazard Area*, permanent *structures* and *fill* for permanent *structures*, roads, and other *development* are allowed only if the following conditions are met: (A) The *development* or *fill* will not significantly adversely affect existing *sensitive biological resources* on-site or off-site; (B) The *development* is capable of withstanding *flooding* and does not require or cause the construction of off-site *flood* protective works including artificial *flood* channels, revetments, and levees nor will it cause adverse impacts related to *flooding* of properties located upstream or downstream, nor will it increase or expand a *(FIRM)* Zone A; (C) *Grading* and *filling* are limited to the minimum amount necessary to accommodate the proposed *development*, harm to the environmental values of the floodplain is minimized including peak flow storage capacity, and *wetlands* hydrology is maintained; (D) The *development* neither significantly increases nor contributes to downstream bank erosion and sedimentation nor causes an increase in *flood* flow velocities or volume; and (E) There will be no significant adverse water quality impacts to downstream wetlands, lagoons or other *sensitive biological resources*, and the *development* is in compliance with the requirements and regulations of the National Pollution Discharge Elimination System, as implemented by the City of San Diego. (F) The design of the *development* incorporates the findings and recommendations of both a site specific and coastal watershed hydrologic study.

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Response to Comment DFG18:
Comment noted.

i. A list of the organizations (e.g., San Diego River Park Foundation, San Diego River Coalition, Lakeside Conservancy), agencies (e.g., San Diego River Conservancy), and jurisdictions (e.g., the City). The City should circulate the DEIR to all the entities identified.

ii. A description of each of the entity's goal, objectives, and efforts to date and proposed efforts, focusing on the reach of the river that is within the proposed redevelopment zone.

iii. A discussion about how the proposed project conforms with the goals and objectives of the identified entities, and avoids impacts to the already preserved habitats. For example, discuss how the proposed project conforms with the City's San Diego River Natural Resources Management Plan (NRMP)[5] (City and Merkel & Associates 2003) and the San Diego River Master Plan.

h. A biological technical report that includes survey methods (including survey personnel, dates, times, and climate conditions), survey results, impact analysis, and proposed mitigation. The report should describe the biological resources associated with each habitat type. These descriptions should include both qualitative and quantitative assessments of the resources present on the proposed subject property and alternative sites, and include complete species lists for all biological resources on site. At a minimum, the following should be included.

DFG18 (cont'd.)

i. A list of federally proposed listed or candidate species, state listed and candidate species, and locally sensitive species that occur on, or in habitat contiguous with, the subject property including, but not limited to, narrow endemic species that are on or near the subject property. A detailed discussion of these species, including information pertaining to their local status and distribution, should also be included.

ii. A comprehensive discussion about the existing biological resources within and adjacent to areas potentially affected by the redevelopment project. Include specific acreage and description of the types of riparian, wetland, non-wetland waters of the U.S., coastal sage scrub, and other sensitive habitats that may be affected by the proposed project or project alternatives, results of early and late spring plant surveys for sensitive spring blooming annuals (including a section which discusses the rationale for why species with a high potential for occurrence may not have been detected). Maps and tables should be included to summarize such information.

iii. A map showing potential wildlife corridors through and/or adjacent to the subject property.

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5 This discussion should take into account the comments the City received on the draft NRMP (e.g., comments from the Department via e-mail, and a letter from the U.S. Fish and Wildlife Service dated May 17, 2004), and the City's responses to those comments.

iv. Figures that depict both the development footprint, updated biological data, and the relationship of the subject property to the MHPA both on and off site.

v. A comprehensive discussion about the positive and negative biological impacts that might result from future redevelopment in the vicinity of, or adjacent to, the San Diego River.

vi. An assessment of direct, indirect, and cumulative project impacts to fish and wildlife species and associated habitats. All facets of the project (e.g., construction, implementation, operation) should be included in this assessment. We are particularly interested in any potential impacts to the MHPA, the San Diego River, wildlife corridors, and narrow endemic species. This assessment should also include the following.

a. A complete hydrological analysis for this project to evaluate potential changes to hydrology, and how those changes may affect the San Diego River, wetlands, riparian areas, and the MHPA.

b. Methods (e.g., BMPs) that will be employed to prevent soil erosion and siltation of habitats on and off site.

DFG18 (cont'd.)

c. Methods (e.g., BMPs) that will be employed to prevent discharge and disposal of toxic and/or caustic substances, including oil and gasoline, from the proposed development.

d. A thorough analysis of noise and light impacts on wildlife, including avian species, and measures to be taken to mitigate any adverse impacts resulting from increased noise and light levels.

e. An analysis of how project-induced impacts may induce fragmentation of open space, isolate wildlife and native vegetation communities, and affect wildlife movement at a local and regional scale.

vii. Specific mitigation and restoration plans to fully offset project related impacts, including proposals for mitigating the cumulative impacts of direct and indirect habitat loss, degradation, or modification.

a. Project impacts should be mitigated through the preservation, creation, restoration, and/or enhancement of affected habitat types consistent with MSCP guidelines.

b. Mitigation and restoration plans, if proposed, should be prepared by persons with specific expertise on southern California ecosystems and native plant revegetation techniques. Each plan should include, at a minimum: (a) the location of the mitigation site; (b) the plant species to be used; (c) a schematic layout depicting the mitigation area; (d) time of year that planting will occur; (e)

a description of the irrigation methodology to be employed; (f) measures to control exotic vegetation on site; (g) a detailed monitoring program which includes provisions for replanting areas where planted materials have not survived; and (h) success criteria and identification of the agency that will guarantee successful creation of the mitigation habitat and provide for the conservation of the restoration site in perpetuity.

c. Measures to be taken to perpetually protect habitat values of preserved and/or mitigation areas. Issues that should be addressed include: restrictions on vehicle and equestrian access; proposed land dedications; monitoring and management programs; control of illegal dumping; restrictions on lighting near mitigation areas; and consistency with the MHPA land use adjacency guidelines, etc.

d. Mitigation for impacts on wildlife movement should include consideration of the installation of bridges of adequate span to allow for wildlife movement beneath them, directional fencing long enough to prevent end runs, construction of adequately sized new culverts where need is indicated for wildlife movement and bridges are infeasible, installation of structures (e.g., berms, sound walls) to attenuate noise and light (e.g., car and street lights).

DFG18 (cont'd.)

e. Measures to be taken to avoid or minimize biological impacts from brush management that might be associated with redevelopment. These measures should include alternatives to brush management within sensitive habitat inside and outside the MHPA. Such alternatives include strategic placement of buildings, and the use of fire walls and building designs that preclude or reduce the need for fuel management Zone 2. The discussion should also identify the benefits of accomplishing fire protection by one-time building design and placement rather than on-going brush management in often inadequately maintained brush management areas.

f. A description of how the proposed project will reduce existing negative biological impacts and avoid introducing new negative impacts to the San Diego River corridor. The NRMP encompasses most of the reach of the River within the proposed redevelopment area (Figure 2 in the NRMP). As the NRMP states, and as identified in the City's MSCP Subarea Plan, "major issues facing urban habitat areas, such as the NRMP area, include intense land uses adjacent to sensitive habitat, litter and vandalism, itinerant living quarters, infrastructure maintenance activities, invasive plants and animals, and degraded water quality resulting from urban runoff." All redevelopment activities within the area of potential effect[6] on sensitive biological resources associated with the San Diego River and adjacent upland habitats should be designed and conducted to avoid additional negative impacts on the resources. Furthermore, the existing negative impacts should be reduced by enhancing and/or restoring sensitive biological resources.

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6 The area of potential effect includes tributaries to the San Diego River (e.g., Alvarado Canyon).

DFG19 The Wildlife Agencies appreciate the opportunity to comment on this DEIR. Please contact Carolyn Lieberman of the Service at (760) 431-9440, or Libby Lucas of the Department at (858) 467-4230 if you have any questions or comments concerning this letter.

Sincerely,

Therese O'Rourke
Assistant Field Supervisor
U.S. Fish and Wildlife Service

Donald Chadwick
Habitat Conservation Planning Supervisor
California Department of Fish and Game

cc: California Regional Water Quality Control Board, San Diego Region (Stacey Baczkowski)
San Diego River Conservancy (Deborah Jayne)
United States Army Corps of Engineers (Terry Dean)
State Clearinghouse

References Cited:

City of San Diego and Merkel & Associates. 2003. Draft San Diego River Natural Resources Management Plan.

Andren, H. and P. Angelstam. 1988. Elevated predation rates as an edge effect in habitat islands: experimental evidence. Ecology 64: 1057-1068.

Bergen, F. and M. Abs. 1997. Etho-ecological study of the singing activity of the blue tit (Parus caeruleus), great tit (Parus major) and chaffinch (Fringilla coelebs). Journal fur Ornithologie 138(4):451-467

Conservation Biology Institute. 2000. Public Review Draft MHCP Plan Volume 1.

Kelly, P. A. and J. T. Rotenberry. 1993. Buffer zones for ecological reserves in California. In J. E. Keeley, ed. Interface Between Ecology and Land Development in California. Southern California Academy of Sciences, Los Angeles.

de Molenar, J. G., D. A. Jonkers, and M. E. Sanders. 2000. Road illumination and nature. III. Local influence of road lights on a black-tailed godwit (Limosa l. limosa) population. Report prepared for Directorate-General of Public Works and Water Management, by Alterra, Green World Research. Wageningen, Netherlands

Soulé, Michael E. 1991. Land use planning and wildlife maintenance. *Journal of the American Planning Association*, Vol. 57, No. 3, Summer 1991. American Planning Association, Chicago, Illinois.

RESPONSE TO COMMENT LETTER FROM THE U.S. FISH AND WILDLIFE SERVICE (FEDERAL AGENCY), SIGNED BY THERESE O'ROURKE/CALIFORNIA DEPARTMENT OF FISH AND GAME, SIGNED BY DONALD CHADWICK (JOINT LETTER), DATED FEBRUARY 14, 2005 (cont.d)

Response to Comment DFG19:
Comment noted.

United States Army Corps of Engineers (USACE). 1991. Hydraulic design of flood control channels. USACE Headquarters, EM1102-0- 1601, Washington D.C.

SAN DIEGO COUNTY OFFICE OF EDUCATION
6401 LINDA VISTA ROAD, SAN DIEGO, CALIFORNIA 92111-7399 (858) 292-3500
Superintendent of Schools
Rudy M. Castruita, Ed.D.

February 2, 2005

Mr. Tracy Reed
Project Manager
City of San Diego Redevelopment Agency
600 B Street, Suite 400
San Diego, CA 92101-4506

RE: Response to Notice of Preparation of a Draft Environmental Impact Report (EIR)

Dear Mr. Reed:

The San Diego County Office of Education (COE) is in receipt of the Notice of Preparation for a Draft Environmental Impact Report (EIR) for the Grantville Redevelopment Plan. This letter constitutes our response to the notice.

The COE provides a variety of school and educational services to County residents. Unlike local school districts, the COE provides its services throughout the County, making it the equivalent of a countywide school district. As a result, the COE is affected by new development wherever it occurs in the County.

COE1 Some COE programs provide direct services to students, including children (infants, pre-school, and students in grades K-12) as well as adults. Other COE services are provided through public schools, including all forty-three school districts and all five community college districts in the County. These services include staff development for teachers and current and prospective administrators as well as numerous management support services. The following COE programs may be affected by the Grantville Redevelopment Plan:

Regional Occupation Program
Hope Infant Handicapped Program
Migrant Education Program
Outdoor Education Program
Teacher Training and Development
Administration Training and Development
COE Administration

Board of Education
Nick Aguilar Ernest J. Dronenburg, Jr. Susan Harrley Robert J. Watkins John Witt

SERVICE AND LEADERSHIP

RESPONSE TO COMMENT LETTER FROM SAN DIEGO COUNTY OFFICE OF EDUCATION, SIGNED BY BOB NICHOLSON, DATED FEBRUARY 2, 2005

Response to Comment COE1:

The EIR provides a quantification of potential buildout of the Project Area according to adopted Community Plan land use designations (EIR, Table 3-2, page 3-9). The Project Area does not contain existing residential uses, although two portions of the Project Area are designated in the Navajo Community for residential uses. The subject areas currently contain non-residential uses including parkland, hotel, school, and commercial uses. Because of their existing uses, they are not likely to redevelop to a residential use. However, assuming these parcels are redeveloped according to the adopted community plan land use, a total of 48 single-family dwelling units, and 86 multi-family residential dwelling units could be constructed.

According to City of San Diego School Generation Factors, a total of 65 students would be generated by the redevelopment of these parcels according to the adopted residential land use designations. This increase would not represent a significant impact to school facilities.

Additionally, Health and Safety Code Section 33607.5 presents the legally mandated formula for paying a portion of the tax increment to all of the affected taxing entities (which includes the San Diego County Office of Education). These new funds are available to be used for education facilities that benefit the Project Area.

In order to provide an accurate analysis of potential impacts resulting from this project to the COE the DRAFT EIR should:

COE1 (cont'd.)

- Quantify the scope and build out of anticipated commercial and residential development (at all densities).
- Quantify the projects direct and indirect effects on population, on student generation and on the costs of facilities to accommodate these new students.
- Include a discussion of the possibility for the use of joint use facilities by schools and public and private agencies, e.g. different city departments such as recreation or public works

We encourage and support cities and counties in the use of the redevelopment process and tax increment revenues for the elimination of blight and to improve the economic viability of areas. However, school districts and the COE will be impacted due to increases in population bringing new students.

COE2 We look forward to working with the Agency to reduce or fully mitigate these impacts in creative and mutually beneficial ways when possible. If you have any questions regarding this correspondence, please feel free to contact me at (858) 292-3680.

Sincerely,

Bob Nicholson
Senior Director, Facility Planning Services

Cc: Bryan Ehm, Facility Planning Coordinator, SDCOE
Donna Knott, Program Business Specialist, SDCOE

RESPONSE TO COMMENT LETTER FROM SAN DIEGO COUNTY OFFICE OF EDUCATION, SIGNED BY BOB NICHOLSON, DATED FEBRUARY 2, 2005 (cont.d)

Response to Comment COE2:
Comment noted.

SANDAG

401 B Street, Suite 800
San Diego, CA 92101-4231
(619) 699-1900
Fax (619) 699-1905
www.sandag.org

February 17, 2005

Mr. Tracy Reed
City of San Diego Redevelopment Agency
600 B Street, Fourth Floor
MS 904
San Diego, CA 92101-4506

Dear Mr. Reed:

MEMBER AGENCIES
City of Carlsbad
Chula Vista
Coronado
Del Mar
El Cajon
Encinitas
Escondido
Imperial Beach
La Mesa
Lemon Grove
National City
Oceanside
Poway
San Diego
San Marcos
Santee
Solana Beach
Vista
and
County of San Diego

ADVISORY MEMBERS
Imperial County
California Department of Transportation
Metropolitan Transit System
North San Diego County Transit Development Board
United States Department of Defense
San Diego Unified Port District
San Diego County Water Authority
Baja California/Mexico

Thank you for the opportunity to review the draft Environmental Impact Report (EIR) for the Grantville Redevelopment Project. SANDAG offers the following comments.

SNDG1

1. Please depict the Mission Valley East light rail line on Figures 4.1-1 and 4.2-5 through 4.2-9. Mission Valley East construction is nearly complete and operations will begin within the next several months.

SNDG2

2. The traffic analysis should assume a 5% trip reduction in automobile travel trips for the portions of the study area within easy access to the light rail station, since the rail line is completing construction and will be operational during the redevelopment area's 30-year time period.

SNDG3

3. The EIR should consider the potential for more intense land uses to develop within ¼ to 1/3 mile of the new Grantville light rail station. Development of housing and mixed uses would create an opportunity for a greater transit mode share split, accommodation of the City's need for additional housing opportunities, and a chance to take advantage of the public's investment in the light rail line.

Please feel free to contact me if you have any questions about SANDAG's comments.

SNDG4

Sincerely,

Toni Bates

TONI BATES
Division Director of Transit Planning

TB/mk/mh

RESPONSE TO COMMENT LETTER FROM SAN DIEGO ASSOCIATION OF GOVERNMENTS (SANDAG), SIGNED BY TONI BATES, DATED FEBRUARY 17, 2005

Response to Comment SNDG1:

EIR Figure 4.1-1 Existing Land Uses provides an aerial photograph (2004) of the Project Area and depicts adopted Community Plan Land Use designations. The recently constructed trolley line is visible in this aerial photograph; however, Figure 4.1-1 has been modified to clearly depict the newly constructed trolley line. Additionally, Figures 4.2-1 through 4.2-9 have also been modified to depict the trolley line.

Response to Comment SNDG2:

The Transportation/Circulation section of the EIR acknowledges the future operation of the Grantville trolley station within the Project Area. As discussed in the EIR, (EIR, page 4.2-9), "This new trolley stop will bring alternative transit opportunities to the project area. This transit opportunity will decrease the amount of vehicle trips generated by the redevelopment. However, the traffic analysis does not assume the five percent reduction for any of the study area. Therefore, the traffic analysis is a conservative estimate of traffic generated by the project."

Response to Comment SNDG3:

The EIR analyzes a reasonable range of alternatives to the proposed project, including two alternatives that consider mixed-use land use opportunities in the vicinity of the trolley station. These alternatives include the "General Plan Opportunities Areas Map" and the "TOD Principals Alternative."

Response to Comment SNDG4:

Comment noted.

City of San Diego
MEMORANDUM

DATE: February 14, 2005

TO: Tracy Reed, Project Manager, Redevelopment Agency

FROM: Ann French Gonsalves, Senior Traffic Engineer, Development Services Dept.

SUBJECT: Grantville Redevelopment Area – Draft Environmental Impact Report

---

Thank you for the opportunity to review the above document dated December 13, 2004. We have the following comments:

AG1 **1. Page ES-4, Executive Summary:** The "Significant, Unavoidable Impacts" section states that the unmitigable impacts are "not a result of implementation of the Redevelopment Project in and of itself, rather they are a result of forecasted growth in the region". This assertion is not supported by the traffic study since it does not contain a near term analysis or any other analysis of the project separate from the rest of the forecasted growth. Therefore, we suggest this sentence be changed to "These impacts are a result of implementation of the Redevelopment Project combined with forecasted growth in the region".

AG2 **2. Page ES-6, Table S-1, Summary of Significant Impacts and Mitigation Measures:** Under "Recommended Mitigation Measures", additional potential mitigation should be considered such as the projects listed on page 4.2-11 (extension of Santo Road, extensions of Princess View Drive and Jackson Drive from the Navajo community into the Tierrasanta community), the extension of State Route 52 from State Route 125 to State Route 67 and improvements to the Interstate 8/Mission Gorge Road/Fairmount Avenue interchange.

AG3 **3. Page 5-3, Section S, Long Term Cumulative Impacts, Transportation/Circulation:** The last sentence of Section S.1.2, states that the "cumulative impact would remain significant and unavoidable". This assertion has not been demonstrated in the document, except perhaps for segments of Mission Gorge Road. We suggest wording be changed to "cumulative impact would remain significant and unmitigated".

RESPONSE TO COMMENT LETTER FROM THE CITY OF SAN DIEGO, REDEVELOPMENT AGENCY, SIGNED BY ANN FRENCH GONSALVES, DATED FEBRUARY 14, 2005

Response to Comment AG1:

The EIR statement that the impacts are a result of forecasted growth in the region is intended to indicate that the impact is largely cumulative, and includes both the project (existing community plan land uses) as well as regional growth. The EIR has been revised to clarify this conclusion as follows:

Page ES-4:

> "Based on the data and conclusions of this Program EIR, the Redevelopment Agency finds that the project will result in significant and unavoidable impacts to the following resources areas:
>
> - Transportation/Circulation
> - Air Quality (Long-term Mobile Emissions)
>
> Implementation of proposed Mitigation Measures will reduce the potential impact to these resources to the extent feasible; however, the impact will remain significant and unavoidable. These impacts are ~~not a result of implementation of the Redevelopment Project in and of itself, rather they are~~ a result of implementation of the Redevelopment Project combined with forecasted growth in the region, which will occur both inside and outside of the Project Area. If the Redevelopment Agency chooses to approve the Grantville Redevelopment Project, it must adopt a "Statement of Overriding Considerations" pursuant to Sections 15093 and 15126(b) of the CEQA Guidelines.

Response to Comment AG2:

The traffic analysis is considered conservative in that it only assumes improvements that are identified in the existing Navajo Community Plan. No other funded improvements have been identified in the project study area. As discussed in the EIR (EIR page 4.2-11), the extensions of Santo Road, Princess View Drive and Jackson Drive into the Tierrasanta Community are identified in the Tierrasanta Community Plan, however there is currently no funding identified for these improvements. The extension of SR52 from SR125 to SR67 is a priority project identified in the recently approved Transnet extension. While potentially feasible, extension of these roadways are not funded, nor currently planned to be funded, and are therefore not considered as feasible at this time.

RESPONSE TO COMMENT LETTER FROM THE CITY OF SAN DIEGO, REDEVELOPMENT AGENCY, SIGNED BY ANN FRENCH GONSALVES, DATED FEBRUARY 14, 2005 (cont.d)

Response to Comment AG2 (cont.d):

Please refer to response to comment DOT3 regarding improvements to the Interstate 8/Mission Gorge Road/Fairmount Avenue Interchange.

It is recognized that these improvements may be feasible and would likely improve circulation in the study area. The EIR does not preclude the implementation of these improvements if considered by the City in the future.

Response to Comment AG3:

No mitigation measure has been identified in the context of this traffic analysis that would reduce the cumulative impact to a level less than significant. The EIR concludes that the impact would be significant and unavoidable, which is consistent with the significant and unmitigable terminology suggested by the commentor. However, no additional changes to the EIR text is proposed.

AG4 **4. Page 8-3, Section 8.1 No Project/No Redevelopment Alternative, Transportation/Circulation**: Section 8.1.1.2 should be modified to clearly state that the reason the No Project Alternative Transportation Impact would be expected to be greater than the proposed project impact is that the No Project Alternative assumes that no transportation infrastructure would be built.

5. Page 8-10, Section 8.3 General Plan Opportunity Areas Map Alternative, Transportation/Circulation:

AG5

A. The project trip generation for this alternative should be rechecked to utilize the appropriate transit reductions from the City's *Traffic Impact Study Manual* (July 1998). For example, for development within 1500 feet walking distance from a transit station, daily reductions of 5% for residential, 5% for industrial and 3% for office development can be applied.

B. Figure 8-1, General Plan Opportunities Area Map Alternative Land Uses, should be revised to show the existing and planned trolley route and station locations.

AG6

6. Appendix B, Traffic Impact Analysis: Some of the base assumptions in the analysis should be rechecked, as they could affect the conclusions. For example:

A. Segments of Mission Gorge Road which are four lanes existing but have no raised median and numerous driveways should be given a capacity of 30,000 average daily trips (ADT) (not 40,000 ADT).

B. Existing queues must be considered in evaluating existing intersection level of service during peak periods.

A. French Gonsalves

Ann French Gonsalves, P.E.
Senior Traffic Engineer

RESPONSE TO COMMENT LETTER FROM THE CITY OF SAN DIEGO, REDEVELOPMENT AGENCY, SIGNED BY ANN FRENCH GONSALVES, DATED FEBRUARY 14, 2005 (cont.d)

Response to Comment AG4:

Page 8-3 of the EIR has been revised as follows:

> In the horizon year, traffic operations at study area segments and intersections are anticipated to be unacceptable, and the proposed project would incrementally add to these conditions – which would also occur under this alternative. Overall, the transportation/circulation impact is expected to be greater than the proposed project, *as this alternative assumes buildout of the Project Area according to adopted land uses, but assumes that no additional transportation infrastructure would be constructed.*

Response to Comment AG5:

Item A. The trip generation utilized in the traffic analysis does not account for any potential reductions or credits for land uses in proximity to public transit. The EIR recognizes that the Grantville Trolley Station is under construction and will be in service to the Project Area soon (e.g., see EIR page 4.2-9). The traffic analysis is considered a conservative estimate of trip generation because it does not assume any trip generation reductions.

Item B. Several EIR figures, including Figure 8-1 as referenced by the commentor, have been revised to depict the trolley line and location of the trolley station within the Project Area.

Response to Comment AG6:

Item A. The traffic analysis assumes that Mission Gorge Road from Interstate 8 north to Friars Road has a functional capacity of a 4-Lane Major (LOS E capacity of 40,000). This roadway has a two-way left-turn lane for its entire length. While there are numerous driveways, it functions more like a 4-Lane Major, which has two dedicated lanes in each direction that are free from turning vehicles (especially left-turning vehicles) than a 4-Lane Collector, whose inner lanes are often blocked by left turning vehicles.

Item B. The HCM methodology is the required method for determining level of service in the City of San Diego at intersections. This methodology does not take into account the resulting delay caused by queues; however, the calculation worksheets contained in the appendix of the traffic study show the resulting queues at intersections.

CITY OF SAN DIEGO
MEMORANDUM

DATE: January 26, 2004

TO: Tracy Reed, Project Manager Community and Economic Development Department

FROM: Barry Kelleher, Park Designer, Park Planning and Development Park and Recreation Department

SUBJECT: Grantville Redevelopment Survey Area – Draft Program Environmental Impact Report (DEIR)

PRD1 Park and Recreation Department staff has reviewed the DEIR and offers the following comments regarding park and recreation requirements associated with the affected communities.

PARK PLANNING AND DEVELOPMENT DIVISION

General Comments

PRD2 The DEIR states in several locations that any new development will conform to the development requirements in the applicable Community Plan and the City's "Progress Guide and General Plan." The typical service area radius for a 5 to 10 acre neighborhood park is ½ mile. The redevelopment plan needs to plan locations for neighborhood parks within the ½ mile service radius from potential residential development sites in order to meet the recreation goals of the General Plan.

Specific Comments

1) Page 2-5

PRD3 The section numbering is not correct. It appears that there needs to be a 2.3 "Community Plans" title. Also in this section, although it is in a draft form, the San Diego River Park Master Plan should be referenced.

2) Page 3-9

PRD4 Please note that the City has several classifications of park land. The Table 3.1 lists 68.92 acres of parks. This number needs to be broken down into resource-based parks, open space park area, and population-based park acreage. Population-based park acreage is generally suitable for active recreation (e.g multi-purpose fields, mini-parks etc.) Because they are intended to serve the city and region as a whole, open space and resource-based parks are not included in the population-based park acreage calculations required to meet the goals of the City's Progress Guide and General Plan.

RESPONSE TO COMMENT LETTER FROM THE CITY OF SAN DIEGO, PARK PLANNING AND DEVELOPMENT, PARK AND RECREATION DEPARTMENT, SIGNED BY BARRY KELLEHER, DATED JANUARY 26, 2005

Response to Comment PRD1:

Please refer to responses to comments PRD2 through PRD23.

Response to Comment PRD2:

Comment noted. The redevelopment plan is consistent with the adopted Community Plan land uses for the Project Area. As indicated on Figure 4.1-2 (EIR, page 4.1-13), parkland within the Project Area is currently developed with park uses. Pursuant to the City of San Diego Municipal Code, parks could also be constructed within several of the zones that are located within the Project Area, or any portion of the Project Area subject to approval of a community plan amendment and rezone. In zones IL-2-1 and IL-3-1, active recreation space is permitted. Active recreation space is a public park facility that requires major land development for installation, requires a high level of maintenance, and can accommodate large assemblages of people. In zones CC-1-3, CC-4-2, CO-1-2, and CV-1-1, open space facilities are not permitted. In zones AR-1-1, AR-1-2, and RM-3-7, all open space facilities are permitted except park maintenance facilities. As stated in Section 3.0 Project Description of the EIR, one objective of the Redevelopment Plan is to provide additional parkland (e.g. river park) that may not otherwise occur without redevelopment financing. Additional goals related to the provision of parkland and open space are provided in the Draft Redevelopment Plan (see Goals #11, #12, and #13).

Response to Comment PRD3:

EIR text page 2-5 has been modified to include a heading for Community Plans as follows:

2.3.3.1 Community Plans

Additionally, the following text has been added to EIR page 2-7:

2.4 Draft San Diego River Park Master Plan

The City of San Diego has prepared the Draft San Diego River Park Master Plan. This document is in draft, and has not been formally adopted by the City of San Diego. The Master Plan is a comprehensive planning document and outlines goals and objectives for the development of the San Diego River Park.

RESPONSE TO COMMENT LETTER FROM THE CITY OF SAN DIEGO, PARK PLANNING AND DEVELOPMENT, PARK AND RECREATION DEPARTMENT, SIGNED BY BARRY KELLEHER, DATED JANUARY 26, 2005 (cont.d)

Response to Comment PRD4:

Table 3-1 (EIR page 3-9) and Table 4.1-1 (EIR page 4.1-4) depict general categories of land uses in the Project Area, including parkland. The 68.92 acres of parkland in the Project Area consists of approximately 23.7 acres of population-based parks, and approximately 45.22 acres of resource-based and open space park area. Tables 3-1 and 4.1-1 have been amended to include a footnote that indicates the acreage amounts of population-based parks and resource-based parkland in the Project Area, as follows:

> [1] The 68.92 acres of parkland in the Project Area consists of 23.7 acres of population-based parks (Lewis middle school and ballfields), and 45.22 acres of resource-based and open space park area.

PRD5 3) Page 3-10
Section 3.4.1 - Please add language addressing the creation of livable communities including active recreation areas and park lands sufficient to provide a variety of active and passive recreation opportunities for the existing and future residents.

PRD6 3) Page 3-14
Section 3.6.1.4 - The Draft San Diego River Park Master Plan is its own document and not a part of the Navajo Community Plan. Please provide a section for its discussion.

PRD7 5) Page 4.1-3
The document does not adequately address existing active recreation park acreage deficiencies for residents in these communities. For example, the Navajo Community Planning Area currently has an "active recreation" park acreage deficit of nearly 21 acres, projected to reach almost 27 acres by the year 2030. This redevelopment plan is an opportunity to increase the total acreage dedicated for public recreation, and reduce this deficit. The discussion of the redevelopment needs to consider public recreation areas as catalysts for revitalization of a community, and public parks as an essential element of sustainable, livable communities.

PRD8 6) Page 4.1-4
Table 4.1-1 - Please refer to comment #2.

PRD9 7) Page 4.1-9
Sections 4.1.15 - Some of the major goals of the San Diego River Park are to widen the river corridor to help address water quality issues, habitat preservation and provide for a viable wildlife corridor. This should be mentioned in this section. Also, the San Diego River Park Master Plan is proposing surfacing Alvarado Creek drainage and creating a strong open space link between Alvarado Canyon and the San Diego River. The second sentence in the second paragraph does not make that clear.

PRD10 8) Page 4.1-16
Section 4.1.3.6- To say that "All of the areas included in the MSCP are designated as park..." is not accurate. Population-based parks (developed parks used for active recreation) would not be included in the MSCP.

PRD11 9) Page 4.6-2
Giant Reed – please double check the "approximate 1.6 acres of giant reed". This seems to fall well short of what is existing within the Grantville Redevelopment District.

PRD12 10) Page 4.6-18
The last paragraph of this section states that the SD River is an important wildfire corridor. That is correct. However, the corridor is highly constricted in some areas due to impacts from existing land use, (ie Superior Mines). Please evaluate if additional restoration/enhancement opportunities are available within Subareas A and B. Include any additional sites within Section 4.6.5.2 and on Figure 4.6-2.

RESPONSE TO COMMENT LETTER FROM THE CITY OF SAN DIEGO, PARK PLANNING AND DEVELOPMENT, PARK AND RECREATION DEPARTMENT, SIGNED BY BARRY KELLEHER, DATED JANUARY 26, 2005 (cont.d)

Response to Comment PRD5:
The EIR identifies the overall objectives of the proposed project. These project objectives have been further refined by the Grantville Redevelopment Area Committee and are provided within the Draft Redevelopment Plan. The objectives address various aspects of the creation of livable communities including improving public infrastructure, creating additional walkways and paths for proper pedestrian, bicycle and/or vehicular circulation (Goal #3), creation of an attractive and pleasant environment through streetscape enhancements (Goal #5), explore opportunities for development of mixed residential and commercial uses particularly transit-oriented development to take advantage of the nearby multi-modal transit system (Goal #8), and expand community serving recreational opportunities through rehabilitation and expansion of existing park and recreational facilities as well as addition park and recreation facilities (Goal #12).

Response to Comment PRD6:
EIR page 3-14 lists applicable goals of the Navajo Community Plan, which includes reference to the River Park.

Response to Comment PRD7:
The Redevelopment Agency recognizes that parkland deficiencies exist within the Navajo Community. There is no specific parkland deficit within the Project Area as there are no residential uses. The existing land use description provided on EIR page 4.1-3 is a description of existing land uses within the Project Area, not the Navajo Community as a whole. However, EIR page 4.1-8 has been modified to describe the current deficiency of parkland within the Navajo Community. The modified text reads as follows:

> The City of San Diego Parks and Recreation Department indicates that the Navajo Community Planning Area currently has an "active recreation" park acreage deficit of nearly 21 acres, which is projected to reach almost 27 acres by the year 2030.

Please also refer to response to comment PRD5.

Response to Comment PRD8:
Please refer to response to comment PRD4.

RESPONSE TO COMMENT LETTER FROM THE CITY OF SAN DIEGO, PARK PLANNING AND DEVELOPMENT, PARK AND RECREATION DEPARTMENT, SIGNED BY BARRY KELLEHER, DATED JANUARY 26, 2005 (cont.d)

Response to Comment PRD9:

Several of the goals of the Draft Redevelopment Plan, as summarized in response to comment PRD5, are consistent with the goals of the Draft San Diego River Park Master Plan.

The text on EIR page 4.1-9 has been modified to read:

> Planning recommendations were created as part of the Draft Master Plan. Recommendations relevant to the Redevelopment Area include coordinating with the proposed Grantville Redevelopment to preserve additional open space along the river and at the confluence with Alvarado Creek, surfacing the Alvarado Creek drainage, and creating a strong open space link between Alvarado Canyon and the San Diego River; engage Navy planners and collaborate with redevelopment of the Superior Mine to create a continuous multi-use trail near river; and, collaborate with redevelopment of Superior Mine to create a historic interpretation zone within development.

Response to Comment PRD10:

The EIR text on page 4.1-16 has been modified to read:

> With the exception of one parcel (APN 456-011-10), Aall of the areas included in the MSCP are designated as park (i.e., resource-based park) or open space land uses in the Navajo and Tierrasanta Community Plans. The exception parcel is a portion of city-owned designated open space that is included in the MSCP, but is designated as single-family residential in the Navajo Community Plan.

Please also refer to comment PRD20 (see City Parks Department comment letter – comment PRD20), which also provides further clarification regarding this parcel.

Response to Comment PRD11:

The acreage amount of giant reed shown for the redevelopment Project Area is based on the amount of giant reed observed and recorded in the Project Area during biological surveys of the Project Area as part of the preparation of the EIR. As recognized in the EIR, giant reed is a California Department of Fish and Game listed noxious weed and is listed by the California Invasive Plant Council as a List A-1 "Most Invasive Wildland Pest Plant." A majority of this species is located within the privately-owned unimproved portion of Alvarado Creek within the Project Area as shown on Figure 4.6-1. Any flood control improvements within this area would likely have a beneficial effect as this noxious plant would be removed, decreasing the potential for further spreading downstream and into the San Diego River.

RESPONSE TO COMMENT LETTER FROM THE CITY OF SAN DIEGO, PARK PLANNING AND DEVELOPMENT, PARK AND RECREATION DEPARTMENT, SIGNED BY BARRY KELLEHER, DATED JANUARY 26, 2005 (cont.d)

Response to Comment PRD12:

Comment noted. It is recognized that the historical development around the San Diego River has restricted this wildlife corridor. While the EIR identifies potential mitigation opportunities, it is not the intent of the EIR to exhaustively identify all potential mitigation opportunities in the area. Additionally, it is recognized that the San Diego River Park Master Plan also identifies potential areas for restoration of habitats and ways to enhance the existing corridor. EIR page 4.6-30 states, "There appears to be many opportunities to mitigate redevelopment impacts within the Project Area that would be consistent with the goals of the San Diego River Park." While potential mitigation opportunities are identified, mitigation opportunities are not limited to only those areas depicted in the EIR.

PRD13

11) Page 4.6-26
Wildlife Corridor Impacts – Please refer to #10. Revise mitigation measure BR1 to incorporate the City's regulations regarding: (1) requirement to avoid impacts to wetlands first, and (2) requirements associated with wetland buffers.

12) Page 4.12-4
Section 4.12.3.2 – It is stated that the redevelopment plan does not currently anticipate additional housing units beyond those which are cited in the current Navajo Community Plan. However, approximately 134 additional residential units are planned within the redevelopment area.

13) Page 4.13-1Public Services and Utilities
Population-based parks are considered a public service. It is not clear as to why it was not discussed in this section

PRD14

The City of San Diego's "Progress Guide and General Plan" population-based park goals recommend 2.8 acres of active recreation area per 1,000 population. The required park acreage for new residential development will be calculated using the proposed number of units and the SANDAG figures on population per household (PPH) in the Community Planning Area (CPA).

The calculation, using the most recent SANDAG population projections of 2.57 PPH in the year 2030, results in a requirement of almost 1.0 acre of new parkland suitable for active recreation to serve the future residents. In some cases, the City may accept fees in-lieu of land dedications in order to expand and improve existing facilities within the community where existing parks can serve the proposed development.

Although the redevelopment plan can not predict how demands will change and how market forces will affect the future, in the current market it would be appropriate to anticipate an increase of residential development within the Grantville neighborhood. For example, currently there is a preliminary development proposal for this area, involving a rezone, proposing a mixed-use development including approximately 700 additional residential units. This development alone would generate the need for about 5 acres of active parkland to meet General Plan recreation goals. The redevelopment plan needs to consider potential locations for these facilities within the community

PRD15

14) Page 5-7
5.1.13 – Please refer to comment #5.

PRD16

15) Page 7-1
Section 7.2 – Yes, that is correct. However, please understand that natural parks and open space are not used to calculate population based park needs.

RESPONSE TO COMMENT LETTER FROM THE CITY OF SAN DIEGO, PARK PLANNING AND DEVELOPMENT, PARK AND RECREATION DEPARTMENT, SIGNED BY BARRY KELLEHER, DATED JANUARY 26, 2005 (cont.d)

Response to Comment PRD13:

The City's Environmentally Sensitive Lands Regulations (ESL) and Biology Guidelines require that:

> The applicant shall solicit input from the Resource Agencies on impact avoidance, minimization, mitigation and buffer requirements, including the need for upland transitional habitat. The applicant shall, to the maximum extent feasible, incorporate the Resource Agencies' recommendations prior to the first public hearing. (Section 143.0141(a) of the ESL regulations).
>
> A wetland buffer shall be maintained around all wetlands as appropriate to protect the functions and values of the wetland (Section 143.0141(b) of the ESL regulations, Section II, (a)(1)(b) of the Biology Guidelines).

All future redevelopment activities would be required to comply with these existing City regulations, and therefore, no additional mitigation language is proposed.

Please also refer to response to comment DFG5.

Response to Comment PRD14:

As stated in response to comment COE1, the Project Area does not contain existing residential uses, although two portions of the Project Area are designated in the Navajo Community Plan as residential land uses. The residentially designated land within the Project Area is currently developed with parkland, hotel, school, and commercial uses, and is not considered likely to redevelop to residential uses. However, assuming these parcels are redeveloped according to the adopted community plan land use, a total of 48 single-family dwelling units, and 86 multi-family residential dwelling units could be constructed. EIR page 7-1 has been modified to clarify this as follows:

> 7.2 Parks and Recreation
>
> There are two parks located within the Redevelopment Project Area, the Allied Garden Community Park and Mission Trails Park. As part of the Redevelopment Project, these will remain park and recreation facilities. Furthermore, the Redevelopment Project will be consistent with the San Diego River Park Master Plan to develop a park along the San Diego River, in which portions of this park will be development within the Grantville Redevelopment Area. The development of this new park will increase the

RESPONSE TO COMMENT LETTER FROM THE CITY OF SAN DIEGO, PARK PLANNING AND DEVELOPMENT, PARK AND RECREATION DEPARTMENT, SIGNED BY BARRY KELLEHER, DATED JANUARY 26, 2005 (cont.d)

Response to Comment PRD14 (cont.d):

> park and recreation uses within the Redevelopment Project Area. The Project Area does not contain existing residential uses, although two small portions of the Project Area are designated in the Navajo Community as residential uses. These uses are not likely to convert to residential, as the subject areas currently contain parkland, hotel, school, and commercial uses. However, assuming these parcels are redeveloped according to the adopted community plan land use, a total of 48 single-family dwelling units, and 86 multi-family residential dwelling units could be constructed. Therefore, the proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered facilities, rather it will act as an improvement to existing conditions.

Furthermore, as acknowledged in prior responses to comments (see responses to comments PRD2, PRD5, and PRD6) goals of the Redevelopment Plan include increasing the amount of recreational opportunities within the Project Area.

Response to Comment PRD15:

Please refer to response to comment PRD14.

Response to Comment PRD16:

Please refer to response to comment PRD14.

PRD17 16) Page 8-9
Section 8.3.1 – The second paragraph discusses increases and decreases of land uses. Please refer to previous comments about population-based park needs for residential developments. Per this alternative, utilizing SANDAG numbers, per comment #13, there would be a need of approximately 22 acres of developed park to satisfy the increase of residents.

PRD18 16) Page 8-11
The General Plan Opportunities Area Map Alternative Land Uses does not appear to address the goals of the San Diego River Park Master Plan. Examples include the percentage of parcel development along the San Diego River south of Friars Road bridge and the exclusion of any open space for the Alvarado Creek connection.

OPEN SPACE DIVISION

PRD19 1) Page ES-2
Executive Summary Project Location Subarea B
Please note that Subarea B includes a portion of MTRP and city-owned designated open space. Be advised that parcel 373-040-18 JJB Land Company is drawn incorrectly on SanGIS and should not extend onto MTRP. This error puts the project boundaries within MTRP dedicated open space. Please contact the City of San Diego Real Estate Assets Department for clarification on this parcel.

PRD20 3) Page 4.1-16
Multiple Species Conservation Program
Report says 'All the areas included in the MSCP are designated as park or open space land uses in the Navajo and Tierrasanta Community Plans.' However, there is a portion of city-owned designated open space that is included in the MSCP but is designated as Single-Family Residential in the Navajo Community Plan. See APN 456-011-10.

PRD21 4) Page 4.6-25
Figure 4.6-3-C8
Please include that C8 is within city-owned open space.

PRD22 5) Page 4.6-25
Figure 4.6-3-C8 and 4.1-16 Multiple Species Conservation Program
Report says 'All the areas included in the MSCP are designated as park or open space land uses in the Navajo and Tierrasanta Community Plans.' Report also says '(There) is a large slope with Diegan Coastal Sage Scrub/Chaparral within the MHPA that is designated as Single Family Residential housing in the Community Plan Land Use.' These lines are conflicting and should be revised.

PRD23 6) Page 4.6-31 B. Subarea B Paragraph 5
Please include that O5 is within city-owned open space and therefore any removal or plantings would need to be reviewed by Open Space Division staff.

RESPONSE TO COMMENT LETTER FROM THE CITY OF SAN DIEGO, PARK PLANNING AND DEVELOPMENT, PARK AND RECREATION DEPARTMENT, SIGNED BY BARRY KELLEHER, DATED JANUARY 26, 2005 (cont.d)

Response to Comment PRD17:
The EIR recognizes that the implementation of this alternative would result in the generation of residential units that generate a population-based parkland demand of 22 acres. Please refer to EIR page 8-22, Section 8.3.1.13 Public Services and Utilities, which states, "Additionally, this alternative would place a demand on parkland that would not occur under the proposed project. Based on City General Plan recommended parks to population ratio (approximately 20 acres/1,000 people), this alternative would generate a demand for approximately 22 acres of population-based parkland."

Response to Comment PRD18:
As noted on EIR page 8-9, the General Plan Opportunity Areas Map Concept anticipates land uses that would generally implement the conceptual land use patterns identified in the City of San Diego General Plan (City of Villages) Opportunity Areas Map for the Project Area. It is recognized that any future planning efforts within the Project Area will need to comply with the applicable land use plans as adopted by the City. In the event the River Park Master Plan Concept is adopted by the City, future development projects would need to be evaluated for consistency with the adopted plans, including any applicable standards adopted as part of the Master Plan such as the allowed percentage of parcel development along the San Diego River south of Friars Road and the incorporation of the Alvarado Creek connection as open space.

Response to Comment PRD19:
EIR figures have been modified to depict the correct boundary of Parcel # 373-040-18 and so as not to extend onto MTRP/City open space.

Response to Comment PRD20:
Please refer to response to comment PRD10.

Response to Comment PRD21:
EIR page 4.6-25 text has been modified as follows:

> Within the area labeled 'C8', near the boundary with Mission Trails Regional Park, is a large slope with Diegan Coastal Sage Scrub/Chaparral within the MHPA that is designated as Single Family Residential housing in the Community Plan Land Use. Although designated as Single Family Residential in the Navajo Community Plan, this parcel is a portion of city-owned designated open space.

cc: Ann Hix, Deputy Director, Open Space Division
Deborah Sharpe, PO II, Park Planning and Development Division,
Jeff Harkness, Park Designer, Park Planning and Development Division,
Paul Kilburg, Senior Planner, Open Space Division

RESPONSE TO COMMENT LETTER FROM THE CITY OF SAN DIEGO, PARK PLANNING AND DEVELOPMENT, PARK AND RECREATION DEPARTMENT, SIGNED BY BARRY KELLEHER, DATED JANUARY 26, 2005 (cont.d)

Response to Comment PRD22:

Please refer to responses to comments PRD10 and PRD21.

Response to Comment PRD23:

The EIR identifies potential mitigation sites; however, it is acknowledged that in some instances, certain sites identified may be constrained by other regulatory aspects. EIR text page 4.6-31 has been modified as follows:

> Another 'Key Site' identified in the San Diego River Park Master Plan that can be incorporated into mitigation for redevelopment impacts are the Disturbed Habitats in, and adjacent to, Superior Mine ('O5')(Figure 4.6-3). Opportunities include acquiring habitat for enhancement and/or protection or removal of non-native, invasive species within native habitats. Site O5 is located within city-owned open space and therefore any removal or plantings would need to be reviewed by Open Space Division staff. These areas are within the MHPA.

Grantville Redevelopment Project
Comments on the Draft Environmental Impact Report (DEIR), Vol. 1
Provided by the Tierrasanta Community Council
14 February 2005

Topic: Environmental Setting, Areas of the Project within Tierrasanta

§ 2.3.3.2 (pg 2-6): The DEIR states the portion of the Tierrasanta Community within the Project Area is the sand and gravel quarry.

Comment: This is not the only part that lies within Tierrasanta and the Final EIR should reflect the other areas as well. As shown in Figure 3-3 (page 3-5) and elsewhere, there are two other sections of the Project Area that lie within Tierrasanta:

TCC1

- A small triangular section in the heart of Admiral Baker located at the NW edge of Subarea B and lying about 315° from the center of Subarea C
- A small parallelogram section in Admiral Baker just north of Friars Rd at the NW edge of Subarea A and due west from the center of Subarea C.

§ 4.12.1.1 (pg 4.12-2): This error is repeated in subpara C, "Community Plan Areas".

Topic: Project Description, Size of the Project Area within Tierrasanta

§ 3.1 (pg 3-1): The Project Area is listed as being 970 acres in size.

§ 3.2 (pg 3-4): The Project Area is described as being 18% within in the Tierrasanta Community Plan area. This suggests 175 acres of the Project Area are within Tierrasanta.

TCC2

§ 3.6.2 (pg 3-14): About 130 acres of the sand and gravel quarry site are said to fall within the jurisdiction of Tierrasanta, and it is clear that all quarry land in Tierrasanta was included in the Project Area.

Fig 4.1-1 (pg 4.1-5): The figure shows the vast majority of the northern end of Subarea B in the Tierrasanta area to be quarry related, but there are two other areas near the terminus of Tierrasanta Blvd shown as: parks (open space) and undeveloped (vacant), both of which include sections of the San Diego River.

Comment: The discrepancy between 130 acres and 175 acres does not seem to be explained by these two small parcels where the river flows. Request these figures be verified for the Final EIR.

Topic: Project Description, Tierrasanta Community Plan

§ 3.6.2.1 (pg 3-14): The two bulleted items are inexact quotes from the Tierrasanta Community Plan.

TCC3

Comment: The wording of these bullets should be identical to that of the referenced Community Plan. The first bullet is close but not quite a complete representation of paragraph 9 on page 56 of the Tierrasanta Community Plan. The second bullet is missing the second sentence of paragraph 2 on page 55 of the Tierrasanta Community Plan, which reads: "Clustered development should then be used to avoid development impacts on the designated open space."

RESPONSE TO COMMENT LETTER FROM THE TIERRASANTA COMMUNITY COUNCIL, DATED FEBRUARY 14, 2005

Response to Comment TCC1:

The commentor is correct. The Project Area includes four separate areas that are part of the Tierrasanta Community Plan. The EIR figures correctly depict the boundary of the Project Area in the context of the Tierrasanta Community Plan. The total Tierrasanta Community Plan portion of the Project Area is approximately 98 acres. EIR text on pages 2-6, 3-4, 3-14 and 4.12-2 of the EIR have been modified as follows:

EIR page 2-6:

The majority of the Redevelopment Project Area, approximately 88~~82~~ percent, is located within the Navajo Community Plan Area.

Approximately 11 ~~18~~ percent of the Redevelopment Project Area is located within the Tierrasanta Community Plan Area. The main portion of the Tierrasanta Community within the Project Area is designated as sand and gravel (approximately 82.80 acres) and open space (approximately 6.43 acres). There are two other smaller portions of the Project Area located within the Tierrasanta Community. These consist of a small triangular section (approximately 2.68 acres) located within Admiral Baker within Subarea B and a linear strip (approximately 6.02 acres) located within Admiral Baker within Subarea A. These two pieces are both designated as commercial recreation.

EIR page 3-4:
The proposed Grantville Redevelopment Project lies within the boundaries of three such community plans; the Navajo Community (88~~82~~%), the Tierrasanta Community (11~~18~~%), and the College Area Community Plans (less than 1%).

EIR page 3-14:

Please refer to response to comment TCC5.

EIR page 4.12-2:

The Project Area includes the Navajo, Tierrasanta, and College Area Community Plan areas. Only a very small portion of the Project Area lies within the College Area Community Plan areas and the portions of the Project Area located within Tierrasanta ~~is~~ are designated as sand and gravel, and open space.

RESPONSE TO COMMENT LETTER FROM THE TIERRASANTA COMMUNITY COUNCIL, DATED FEBRUARY 14, 2005 (cont.d)

Response to Comment TCC2:

Please refer to response to comment TCC1.

Response to Comment TCC3:

EIR page 3-14 has been modified to reflect the exact language as provided in the Tierrasanta Community Plan as follows:

- Upon termination of the sand and gravel operations, the excavated area should be rehabilitiated and a pathway to Mission Trails park ~~be~~ provided. Any other use of the property beyond open space uses will require an amendment to ~~the~~ this plan. (page 56)
- Designated open space areas which are not to be acquired by the City should be allowed to apply the adjacent residential density for development purposes. Clustered development should then be used to avoid development impacts on the designated open space. (page 55)

Topic: Project Description, Development Potential (Industrial Development)

§ 3.3.3 (pg 3-8): "It is estimated that ... industrial development would be increased by 6,145,342 square feet"

§3.4.1 (pg-3-10): Stated objective: "encouraging the development of manufacturing enterprises."

TCC4

Comment: Per Table 3-1 (pg 3-9), this is a quadrupling of industrial development from what exists today. Such development clearly would result in significant, unavoidable impacts in Transportation & Circulation and Air Quality (long-term), as is predicted in the DEIR, but contrary to the DEIR there is no predicted significant and unavoidable long-term impact to Noise.

It seems extremely likely there also will be significant and unavoidable Noise impact to the community of Tierrasanta. This probably is not predicted in the DEIR because nowhere in the document is there mention of the atmospheric anomaly that typically occurs in the morning hours when the air is cool and still: a form of sound ducting commonly exists that carries noises from the south side of Admiral Baker all the way to Tierrasanta (example: backing bells on cement mixers). The mitigations proposed in §4.4.5 (pg 4.4-15) will need to address this phenomenon as the added 6 million square feet of light industry adds to what exists today.

Topic: Land Use, Stated Goals of the Tierrasanta Community Plan (1982)

§ 4.1.1.3 (pg 4.1-8): Subpara B says "Goals applicable to the proposed project are described in Section 2.3 and Section 3.6 of this EIR."

TCC5

Comment: Not all goals applicable to the proposed project are described in the referenced sections. The Tierrasanta Community Plan is full of goals and recommendations on the future development of Tierrasanta, but Section 3.6 of the DEIR only includes two such goals and Section 2.3 of the DEIR includes none (but §4.14.1.2, Subpara C on pg 4.14-4 quotes three goals related to the mine operation). Appearing below are a few more of the goals that pertain are (listed references are to the Tierrasanta Community Plan document):

- Paragraph 1 on page 48: "With the exception of sand and gravel extraction, only park related uses should be allowed within the adopted regional park boundaries."
- Paragraph 2 on page 48: "Future urban land use for all areas that abut the park should be sensitive to it, as proposed within the Urban Design Element of this plan." (Mentioned in §4.10.1.1 and §4.10.5.)
- Goal on page 54: "Establish an open space system which protects the natural resources, provides for the managed production of resources, provides outdoor recreation and enhances the identity and character of the community."
- Paragraph 6 on page 55: "Landscaped transition areas should be established between the developed urban areas and the open space system, along traffic corridors, and at canyon overlooks, where considered appropriate."
- Goal on page 61: "To create a functional, affordable, efficient and diverse suburban environment which is esthetically pleasing and sensitive to the natural environment."
- Goal on page 62: "To protect the assets of Mission Trails Regional Park from degradation by surrounding development." (Mentioned in §4.10.1.1 on pg 4.10-3).
- Bulleted objective on page 90: "To minimize disruption to the community and its neighborhoods by through traffic."

RESPONSE TO COMMENT LETTER FROM THE TIERRASANTA COMMUNITY COUNCIL, DATED FEBRUARY 14, 2005 (cont.d)

Response to Comment TCC4:

Comment noted. The EIR provides a comprehensive analysis of potential noise impacts, including potential stationary noise associated with industrial-related uses (see EIR pages 4.4-7 through 4.4-11, and 4.4-14). Mitigation Measure N2 is proposed so that the noise compatibility of redevelopment activities will be addressed on a case-by-case basis as specific redevelopment activities are proposed. Additionally, all redevelopment activities are required to comply with City of San Diego sound level limits as identified in Table 4.4-1 of the EIR. Compliance with Mitigation Measure N2 and City sound level limits would ensure no significant noise impact as a result of future redevelopment activities.

Response to Comment TCC5:

EIR page 3-14 has been modified to reflect the additional goals suggested by the commentor as follows:

3.6.2 The Tierrasanta Community Plan

~~Approximately 130 acres of sand and gravel operations fall under the jurisdiction of~~ The Tierrasanta Community Plan~~, which~~ was adopted in 1982. There are three non-contiguous areas located within the Project Area that are part of the Tierrasanta Community Plan. These include the sand and gravel processing area, and two smaller pieces that are part of the Admiral Baker Golf Course and are designated as open space. The sand and gravel processing area is isolated from the Tierrasanta community at its southeastern corner and has been designated as Open Space with a sub-designation of sand and gravel ~~open space~~ by the Tierrasanta Community Plan. The following identifies goals and recommendations related to future development in Tierrasanta:

3.6.2.1 *Open Space*

- Upon termination of the sand and gravel operations, the excavated area should be rehabilitiated and a pathway to Mission Trails be provided. Any other use of the property beyond open space uses will require an amendment to the plan.
- Designated open space areas which are not to be acquired by the City should be allowed to apply the adjacent residential density for development purposes.
- With the exception of sand and gravel extraction, only park related uses should be allowed within the adopted regional park boundaries.
- Future urban land use for all areas that abut the park should be sensitive to it, as proposed within the Urban Design Element of this plan.

RESPONSE TO COMMENT LETTER FROM THE TIERRASANTA COMMUNITY COUNCIL, DATED FEBRUARY 14, 2005 (cont.d)

Response to Comment TCC5 (cont.d):

- Establish an open space system which protects the natural resources, provides for the managed production of resources, provides outdoor recreation and enhances the identity and character of the community.
- Landscaped transition areas should be established between the developed urban areas and the open space system, along traffic corridors, and at canyon overlooks, where considered appropriate.
- To create a functional, affordable, efficient and diverse suburban environmental which is esthetically pleasing and sensitive to the natural environment.
- To protect the assets of Mission Trails Regional Park from degradation by surrounding development.
- To minimize disruption to the community and its neighborhoods by through traffic.

Topic: Transportation/Circulation, Traffic Measurements & Predictions at Mission Gorge Road

Fig 4.2-2 (pg 4.2-5):

Fig 4.2-3 (pg 4.2-6):

Fig 4.2-4 (pg 4.2-10):

Comments:

TCC6

1. The orientation of the 4-quadrant trip-assignment circle at Jackson and Mission Gorge is correctly oriented in Fig 4.2-4, but appears to be 90° off in Fig 4.2-2 and Fig 4.2-3 (these need to be rotated clockwise a quarter turn). This presumes Mission Gorge is deemed East-West and Jackson is deemed North-South.
2. Given the above correction, what is the explanation in Fig 4.2-2 for 39 cars turning left from Mission Gorge eastbound? This seems unlikely since zero cars originate from Jackson heading southbound, an assessment derived from the fact there is no road segment heading southbound from Mission Trails Regional Park at Mission Gorge and Jackson.
3. Given the above correction, the same reasoning applies to Fig 4.2-3. What is the explanation for the following described traffic patterns given there is no road segment of Jackson north of Mission Gorge:
   - 32 cars turning left from Mission Gorge eastbound,
   - 2 cars turning right from Mission Gorge westbound,
   - 2 cars continuing straight through (northbound) from Jackson, or
   - 4 cars heading south on Jackson (2 straight through, one turning left and one turning right)?
4. Figure 4.2-4 appears to correctly show meaningful data at the intersection of Mission Gorge and Jackson: that zero cars will travel northbound from Mission Gorge at this intersection, and none will emerge heading southbound from the north at this intersection, because there is no road segment to turn into or emerge from.

Similar concerns apply to Fig 8-3 (pg 8-17) and Fig 8-4 (pg 8-18).

Topic: Transportation/Circulation, Traffic Measurements & Predictions at Mission Gorge Road

TCC7

Fig 4.2-2 (pg 4.2-5):
Fig 4.2-3 (pg 4.2-6):
Fig 4.2-4 (pg 4.2-10):

Comment: Though orientations are correct (and identical) in the figures listed to the left, the data in the 4-quadrant trip-assignment circles at Princess View & Mission Gorge is questioned. The northward extension of this intersection appears to enter into a quarry operation, so it is assumed this traffic is most likely trucks related to the mining operations. Why then do Figures 2 and 3 show traffic north of the intersection but Figure 4 shows no such traffic?

Fig 4.2-6 (pg 4.2-16):
Fig 4.2-7 (pg 4.2-17):
Fig 4.2-8 (pg 4.2-18):
Fig 4.2-9 (pg 4.2-19):

Comments:

1. The orientations of the 4-quadrant trip-assignment circles at Jackson and Mission Gorge are uncertain in light of the discussion above.
2. What is the explanation for traffic turning/heading northbound from Mission Gorge at Jackson, and what is the explanation for traffic heading southbound here? (continued)

RESPONSE TO COMMENT LETTER FROM THE TIERRASANTA COMMUNITY COUNCIL, DATED FEBRUARY 14, 2005 (cont.d)

Response to Comment TCC6:

#1. The orientation of the existing turning movement figures (Figures 4.2-2 and 4.2-3) is incorrect; however the analysis is correct.

EIR Figures 4.2-2 and 4.2-3 have been revised to depict the correct orientation.

#2. Existing traffic counts at this location were conducted manually for the traffic analysis. The left turns at this location could either be left-turns into a small parking lot for Mission Trails park, or, more likely, U-turns.

#3. The north leg of this intersection is a popular parking spot for people using Mission Trails Regional Park. It is not surprising that the turning movement counts show vehicles entering and exiting this location.

The "Peak Hour Trip Assignment" graphics correctly display the project vehicles moving east and west along Mission Gorge Road. There are no trips entering or exiting the north leg of the intersection because there is no redevelopment on the north leg of the intersection; however, there is a small segment of road that dead-ends where people park to access Mission Trails Regional Park.

#4. Comment noted and responded to in Items #1-3. The northbound and southbound turning movements in the AM peak hour General Plan Opportunities Area were also switched in the graphic. However, the analysis is correct.

Response to Comment TCC7:

#1. As stated in response to comment TCC6, the orientation of the volumes at Jackson Drive and Mission Gorge Road should be rotated 90 degrees clockwise.

#2. As stated in response to comment TCC6, the orientation of the volumes at Jackson Drive and Mission Gorge Road should be rotated 90 degrees clockwise. The northbound traffic at this location is heading in an easterly direction on Mission Gorge Road.

#3. While the daily trips entering and exiting a project typically match (using trip generation tables), the AM and PM peak hour entering and existing volumes do not necessarily equal one another.

TCC7 (cont'd.)

3. Why do the number of vehicles entering the quarry operation at Princess View in each of these figures not equal the number of vehicles exiting this quarry operation?

TCC8

Topic: Map Depictions, Connection of Tierrasanta Roads to Mission Gorge Road and Jackson Drive

§ 4.2.3.5 (pg 4.2-11):
Fig 4.4-1 (pg 4.4-6):
Fig 4.4-2 (pg 4.4-8):
Fig 4.4-3 (pg 4.4-12):
Fig 4.8-1 (pg 4.8-3):
Fig 4.11-2 (pg 4.11-4):
Fig 8-1 (pg 8-11):

Comment: The DEIR, § 4.2.3.5, accurately reflects Tierrasanta's intention not to connect existing roads across the San Diego River or into Mission Trails Regional Park (final paragraph in "Planned Improvements"), and it correctly states that such connections are not included in the analysis. Unfortunately, the several figures listed to the left all show some of the proscribed road connections. These drawings should be corrected to more accurately reflect the DEIR's statement made in § 4.2.3.5.

TCC9

Topic: Air Quality, Aluminum as an additional Quarry-Related Air Pollutant

Table 4.3-3 (pg 4.3-7): Aluminum is not listed as an air pollutant although this is known to exist around the quarry.

Comment: The Final EIR should include airborne Aluminum dust as a relevant health concern resulting from quarry operations.

TCC10

Topic: Air Quality, Mitigation Measures for construction-related Impacts to Air Quality

Table 4.3-5 (pg 4.3-11): Projected long-term air pollutant emissions, where levels of CO (carbon monoxide), ROG (reactive organic gases), NOx (nitrogen dioxide) and PM_{10} (fine particulate matter) are projected to exceed the existing "significance threshold" values for these pollutants.

§ 4.3.5 (pg 4.3-14): List of mitigation measures to control short-term impact on air quality.

Comment: Table 4.3-5 predicts levels of CO will exceed the listed significance threshold by 800%, and it predicts levels of PM_{10} will exceed the significance threshold by 1,100%. Thresholds of other pollutants are predicted to *only* exceeded their significance thresholds by 200% to 300%. The DEIR lists in §4.3.5 a variety of mitigation measures, including: applying water to control dust, properly maintaining diesel-powered vehicles, washing off trucks leaving construction sites, replacing ground cover, speed limits on dirt roads, and the like. These are good, but the adjoining resident must know how to voice a concern when it appears the mitigations are being ignored (who to complain to when these measures are taken with undue reluctance). The Final EIR should provide guidance on how the public can compel the required actions by developers should the promised mitigations fail to be followed.

RESPONSE TO COMMENT LETTER FROM THE TIERRASANTA COMMUNITY COUNCIL, DATED FEBRUARY 14, 2005 (cont.d)

Response to Comment TCC8:

Comment noted. The maps utilized in the EIR are provided by SANGIS. As indicated by the commentor, the EIR does not assume that roadways would connect (e.g., Princess View) to cross the river into the Tierrasanta Community. Specifically, none of the figures in the traffic analysis show road connections at Tierrasanta/Princess View, Santo Road, or Jackson Drive. Furthermore, the traffic analysis does not assume any of these roadway connections.

EIR figures 4.4-1, 4.4-2, 4.4-3, 4.8-1, 4.11-2, and 8-1 have been modified in response to this comment to delete the appearance of these roadway connections.

Response to Comment TCC9:

EIR page 4.3-2 has been modified as follows:

Aluminum emissions

According to the San Diego Air Pollution Control District (APCD), the existing sand and gravel operation located within the Project Area generates aluminum emissions. An emissions inventory (calculation) is completed for each facility once every four years. According to the APCD, Superior Ready Mix (Canyon Rock) emitted 1,557 pounds of aluminum in 2001 (the last year that emissions were calculated for this facility). Emissions from this facility will be calculated again at the end of 2005. The emissions are calculated by identifying the tonnage of concrete (or gravel, etc.) produced the previous year and then calculating the emissions based on an emissions factor (from EPA, ARB, etc.). No actual monitoring is conducted because it would not be accurate for the site as it would include surrounding emissions (diesel, etc.). The toxics inventory has no limiting mechanism unless there is a significant health risk associated with it. OEHHA does not have a limiting mechanism for aluminum. So, regardless of the amount of aluminum emitted by this facility per year, APCD would not consider it to be significant. According to APCD, aluminum emissions, in and of itself, is not a considered the significant health risk for this facility; however, other emissions (dust, diesel) are considered a hazard from this facility.

Response to Comment TCC10:

Table 4.3-5 depicts long-term air pollutant emissions associated with the generation of traffic and non-point sources for the generation of energy. Short-term air quality emissions as a result of construction activities will be evaluated on a case-by-case basis as specific redevelopment activities are proposed. EIR Mitigation Measure AQ1

RESPONSE TO COMMENT LETTER FROM THE TIERRASANTA COMMUNITY COUNCIL, DATED FEBRUARY 14, 2005 (cont.d)

Response to Comment TCC10 (cont.d):
requires the implementation of measures to control dust during construction operations. Mitigation Measure AQ1 will be included in the Mitigation Monitoring and Reporting Program (MMRP) adopted by the City. The MMRP will ensure compliance with the proposed mitigation measures, and is also available to the public for review. Also, an MMRP will be require for all future redevelopment activities requiring short-term air quality mitigation.

TCC11

Topic: Hazards & Hazardous Materials, Use of acronyms

Pg ES-13: Uses the terms "UST" and "DEH" without explanation.

§ 4.8.1.3 (pg 4.8-1): Spells out both terms.

Glossary, § 10: Spells out DEH but not UST.

Comment: The acronyms UST and DEH are used in the Executive Summary but these are not explained. The Glossary is not uniformly complete. One must read §4.8 to learn the meaning of UST.

TCC12

Topic: Aesthetics, Light and Glare produced by Industrial Development

§ 4.10.1.2 (pg 4.10-3): "substantial light and glare is produced by ... vacant land and open space"(?)

§ 4.10.3.2 (pg 4.10-4): "The impact associated with an increase in light and glare is considered less than significant."

Comment: The earlier mention of an additional 6 million square feet of industrial development suggests the DEIR's conclusion (above) is flawed. The development of "vacant land and open space" into industrial development should be revisited in the Final EIR in terms of the impact of light and glare to the neighboring communities of southern Tierrasanta (and northern Allied Gardens).

TCC13

Topic: Miscellaneous (leftovers from the Scoping Comments)

The following were provided as scoping comments that do not appear to have been addressed. The Final EIR should provide the missing answers:

Land Use: The DEIR should explain the relationship between this Grantville "Program DEIR" and a subsequent project-specific DEIR that encompasses part of the Grantville project area? Will a project-specific DEIR be standalone, or will it be beholden to what's contained in the Grantville Program DEIR? If they in fact are interrelated, then which will have seniority?

Land Use: The DEIR should explain the height restrictions that apply to property within the redevelopment area and thus to building construction that may occur on this land.

Cultural Resources: The DEIR will require a confidential appendix (not released to the public) to address certain historic cultural resources that lie within the Grantville area and along the S.D. River.

Biological Resources: The DEIR should explain how existing bodies of water will (or will not) be protected by this project once they are included within the Grantville area boundary. Specifically, the two "settling ponds" along the San Diego River and south of Admiral Baker, created as a part of the Rock Quarry and resulting from gravel/sand/rock excavation, most likely support certain biologic needs for native species. It is not clear whether the DEIR will serve either to maintain these ponds or to ensure such ponds even will exist into the future.

Aesthetics: The DEIR should explain how and whether residents of Tierrasanta (particularly those to the south, with a view of the Grantville area) will be able to have input to project-specific developments that are wholly within the Navajo planning area. As above in "Noise," development in Navajo along the southern boundary of Tierrasanta, will have direct impact to Tierrasantans with a clear view of the Grantville project.

RESPONSE TO COMMENT LETTER FROM THE TIERRASANTA COMMUNITY COUNCIL, DATED FEBRUARY 14, 2005 (cont.d)

Response to Comment TCC11:

The term "UST" refers to Underground Storage Tank and the term "DEH" refers to Department of Environmental Health. EIR pages ES-13, 4.8-13 and 10-2 have been modified to define these acronyms as follows:

EIR page ES-13 and page 4.8-13 (Mitigation Measures HM2 and HM3):

HM2 Any underground storage tanks (USTs) that are removed during redevelopment activities shall be removed under permit by the Department of Environmental Health (DEH). The soil and groundwater within the vicinity of the USTs shall be adequately characterized and remediated, if necessary, to a standard that would be protective of water quality and human health, based on the future site use.

HM3 In the event that not previously identified underground storage tanks (USTs) or undocumented areas of contamination are encountered during redevelopment activities, work shall be discontinued until appropriate health and safety procedures are implemented. A contingency plan shall be prepared to address contractor procedures for such an event, to minimize potential for costly construction delays. In addition, either Department of Environmental Health (DEH) or the Regional Water Quality Control Board (RWQCB), depending on the nature of the contamination, shall be notified regarding the contamination. Each agency and program within the respective agency has its own mechanism for initiating an investigation. The appropriate program shall be selected based on the nature of the contamination identified. The contamination remediation and removal activities shall be conducted in accordance with pertinent local, state, and federal regulatory guidelines, under the oversight of the appropriate regulatory agency.

EIR page 10-2 (Glossary):

UST Underground Storage Tank

Response to Comment TCC12:

EIR page 4.10-3 recognizes that there are existing sources of nighttime light and glare in the Project Area which is produced by existing development. Any new development would need to comply with City of San Diego Ordinance 0-86-5 and Municipal Code Sections 142.0730 and 142.0740 regulating light and glare. Additionally, as noted in response to comment DFG7, development adjacent to the San Diego River would need to incorporate measures to minimize edge effects to the San Diego River corridor, including lighting. Any new development, including industrial

RESPONSE TO COMMENT LETTER FROM THE TIERRASANTA COMMUNITY COUNCIL, DATED FEBRUARY 14, 2005 (cont.d)

Response to Comment TCC12 (cont.d):

development would be evaluated by the City for potential light and glare impacts as part of development and environmental review. Additionally, future development projects would be evaluated for consistency with River Park Master Plan, when adopted by the City.

Response to Comment TCC13:

Land Use. EIR page 1-2 describes the CEQA Guideline requirements for preparation of a Program EIR for the adoption of a redevelopment project area. EIR page 3-15 - Section 3.7 Intended Uses of the EIR, describes the various actions that may be covered by the Program EIR, subject to review under criteria as described in CEQA Guidelines Sections 15162 and 15163.

As stated on EIR page 1-2:

> This document has been prepared as a Program EIR in accordance with Section 15168(a)(3) of the State CEQA Guidelines. Preparation of a Program EIR for this project is appropriate in light of Section 15180 of the CEQA Guidelines related to Redevelopment Projects. Section 15180 of the CEQA Guidelines states:
>
> (a) All public and private activities or undertakings pursuant to or in furtherance of a redevelopment plan constitute a single project, which shall be deemed approved at the time of adoption of the redevelopment plan by the legislative body. The EIR in connection with the redevelopment plan shall be submitted in accordance with Section 33352 of the Health and Safety Code.
>
> (b) An EIR on a redevelopment plan shall be treated as a program EIR with no subsequent EIRs required for individual components of the redevelopment plan unless a subsequent EIR or a supplement to an EIR would be required by Section 15162 or 15163.

The Program EIR addresses the potential environmental impacts associated with the adopted of the proposed Grantville Redevelopment Project Area. Similar to Program EIR's that are prepared for the adoption of Community Plans, the Grantville Program EIR provides a comprehensive analysis of potential impacts associated with redevelopment of the Project Area; however, no specific redevelopment project is proposed. All future redevelopment activities will need to be evaluated for compliance with the provisions of the California Environmental Quality Act. Depending on the size, nature, and scope of redevelopment activities, future CEQA documentation may consist of an exemption, a Negative Declaration or Mitigated

RESPONSE TO COMMENT LETTER FROM THE TIERRASANTA COMMUNITY COUNCIL, DATED FEBRUARY 14, 2005 (cont.d)

Response to Comment TCC13 (cont.d):

Negative Declaration, a Secondary Study (pursuant to the Procedures for Implementation of the California Environmental Quality Act and State CEQA Guidelines, July 1990), an Addendum, Subsequent or Supplemental EIR. A Subsequent or Supplement to an EIR would be required under Section 15162 or 15163.

Land Use. The current height restrictions according to existing zoning in the Project Area are as follows:

Zone	Maximum Structure Height
IL-2-1	None
IL-3-1	None
CC-1-3	45 ft
CC-4-2	60 ft
AR-1-1	30 ft
AR-1-2	30 ft
RM-3-7	40 ft
CO-1-2	60 ft
CV-1-1	60 ft

Cultural Resources. A confidential appendix to the cultural resources report has been prepared and is on file with the City of San Diego Redevelopment Agency. The confidential appendix is not provided to the public in order to protect cultural resources, as locations of sensitive cultural resource sites within one mile of the Project Area are depicted.

Biological Resources. The EIR identifies mitigation measures (see Mitigation Measures BR 1 through BR 8) that places certain protections on biological resources within the Project Area. Both ponds referenced by the commentor are located within areas designated as Open Space according to the existing Navajo Community Plan designation. No additional development was assumed for these areas as part of the development assumptions analyzed in the EIR, which is consistent with the intent of the Open Space designation of the Navajo Community Plan.

Additionally, as discussed in Section 4.6 Biological Resources, the settling ponds are mapped as Open Water and are surrounded by sensitive wetland habitats of riparian forest and southern willow scrub. These ponds, and land immediately surrounding, are located within the City of San Diego MSCP MHPA, and are subject to City of San Diego

RESPONSE TO COMMENT LETTER FROM THE TIERRASANTA COMMUNITY COUNCIL, DATED FEBRUARY 14, 2005 (cont.d)

Response to Comment TCC13 (cont.d):
MSCP regulations, and potentially U.S. Army Corps of Engineers, Department of Fish and Game and Regional Water Quality Control Board regulation depending on the type of activity proposed.

Aesthetics. Any future discretionary actions within the Project Area are subject to the public notification requirements pursuant to Section 112.0501-112.0509 of the San Diego Municipal Code. Additionally, future subsequent redevelopment activities will be evaluated by the appropriate community planning group where public input and comment is invited.

FOUR D PROPERTIES, INC.

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SAN DIEGO, CA 92120
Telephone (619) 283-0588
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1/19/05

RE: GRANTVILLE REDEVELOPMENT.

DEAR MR REED,

DD1 I HAVE MADE COPIES OF VARIOUS PAGES OF THE EIR WITH MY COMMENTS FOR YOUR REVIEW.

RESPECTFULLY,

DANIEL J. DALLENBACH
Broker

6136 Mission Gorge Rd., #230
San Diego, CA 92120

VALLEY VIEW PROPERTIES
A division of
PACIFIC ASSET CAPITAL, INC.
Real Estate Sales & Mortgages, Property Mgt.

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RESPONSE TO COMMENT LETTER FROM DANIEL J. DALLENBACH, DATED JANUARY 19, 2005

Response to Comment DD1:
Please refer to responses to comments DD2 through DD13.

Executive Summary

Project Description

The proposed project is the adoption and subsequent implementation of the Grantville Redevelopment Project, located in portions of the Navajo, Tierrasanta, and College Area Community Planning Areas of the City of San Diego. The primary discretionary action associated with the proposed project is the adoption of the Grantville Redevelopment Project Area by the Redevelopment Agency of the City of San Diego. The Redevelopment Agency proposes the establishment of the Grantville Redevelopment Project Area as a catalyst to reverse the physical and economic blight in the Project Area. A variety of redevelopment activities will be implemented subsequent to the adoption of the Redevelopment Project Area in order to achieve the objectives of the project. These activities will include, but not be limited to, the acquisition of land or building sites, improvement of land and building sites, rehabilitation of structures, improving public facilities and infrastructure, expanding employment opportunities, expanding recreational opportunities in the Project Area, and providing other public improvements and landscaping.

The Grantville Redevelopment Project will be implemented in accordance with the California Community Redevelopment Law (CCRL), Health and Safety Code Section 33000 et. seq. Approval of the project will implement a plan, with subsequent redevelopment, and private and public improvements within the Redevelopment Project Area encompassing approximately 970 acres of land.

Redevelopment is defined pursuant to Section 33020 of the CCRL as "the planning, development, replanning, redesign, clearance, reconstruction, or rehabilitation, or any combination of these, of all or part of a survey area, and the provision of those residential, commercial, industrial, public, or other structures or spaces as may be appropriate or necessary in the interest of the general welfare, including recreational and other facilities incidental or appurtenant to them." Redevelopment also includes the activities described in Section 33021 of the CCRL which comprise the following:

a) Alteration, improvement, modernization, reconstruction or rehabilitation, or any combination of these, of existing structures in a Project Area;

b) Provision of open space and public or private recreation areas; and,

c) Replanning or redesign or development of undeveloped areas in which either of the following conditions exist:

DD2

1) the areas are stagnant or improperly utilized because of defective or inadequate street layout, faulty lot layout in relation to size, shape, accessibility or usefulness, or for other causes; or

2) the area requires replanning and land assembly for development in the interest of the general welfare because of widely scattered ownership, tax delinquency or other reasons.

DO ROAD & ORDINANCE EXIST INTERNAL THAT IF SO WHY NOT THEY MENTIONED?

RESPONSE TO COMMENT LETTER FROM DANIEL J. DALLENBACH, DATED JANUARY 19, 2005 (cont.d)

Response to Comment DD2:

This section of the EIR quotes language directly from CCRL. The law in other places addresses public improvements including roadways and infrastructure. Specifically, Section 33030C defines blight as including:'

> "A blighting area also may be one that contains the conditions described in subdivision (b) and is, in addition, characterized by the existence of inadequate public improvements, parking facilities, or utilities."

Further provisions under Section 33445 allow the agency to construct public infrastructure improvements, subject to certain findings:

> "(a) Notwithstanding Section 33440, an agency may, with the consent of the legislative body, pay all or a part of the value of the land for and the cost of the installation and construction of any building, facility, structure, or other improvement which is publicly owned either within or without the project area, ..."

Flooding, in and of itself, is not a criteria for blight. However, flooding issues may indirectly lead to blight conditions. Flooding and inadequate infrastructure decreases incentives for investment in properties, which in turn, contribute to overall blighting conditions.

TABLE S-1
Summary of Significant Impacts and Mitigation Measures

Impact(s)	Recommended Mitigation Measure(s)	Significance of Impact(s) After Mitigation
Section 4.2 – Transportation/Circulation		
Proposed redevelopment activities based on existing community plan land uses are anticipated to add 31,606 daily trips to the circulation network with 3,280 trips occurring in the morning peak hour and 4,346 trips occurring during afternoon peak hour. The following roadway segments would be significantly impacted: • Friars Road from I-15 North Bound Ramps to Rancho Mission Road (LOS F); • Friars Road from Rancho Mission Road to Santo Road (LOS F); • Fairmount Avenue from I-8 East Bound Off Ramp to Camino Del Rio North (LOS F); • Mission Gorge Road from Mission Gorge Place to Twain Avenue (LOS F); • Mission Gorge Road from Twain Avenue to Vandever Avenue (LOS F); and, • Mission Gorge Road from Friars Road to Zion Avenue (LOS E). The following intersections would be significantly impacted by the proposed redevelopment: • Friars & I-15 South Bound Ramps (PM Peak hour); • Friars & Mission Gorge Road (PM Peak hour); • Twain & Mission Gorge Road (AM and PM Peak hours); • Fairmount Avenue & Mission Gorge Road (AM and PM Peak hours); • Camino Del Rio & I-8 West Bound Off Ramp & Fairmount Avenue (AM and PM Peak hours); and, • I-8 East Bound On and Off Ramps & Fairmount Avenue (AM Peak hour). Ramp meter analysis was also conducted for the proposed project. This analysis indicates impacts would occur to the following ramp meter locations: Friars Rd. to I-15 North (AM Peak Hour); Friars Rd. to I-15 South (loop) (PM Peak Hour); and, Friars Rd. (HOV) to I-15 North (PM Peak hour)	T1 Improvements identified within the Navajo and Tierrasanta Community Plans shall be implemented as sufficient financial resources become available through the establishment of the proposed redevelopment project area. These improvements include: • Widen Mission Gorge Road to a six-lane facility north of Zion Avenue with no left-turn lanes except at signalized intersections. Widen Mission Gorge Road to a six-lane major street between Fairmount Avenue and Interstate 8. Improve Mission Gorge Road to a six-lane major street between Fairmount Avenue and Interstate 8. WHAT IS DIFFERENCE? WHAT HAPPENS BETWEEN FAIRMOUNT & ZION ?	Significant and Unavoidable

DD3

RTC-53

RESPONSE TO COMMENT LETTER FROM DANIEL J. DALLENBACH, DATED JANUARY 19, 2005 (cont.d)

Response to Comment DD3:
Please refer to EIR page 4.2-21 which provides a description of the improvements identified in the Navajo and Tierrasanta Community Plans. Proposed mitigation would include both widening Mission Gorge Road as well as improving existing 6-lane segments of Mission Gorge Road so that the facility operates as a 6-lane major roadway.

As stated on EIR page 4.2-2, the segment of Mission Gorge Road between Friars Road and Mission Gorge Road is classified as a 6-lane primary arterial transitioning to a 6-lane major roadway. This includes the segment between Fairmont Avenue and Zion Road. No further improvement is recommended for this specific segment as it current is improved to a 6-lane primary arterial.

Impact(s)	Recommended Mitigation Measure(s)		
Section 4.9 – Paleontological Resources (cont'd.)			
	4. Final Results Report a. Prior to the release of the grading bond, two copies of the Final Results Report (even if negative), which describes the results, analysis, and conclusions of the above Paleontological Monitoring Program (with appropriate graphics) shall be submitted to MMC for approval by the ADD of LDR. b. MMC shall notify the RE or BI, as appropriate, of receipt of the Final Results Report.		
Section 4.10 – Aesthetics			
Future redevelopment activities within the Project Area may result in significant aesthetic impacts.	A1 As redevelopment activities proceed within the Project Area, each individual development proposal shall be reviewed by the Agency and City to comply with the development standards of the City of San Diego Land Development Code and the adopted design guidelines of the Community Plans. Specific redevelopment projects shall incorporate appropriate design details and principals consistent with the Novajo and Tierrasanto Community Plans, including: • The rear elevations of buildings which face the San Diego River or are visible from the street should be as well-detailed and visually interesting as the front elevations; • Buildings developed adjacent to the river should be set back from the river to avoid glare and shading impacts to the habitat; • Improve the appearance of the existing strip commercial development on Mission Gorge Road between Interstate 8 and Zion Avenue by reducing signs, improving landscaping and architectural design, providing consistent building setbacks and providing adequate off-street parking; • Site design should provide adequate visual buffers surrounding uses, such as with the use of landscaping or grade separation; • Develop commercial areas which have desirably distinctive qualities in their design, appearance and operation; • Ensure that industrial appearance and effects of industrial uses are compatible with the character of the surrounding residential and commercial areas and the sensitive resources of the San Diego River; • Development along Mission Gorge Road shall comply with the regulations included in the Community Plan Implementation Overlay Zone (CPIOZ); and. • Future development of areas within the Tierrasanto Community that abut the Mission Trails Regional Park should be sensitive to it, as proposed within the Urban Design Element of the Tierrasanto Community Plan.		Less Than Significant

SHOULDN'T THIS INCLUDE OR AS AMENDED?

DD4

RTC-54

RESPONSE TO COMMENT LETTER FROM DANIEL J. DALLENBACH, DATED JANUARY 19, 2005 (cont.d)

Response to Comment DD4:
Recommendations identified in EIR Mitigation Measure A1 are taken verbatim from the adopted Navajo Community Plan's goals and recommendations (see EIR page 4.10-2). As such, no change is proposed.

ogical resources sensitivity. The Friars Formation has a high resources sensitivity and the Santiago anics, within the Project Area, has a marginal resource sensitivity.

2.2.10 Aesthetics

Portions of Project Area have public views to the relatively natural landscape of the San Diego River and Mission Trails Regional Park to the north and northeast. However, a majority of the Project Area is urban and characterized by older development and blighted conditions.

2.2.11 Water Quality/Hydrology

The San Diego River is the primary hydrologic feature within the Project Area. The San Diego River bisects the northwestern portion of Subarea B and generally forms the western boundary of the Project Area as it flows from the southwest through the Navajo Community into Mission Valley. The San Diego River originates in the mountains northwest of the historic town of Julian and runs southwestward through an unincorporated, largely uninhabited area of San Diego County before entering El Capitan Reservoir. Downstream of El Capitan Reservoir, the river flows westward through the Cities of Santee and San Diego and past Famosa Slough to the San Diego River Estuary. The river discharges into the Pacific Ocean just south of the jettied entrance of Mission Bay in the community of Ocean Beach. The majority of the runoff from the Project Area flows into the San Diego River. Alvarado Canyon Creek traverses the southern portion of the Project Area, and is a tributary to the San Diego River.

2.2.12 Population/Housing

There are no residential units located within the Project Area, although the Navajo and Tierrasanta Community Plan areas are comprised primarily of residential land uses. The redevelopment area encompasses primarily non-residential uses.

2.2.13 Public Services

Much of the infrastructure in the Redevelopment Project Area is deficient and in need of improvement. Transportation and flood control infrastructure are the most notable deficiencies with respect to public services and utilities in the Project Area.

DD5

IS THIS MEANT TO BE PROJECT SPECIFIC AS STATED ES-19 HD1?

2.2.14 Mineral Resources

A 200-acre portion of a sand and gravel processing facility is located within Subarea B in the northern portion of the Project Area. The facility operates on both sides of the San Diego River and comprises a total of 250 acres.

2.3 Planning Context

As a basis for the redevelopment of the project, the project will be consistent with the City of San Diego Progress Guide and General Plan, community plans, and the Land Development Code (Zoning Ordinance) of the City of San Diego, as amended from time to time, and all other applicable state and local codes and guidelines.

RESPONSE TO COMMENT LETTER FROM DANIEL J. DALLENBACH, DATED JANUARY 19, 2005 (cont.d)

Response to Comment DD5:

EIR page 2-4 states that there are existing public service deficiencies in the Project Area including, most notably transportation and flood control infrastructure. These deficiencies are discussed in further detail in Sections 4.2 Transportation/Circulation and 4.11 Water Quality/Hydrology of the EIR. Mitigation Measure HD 1 addresses the flood control deficiencies by requiring that, among others, an appropriate drainage control plan that controls runoff and drainage in a manner acceptable to City engineering standards for the specific project.

The Draft Redevelopment Plan and Five-Year Implementation Plan also recognize the flooding issues in the Project Area and improvements to infrastructure, including flooding facilities, are incorporated into the redevelopment plan goals as well as the Five-Year Implementation Plan. Redevelopment plan goals addressing this issue include, "Improve public infrastructure and undertake other public improvements in, and of benefit to, the Project Area including: preparation of a comprehensive Public Facilities Financing Plan to address short and long term infrastructure improvements; storm drain improvements (particularly to properties affected by the Alvarado Creek and San Diego River) ... (Objective #3).

- Inadequate lot size;
- Industrial pollution; and,
- Low lease rates.

The Agency proposes the Grantville Redevelopment Project as a catalyst to reverse the physical and economic blight in the area. Redevelopment would achieve the purposes of the CCRL (Health and Safety Code Section 33000 et. seq.) by:

DD6

- Eliminating physical and economic blighting conditions;
- Replacement of obsolete and deteriorated public improvements and facilities;
- Rehabilitation of industrial and commercial structures;
- Planning, redesign, and development of areas which are underutilized;
- Participation of owners and tenants in the revitalization of their properties;
- Providing affordable housing;
- Restoration of waterways and reduction of urban runoff along the San Diego River; and,
- Revitalization of commercial and industrial districts.

DOES CCRL INCLUDE TRAFFIC ISSUES RELATING TO SAFETY?

3.3.1 Redevelopment Project Actions

The Grantville Redevelopment Project will involve a number of subsequent actions over a 30-year time period to implement the Redevelopment Project. Redevelopment actions undertaken by private development interests and public agencies within the Redevelopment Project Area may include:

a. Rehabilitating, altering, remodeling, improving, modernizing, clearing or reconstructing buildings, structures and improvements;

b. Rehabilitating, preserving, developing, or constructing affordable housing in compliance with State Law;

c. Providing the opportunity for owners and tenants presently located in the Redevelopment Project Area to participate in redevelopment projects and programs, and extending preferences to occupants to remain or relocate within the Redevelopment Project Area;

d. Providing relocation assistance to displaced residential and nonresidential occupants, if necessary;

e. Facilitating the development or redevelopment of land for purposes and uses consistent with the Redevelopment Plan;

f. Providing incentives for property owners, tenants, businesses, and residents to participate in improving conditions throughout the Redevelopment Project Area;

g. Acquiring real property by purchase, lease, gift, request, devise, or any other lawful means, after the conduct of appropriate hearings;

RESPONSE TO COMMENT LETTER FROM DANIEL J. DALLENBACH, DATED JANUARY 19, 2005 (cont.d)

Response to Comment DD6:

No. Health and Safety Code Section 33030(c) provides that a blighted area may also include inadequate public improvements, parking facilities, or utilities. Health and Safety Codes Section 33445 allows the Agency to pay all or a portion of the costs associated with public infrastructure improvements that will benefit the Project Area and eliminate blighting conditions. However, improving safety in the Project Area is included as an objective of the Draft Redevelopment Plan (see Objective #2).

estments, providing incentives for private investments, and assembling properties suitable for new development at current standards. To fund the improvements needed to revitalize, rehabilitate, and attract private development to the Grantville Redevelopment Project Area, the Agency will utilize tax increment financing.

3.4.1 Redevelopment Project Objectives

Specific objectives for the Grantville Redevelopment Project include:

1. Eliminate and prevent the spread of blight and deterioration, and redevelop the proposed redevelopment Project Area in accordance with the City of San Diego Progress Guide and General Plan, applicable community plans, the Proposed Redevelopment Plan, and local codes and ordinances;
2. Enhance economic growth within the Redevelopment Project Area by continuing ongoing efforts to revitalize industrial and commercial areas;
3. Improve the flow of traffic within the Redevelopment Project Area and otherwise enhance the quality of pedestrian and vehicular mobility, and improve transportation facilities, which support the vitality, safety, and viability of the Redevelopment Project Area;
4. Alleviate the shortage of parking while avoiding negative impacts on residential neighborhoods resulting from the oversupply of parking by implementing a coordinated and comprehensive plan for the proportional distribution and proper configuration of parking spaces and facilities;
5. Expand employment opportunities within the Redevelopment Project Area by encouraging the development of manufacturing enterprises and improving accessibility of employment centers within and outside the Redevelopment Project Area;

DD7

6. Improve public infrastructure and undertake other public improvements in, and of benefit to, the Redevelopment Project Area, such as undergrounding electrical distribution lines and telephone lines along major streets, widening, reducing or otherwise modifying existing roadways or creating additional streets for proper pedestrian and/or vehicular circulation;

WHAT ABOUT FLOODING?

7. Expand recreational opportunities within the Project Area;
8. Create an attractive and pleasant environment within the Redevelopment Area.

3.4.2 Projects and Programs

3.4.2.1 *Economic Development Programs*

Economic development programs are needed to improve the Redevelopment Project Area's economic base. These programs would facilitate the revitalization of blighted properties by using redevelopment tools. Agency staff will pursue reuse, redevelopment, and revitalization of nonconforming, vacant, or underutilized properties through marketing of the area and encouragement of private sector investment. Potential projects include, but are not limited to:

RESPONSE TO COMMENT LETTER FROM DANIEL J. DALLENBACH, DATED JANUARY 19, 2005 (cont.d)

Response to Comment DD7:

Please refer to responses to comments DD2 and DD5. EIR page 3-10 identifies objectives of the proposed project. As a component of the Redevelopment Plan adoption process, the Grantville Redevelopment Advisory Committee (GRAC), has reviewed and refined these objectives (see Section 110, Project Objectives 2 and 3 of the Redevelopment Plan). The objectives specifically address improving traffic flow, and public infrastructure including storm drain improvements (particularly to properties affected by the Alvarado Creek and San Diego River).

Redevelopment Project Objective 6 identified in the EIR, "Improve public infrastructure ..." would address flooding deficiencies in the Project Area as well. The Redevelopment Agency recognizes the flooding deficiencies in the Project Area as a major public facility deficiency of the Project Area. Correcting the Alvarado Creek flood control deficiencies are among the priorities identified in the Draft Redevelopment Plan and have been included in the Five-Year Implementation Plan (see response to comment DF2).

4.2 Transportation/Circulation

The following summarizes the findings of the Grantville Redevelopment Traffic Impact Analysis (Katz, (& Associates, November, 2004). The traffic study technical report is provided in Volume II Appendix B o EIR.

4.2.1 Existing Conditions

4.2.1.1 Methodologies

The traffic analysis examines existing (Year 2004) and Horizon Year (Year 2030) timeframes. Street system operating conditions are typically described in terms of "level of service." Level of service is a report-card scale used to indicate the quality of traffic flow on roadway segments and at intersections. The Level of service (LOS) ranges from LOS A (free flow, little congestion) to LOS F (forced flow, extreme congestion). A more detailed description of LOS is provided in the traffic technical study (see Volume II, Appendix B of this EIR).

Roadway Segment Capacity Analysis. The City of San Diego has published daily traffic volume standards for roadways within its jurisdiction. To determine existing service levels on study area roadway segments, a comparison was made among the appropriate average daily traffic thresholds for level of service, the daily capacity of the study area roadway segments, and the existing and future volumes in the study area.

Intersection Capacity Analysis. The analysis of peak hour intersection performance was conducted using the Traffix analysis software program, which uses the "operational analysis" procedure for signalized intersections as defined in the Highway Capacity Manual (2000 HCM). This technique uses 1,900 passenger cars per hour of green per lane (pcphgpl) as the maximum saturation flow of a single lane at an intersection. This saturation flow rate is adjusted to account for lane width, on-street parking, conflicting pedestrian flow, traffic composition (i.e., percent of trucks) and shared lane movements (e.g., through and right-turn movements from the same lane). Level of service for signalized intersections is based on the average time (seconds) that vehicles entering an intersection are stopped or delayed.

The Highway Capacity Manual analysis method for evaluating unsignalized, minor street stop intersections is based on the average total delay for each impeded movement. As used here, total delay is defined as the total elapsed time from when a vehicle stops at the end of a queue until the vehicle departs from the stop line. This time includes the time required for the vehicle to travel from the last-in-queue to the first-in-queue position. The average total delay for any particular minor movement is a function of the service rate or capacity of the approach and the degree of saturation.

4.2.1.2 Existing Circulation Network

Streets and highways in the study area that could be impacted by the proposed project include Fairmount Avenue, Friars Road, Mission Gorge Road, and Waring Road.

DD8 WHAT ABOUT TWAIN ?

RESPONSE TO COMMENT LETTER FROM DANIEL J. DALLENBACH, DATED JANUARY 19, 2005 (cont.d)

Response to Comment DD8:

The actual functional capacity of a roadway segment is based on the ability of arterial intersections to accommodate peak hour volumes. Efficient designs of intersections to achieve acceptable levels of service could result in higher capacities.

The key signalized intersections of Twain within the project study area were analyzed. These include the intersection of Mission Gorge Road/Twain Avenue (Intersection 10) and Waring Road/Twain Avenue (Intersection 26).

4.2.3 Impact

The proposed action is to redevelop areas within the Navajo Community Planning Area. Future redevelopment activities will be in accordance with the applicable development regulations at the time specific redevelopment activities are proposed (e.g., zoning ordinance). The inherent nature of redevelopment tends to readjust the intensity of land use in the study area. Therefore, existing land use intensities were summarized and then compared to the proposed land use intensities to estimate the change caused by the redevelopment. This net change was used to calculate the increase, or decrease, of traffic in the project area. Any change in current land intensity results in a change of traffic on the surrounding roadway network.

DD9

OR AS AMENDED

4.2.3.1 *Project Trip Generation*

Vehicular traffic generation characteristics for projects are estimated based on rates in the City of San Diego's Trip Generation Manual (dated September 1998). This manual provides standards and recommendations for the probable traffic generation of various land uses based upon local, regional and nation-wide studies of existing developments in comparable settings. Appendix C of the traffic technical study (see Volume II, Appendix B) contains excerpts from the trip generation manual used in this analysis. Table 4.2-4 summarizes anticipated trip generation based on existing community plan land use designation. As shown in Table 4.2-4, redevelopment activities according to the existing Community Plan would add 31,606 daily trips to the circulation network with 3,280 trips occurring in the morning peak hour and 4,346 trips occurring during afternoon peak hour. The project impacts are analyzed in the 2030 "Horizon Year" scenario.

4.2.3.2 *Project Access*

The broad nature of and diversity of land use throughout the redevelopment area necessitates that generalized access points will dictate access throughout the redevelopment area. Project redevelopment in the Grantville Redevelopment Area will take access on the primary, adjacent streets including Friars Road, Mission Gorge Road, Waring Road, Princess View Road, Twain Avenue, Jackson Drive, and Fairmount Avenue.

4.2.3.3 *Parking*

Adequate parking should be assured by the developers per the San Diego Municipal Code, which establishes parking requirement for development within the City of San Diego.

4.2.3.4 *Project Trip Distribution*

Trip distribution is the process of identifying the probable destinations, directions, or traffic routes that project related traffic will likely affect. Trip distribution information can be estimated from observed traffic patterns, experience or through use of appropriate travel demand models. Trip distributions for this analysis are derived from both observed patterns and a SANDAG Series 10 Select Zone Analysis. For purposes of this analysis, the Select Zone Analysis was used in conjunction with observed patterns and then split into 18 groups defined by geographic area. A distribution was assumed for each area relative to location. Appendix D of the traffic technical study (see Volume II, Appendix B) shows both the location of the land use groups and the distributions used for each.

RESPONSE TO COMMENT LETTER FROM DANIEL J. DALLENBACH, DATED JANUARY 19, 2005 (cont.d)

Response to Comment DD9:

As stated in Section 3.0 of the EIR, the redevelopment plan horizon is approximately 20-30 years. The EIR states that future redevelopment activities will be in accordance with the applicable development regulations at the time specific redevelopment activities are proposed (e.g., zoning ordinance) (see EIR page 4.2-8). This would apply to any land use amendments as well, if proposed in the future.

B. City of San Diego

According to U.S. Census Bureau data, in 2000 the total number of housing units within the City of San Diego was 450,691. In 1990, the estimated number of housing units was 406,096. During the ten year period, 44,595 housing units were added to the City's housing stock. This represents an increase of approximately 11 percent in the total number of housing units. According to SANDAG, the current (2004) estimate of housing units is 469,154, which represents a four percent increase between 2000 and 2004.

C. Community Plan Areas

The Project Area includes both the Navajo and Tierrasanta Community Plan areas. Only a very small portion of the Project Area lies within the College Community Plan area. In 2000, 19,914 housing units were located in the Navajo Community Plan area and 10,635 housing units were located in the Tierrasanta Community Plan Area. According to SANDAG, the 2004 estimate for the number of housing units in the Navajo Community Plan area is 20,128 and the 2004 estimate for the number of housing units in the Tierrasanta Community Plan Area is 10,985. This represents a two percent increase between 2000 and 2004 in the Navajo Community Plan area and a 4 percent increase between 2000 and 2004 in the Tierrasanta Community Plan area.

D. Redevelopment Project Area

There are no housing units located within the Project Area. However, housing units are located in the surrounding area of the Navajo and Tierrasanta Community Plan areas.

4.12.2 Impact Threshold

For the purposes of this EIR, a significant impact to population and housing will occur if the proposed redevelopment project will:

- *Induce substantial growth or concentration of population;*
- *Displace large numbers of persons; or*
- *Create substantial demand for additional housing.*

4.12.3 Impact

4.12.3.1 Population

The Redevelopment Plan does not propose to change any land use designation within the Project Area. Therefore, the project would not generate an increase in population beyond the increase that could occur if the parcels designated for multi-family residential uses were redeveloped from their existing park and hotel uses to residential (a total of 48 single-family and 86-multi-family units could be constructed under this scenario). The project would not result in the displacement of a large number of persons. Therefore, the project would not result in a significant impact related to population within the County, City, Community Plan Areas, or Project Area and no mitigation measure is required.

4.12.3.2 Housing

The Redevelopment Plan does not propose additional housing in the Project Area. Redevelopment consistent with the Navajo Community Plan would allow for approximately 48 single-family and 86 multi-family residential units. This would only occur if the existing uses of these parcels (park, hotel) are redeveloped with residential uses. Development of these planned housing units within the Project Area would be less than one percent of the existing number of housing units within the Navajo Community Plan Area. Therefore, implementation of the proposed Redevelopment Plan would not induce substantial housing growth or concentration of population.

As provided by CRL Section 33334.2(a), no less than 20 percent of all tax increment revenue allocated to the Agency will be used for the purpose of increasing, improving, or preserving the community/neighborhood's supply of low and moderate income housing outside of the Redevelopment Area. This provides the community/neighborhood resources to maintain the low and moderate housing stock and assists residents with homeownership. Therefore, implementation of the proposed Redevelopment Plan would not require the displacement of population or housing.

The City recognizes that some residential land speculators may view approval of the Redevelopment Plan as an opportunity to develop residential land uses within the Project Area, especially during favorable economic conditions. Should residential projects be proposed on land that is not currently planned or zoned for residential development, an amendment to the Navajo Community Plan and approval of a zone change would be required. Therefore, because the project does not involve any redesignation of land uses, implementation of the proposed Redevelopment Plan would not induce substantial housing growth or concentration of population.

4.12.4 Significance of Impact

No impact associated with population and housing is anticipated.

4.12.5 Mitigation Measures

No mitigation measure is proposed, as no significant population and housing impact has been identified.

4.12.6 Conclusion

No significant population and housing impact is anticipated.

DD10 THIS IS IN CONFLICT WITH TRANSIT ORIENTED DEVELOPMENT? (ALSO SEE NEXT PAGE)

RESPONSE TO COMMENT LETTER FROM DANIEL J. DALLENBACH, DATED JANUARY 19, 2005 (cont.d)

Response to Comment DD10:

The EIR analyzes the potential impacts associated with the existing, adopted community plan land use designations. The EIR also provides an analysis of alternatives to the proposed project (see Section 8.0 Project Alternatives) which includes an analysis of a Transit-Oriented Development Principles alternative. As identified in the EIR (see page 8-25), the population/housing impact of the TOD alternative would be greater than the proposed project as it would introduce housing and population into the Project Area that is currently not contemplated in the existing adopted Navajo Community Plan.

TABLE 5-1
Projections for the County of San Diego and the City of San Diego

	Total Population		Total Housing		Total Employment	
	2000	2030	2000	2030	2000	2030
County of San Diego	442,919	682,791	152,947	236,869	140,269	211,236
City of San Diego	1,223,400	1,656,820	469,689	604,399	777,600	975,990

Source: SANDAG, 2003

5.1.1 Land Use

The Redevelopment Plan is consistent with the City of San Diego General Plan Land Use Element (Navajo, Tierrasanta and College Area Community Plans) and no General Plan Amendment or Zone Change is proposed. The project is also consistent with the MSCP and Regional Water Quality Control Board Plans. Achievement of orderly growth is dependent upon development in the future occurring in a manner consistent with the City's General Plan and other applicable regional plans. Since the City has adopted these plans and will continue to implement them no significant cumulative land use impact is anticipated.

5.1.2 Transportation/Circulation

The proposed project traffic impacts and cumulative traffic impacts are evaluated in *Section 4.2 Transportation/Circulation* of this EIR. Currently, several roadway segments and intersections located within and adjacent to the Project Area are not operating within an acceptable Level of Service (LOS). This condition is attributable to local and regional cumulative traffic. As discussed in Section 4.2, horizon year (year 2030) traffic volumes are based on the SANDAG Series 10 future forecast model. In the year 2030, the following roadway segments are expected to operate at an unacceptable LOS (without the proposed

DD11 project): WHAT ABOUT FAIRMOUNT EXTENDING TO ALVARADO?

- Friars Road from I-15 northbound ramps to Rancho Mission Road (LOS F);
- Friars Road from Rancho Mission Road to Santo Road (LOS E);
- Fairmount Avenue from I-8 eastbound off-ramp to Camino Del Rio North (LOS F); and,
- Mission Gorge Road from Mission Gorge Place to Twain Avenue (LOS E).

Additionally, the following intersections are expected to operate at an unacceptable LOS (without the proposed project):

- Camino Del Rio/I-8 westbound off-ramp and Fairmount Avenue (LOS F);
- Friars Road and I-15 southbound ramps (LOS E);
- Twain Avenue and Mission Gorge Road (LOS E); and,
- Camino Del Rio/I-8 westbound off-ramp and Fairmount Avenue (LOS F).

As identified in Section 4.2 (see Table 4.2-6), the proposed project would contribute to a significant cumulative impact as additional traffic generated in the Project Area will significantly impact roadway

RESPONSE TO COMMENT LETTER FROM DANIEL J. DALLENBACH, DATED JANUARY 19, 2005 (cont.d)

Response to Comment DD11:
The SANDAG Series 10 future traffic forecast model does not include the extension of Alvarado to Fairmount Avenue. Please refer to response to comment DOT2. Additionally, the proposed Five-Year Implementation Plan also identifies the initiation, design, and construction of Mission Gorge Road traffic improvements, including the Interstate 8 interchange at Alvarado Road.

8.3.1.12 Population and Housing

No impact to population/housing has been identified for the proposed project because the redevelopment plan is consistent with the Navajo, Tierrasanta, and College Area Community Plans. Under this alternative, substantially more housing (approximately 3,010 dwelling units could be constructed) would occur, which would represent a substantial increase in population beyond the level currently contemplated in the Navajo Community Plan for the Project Area. This alternative would result in a greater impact to population/housing than the proposed project.

8.3.1.13 Public Services and Utilities

This alternative would result in a greater impact to public services and utilities than the proposed project as a result of the increase in housing and population that would occur in the Project Area. This increase would place a greater demand on public services, including police, fire, schools, and parkland. This alternative would generate approximately 976 additional students (as compared to 65 generated under the proposed project). Additionally, this alternative would place a demand on parkland that would not occur under the proposed project. Based on City General Plan recommended parks to population ratio (approximately 20 acres/1,000 people), this alternative would generate a demand for approximately 22 acres of population-based parkland.

8.3.1.14 Mineral Resources

Implementation of this alternative would result in continued operation of the sand and gravel-processing facility located within the Project Area until the resources are exhausted or marginal economic return ends production. The conditional use permit expires in 2033. This alternative would result in a similar mineral resources impact as the proposed project.

8.3.1.15 Conclusion – General Plan Opportunity Areas Map Concept

This alternative is environmentally similar to the proposed project. Redevelopment that occurs under this alternative would result in greater environmental impacts to transportation/circulation, air quality, noise, population/housing, and public services. Impacts would be similar related to land use, cultural resources, biological resources, geology/soils, hazards/hazardous materials, paleontological resources, aesthetics, water quality, and mineral resources. This alternative would meet most of the basic objectives of the proposed project.

8.4 Transit-Oriented Development Principals Alternative

MY UNDERSTANDING IS THAT THIS WAS THE PRIMARY FOCUS FOR REDEVELOPMENT.

DD12

8.4.1 Description of Alternative

This alternative considers the environmental impacts associated with redevelopment activities occurring over the 20 to 30 year redevelopment timeframe anticipating land uses that would be consistent with Transit Oriented Development principals. This alternative assumes that land use designations would allow multi-family residential uses at 25 dwelling units per acre, within approximately 2,000 feet of the trolley station that will be located in the southern portion of the Project Area. This area generally encompasses

RESPONSE TO COMMENT LETTER FROM DANIEL J. DALLENBACH, DATED JANUARY 19, 2005 (cont.d)

Response to Comment DD12:

Comment noted. The objectives of the proposed project are listed on pages 3-9 through 3-10 of the EIR as well as Section 110 of the Draft Redevelopment Plan. Draft Redevelopment Plan project objectives include, "Explore opportunities in the Project Area for development of mixed residential and commercial uses particularly transit-oriented residential development to take advantage of nearby multi-modal transit system." Implementation of TOD land uses would require a community plan amendment.

Form A

Notice of Completion & Environmental Document Transmittal

SCH # _____

Revi

Mail to: State Clearinghouse, PO Box 3044, Sacramento, CA 95812-3044 916/445-0613

Project Title: Grantville Redevelopment Project

Lead Agency: City of San Diego Redevelopment Contact Person: Mr. Tracy Reed

Street Address: 600 B Street, Fourth Floor MS 904 Agency Phone: (619) 533-4233

City: San Diego Zip: 92101 County: San Diego

Project Location:

County: San Diego City/Nearest Community: San Diego

Cross Streets: Friars Road, Mission Gorge Road Zip Code: _____ Total Acres: 831

Assessor's Parcel No. Various (See Attached) Section: _____ Twp. _____ Range: _____ Base: _____

Within 2 Miles: State Hwy #: I-15, I-8 Waterways: San Diego River

Airports: _____ Railways: _____ Schools: _____

Document Type:

CEQA: ☑ NOP ☐ Early Cons ☐ Neg Dec ☐ Draft EIR ☐ Supplement/Subsequent EIR (Prior SCH No.) _____ ☐ Other _____

NEPA: ☐ NOI ☐ EA ☐ Draft EIS ☐ FONSI

Other: ☐ Joint Document ☐ Final Document ☐ Other _____

Local Action Type:

☐ General Plan Update ☐ General Plan Amendment ☐ General Plan Element ☐ Community Plan ☐ Specific Plan ☐ Master Plan ☐ Planned Unit Development ☐ Site Plan ☐ Rezone ☐ Prezone ☐ Use Permit ☐ Land Division (Subdivision, etc.) ☐ Annexation ☑ Redevelopment ☐ Coastal Permit ☐ Other _____

Development Type:

☐ Residential: *Units* _____ *Acres* _____
☑ Office: *Sq.ft.* _____ *Acres* _____ *Employees* _____
☑ Commercial: *Sq.ft.* _____ *Acres* _____ *Employees* _____
☑ Industrial: *Sq.ft.* _____ *Acres* _____ *Employees* _____
☐ Educational _____
☐ Recreational _____

☐ Water Facilities: *Type* Pump Station *MGD* _____
☐ Transportation: *Type* _____
☑ Mining: *Mineral* _____
☐ Power: *Type* _____ *Watts* _____
☐ Waste Treatment: *Type* _____
☐ Hazardous Waste: *Type* _____
☐ Other: _____

Funding (approx.): Federal $_____ State $_____ Total $_____

Project Issues Discussed in Document:

☑ Aesthetic/Visual ☑ Agricultural Land ☑ Air Quality ☑ Archeological/Historical ☐ Coastal Zone ☑ Drainage/Absorption ☐ Economic/Jobs ☐ Fiscal ☑ Flood Plain/Flooding ☐ Forest Land/Fire Hazard ☑ Geologic/Seismic ☑ Minerals ☑ Noise ☑ Population/Housing Balance ☑ Public Services/Facilities ☑ Recreation/Parks ☑ Schools/Universities ☐ Septic Systems ☑ Sewer Capacity ☑ Soil Erosion/Compaction/Grading ☑ Solid Waste ☑ Toxic/Hazardous ☑ Traffic/Circulation ☑ Vegetation ☑ Water Quality ☑ Water Supply/Groundwater ☑ Wetland/Riparian ☑ Wildlife ☑ Growth Inducing ☑ Landuse ☑ Cumulative Effects ☐ Other _____

Present Land Use/Zoning/General Plan Designation: Commercial, office, industrial, parks, open space, community facilities, mining

Project Description: Adoption of a redevelopment project area to promote land use, improve traffic flow, parking, and services, and eliminate physical and economic blight.

DD13

Revised 3-31-99

23

FINANCIAL GENERAL DEVELOPMENT.

RESPONSE TO COMMENT LETTER FROM DANIEL J. DALLENBACH, DATED JANUARY 19, 2005 (cont.d)

Response to Comment DD13:

Please refer to response to comment DD12.

CALIFORNIA NEON PRODUCTS

January 31, 2005

Mr. Tracy Reed
City Redevelopment Agency
600 B Street, 4th Floor, MS 904
San Diego, CA 92101

Dear Mr. Reed:

RM1 California Neon Products owns approximately 4.5 acres in Subarea A of the proposed redevelopment project. As owners we would like to believe the proposed redevelopment program will generally improve the area by mitigating traffic, improving drainage and providing a better mix of uses that are more compatible with a changing neighborhood. Unfortunately, this Program Environmental Impact Report does not adequately address the universe of changes being planned around us.

RM2 The Grantville Redevelopment Plan is being taken forward without a corresponding Community Plan Amendment. Under normal circumstances, Redevelopment Plans are adopted to implement a community plan or the City's General Plan. The Navajo Community Plan was adopted in 1982 and is out of date. The EIR addresses the impacts associated with buildout of that plan. Proposed improvements to Mission Gorge Road correspond to 1982 Navajo Plan and have little relevancy to today's traffic problems. As is noted in the following section of the EIR, if the detailed improvements were implemented, they would not improve service levels above Level F. This is totally unacceptable. The City needs to look for real mitigation before adopting this plan.

RM3

> As shown in Table 4.2-4, redevelopment activities according to the existing Community Plan would add 31,606 daily trips to the circulation network with 3,280 trips occurring in the morning peak hour and 4,346 trips occurring during afternoon peak hour. The project impacts are analyzed in the 2030 "Horizon Year" scenario.
>
> The Navajo Community Plan also states that Mission Gorge Road be improved to a six-lane major street between Fairmount Avenue and Interstate 8. This improvement has not yet been completed and the roadway is classified as a 4-lane major street. Table 4.2-7 shows that the impact that widening this segment to 6-lanes would have on the Level of Service for the Community Plan scenario. The level of service on this segment would remain an LOS F with this improvement under the Community Plan; and therefore, the impact is considered significant and unavoidable.

RM4 We are particularly concerned about figure 8-1, General Plan Opportunities Area Map Alternative Land Uses. It shows our property with a different land use designation than the one in the 1982 Navajo Plan. Does this mean that all the properties in my

4530 Mission Gorge Place, San Diego, CA 92120 • (619) 283-2191 Fax: (619) 283-9503

RESPONSE TO COMMENT LETTER FROM RICHARD MCCARTER, DATED JANUARY 31, 2005

Response to Comment RM1:
Comment noted. Please refer to responses to comments RM2 through RM6.

Response to Comment RM2:
Comment noted. Pursuant to California Community Redevelopment Law, the redevelopment plan must be consistent with the General Plan (i.e., Community Plans). As noted on EIR page ES-2, it is proposed that uses be permitted in compliance with the City of San Diego Progress Guide and General Plan, Navajo, Tierrasanta and College Area Community Plans. Implementation of the proposed redevelopment project would not preclude future amendments or updates to the Navajo Community plan. In the event the Navajo Community plan is updated in the future, the redevelopment plan would be amended to maintain consistency as required by law.

Response to Comment RM3:
The EIR concludes that the traffic impacts would be significant and unavoidable based on buildout according to currently adopted Community Plan land use designations, and roadway improvements as identified in the Community Plan. Future land use changes may occur in the Project Area, and the traffic and circulation impacts would need to be evaluated as a part of the approval process for future land uses. Furthermore, while the EIR traffic analysis is conservative (i.e., worst-case), in that it assumes circulation improvements only to the level consistent with adopted Community Plans, additional improvements and opportunities may be identified that would improve circulation.

An objective of the Draft Redevelopment Plan is to, "Improve public infrastructure and undertake other public improvements in, and of benefit to, the Project Area including: preparation of a comprehensive Public Facilities Financing Plan to address short and long term infrastructure improvements; ... widening, reducing or otherwise modifying existing roadways or creating additional streets, ... for proper ... vehicular circulation ... (Objective #3).

Please also refer to response to comment DOT3.

Response to Comment RM4:
The EIR evaluates alternatives to the proposed project that have the potential to reduce or avoid the potentially significant impacts associated with the proposed project. Although the General Plan Opportunities Map is evaluated as an alternative to the proposed project, further implementation of this alternative would require a Community Plan Amendment or Update, and a rezone of the affected properties. No such change is proposed at this time.

RM4 (cont'd.) neighborhood will be rezoned to allow for Multi-Family Residential and Commercial? The Program EIR does not adequately address the impact of such a rezoning. The land use impacts are not "similar to the proposed project", (P. 8.9, Sec. 8.3.1.2).

RM5 Similarly, under the Transit Oriented Development Principals Alternative, our property could be considered for TOD housing at 25 dwelling units per acre. Does including this alternative in some way allow for a future rezoning without community input?

Thank you for the opportunity to comment on this Draft Program EIR. We look forward to your response in the final document.

RM6 Sincerely,

Richard McCarter
Vice President

RESPONSE TO COMMENT LETTER FROM RICHARD MCCARTER, DATED JANUARY 31, 2005 (cont.d)

Response to Comment RM4 (cont.d):

It is expected that similar to redevelopment of the Project Area according to existing adopted land uses, redevelopment of existing land uses according to the General Plan Opportunities Map alternative would also reduce the occurrence of existing land use incompatibilities within the Project Area.

Response to Comment RM5:

The evaluation of the TOD Alternative in the EIR does not allow for future rezoning of the property. Any future rezoning would be subject to a discretionary review process by the City, including further opportunities for public review and comment.

Response to Comment RM6:

Comment noted.

Caster Properties, Inc.

Memo

To: Terry Reed, City of San Diego, treed@sandiego.gov

From: Brian R. Caster

Date: 2/9/05

Re: Grantville Redevelopment EIR Comments

Dear Tracy,

I wanted to get this to you before the meeting with the city council, and I would like to talk to you about it if I could. Below are my comments and questions.

Questions.

BC1 1. In the EIR 5.1.12 can you say, "The redevelop agency will encourage high density housing around the transportation hub of the trolley and bus station?"

BC2 2. If we were to get the property rezoned around the trolley station from industrial to residential, would we be required to build 20% low income housing?

BC3 3. Where in the EIR did it talk about the redevelopment agency working on the flood control problem on Mission Gorge Place?

BC4 4. Page 3.13 in the EIR Transportation, I did not know that we were planning to use the redevelopment funds to pay for any of the trolley?

BC5 5. Caster would like to see the figure in the EIR 8-1 show their property to be designated as an alterative use as High Density Residential. Can you do that?

BC6 6. Page 4.1-15 Goals-can you say that one of the goals is to increase density wherever it is appropriate?

BC7 7. Page 4.1-15 there are two paragrahs that repeat not sure if this is a typo?

BC8 8. In the EIR 3.4.2.1 Project Objectives. I would like to see housing put in here too.

4607 Mission Gorge Place
San Diego, CA 92120
619-287-8873 Ext. 117
Fax 619-287-2493
brcaster@castergrp.com

RESPONSE TO COMMENT LETTER FROM BRIAN CASTER, DATED FEBRUARY 9, 2005

Response to Comment BC1:

The Redevelopment Plan must be consistent with the adopted community plan, which currently shows industrial and commercial land uses in this area.

Response to Comment BC2:

Redevelopment Law requires that 20% of the tax increment generated in the Project Area must be used to improve or expand low and moderate-income housing. These funds may be spent either within or outside of the Project Area. Redevelopment Law also requires that 15% of new dwelling units constructed in the Project Area must be restricted for use by very low, low and moderate income households. This requirement must be met for the Project Area as a whole, not by each new housing project that is constructed. Redevelopment Law also makes provision for meeting this requirement outside of the Project Area boundaries.

Response to Comment BC3:

Description of existing flooding problems and potential flooding impacts are provided in various sections of the EIR; however, Section 4.11- Water Quality/Hydrology, provides a detailed discussion related to this issue. Figure 4.11-2 depicts the extent of the 100-year and 500-year floodplains within the Project Area based on SANGIS data (Flood Rate Insurance Map). This information depicts that large portions of the Project Area are subject to, and/or at risk for flooding. Mitigation Measure HD 1 is proposed to addresses the flood control deficiencies by requiring that, among others, an appropriate drainage control plan that controls runoff and drainage in a manner acceptable to City engineering standards for the specific project. Furthermore, flooding is addressed in specific objectives of the Draft Redevelopment Plan and the Five-Year Implementation Plan, as discussed in responses to comments DRS6, DD2, DD5, and DD7.

Response to Comment BC4:

EIR page 3-13 provides a discussion of the project's relation to existing community plans, and lists applicable goals and objectives of the Navajo Community Plan. As referenced by the commentor, Subsection 3.6.1.1 Transportation states, "Complete the extension of the Mission Valley Light Rail Transit Lane to serve the College Area community." This is an objective of the adopted Navajo Community Plan, and is not a stated goal of the redevelopment project.

RESPONSE TO COMMENT LETTER FROM BRIAN CASTER, DATED FEBRUARY 9, 2005 (cont.d)

Response to Comment BC5:

The EIR evaluates alternatives to the proposed project that have the potential to reduce or avoid the potentially significant impacts associated with the proposed project. Regardless of whether the subject property as referenced by the commentor is shown as an alternative use, a Community Plan Amendment, rezone, and subsequent environmental review would be required in order to implement residential uses at this location.

Response to Comment BC6:

The goals listed on EIR page 4.1-15 are contained in the City of San Diego Progress Guide and General Plan. As it related to the goals, guidelines and standards for redevelopment and reinvestment, the General Plan does not identify the specific goal to "increase density wherever it is appropriate." However, Objective #8 of the Draft Redevelopment Plan states, "Explore opportunities in the Project Area for development of mixed residential and commercial uses particularly transit-oriented residential development to take advantage of nearby multi-modal transit system."

Response to Comment BC7:

The two paragraphs, while duplicative, address two specific goals of the City of San Diego Progress Guide and General Plan.

Response to Comment BC8:

Please refer to response to comment BC6.

EL DORADO PROPERTIES

6136 Mission Gorge Road, Suite 230
San Diego, CA 92120
Phone: (619) 283-5557
Fax: (619) 283-0023

January 25, 2005

Mr. Tracy Reed
Project Manager
City of San Diego
Community & Economic Development
Redevelopment Agency
600 "B" Street, Fourth Floor (MS-904)
San Diego, CA 92101-4506

Dear Mr. Reed:

DRS1 Attached are pages from the Environmental Impact Report (EIR) Draft, for the Grantville Redevelopment Project Volume I. I have marked my comments on the attached pages for your review or comment.

DRS2 In general, I am quite pleased with the content of the report. However, I do feel it is necessary to be candid with my past, present, and future visions for the Grantville Redevelopment Project.

DRS3 The report throughout refers to the existing problem with flooding, and the need for traffic mitigation at Fairmount Avenue, and Mission Gorge Road. It also points to the need for planning and re-planning.

DRS4 In the Executive Summary, on Page ES-1: The redevelopment also includes the activities described in Section 33021, of the CCRL; which comprises of the following: C) (C) 2): Re-Planning.

DRS5 Figure ES-1: The Alvarado Creek drainage and the trolley station channel should be shown on this figure.

DRS6 The health and safety of our neighbors and us is at issue here. The same area referred to above is a flood zone. This is an even bigger health and safety concern that has increased in magnitude over the years

DRS7 On Page ES-2: The Draft refers to the possible amendment to the City of San Diego Progress Guide, City of San Diego General Plan, the Navajo Area Community Plans, and the Land Development Codes, in order to achieve the objectives of the Grantville Redevelopment Project.

RESPONSE TO COMMENT LETTER FROM DANIEL R. SMITH, DATED FEBRUARY 9, 2005

Response to Comment DRS1:
Comment noted. Please refer to responses to comments DS2 through DS29.

Response to Comment DRS2:
Comment noted.

Response to Comment DRS3:
Comment noted.

Response to Comment DRS4:
Comment noted.

Response to Comment DRS5:
EIR Figure ES-1 has been modified to depict the Alvarado Creek drainage and trolley station channel.

Response to Comment DRS6:
Comment noted. The EIR identifies flooding as an issue within the Project Area. As stated on EIR page 4.11-3, "Portions of the Project Area are subject to flooding as identified by the Federal Emergency Management Agency (FEMA) maps during rain events. This is attributable to the fact that portions of the Project Area are located within the floodplain, the growth within the San Diego River Watershed (SDRW) that has increased, and inadequate drainage/flooding infrastructure. As depicted on Figure 4.11-2, the southeastern portion of Subarea A is located within the 100-year floodplain of Alvarado Canyon Creek."

Please also refer to responses to comments BC3, DRS6, DD2, DD5, and DD7.

Response to Comment DRS7:
Please refer to response to comment RM2.

DRS8 **Question 1: Section 3.3.3:** Does this say that the current FAR of two (2) in some areas may be reduced to .34-.40? The area needs higher density, not less.

DRS9 **Section 3.4.1:** Redevelopment Objective, 3. 6: To improve the flow of traffic, the roadway needs to be the priority project. The flooding issue also needs to be corrected.

DRS10 **Question 2: Section 3.4.2.1: Economic Development Program:** Precisely, how will the Agency pay for itself as it assists the Grantville Project Area?

DRS11 **Question 3: Section 3.4.2.2: Low and Moderate Income Housing Program:** Does student housing qualify as low and moderate-income housing?

DRS12 **Section 3.7.2, Page 3.15:** Suggests that a rezoning map is necessary.

DRS13 **Question 4: Section 3.7.2:** What zoning designation should a transit area have?

DRS14 **This Figure 4.1-1:** Should show an area with land use: Mixed Use and Transit Oriented Development next to the trolley station.

DRS15 **Section 4.2.6:** The environmental impacts present in the area will not be completely mitigated by the Grantville Redevelopment Project. Some mitigation can be achieved if the roadways between Highway Eight and Fairmount Avenue, the extension to Alvarado Canyon Road and Mission Gorge Road North 500' are improved. See attached Exhibit B.

DRS16 **Section 4.6-1:** The Giant Reed (arundo donax), a very obnoxious plant, needs to be eradicated as a way to protect the native vegetation and those species of vegetation introduced by the planning process.

DRS17 **Section 6.0: Growth Inducement:** The upgrading of the area roadway system is the most important inducement to bring development into the area. This infrastructure upgrading is necessary, and should receive the first dollars acquired by the Agency.

DRS18 **Question 4:** Is the flood channel, also known as Alvarado Canyon Creek an infrastructure project?

DRS19 **Question 5:** What land use changes by amendment to the Navajo Plan, or City General Plan need to be made so that the project area would be consistent with Transit-Oriented Development?

DRS20 **Figure 8-1 and 8.1:** Mixed-Use, Transit-Oriented Development should be shown next to the trolley station.

DRS21 **Section 8.4:** The presence of the trolley station makes the area more suitable for Transit-Oriented Development.

DRS22 **Section 8.4.1:** This section refers to a possible 2,500 multiple family units being built, whereas, Section 3.3.3, references a total of 48 residential units, and 86 multi-family dwelling units.

RESPONSE TO COMMENT LETTER FROM DANIEL R. SMITH, DATED FEBRUARY 9, 2005 (cont.d)

Response to Comment DRS8:
As stated on EIR page 3-8, "It should be noted that existing land use regulations in the Project Area allow an FAR up to 2.0; however, the application of the .34 to .40 range is considered a more realistic estimate of future growth based on land use and infrastructure (e.g., roadway) capacities in the Project Area." Neither the EIR, nor the Redevelopment Plan propose to reduce the currently allowed FAR's within the Project Area.

Response to Comment DRS9:
Comment noted. Please also refer to responses to comments BC3, DRS6, DD2, DD5, and DD7.

Response to Comment DRS10:
In compliance with Redevelopment Law, the Agency will adopt an Implementation Plan every five years that outlines the projects and programs to be implemented and how they will be funded. This will include necessary administrative costs. Additionally, each year the Agency will adopt an annual budget that outlines the specific costs and revenue sources that will be used to pay those costs, including administrative costs.

Response to Comment DRS11:
The determination of a "low and moderate-income" housing unit is made based upon annual household income, adjusted for family size, and the housing cost paid for that unit. A student may qualify if the legally mandated criteria are met.

Response to Comment DRS12:
Comment noted.

Response to Comment DRS13:
Transit areas, and transit-related uses, as well as land uses that may complement transit areas are allowed in various zones throughout the City. The City of San Diego Municipal Code also identifies transit overlay zones, would include special provisions for land uses within proximity to public transit systems (e.g., see Chapter 13, Article 2, Division10).

Response to Comment DRS14:
EIR Figure 4.1-1 depicts existing land uses in the Project Area based on land use surveys conducted as part of preparation of the EIR and accurately reflects existing land uses within the Project Area.

RESPONSE TO COMMENT LETTER FROM DANIEL R. SMITH, DATED FEBRUARY 9, 2005 (cont.d)

Response to Comment DRS15:
The segment of Fairmont Avenue between Interstate 8 and Mission Gorge Road is planned as a six-lane major street. The improvement recommended by the commentor would also improve traffic flow in this area. Future redevelopment would consider improvements such as suggested by the commentor and shown in the commentor's exhibit A. However, subsequent detailed engineering analysis would be required prior to implementation of the type of improvement suggested by the commentor. Establishment of a redevelopment project area would allow more opportunity for this to be addressed. Please also refer to response to comment DOT3.

Response to Comment DRS16:
Comment noted. See also response to comment PRD11.

Response to Comment DRS17:
Comment noted. Public infrastructure improvement priorities will be established in the 5-year implementation plan. The EIR analysis assumes implementation of only those traffic improvements as identified in the Navajo Community Plan. Please also refer to response to comment DD5 (public facilities financing plan) and DF4 (growth-inducing impacts).

Response to Comment DRS18:
The future improvement to the Alvarado Creek flood channel is identified as a public infrastructure project in the Five-Year Implementation Plan.

Response to Comment DRS19:
As discussed in EIR Section 8.4 Transit-Oriented Development Principles Alternative, land use designations would need to allow multi-family residential uses at 25 dwelling units per acre, within approximately 2,000 feet of the trolley station. There are a variety of land use and zoning designations in the City's General Plan and Municipal Code that would allow residential and mixed-use developments, consistent with TOD principles. The subject areas are currently primarily designated for industrial and commercial uses.

Response to Comment DRS20:
Comment noted. EIR Figure 8-1 does depict mixed-uses in proximity to the trolley station.

RESPONSE TO COMMENT LETTER FROM DANIEL R. SMITH, DATED FEBRUARY 9, 2005 (cont.d)

Response to Comment DRS21:
Comment noted. Please also refer to responses to comments DRS13, DRS19, LM4, SNDG3, DD10, and DD12.

Response to Comment DRS22:
Section 8.4.1, as referenced by the commentor, evaluates a land use alternative to the existing adopted Navajo Community Plan. Section 3.3.3 refers to the development potential according to the existing Navajo Community Plan land uses.

DRS23 **Question 6: Section 8.4.1:** What is correct?

DRS24 **Section 8.4.1.1:** Encourages higher density residential use in proximity to the trolley station.

DRS25 **Question 6:** What FAR would be acceptable in the Transit-Oriented Area?

DRS26 **Question 7/8: Section 8.4.1:** Does an FAR of two (2) equate to 25 units per acre? What section is more obtainable?

DRS27 **Section 8.4.1.15: Transit Oriented Development Principal Alternative:** This is what the project is all about. Housing at the transit center promotes local retail business without the aspects of automobile traffic.

DRS28 A pocket park as open space and entryway into Grantville, and a roadway system change is important to obtain. See proposed area map attached as Exhibit A.

Thank you for your responses. Should you have any questions in reference to any of the above, please feel free to contact me at (619) 283-5557.

DRS29 Sincerely,

Daniel R. Smith
Member
Grantville Redevelopment Project Advisory Committee

RESPONSE TO COMMENT LETTER FROM DANIEL R. SMITH, DATED FEBRUARY 9, 2005 (cont.d)

Response to Comment DRS23:
Please refer to response to comment DS22.

Response to Comment DRS24:
Comment noted.

Response to Comment DRS25:
The acceptable FAR would be dependent on the specific type of mixed-use project proposed and land use configuration.

Response to Comment DRS26:
An FAR of 2.0 does not necessarily equate to 25 units per acre. However, FAR (floor area ratio) does apply to both non-residential (e.g., commercial and industrial uses) and residential square footage. It is the allowed amount of building square footage based on the lot size. For example, on a one-acre parcel (43,000 square feet) with an FAR of 2.0, a maximum development of 86,000 square foot of building space would be allowed (not including any further restrictions related to parking requirements, landscaping and setbacks, etc.). Residential density is expressed in dwelling units per acre as well as FAR. A residential density of 25 units per acre would allow a maximum of 25 dwelling units on a one-acre parcel (not including any further restrictions related to parking requirements, landscaping and setbacks, etc.).

Response to Comment DRS27:
Comment noted.

Response to Comment DRS28:
Comment noted.

Response to Comment DRS29:
Comment noted.

DRS
(ATTACH.)

Executive Summary

Project Description

The proposed project is the adoption and subsequent implementation of the Grantville Redevelopment Project, located in portions of the Navajo, Tierrasanta, and College Area Community Planning Areas of the City of San Diego. The primary discretionary action associated with the proposed project is the adoption of the Grantville Redevelopment Project Area by the Redevelopment Agency of the City of San Diego. The Redevelopment Agency proposes the establishment of the Grantville Redevelopment Project Area as a catalyst to reverse the physical and economic blight in the Project Area. A variety of redevelopment activities will be implemented subsequent to the adoption of the Redevelopment Project Area in order to achieve the objectives of the project. These activities will include, but not be limited to, the acquisition of land or building sites, improvement of land and building sites, rehabilitation of structures, improving public facilities and infrastructure, expanding employment opportunities, expanding recreational opportunities in the Project Area, and providing other public improvements and landscaping.

The Grantville Redevelopment Project will be implemented in accordance with the California Community Redevelopment Law (CCRL), Health and Safety Code Section 33000 et. seq. Approval of the project will implement a plan, with subsequent redevelopment, and private and public improvements within the Redevelopment Project Area encompassing approximately 970 acres of land.

Redevelopment is defined pursuant to Section 33020 of the CCRL as "the planning, development, replanning, redesign, clearance, reconstruction, or rehabilitation, or any combination of these, of all or part of a survey area, and the provision of those residential, commercial, industrial, public, or other structures or spaces as may be appropriate or necessary in the interest of the general welfare, including recreational and other facilities incidental or appurtenant to them." Redevelopment also includes the activities described in Section 33021 of the CCRL which comprise the following:

a) Alteration, improvement, modernization, reconstruction or rehabilitation, or any combination of these, of existing structures in a Project Area;

b) Provision of open space and public or private recreation areas; and,

c) Replanning or redesign or development of undeveloped areas in which either of the following conditions exist:

   1) the areas are stagnant or improperly utilized because of defective or inadequate street layout, faulty lot layout in relation to size, shape, accessibility or usefulness, or for other causes; or

   2) the area requires replanning and land assembly for development in the interest of the general welfare because of widely scattered ownership, tax delinquency or other reasons.

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As a basis for the redevelopment of the Project Area under consideration, it is proposed that uses be permitted in compliance with the City of San Diego Progress Guide and General Plan, Navajo, Tierrasanta and College Area Community Plans, and the Land Development Code (Zoning Ordinance) of the City of San Diego, as amended from time to time, and all other applicable state and local codes and guidelines.

Project Location

The proposed Grantville Redevelopment Project Area is located in San Diego County, in the eastern portion of the City of San Diego north of Interstate 8 and east of Interstate 15. A majority of the Project Area is located within the Navajo Community Planning Area, and generally includes the existing industrial and commercial areas along Friars Road, Mission Gorge Road, Fairmount Avenue and Waring Road. The approximately 970-acre Project Area consists of three non-contiguous subareas, referred to in this EIR as Subarea A, Subarea B and Subarea C. Figure ES-1 depicts the location of each subarea. The three subareas are described as follows:

Transit Center / Hospital

- *Subarea A* – Subarea A is comprised of commercial, office, industrial, public facility, park and open space uses immediately north of I-8 and located along both sides of Fairmount Avenue, Friars Road and Mission Gorge Road north to Zion Avenue (and including several parcels north of Zion Avenue). The southeast portion of Subarea A also includes the first seven parcels on the southern side of Adobe Falls Road (starting at Waring Road). Subarea A comprises approximately 400 acres.
- *Subarea B* – Subarea B consists of the commercial, office, industrial, sand and gravel, and open space uses located along Mission Gorge Road from Zion Avenue, northeast to Margerum Avenue. Within this subarea, sand and gravel processing operations take place on both sides of the San Diego River. The western boundary is defined by the residential neighborhood along Colina Dorada Drive. Subarea B comprises approximately 505 acres.
- *Subarea C* – Subarea C includes a shopping center, retail uses and community facilities, at and adjacent to, the intersection of Zion Avenue and Waring Road. The Allied Gardens Community Park, and other community services such as the Edwin A. Benjamin Library, Lewis Middle School, and two churches are included as the community facilities in this subarea. Subarea C comprises approximately 65 acres.

Environmental Impacts

The Redevelopment Agency determined that a Program EIR is required pursuant to the California Environmental Quality Act (CEQA). The environmental issue areas identified by the Agency and as a result of input received on the Notice of Preparation (NOP) and public scoping meeting for the project include the following: land use, transportation/circulation, air quality, noise, cultural resources, biological resources geology/soils, hazards and hazardous materials, paleontological resources, aesthetics, water quality/hydrology, population/housing, public services, mineral resources, cumulative impacts, growth-inducing impacts, and significant irreversible environmental changes. Table ES-1 presents a summary of the environmental impacts of the proposed project, mitigation measures to reduce potential significant impacts for the proposed project, and the level of significance of each impact after implementation of proposed mitigation measures.

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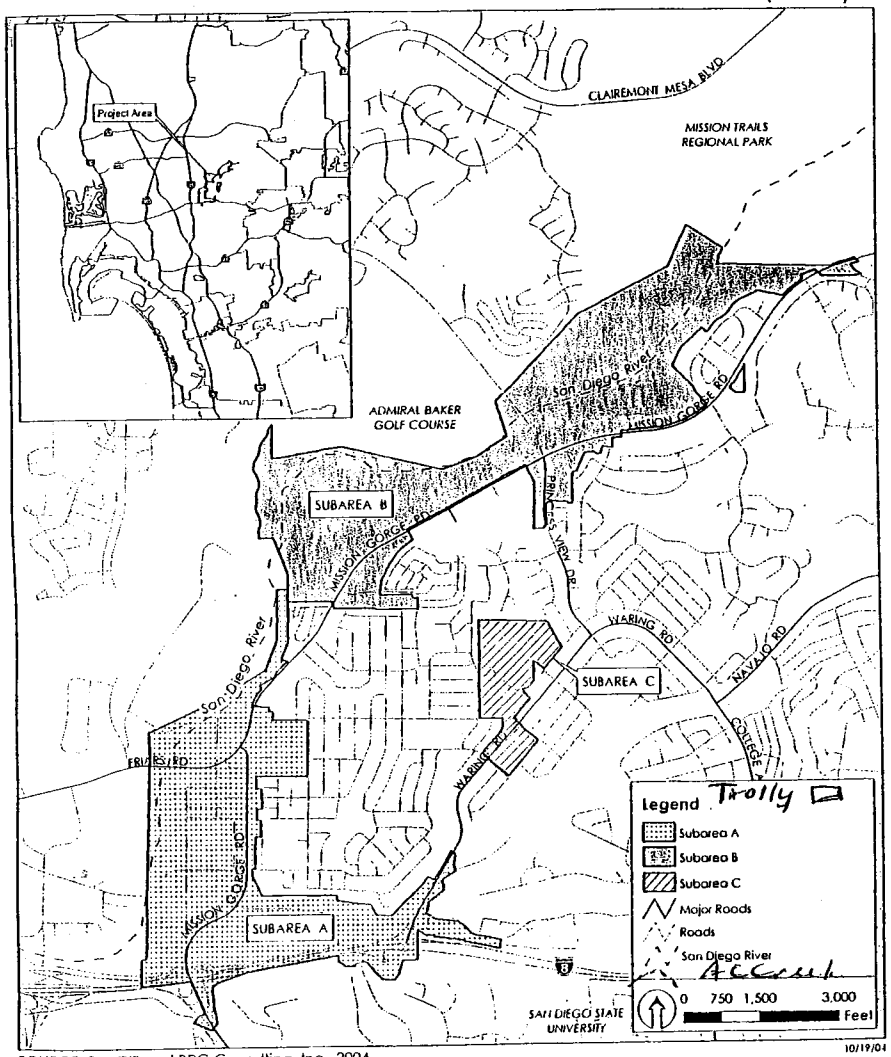

SOURCE: SanGIS and BRG Consulting, Inc., 2004

BRG CONSULTING, INC

Grantville EIR

Grantville Project Location and Subareas

FIGURE ES-1

Significant, Mitigable Impacts

Implementation of the proposed Redevelopment Project will result in significant impacts as a result of future redevelopment activities that will occur within the Project Area. Significant impacts have been identified to the following environmental issue areas:

- Air Quality (Short-term Construction)
- Noise
- Cultural Resources
- Biological Resources
- Geology/Soils
- Hazards and Hazardous Materials
- Paleontological Resources
- Aesthetics
- Water Quality/Hydrology
- Traffic Congestion
- Public Services
- Controlled Flooding

Implementation of proposed Mitigation Measures identified in this Program EIR will reduce the impact to these resource areas to a level less than significant.

Significant, Unavoidable Impacts

Based on the data and conclusions of this Program EIR, the Redevelopment Agency finds that the project will result in significant unavoidable impacts to the following resources areas:

- Transportation/Circulation
- Air Quality (Long-term Mobile Emissions)
- Floodway

Implementation of proposed Mitigation Measures will reduce the potential impact to these resources to the extent feasible; however, the impact will remain significant and unavoidable. These impacts are not a result of implementation of the Redevelopment Project in and of itself, rather they are a result of forecasted growth in the region, which will occur both inside and outside of the Project Area. If the Redevelopment Agency chooses to approve the Grantville Redevelopment Project, it must adopt a "Statement of Overriding Considerations" pursuant to Sections 15093 and 15126(b) of the CEQA Guidelines.

TABLE S-1
Summary of Significant Impacts and Mitigation Measures

Impact(s)	Recommended Mitigation Measure(s)	Significance of Impact(s) After Mitigation
Section 4.2 – Transportation/Circulation		
Proposed redevelopment activities based on existing community plan land uses are anticipated to add 31,606 daily trips to the circulation network with 3,280 trips occurring in the morning peak hour and 4,346 trips occurring during afternoon peak hour. The following roadway segments would be significantly impacted: • Friars Road from I-15 North Bound Ramps to Rancho Mission Road (LOS F); • Friars Road from Rancho Mission Road to Santo Road (LOS F); • Fairmount Avenue from I-8 East Bound Off Ramp to Camino Del Rio North (LOS F); • Mission Gorge Road from Mission Gorge Place to Twain Avenue (LOS F); • Mission Gorge Road from Twain Avenue to Vandever Avenue (LOS F); and, • Mission Gorge Road from Friars Road to Zion Avenue (LOS E). The following intersections would be significantly impacted by the proposed redevelopment: • Friars & I-15 South Bound Ramps (PM Peak hour); • Friars & Mission Gorge Road (PM Peak hour); • Twain & Mission Gorge Road (AM and PM Peak hours); • Fairmount Avenue & Mission Gorge Road (AM and PM Peak hours); • Camino Del Rio & I-8 West Bound Off Ramp & Fairmount Avenue (AM and PM Peak hours); and, • I-8 East Bound On and Off Ramps & Fairmount Avenue (AM Peak hour). Ramp meter analysis was also conducted for the proposed project. This analysis indicates impacts would occur to the following ramp meter locations: Friars Rd. to I-15 North (AM Peak Hour); Friars Rd. to I-15 South (loop) (PM Peak Hour); and, Friars Rd. (HOV) to I-15 North (PM Peak hour)	T1 Improvements identified within the Navajo and Tierrasanto Community Plans shall be implemented as sufficient financial resources become available through the establishment of the proposed redevelopment project area. These improvements include: • Widen Mission Gorge Road to a six-lane facility north of Zion Avenue with no left-turn lanes except at signalized intersections. • Widen Mission Gorge Road to a six-lane major street between Fairmount Avenue and Interstate 8. • Improve Mission Gorge Road to a six-lane major street between Fairmount Avenue and Interstate 8. Flooding at Mission Gorge Place and Mission Gorge Rd Bridge	Significant and Unavoidable

DRS (ATTACH.)

RTC-78

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(ATTACH.)

Exhibit B

DRS
(ATTACH.)

investments, providing incentives for private investments, and assembling properties suitable for new development at current standards. To fund the improvements needed to revitalize, rehabilitate, and attract private development to the Grantville Redevelopment Project Area, the Agency will utilize tax increment financing.

3.4.1 Redevelopment Project Objectives

Specific objectives for the Grantville Redevelopment Project include:

1. Eliminate and prevent the spread of blight and deterioration, and redevelop the proposed redevelopment Project Area in accordance with the City of San Diego Progress Guide and General Plan, applicable community plans, the Proposed Redevelopment Plan, and local codes and ordinances;
2. Enhance economic growth within the Redevelopment Project Area by continuing ongoing efforts to revitalize industrial and commercial areas;
3. Improve the flow of traffic within the Redevelopment Project Area and otherwise enhance the quality of pedestrian and vehicular mobility, and improve transportation facilities, which support the vitality, safety, and viability of the Redevelopment Project Area;
4. Alleviate the shortage of parking while avoiding negative impacts on residential neighborhoods resulting from the oversupply of parking by implementing a coordinated and comprehensive plan for the proportional distribution and proper configuration of parking spaces and facilities;
5. Expand employment opportunities within the Redevelopment Project Area by encouraging the development of manufacturing enterprises and improving accessibility of employment centers within and outside the Redevelopment Project Area;
6. Improve public infrastructure and undertake other public improvements in, and of benefit to, the Redevelopment Project Area, such as undergrounding electrical distribution lines and telephone lines along major streets, widening, reducing or otherwise modifying existing roadways or creating additional streets for proper pedestrian and/or vehicular circulation;
7. Expand recreational opportunities within the Project Area;
8. Create an attractive and pleasant environment within the Redevelopment Area.
9. Flooding Problem

3.4.2 Projects and Programs

3.4.2.1 *Economic Development Programs*

Economic development programs are needed to improve the Redevelopment Project Area's economic base. These programs would facilitate the revitalization of blighted properties by using redevelopment tools. Agency staff will pursue reuse, redevelopment, and revitalization of nonconforming, vacant, or underutilized properties through marketing of the area and encouragement of private sector investment. Potential projects include, but are not limited to:

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(ATTACH.)

- Assist with rehabilitation of industrial and commercial buildings throughout the Redevelopment Project Area;
- Assist in the development of commercial nodes along Mission Gorge Road including mixed-use projects;
- Assist in the development of additional parking opportunities throughout the Redevelopment Project Area;
- Assist in the development of light industrial and manufacturing parks; and
- Assist in assembling land for new development.

Economic development initiatives include implementation of an industrial and commercial rehabilitation program. This program would provide assistance in the form of grants and/or low interest loans to eligible Redevelopment Project Area businesses to encourage and assist in modernizing and improving industrial and commercial structures. The reinvestment in the business community would include façade improvements, rehabilitation of deteriorated buildings, hazardous materials disposal and signage upgrades.

Furthermore, the Agency proposes a proactive business expansion and retention program that would encourage new businesses to locate within the boundaries of the Redevelopment Project Area, and assist in the retention of existing businesses. This investment in the business community may include expanded marketing of the area, improvements to business facilities to meet modern market demands, and other actions to deter sales tax leakage.

3.4.2.2 Low And Moderate Income Housing Programs

As provide by CRL Section 33334.2(a), no less than 20 percent of all tax increment revenue allocated to the Agency shall be used for the purpose of increasing, improving, or preserving the community's supply of low and moderate income housing. Taken together, these factors present a substantial challenge for the Agency, yet also provide an opportunity to influence the community by providing resources to maintain the low and moderate housing stock and to assist residents with homeownership. In order to meet these objectives, the Agency may develop new programs for property owners such as:

- First-Time Home Buyer Program – Develop a training program for first time homebuyers to educate them about saving for, financing and caring for a home. Another facet of the program could offer "silent second" mortgages to homebuyers that are very low or low income according to HUD guidelines. Both the realty and backing communities would be key participants in this program.
- Rehab Loan Program for Single-Family Owner-Occupants – This program would be offered to existing homeowners and provide grants, low-interest rate loans for property improvement or additions. This would assure residents live in safe and sanitary housing and alleviate overcrowded conditions by constructing additional bedrooms as needed.
- Multi-Family Rehabilitation Program – Offer low interest rate loans to rehab units occupied predominantly by very low, low and moderate income residents. This would assure that owners are

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3.6.1.4 *San Diego River Revitalization*

- Continue the ongoing process to complete the San Diego River Master Plan.
- Ensure that future development along the San Diego River is designed to minimize impacts to this sensitive resource.

Alvarado Creek

3.6.1.5 *Economic Restructuring and Reinvestment Goals*

- To enhance Grantville's commercial corridors as neighborhood and community oriented shopping and employment centers.
- To improve accessibility of employment centers within and outside the community.

3.6.1.6 *Utilities*

- Undergrounding of electrical distribution lines and telephone lines along major streets is jointly financed by the City and San Diego Gas and Electric (SDG&E). Priorities for undergrounding are based upon the amount of traffic, congestion of wires, and major scenic routes. The plan recommends continuation of the undergrounding of overhead lines, and recommends that guidelines be established for the timely removal of utility poles once underground facilities are in place.

3.6.1.7 *Parking*

- As a result of historical development patterns, changed demographics and current parking needs, the Grantville community faces problems with the quantity, location and safety of it's existing parking supply. Many of the older, predominately commercial and industrial areas were developed with parking standards that were appropriate for the early twentieth-century, but do not meet current demands. Furthermore, the existing parking supply of many projects is found to have inadequate configuration for its location and is unsuited to the needs of current businesses.

3.6.2 The Tierrasanta Community Plan

Approximately 130 acres of sand and gravel operations fall under the jurisdiction of the Tierrasanta Community Plan, which was adopted in 1982. The sand and gravel processing area is isolated from the Tierrasanta community at its southeastern corner and has been designated as open space by the Tierrasanta Community Plan.

3.6.2.1 *Open Space*

- Upon termination of the sand and gravel operations, the excavated area should be rehabilitated and a pathway to Mission Trails be provided. Any other use of the property beyond open space uses will require an amendment to the plan.
- Designated open space areas which are not to be acquired by the City should be allowed to apply the adjacent residential density for development purposes.

Marengo
Morton
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1246 Rosecrans Lane
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Tel. (858) 459-3746
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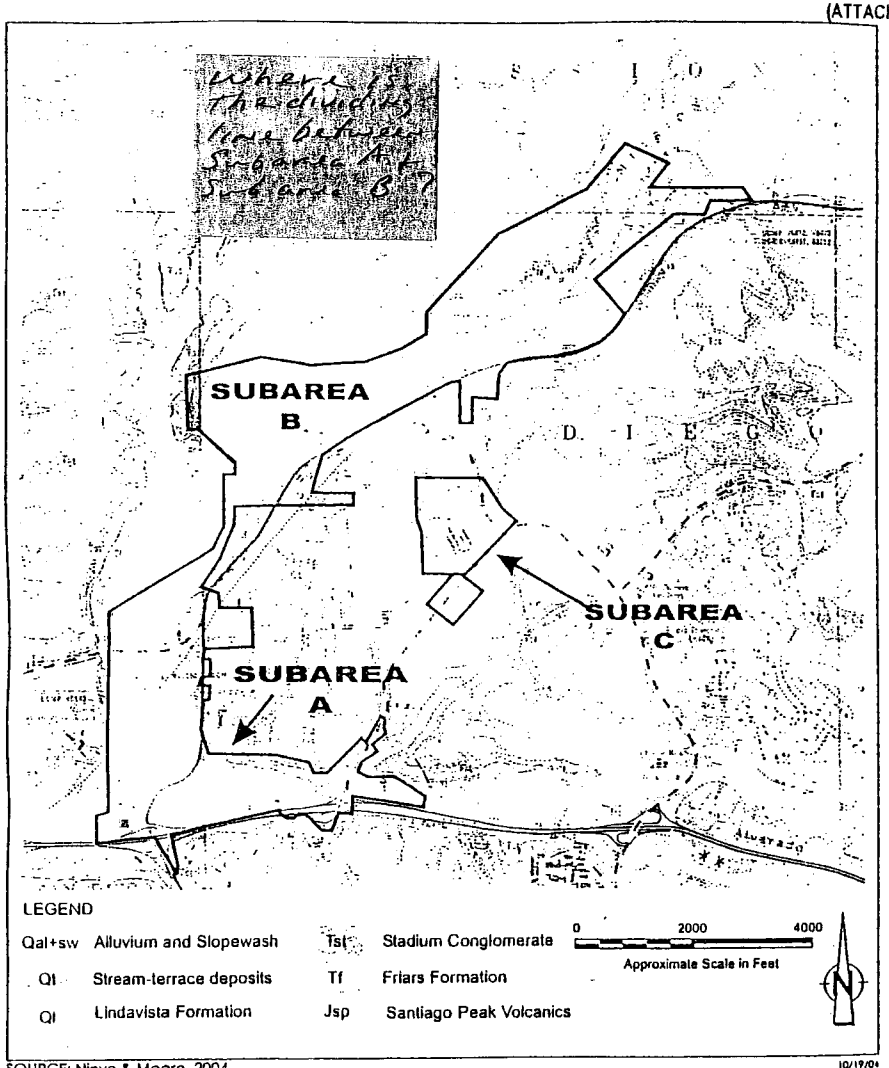
GRANTVILLE
MISSION GORGE ROAD
SAN DIEGO, CA 92120
CONCEPTUAL DESIGN
DRS
(ATTACH.)
© 2004 Navteq. Inc.
Roads © 2004 GDT Inc.
Imagery © 2004 AirPhotoUSA
Topo Maps © 2004 USGS

Exhibit A



SOURCE: Ninyo & Moore, 2004

10/19/04

BRG CONSULTING, INC.

Granlville EIR

Geologic Map

FIGURE 4.7-1

DRS
(ATTACH.)

Form A
Notice of Completion & Environmental Document Transmittal

SCH # _____

Mail to: State Clearinghouse, PO Box 3044, Sacramento, CA 95812-3044 916/445-0613

Project Title: Grantville Redevelopment Project
Lead Agency: City of San Diego Redevelopment Agency
Contact Person: Mr. Tracy Reed
Street Address: 600 B Street, Fourth Floor MS 904
Phone: (619) 533-4233
City: San Diego
Zip: 92101
County: San Diego

Project Location:
County: San Diego
City/Nearest Community: San Diego
Cross Streets: Friars Road, Mission Gorge Road
Zip Code: _____
Total Acres: 831
Assessor's Parcel No. Various (see attached)
Section: _____ Twp. _____ Range: _____ Base: _____
Within 2 Miles: State Hwy #: I-15, I-8
Waterways: San Diego River
Airports: _____
Railways: _____
Schools: _____

Document Type:

CEQA:
- [x] NOP
- [ ] Early Cons
- [ ] Neg Dec
- [ ] Draft EIR
- [ ] Supplement/Subsequent EIR (Prior SCH No.)_____
- [ ] Other _____

NEPA:
- [ ] NOI
- [ ] EA
- [ ] Draft EIS
- [ ] FONSI

Other:
- [ ] Joint Document
- [ ] Final Document
- [ ] Other_____

Local Action Type:
- [ ] General Plan Update
- [ ] General Plan Amendment
- [ ] General Plan Element
- [ ] Community Plan
- [ ] Specific Plan
- [ ] Master Plan
- [ ] Planned Unit Development
- [ ] Site Plan
- [ ] Rezone
- [ ] Prezone
- [ ] Use Permit
- [ ] Land Division (Subdivision, etc.)
- [ ] Annexation
- [x] Redevelopment
- [ ] Coastal Permit
- [ ] Other_____

Development Type:
- [ ] Residential: *Units*_____ *Acres*_____
- [x] Office: *Sq.ft.*_____ *Acres*_____ *Employees*_____
- [x] Commercial: *Sq.ft.*_____ *Acres*_____ *Employees*_____
- [x] Industrial: *Sq.ft.*_____ *Acres*_____ *Employees*_____
- [ ] Educational _____
- [ ] Recreational _____
- [ ] Water Facilities: *Type* Pump Station *MGD*_____
- [ ] Transportation: *Type*_____
- [x] Mining: *Mineral*_____
- [ ] Power: *Type*_____ *Watts*_____
- [ ] Waste Treatment: *Type*_____
- [ ] Hazardous Waste: *Type*_____
- [ ] Other:_____

Funding (approx.): Federal $_____ State $_____ Total $_____

Project Issues Discussed in Document:
- [x] Aesthetic/Visual
- [x] Agricultural Land
- [x] Air Quality
- [x] Archeological/Historical
- [ ] Coastal Zone
- [x] Drainage/Absorption
- [ ] Economic/Jobs
- [ ] Fiscal
- [x] Flood Plain/Flooding
- [ ] Forest Land/Fire Hazard
- [x] Geologic/Seismic
- [x] Minerals
- [x] Noise
- [x] Population/Housing Balance
- [x] Public Services/Facilities
- [x] Recreation/Parks
- [x] Schools/Universities
- [ ] Septic Systems
- [x] Sewer Capacity
- [x] Soil Erosion/Compaction/Grading
- [x] Solid Waste
- [x] Toxic/Hazardous
- [x] Traffic/Circulation
- [x] Vegetation
- [x] Water Quality
- [x] Water Supply/Groundwater
- [x] Wetland/Riparian
- [x] Wildlife
- [x] Growth Inducing
- [x] Landuse
- [x] Cumulative Effects
- [ ] Other _____

Present Land Use/Zoning/General Plan Designation: Commercial, office, industrial, parks, open space, community facilities, mining

Project Description: Adoption of a redevelopment project area to promote land use, improve traffic flow, parking, and services, and eliminate physical and economic blight. Upgrade inadequate infrastructure involving storm drainage, Roadways

REVISED 3-31-99

23

DRS (ATTACH.)

Reviewing Agencies Checklist

Form A, continued

KEY
S = Document sent by lead agency
X = Document sent by SCH
✓ = Suggested distribution

____**Resources Agency**
____Boating & Waterways
____Coastal Commission
____Coastal Conservancy
____Colorado River Board
✓ Conservation
✓ Fish & Game
____Forestry & Fire Protection
____Office of Historic Preservation
____Parks & Recreation
____Reclamation Board
____S.F. Bay Conservation & Development Commission
____Water Resources (DWR)

Business, Transportation & Housing
____Aeronautics
____California Highway Patrol
✓ CALTRANS District #_____
____Department of Transportation Planning (headquarters)
____Housing & Community Development

____**Food & Agriculture**

Health & Welfare
____Health Services _____

State & Consumer Services
____General Services
____OLA (Schools)

Environmental Protection Agency
✓ Air Resources Board
✓ California Waste Management Board
____SWRCB: Clean Water Grants
____SWRCB: Delta Unit
____SWRCB: Water Quality
____SWRCB: Water Rights
✓ Regional WQCB #_____ (_____)

Youth & Adult Corrections
____Corrections

Independent Commissions & Offices
____Energy Commission
____Native American Heritage Commission
____Public Utilities Commission
____Santa Monica Mountains Conservancy
____State Lands Commission
____Tahoe Regional Planning Agency

____Other _____

Public Review Period (to be filled in by lead agency)

Starting Date 7/26/04 Ending Date 8/30/04

Signature [signature] Date 7/22/04

Lead Agency (Complete if applicable):
Consulting Firm: BRG Consulting, INC.
Address: 304 Ivy Street
City/State/Zip: San Diego, CA 92101
Contact: Tim Gribus, AICP
Phone: (619) 298-7127

Applicant: _____
Address: _____
City/State/Zip: _____
Phone: (____) _____

For SCH Use Only:
Date Received at SCH _____
Date Review Starts _____
Date to Agencies _____
Date to SCH _____
Clearance Date _____
Notes:

Tracy Reed - Grantville Draft EIR

From: "Charles Little" <lchuck@sprynet.com>
To: <treed@sandiego.gov>
Date: 1/24/2005 4:01:09 PM
Subject: Grantville Draft EIR

Mr. Tracy Reed

Re: Draft Grantville Environmental Impact Report

CLA1 As I read the EIR I see no way the redevelopment plan as envisioned would meet the stated goals for Grantville.
As outlined in the Draft Grantville Redevelopment plan.

CLA2 Improve Public Infrastructure and undertake other public Improvements.
Seems as though those are the responsibility of government to take care of from t tax dollars we pay on a yearly basis.

CLA3 # 4 Improve the flow of traffic , relieve congestion.
The EIR as I read it indicates that the redevelopment will NOT accomplish this.
As I look at the stated time it takes to go thru the traffic light at the intersection at Fairmount and Mission Gorge road.
I find those numbers unrealistic and they would not improve with the so called redevelopment.

CLA4 # 6 Establishing a Business Improvement District and/or Maintenance Assessmer District.
Does the above mean we get no services from our tax money???

CLA5 We need a updated Grantville plan so the existing owners can meet the demands the community.

CLA6 So far the additions to the Grantville area has increased traffic with no help to improve the traffic flow.
I speak of the Honda facility Sav-on and Home Depot.

CLA7 I am not against upgrading our area, but we should do it without creating more of traffic nightmare.

CLA8 Eminent should not be a tool of this plan.
As you all know Eminent Domain was not to be used to take property owners property for the use of some third party.

RESPONSE TO COMMENT LETTER FROM CHARLES LITTLE, DATED JANUARY 24, 2005

Response to Comment CLA1:
Comment noted. The EIR provides a conservative analysis with respect to traffic impacts, as only those improvements currently shown in the adopted Navajo Community plan are evaluated. This does not preclude the ability of the agency to implement currently undefined improvements within the Project Area in order to meet the goals of the redevelopment plan. Additional, specific traffic improvements will be identified as specific redevelopment projects are proposed and evaluated. See also responses to comments DOT3 and DRS17.

Response to Comment CLA2:
Comment noted.

Response to Comment CLA3:
Appropriate mitigation at each impacted location will be looked at on a project-by-project basis (see responses to comments DOT3 and DRS17). Individual development will be required to evaluate environmental impacts and implement appropriate mitigation where necessary. Fairmont Avenue (Mission Gorge Road) is planned as a six-lane major street.

In accordance with City of San Diego intersection capacity methodology, the delay reported for signalized intersections is average delay for all vehicles entering the intersection.

Response to Comment CLA4:
The Business Improvement District (BID) has been removed from the proposed Grantville Draft Redevelopment Plan.

Response to Comment CLA5:
Comment noted.

Response to Comment CLA6:
Recent developments, such as those referenced by the commentor and including the Honda facility, Sav-on and Home Depot are currently allowed by right within the Project Area. The adoption of a redevelopment project area would provide the ability to implement additional traffic improvements through tax increment.

RESPONSE TO COMMENT LETTER FROM CHARLES LITTLE, DATED JANUARY 24, 2005 (cont.d)

Response to Comment CLA7:

Comment noted. It should be noted that the EIR evaluates future growth of the Project Area according to existing community plan land use designations.

Response to Comment CLA8:

The Grantville redevelopment plan as currently drafted proposes the inclusion of eminent domain authority (see Section 410 of the Redevelopment plan). Eminent domain continues to be the subject of public review and review by the GRAC. The GRAC has modified the language to require specific findings that would need to be made to use eminent domain in the Project Area. The City of San Diego will ultimately be the authority as to whether eminent domain authority will be included in the redevelopment project area.

CLA9 And to increase the tax base of the area.

Charles Little
P.O. Box 600190 0190
San Diego, CA 92160-0190
lchuck@sprynet.com

RESPONSE TO COMMENT LETTER FROM CHARLES LITTLE, DATED JANUARY 24, 2005 (cont.d)

Response to Comment CLA9:
See response to comment CL-A8.

Mr. Tracy Reed
Redevelopment Agency
600 B Street, Fourth Floor, MS 904
San Diego, CA 92101-4506

February 1, 2005

SUBJECT: Personal Comments
Program Environmental Impact Report Draft
Grantville Redevelopment Project, Volume I, Dec. 13, 2004
San Diego, CA

Dear Mr. Reed:

Below we have itemized our concerns regarding the following items.

A. Executive Summary – Significant, Unavoidable Impacts

"Based upon the data and conclusions of this Program EIR, the Redevelopment Agency finds that the project will result in significant unavoidable impacts to the following resources area:

1. Transportation/Circulation
2. Air Quality (Long-term Mobile Emissions)"

CLB1

Please refer to Page 4.2-9, Table 4.2-4, regarding TRIP GENERATION for the proposed project. The proposed Redevelopment Project projects an increase of 31,606 Daily Trips. Please refer to Page 4.2-20 for Significance of Impact. There are six roadway segments, and there are six intersections that will be adversely impacted.

The above data certainly shows how this development will add to a existing very serious traffic problem in the Navajo Community Plan area.

The mitigation measures on Table S-1. Page ES-6, not only come up short in the view of those of us who travel these roads daily, the measures will only add to the existing travel gridlock along Mission Gorge Road and Fairmount Avenue. Please also note that there is no mention of mitagation measures for Fairmount Avenue. Problems exist today on Fairmount at the Traffic Light at Mission Gorge Road. This traffic problem is exacerbated by

CLB2

RESPONSE TO COMMENT LETTER FROM CHARLES LITTLE, DATED JANUARY 24, 2005

Response to Comment CLB1:

The commentor restates data and analysis as provided in the EIR. It should be noted that the trip generation estimate of 31,066 trips is estimated for the life of the project, which may occur over an approximate 25-30 year period. The EIR identifies that significant traffic conditions and deficiencies exist in the Project Area and are not likely to improve, even with the implementation of traffic improvements as currently identified in the adopted Navajo Community Plan. It is evident that additional improvements will be required in order to improve traffic in the area. Please also refer to responses to comments DOT3 and DRS17.

Response to Comment CLB2:

Please refer to response to comment CL-B1. The commentor identifies other traffic deficiencies within the Project Area that could be addressed through redevelopment activities. For example, as referenced by the commentor, the traffic problem on Fairmount at the traffic light at Mission Gorge Road is exacerbated by loading and unloading of car transporters. Also, the design of the intersection does not meet the needs of current traffic. Circulation improvements, as those suggested by the commentor can be incorporated into redevelopment activities and should continue to be suggested to the Agency and City who will make decisions and prioritize improvements within the Project Area. Specific circulation improvements are identified in the proposed Five-Year Implementation Plan including Mission Gorge Road traffic improvements and Interstate 8 interchange at Alvarado Canyon Road.

CLB2 (cont'd.)

the unloading and loading from Car Transporters. The design of this intersection does not meet the needs of current traffic.
The following is the amount of time it took the undersigned to travel southbound on Fairmount Ave., on to Mission Gorge Road, at 11:45am, February 4, 2005. Weather clear.

CLB3

From a dead stop, waiting for 10 cars, and an undetermined number of light cycles, it took us three minutes and 31 seconds to arrive at the white line at the entry of the intersection. Additionally, it took us another one minute and 30 seconds stopped at the red light, before we could turn right and go south onto Mission Gorge Road through the green light. No right turns are permitted on a red light. The total elapsed time to make a right turn on to Mission Gorge Road was five minutes. The important thing to note that the above time trial was done at Off Peak Time.

CLB4

Please refer to Page 4.2-3, Table 4.2-2, of the Program Environmental Impact Report, that states "Existing Peak Hour Intersection Conditions". Item No.11 (Fairmount Ave & Mission Gorge Road) only indicates a Average Intersection Delay at AM PEAK HOUR of 15.8 seconds. A Average Intersection Delay of 19.2 seconds is for PM PEAK HOUR.

We question the validity of the above times listed under "Existing Peak Hour Intersection Conditions"

CLB5

Regarding Air Quality (Long Term Mobile Emissions), we ask you to refer to Page 4.3-11, Table 4.3-5. Four out five of listed pollutants exceeds significance Threshholds.

Page 4.3-12, Table 4.3-6
Four out of five listed pollutants exceeds significance Threshholds.

CLB6

Page 4.3-13, Table 4.3-7; Poorly Operating Intersections.
Five out of the listed six intersections show a "Level of Service" of "F". One intersection is listed as "E".

Quoting from 4.3.3.4, CO Hotspots
"Vehicles idling at these intersections could create CO hot spots which may impact sensitive receptors in the vicinity of the intersections."

RESPONSE TO COMMENT LETTER FROM CHARLES LITTLE, DATED JANUARY 24, 2005 (cont.d)

Response to Comment CLB3:
Comment noted. This information confirms what is already stated in the EIR, that traffic and circulation impacts are, and will continue to remain significant even with the implementation of improvements as currently identified in the adopted Navajo Community Plan. Please also refer to response to comment CLA3.

Response to Comment CLB4:
Please refer to response to comment CLA4.

Response to Comment CLB5:
Comment noted.

Response to Comment CLB6:
Comment noted.

Our final concern regarding the approval of this project is summarized on Page ES-4:

CLB7 "If the Redevelopment Agency chooses to approve the Grantville Redevelopment Project, it must adopt a STATEMENT OF OVERIDING CONSIDERATIONS pursuant to Sections 15093 and 15126(b) of the CEQA Guidelines."

Because of aforementioned concerns, we feel that the proposed project should not go forward.

CLB8 Respectfully submitted,

Charles Little
PO Box 6000190
San Diego, CA 92160-0190
(lchuck@sprynet.com)

Alfred Venton
6371 Murray Park Court
San Diego, CA 92119-2930
(email venton@cox.net)

(1) addressee by fax
(1) Councilman Jim Madaffer

RESPONSE TO COMMENT LETTER FROM CHARLES LITTLE, DATED JANUARY 24, 2005 (cont.d)

Response to Comment CLB7:

Comment noted. Pursuant to Sections 15093 and 15126(b) of the CEQA Guidelines, "CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable environmental risks when determining whether to approve a project." In so doing, the City must adopt a statement of overriding considerations for the proposed redevelopment project as significant unavoidable impacts to traffic/circulation and air quality have been identified.

Response to Comment CLB8:

Comment noted.

February 8, 2006

Tracy Reed
Redevelopment Agency
600 B Street, Suite 400
San Diego, CA 92101

RE: Grantville Redevelopment Project Draft EIR

Mr. Reed,

The following are some of my comments and/or concerns regarding the Draft EIR pertaining to the Proposed Grantville Redevelopment Project.

TRAFFIC

LM1 Traffic is the major concern of the GRAC, business owners in the proposed area and residents in the surrounding area. The EIR indicates that traffic will increase, mitigation measures will be taken and the impact after traffic mitigation will still be significant and unavoidable. If the EIR projections on traffic increases are correct, and many believe the numbers will be worse because ultimately the City will use this project to increase residential density, this proposed redevelopment area creates a even bigger traffic problem than the area has currently. All you have to do is take a look at the traffic problems in Mission Valley where major development (both commercial and residential) has been permitted to see what will happen to Grantville. Why would the City Council go forward with a project that does not solve (or at least improve) the major problem in the area? If the project does go forward what assurances do those inside the project area and those surrounding it have that traffic mitigation measures will be the first project undertaken?

LM2 I would also like to see a more detailed plan on how increased transportation/circulation within the project area will impact the areas outside of the project area. If the problems with the I8 interchange at the Fairmount/Mission Gorge area are not resolved, many cars will be looking for alternative routes through residential areas. You stated in a recent GRAC meeting that the anticipated cost of work at I8 would be extremely costly. When will it be known if this work will be done?

CHAPTER 8 – ALTERNATIVES

LM3 Section 8.3 describes the "General Plan Opportunity Areas Map Concept" that basically says the alternative would implement the conceptual land use patterns identified in the City of San Diego General Plan (City of Villages). The plan would increase commercial, industrial, single and multi-family residential units and reduce institutional, religious, hospital development and commercial recreation areas. The conclusion is that this is environmentally similar to and would meet most of the basic objectives of the proposed project. About two years ago the Allied Gardens Community made it very clear to our elected representative that they did not want the "City of Villages" concept in their neighborhood. Why would this now be included as an alternative?

1

RESPONSE TO COMMENT LETTER FROM LYNN MURRAY, DATED FEBRUARY 8, 2005

Response to Comment LM1:

Please refer to responses to comments DOT3, DRS17, and CLB2.

Response to Comment LM2:

The traffic analysis does include an analysis of roadway segments and intersections outside of the project area, and in same cases intersections were included in the Project Area so as to allow the City more ability to correct existing deficiencies. A specific example is the inclusion of the I-8/Fairmount/Mission Gorge interchange in the redevelopment project area. It is currently not known when interchange improvements will be initiated for this interchange; however, it is a well recognized, and documented traffic deficiency. The EIR traffic analysis further documents this existing deficiency and anticipates the deficiency will continue to exceed acceptable LOS standards in the future. No specific improvements were assumed in the traffic analysis as the currently adopted Navajo Community Plan does not identify improvements to this area, and any future improvements will require Caltrans involvement and further analysis and documentation pursuant to CEQA and the National Environmental Policy Act. Please also refer to responses to comments DOT3 and DRS17.

Response to Comment LM3:

The EIR does not conclude that the General Plan Opportunity Areas Alternative is similar to the proposed project. In fact, the EIR states that the General Plan Opportunity Areas Alternative is NOT environmentally superior to the proposed project and identifies greater impacts to transportation/circulation, air quality, noise, population/housing, and public services that would result with this alternative than would occur under the proposed project (existing community plan land uses).

This alternative was originally included in the EIR analysis as one of several alternatives evaluated in the EIR that would have the potential to reduce one, or any combination of several environmental impacts associated with the proposed project. However, further evaluation of the alternative as part of the EIR process found the contrary. Additionally, this alternative was including in the alternatives evaluation as it generally represents recently adopted City policy as conceptualized in the General Plan Opportunity Areas Map, which is an adopted component of the City's General Plan. Any further consideration of this conceptual land use pattern by the City would require a community plan update and would undergo its own environmental review process in accordance with CEQA.

LM4 Section 8.4 describes the "Transit-Oriented Development Principals Alternative" that is considered environmentally superior to the proposed project and meets most of the basic objectives of the proposed project. This alternative would add 2500 dwelling units in the proposed area. We keep being told that the proposed redevelopment is not an attempt to put in more housing yet this alternative is specifically for that purpose. Again, it seems to be the "City of Villages" concept that the community has indicated they do not want. Were these alternatives chosen by the outside consultants who prepared this report or were they based on input from City staff?

APPENDIX A

LM5 Letter submitted by Jeryl W. Cordell, CDR, USN (Ret.) includes a 1999 letter pertaining to development at Admiral Baker Field. While this area is not in the current proposed redevelopment area, it cites various problems that relate to the whole Mission Gorge Valley. Flooding, hazardous material, noise, traffic, air quality and the resulting cumulative effects were some of the issues listed. These issues were cited as having significant impact; with recommended mitigation being that individual development projects submit appropriate studies and reports that shall be reviewed by the Agency and the City. Significance of Impact after mitigation was considered less than significant. I don't understand how issues as serious as some of these appear can be evaluated and considered less than significant when you do not even know at this point what "projects" will be proposed for the area. How can you evaluate cumulative effects if each project will be reviewed on an individual basis?

LM6 An additional letter from the United State Marine Corps expressed concerns that the project area will be affected by military operation of aircraft from Miramar. How would potential occupants of this area be notified of this situation?

Thank you,

LM7

Lynn Murray
6549 Carthage Street
San Diego, CA 92120

2

RESPONSE TO COMMENT LETTER FROM LYNN MURRAY, DATED FEBRUARY 8, 2005 (cont.d)

Response to Comment LM4:

The primary objective in evaluating alternatives in the EIR is to find alternatives to the proposed project (in the case the existing adopted community plan) that have the potential to reduce the potentially significant impacts associated with the proposed project. Because transportation/circulation and air quality impacts were found to be significant an unavoidable, the TOD alternative was evaluated. TOD concepts are widely recognized and accepted by planning agencies, including the City of San Diego, SANDAG (refer to responses to comments SNDG1-4), and the San Diego Air Pollution Control District, as well as numerous national planning organizations as a mechanism to improve quality of life, livable communities, reduce local and regional traffic and benefit air quality as they encourage livable, walkable, community concepts, and emphasize the use of public transit systems, such as the Grantville trolley station located in the Project Area.

Response to Comment LM5:

The Program EIR, in fact, provides an evaluation of cumulative impacts as it analyzes the whole of the project based on the development potential according to existing adopted community plan designations. The Program EIR includes, among other environmental topics, a comprehensive evaluation of potential traffic and air quality impacts in the Project Area, in which case no feasible mitigation measures have been identified at this time that would reduce the impacts to a level less than significant (i.e., below significance thresholds). With respect to the remaining issues identified by the commentor, specific mitigation measures have been identified in the EIR that will ensure that the impacts to these environmental issue areas would be reduced to a level less than significant.

Additionally, individual projects will also need to be evaluated pursuant to the provisions of CEQA, which includes the consideration of cumulative effects. By disclosing these cumulative impacts at this level of analysis, the Agency understands that traffic improvements are needed to be conducted on a comprehensive basis, and can begin to prioritize improvements within the Project Area based on this information.

Response to Comment LM6:

With the exception of two areas, the majority of the Project Area does not allow residential uses. Any future development proposal within the Project Area that includes residential uses would require a community plan amendment, and notification disclosure as required by law.

Response to Comment LM7:

Comment noted.

February 2, 2005

Tracy Reed
Redevelopment Agency
600 B Street, Suite 400, MS904
San Diego, CA 92101

Re: Grantville Redevelopment

Dear Mr. Reed,

The following are some of the concerns I have regarding the proposed redevelopment for the Grantville/Allied Gardens area. I understand my concerns will be incorporated and answered in your proposal process. If this is not correct, please let me know and advise me on the proper channels to have my issues addressed.

JN1

1. Our beautiful City is in a mess (i.e. pension fund, zoning enforcements, traffic lights not timed correctly, pot holes, etc., etc.,); shouldn't we hold off taking on more of a financial burden until some of our current issues are resolved?

JN2 2. What assurance do we have that City employees can handle this job competently?

JN3 3. According to Donna Frye, the information regarding police and fire protection may be inaccurate in the proposal. Who is verifying the data?

JN4 4. Who is behind the push for this project? Fenton?

JN5 5. Will the air quality be impacted by the proposal? To what specific degree?

JN6 6. How much, specifically, will traffic be increased?

JN7 7. How will increased traffic impact crime in this area?

JN8 8. Have the owners of the small businesses in the impacted area been notified in writing? I understand perhaps the owners of the property may have been notified but the renters who own the businesses have not. This is there livelihood!

JN9 9. Why are property owners, i.e. Albertson's Shopping Center, not being held responsible for the upkeep of the property rather than the City?

JN10 10. Has this area been neglected so that it will become "blight"?

JN11 11. Why haven't zoning laws been enforced in this area?

JN12 12. I understand if this proposal is approved, funds will be diverted from schools. Is this correct?

JN13 13. I live on Carthage Street, what is the specific impact to my home?

As well as including my questions in the proposal I would appreciate a reply to my letter.

Thank you.

JN14

Jennifer Nickles
6591 Carthage Street
San Diego, CA 92120

RESPONSE TO COMMENT LETTER FROM JENNIFER NICKLES, DATED FEBRUARY 2, 2005

Response to Comment JN1:
The implementation of the Grantville Redevelopment Project Area would increase revenues that could be expended on improvements within, and benefiting the Project Area.

Response to Comment JN2:
Comment noted.

Response to Comment JN3:
Please refer to response to comment DF1.

Response to Comment JN4:
The City of Planning Commission initiated the Grantville Redevelopment Adoption process by adoption of Resolution No. 3550-PC on August 5, 2004.

Response to Comment JN5:
Please refer to Section 4.3 Air Quality of the Program EIR for a detailed discussion of potential air quality impacts associated with the proposed project.

Response to Comment JN6:
Please refer to Section 4.2 Transportation/Circulation for a detailed discussion of potential traffic/circulation impacts associated with the proposed project. Development of the Project Area, according to the existing adopted community plan designations, is estimated to generate a net increase of approximately 31,606 vehicular trips over the implementation of the project (an approximately 25-30 year timeframe).

Response to Comment JN7:
The increase in traffic does not necessarily correspond to increases in crime. The Project Area currently experiences higher crime rate percentages than occur in other portions of the community.

- The Project Area generally has 37% higher crime rates per one thousand population than San Diego County.
- The Project Area generally has 16% higher crime rates per one thousand population than City of San Diego.
- There is a significant homeless population in the Project Area. 162 people were arrested along the San Diego River during a 4-week sweep period in the summer of 2004.

RESPONSE TO COMMENT LETTER FROM JENNIFER NICKLES, DATED FEBRUARY 2, 2005 (cont.d)

Response to Comment JN8:
In addition to the CEQA and Redevelopment Plan adoption process noticing requirements, the Grantville Redevelopment newsletter was mailed to over 1,500 property and business owners and interested members of the public in August 2004. The Grantville internet website has been active since January 2004 and has had a minimum of 100 visitors per month since it has been available.

Response to Comment JN9:
Neighborhood Compliance addresses code violations. Please refer to response to comment JN11.

Response to Comment JN10:
Blighting conditions are caused by a variety of factors, including lack of incentive by property and business owners to invest in improvements and enhancements to the physical conditions of the properties.

Response to Comment JN11:
Many of the properties within the Project Area are considered non-conforming uses and/or were constructed prior to current zoning controls and development standards were in place. Because there is little investment incentive in the Project Area at this time, these properties can not legally be brought into conforming with current zoning standards until that time the property is sold and/or converted to another use.

Response to Comment JN12:
Please refer to response to comment HS18.

Response to Comment JN13:
Existing residential uses are not included within the Redevelopment Project Area.

Response to Comment JN14:
Comment noted.

Holly Simonette
4838 Elsa Road
San Diego, CA 92120-4211
(619) 501-7414

February 14, 2005

Mr. Tracy Reed
Project Manager
Grantville Redevelopment Project
Economic Development Division
600 B Street, Fourth Floor (MS-904)
San Diego, CA 92101-4506

RE: Comments regarding the Draft Program Environmental Impact Report for the Grantville Redevelopment Project

Dear Mr. Reed:

HSA1 Following are my comments regarding the Draft Program Environmental Impact Report for the Grantville Redevelopment Project. I have also included a written copy of my comments at the Noticed Public Hearing of the Redevelopment Agency, Community and Economic Development on January 25, 2005.

Section 2.2.12 - Population/Housing: While it is true that the proposed Redevelopment Project Area encompasses primarily non-residential uses, recent statements by Tony Fulton, Executive Director of Development for San Diego State University suggest that he has already been involved in conversations with developers regarding putting student housing in the Grantville area. A recent article by Steve Laub, President of the College Area Community Council, also suggests that high-density residential uses are proposed in the Project Area:

HSA2

> The City Redevelopment Agency is starting the process of a Grantville redevelopment project. Good news for them, but maybe better news for us because Grantville has the positive distinction of being one trolley stop away from the heart of SDSU. The large number of students driving to and from SDSU causes a lot of congestion on our arterials.... Grantville redevelopment offers the opportunity for much more housing virtually on the doorstep of SDSU. An affordable housing component next to the trolley theere [sic] would allow students to roll out of bed and onto a train that drops them off in the heart of Aztecland. Our Mayor and Council are advocates of smart growth along major transit corridors.

RESPONSE TO COMMENT LETTER FROM HOLLY SIMONETTE, DATED FEBRUARY 14, 2005

Response to Comment HSA1:

Comment noted. Please refer to responses to comments HS-A2 through HS-A32.

Response to Comment HSA2:

Comment noted. The individual quoted in the newspaper is affiliated with San Diego State University and is not affiliated with the City of San Diego. No specific development proposal has been proposed, or has been applied for in the Project Area as referenced by the commentor. Should such project be considered in the future, a community plan amendment, rezone and other actions would be required, and would be subject to review in accordance with CEQA.

HAB3 These statements are reminiscent of the City of Villages concept that the Grantville community successfully fought several years ago. Additionally, the 12-acre property at the corner of Mission Gorge and Twain is being proposed as a mixed-use residential-commercial area with more than 500 units. Please address specific projects that are currently in the planning stages, or outstanding permit requests, within for the Grantville area within the proposed Redevelopment Project Area. Please incorporate all of these projects into the findings for the Program Draft EIR.

HAB4 Section 2.2.13 - Public Services: Please address the needs for police and fire protection in the Grantville Redevelopment Project area with the additional traffic, residences, commercial, and industrial uses in the area. Please address how local public safety officials will be able to serve the area with the increased traffic as identified in Section 4.2.

HAB5 Section 3.4.2.1 - Economic Development Programs: It would seem that eminent domain proceedings against land owners and small businesses would be necessary in order for the Redevelopment Agency to "assist in assembling land for new development." Please address how eminent domain proceedings (as allowed under CCRL (Health and Safety Code Section 33000 et seq.) would be used by the Agency to successfully implement its plans. Additionally, please address alternatives to eminent domain proceedings that may be used in the area. Please explain why these alternatives could not be used to immediately address the conditions along the Mission Gorge corridor without declaring Grantville a Redevelopment Project Area.

HAB6 Section 3.6 - Relation to Existing Community Plans: Please address why many, if not all, of the proposals noted in the Draft EIR cannot be completed under the existing community plans, through programs such as declaring Grantville a Business Improvement District.

HAB7 Section 3.6.2.1 - The Tierrasanta Community Plan notes that upon termination of the sand and gravel operations on Mission Gorge, the area should be rehabilitated. Reclamation in the southern region of the quarry is already taking place. Additionally, Councilmember Jim Madaffer noted in his January 21, 2005 Mission Times Courier column, "Straight From Jim," that "the long-term transformation is to change what is a rock quarry and light industrial area into a bio-tech and high-tech production area. Please investigate and address any and all permit applications, plans submitted to the City's Development Services agency for even numbered addresses from 7188 to 7500 Mission Gorge Road. Please incorporate these proposals into the Draft EIR for the Grantville Redevelopment Project. Please investigate and address the PID that Superior Ready Mix submitted, and subsequently put on hold, for its quarry property. Please investigate and address Councilmember Madaffer's comments regarding the area and incorporate these long-term plans, including the impact on the region (including nearby residential areas) into the Draft EIR.

RESPONSE TO COMMENT LETTER FROM HOLLY SIMONETTE, DATED FEBRUARY 14, 2005 (cont.d)

Response to Comment HSA3:

Currently, no formal application has been submitted to the Agency or City of San Diego therefore the specific characteristics of any such project, if in fact proposed in the future, are not known at this time and could not be evaluated. Projects of the nature as referenced by the commentor would necessitate a community plan amendment. Because the Redevelopment Plan must be consistent with the community plan, the project was evaluated in the context of the currently adopted community plan land uses within the Project Area.

Response to Comment HSA4:

Please refer to response to comment DF1.

Response to Comment HSA5:

The Agency has no current plans for acquiring any property in the Project Area; however, the Redevelopment Plan gives the Agency the authority to acquire property, including the use of eminent domain if certain criteria area met. The Agency will adopt Owner Participation Rules (currently under review by the Grantville Redevelopment Advisory Committee) that provide preferences to existing property owners and businesses to participate in the redevelopment implementation process. The private marketplace has and will continue to have the option of consolidating properties for new development without participation by the Agency. Such private market activity is preferred and will be encouraged. However, private enterprise has not been successful in the past in redeveloping the entire Project Area and it is for this reason that the tools of redevelopment are being sought.

Response to Comment HSA6:

Specifically, existing business owners in the Project Area have not shown an interest in forming a Business Improvement District (BID). The formation of a BID involves a "self-tax" on participating businesses, the funds of which would be used for improvement programs. Reference to the BID has been specifically removed from the Draft Redevelopment Plan; however, adoption of the redevelopment plan would also not preclude the formation of a BID by businesses in the Project Area in the future.

CDBG funds can be used to set-up the formation and analysis of a BID (if the area qualifies for CDBG funds); however, given the nature of certain regional improvements needed for the Project Area, the cost is likely excessive in terms of creating a successful BID that would significantly improve the Project Area.

RESPONSE TO COMMENT LETTER FROM HOLLY SIMONETTE, DATED FEBRUARY 14, 2005 (cont.d)

Response to Comment HSA7:

Please refer to response to comment HSA3. The land use activities referenced by the commentor would require a community plan amendment, rezone and other related actions, including subsequent environmental review pursuant to CEQA. No application has been submitted regarding these projects and the details and characteristics are not known, therefore detailed environmental evaluation is not possible at this time.

HAB8 Section 3.7.1 – Redevelopment Agency of the City of San Diego: Recent news stories indicate that the City is unable (or unwilling) to issue bonds for redevelopment projects in other areas, most notably the NTC project. Please address how the Agency would undertake the "sale of tax increment bonds" for the Grantville Redevelopment Project. Additionally, please address how the Agency would acquire and dispose of property, and why it would be necessary to construct or rehab replacement housing (when no residential units are currently included in the Redevelopment Project area).

HAB9 Section 4.1.1.1.B – Land Use – Existing Conditions – Surrounding Land Uses – Please address how the projects proposed in the Redevelopment Project area, specifically increases in traffic congestion, air quality, and noise, would affect the surrounding land uses (i.e., residential communities next to or in-between Subareas A, B, and C.

HAB10 Section 4.1.3.1 – Development potential: This section notes that the primary goals of the Redevelopment Project include: improve the quality of life, eliminate physical and economic blighting conditions, and improve traffic flows. Please specifically address how this will be accomplished. Please address how it will be accomplished without "an amendment to the community plan land use designations," and how the Agency will accomplish these goals while being "consistent with the provisions of the community plan in which the activity is located."

HSA11 Sections 4.1.4, 4.1.5, and 4.1.6 – Mitigation Measures and Conclusion: I don't understand how the Draft EIR can note that:

- "No significant land use impact is anticipated.
- "No mitigation measure is proposed, as no significant land use impact has been identified.
- "Implementation of the proposed project will not result in a significant land use impact."

These statements seem inconsistent with other areas of the Draft EIR and public statements made by Councilmember Madaffer, Tony Fulton, and Steve Laub. Please clarify and rectify.

HSA12 Section 4.2 – Transportation/Circulation: SANDAG forecasts that in the year 2030, even without the proposed Redevelopment Project, these roads and intersections will continue to operate at an unacceptable Level of Service. The Redevelopment Project would add more than 31,000 cars along Mission Gorge and Friars Roads and other areas of the project. The draft EIR states that the Navajo and Tierrasanta Community Plans would help reduce the cumulative traffic impact when implemented. However, the "timing of these improvements is unknown, and *the cumulative impact would remain significant and unavoidable.*"

HSA13 It appears from the Draft EIR that the widening of Mission Gorge Road to 6 lanes north of Zion Avenue and between Fairmount Avenue and Interstate 8 would create more of a bottleneck in these currently (and highly) congested areas. Additionally, these improvements are already part of the current Navajo and Tierrasanta Community Plans,

RESPONSE TO COMMENT LETTER FROM HOLLY SIMONETTE, DATED FEBRUARY 14, 2005 (cont.d)

Response to Comment HSA8:

The Agency may undertake the sale of bonds secured by tax increment at any time during the next 20 years. The sale will depend on the Agency's willingness to issue, and finding a willing underwriter for the bonds. The Agency would acquire property only after following the adopted procedures for seeking owner participation. Any property purchased by the Agency would be disposed of in accordance with law that may include negotiated sale subject to a public hearing. Replacement housing would only be required if, at some point in time, the Agency caused units of housing for low and moderate income persons to be destroyed. This is unlikely because there are no known housing units in the Project Area. However, given the 30-year life of the Redevelopment Plan, it is important to have this provision included in the Plan.

Response to Comment HSA9:

The EIR provides a detailed analysis of traffic, air quality, and noise, which includes areas both within the Project Area, and surrounding the Project Area. Please refer to Sections 4.2 Transportation/Circulation, 4.3 Air Quality, and 4.4 Noise of the EIR.

Response to Comment HSA10:

The Agency will adopt a Five Year Implementation Plan as part of the Redevelopment Plan adoption activities. This Implementation Plan identifies potential projects and programs to be undertaken. The draft of the Implementation Plan recognizes the potential for an amendment to the pertinent community plans. Land use within the Project Area will be controlled by the appropriate community plans as they exist or are amended in the future, therefore, the Agency's activities will be consistent with the provisions of the community plan in which the activity is located.

Response to Comment HSA11:

The conclusion with respect to land use that no significant land use impact anticipated is based on the fact that there are a variety of land use incompatibilities, conflicting land uses, and incompatible uses within the Project Area that do not comply with current City Municipal Code regulations. Any new development that occurs within the Project Area would be required to conform with current land use and zoning regulations including parking, setbacks, building heights, etc. Therefore no land use compatibility impact is anticipated.

Response to Comment HSA12:

Comment noted.

HSA13 (cont'd.) and therefore it is not necessary to declare Grantville a Redevelopment Project area. Please address why these improvements could not be made by working with Caltrans and City Traffic Engineers at this time, and prior to the area being declared a Grantville Redevelopment Project area. Also, please address the costs associated with this realignment, with or without the Grantville Redevelopment Project.

HSA14 Additionally, please investigate and incorporate into the Draft EIR the current conditions along the East/West arteries between Mission Gorge and Waring Roads, most notably Zion and Twain, and the North/South major artery of Crawford Street. These roads are already heavily impacted by vehicular traffic trying to avoid congestion along Mission Gorge, Waring, and Friars Roads. Please investigate and incorporate the impact of this additional traffic on these same roads in the event that redevelopment in the area is pursued.

HSA15 Section 4.3 – Air Quality: "Development forecasted for the region will generate increased emission levels from transportation and stationary sources." The analysis of long-term effects on the air quality concludes that "combined emissions from the Redevelopment Project Area and other developed areas in the Basin are expected to continue to *exceed state and federal standards* in *the near term and emissions associated with these developments will exceed threshold levels.*"

The Draft EIR notes that project-specific air quality analysis shall be prepared for future redevelopments to determine the emissions associated with construction activities and identify measures to reduce air emissions. It would seem that this project-specific analysis would open the door for poorer air quality in the Basin. For example, if 5 projects along Mission Gorge each added 150 vehicles and industrial-related emissions, the cumulative impact would be far greater (if analyzed comprehensively) than one project that added only 150. Please address the reason for project-specific analysis rather than comprehensive project analysis (as in other areas of the DEIR) for air quality.

HSA16 Section 4.10: Aesthetics notes that recommended mitigation includes "improve[ing] the appearance of the existing strip commercial development on Mission Gorge Road between Interstate 8 and Zion Avenue by reducing signs, improving landscaping and architectural design, providing consistent building setbacks and providing adequate off-street parking." While I do not disagree that this strip of commercial development could use a face-lift, I am appalled at the idea of declaring the area a Redevelopment Project zone, when these same improvements could be made through implementation of a Business Improvement District or other programs for these business owners. Please address why this corridor has not been declared a Business Improvement District or received other programmatic assistance prior to the proposed declaration of it as a Redevelopment Project area.

HSA17 Section 4.12.3.1 – The first sentence of this section seems inconsistent with the plans noted earlier in this letter, as well as other areas of the Draft EIR: "The Redevelopment Plan does not

RESPONSE TO COMMENT LETTER FROM HOLLY SIMONETTE, DATED FEBRUARY 14, 2005 (cont.d)

Response to Comment HSA13:

The widening of Mission Gorge Road to 6 lanes north of Zion Avenue and between Fairmount Avenue and Interstate 8 are improvements identified in the currently adopted community plan. Please refer to responses to comments DOT3, DD5 and DRS17.

The costs associated with these improvements are not known and would depending on numerous factors including engineering, environmental, and land use constraints.

Response to Comment HSA14:

Please refer to response to comment DD8.

The Program EIR evaluates community plan and general plan circulation element roadways, including intersections that serve the roadway segments identified by the commentor. As specific developments are proposed, each will be required to be analyzed for their potential localized traffic impact, including, residential streets.

Response to Comment HSA15:

The cumulative impact as a result of the development potential of the entire Project Area is quantified and disclosed. As stated on EIR page 4.3-13 that, "A project that is consistent with the applicable General Plan of the jurisdiction in which it is located has been anticipated within the regional air quality planning process (i.e., the RAQS Plan). Consistency with the RAQS Plan will ensure that the project does not have an adverse impact on regional air quality." Because the redevelopment plan must be consistent with the General Plan, the project is consistent with the RAQS. However, the EIR also analyzes the project as a whole based on project-specific significance thresholds (refer to EIR Table 4.3-4). As shown, the cumulative impact of development of the entire Project Area would exceed significance thresholds, and is considered significant. Therefore the impact of multiple projects are not slighted, and are in fact evaluated comprehensively. In recognizing this condition, Mitigation Measures AQ 1 and AQ 2 are proposed to ensure that each individual project is evaluated for compliance with appropriate air quality thresholds and measure are implemented to address air quality impacts. As specific developments are proposed, specific mitigation measures can be applied to each individual project based on the nature, size, and characteristics of the project. In accordance with CEQA, cumulative effects would need to be considered as part of the CEQA evaluation of each project.

RESPONSE TO COMMENT LETTER FROM HOLLY SIMONETTE, DATED FEBRUARY 14, 2005 (cont.d)

Response to Comment HSA15 (cont.d):
Additionally, CEQA does not allow the piece-mealing of project analysis. Mitigation Measures have been identified in the EIR to ensure that, although a significant unavoidable impact has been identified, measures will be incorporated into future projects to ensure conformity to applicable air quality regulations.

Response to Comment HSA16:
Please refer to response to comment HS-A6.

Response to Comment HSA17:
Comment noted. Please refer to response to comment RM2.

propose to change any land use designation with the Project Area." However, in order to accomplish many of the long-terms goals of the Redevelopment Project, including but not limited to the proposed high-tech/bio-tech industrial development at what is now the quarry, it would seem that significant changes would need to be made in the Community Plans. Public statements made at the Grantville Redevelopment Advisory Committee meeting on January 31, 2005 indicate that that is exactly what is planned – adopting the Environmental Impact Report and Grantville Redevelopment Project – then changing the Community Plans to be consistent with this new development. **I hereby request that the Redevelopment Agency address these inconsistencies, and immediately stop any and all planning necessary to designate the Grantville Redevelopment Project area.**

HSA17 (cont'd.)

Section 4.13.1 – Schools: **Please address in the DEIR how the allocation of the tax increment to the Grantville Redevelopment Project area would affect local schools in the community and outside the Grantville community – i.e., with fewer tax dollars available to the San Diego Unified School District and San Diego Community College District taxing agencies.**

HSA18

Section 4.13.4 – Sewer Facilities: The City cannot finance its current obligations to improve the wastewater and sewer pipes throughout the region. **Please address how 60-year-old sewer pipes in the Grantville region will be able to handle an increase of approximately 26,160 gallons of sewer flows per day without any mitigation measures being proposed.**

HSA19

Section 4.13.5 – Police Services: As Councilmember Donna Frye noted during the Redevelopment Agency meeting on January 25, 2005, the existing conditions statement in this section is incorrect. **I hereby request that ALL existing conditions statements throughout the entire Draft EIR be reviewed, investigated, corroborated, and, if necessary, changed for accuracy. Additionally, I request that any changes to the existing conditions that may result in changes to the Draft EIR be publicly noticed and additional time be given to review and make comments on these changes.**

HSA20

Section 4.13.5.4 – **Please address any and all potential impacts on Police Services related to response times in and around the Grantville Redevelopment Project area.** These impacts should include analysis related to increased traffic congestion, increased population, and increased business entities in the area.

HSA21

Section 4.13.6.6 – Fire Protection: **Please address any and all potential impacts on Fire Protection and Emergency Medical Services related to response times in and around the Grantville Redevelopment Project area.** These impacts should include analysis related to increased traffic congestion, increased population, and increased business entities in the area, including but not limited to transport of patients to Kaiser Hospital Emergency Department and other facilities.

HSA22

Additionally, Police & Fire Protection Services are paid for out of the City's General Fund. It is my understanding that the Grantville Redevelopment Project, as with other Redevelopment Projects throughout the City of San Diego, would divert property tax increment funds from the City's General Fund into infrastructure projects in the

HSA23

RESPONSE TO COMMENT LETTER FROM HOLLY SIMONETTE, DATED FEBRUARY 14, 2005 (cont.d)

Response to Comment HSA18:
Health and Safety Code Section 33607.5 presents the legally mandated formula for paying a portion of the tax increment to all of the affected taxing entities. In the case of school districts (K-14), a portion of the tax increment paid to the district is not deemed "property taxes" for the purposes of their financing pursuant to State law, and therefore, it is funding beyond what the school district would otherwise receive had there been no redevelopment project area. These new funds are available to be used for education facilities that benefit the Project Area.

Response to Comment HSA19:
The City requires upgrading sewer facilities and infrastructure commensurate with development. The improvement of sewer facilities can also be identified in the 5-year implementation plan for the Project Area.

Response to Comment HSA20:
Existing conditions and impact analysis information was researched and verified by the public service providers serving the Project Area. Please refer to DF1. The additional response provided in response to this issue and as responded to in DF1 does not meet the criteria for recirculation of the EIR as set forth in the CEQA Guidelines.

Response to Comment HSA21:
Please refer to response to comment DF1. Under the currently adopted Navajo Community Plan, no residential/population increase is anticipated within the Project Area (see response to comment PRD14).

Response to Comment HSA22:
Please refer to DF1.

Response to Comment HSA23:
Health and Safety Code Section 33607.5 presents the legally mandated formula for paying a portion of the tax increment to all of the affected taxing entities. The City's General Fund will receive its portion of the first tier of these payments. It is probable that with redevelopment activities enhancing the area, the growth in assessed value will exceed what would have occurred absent the Redevelopment Plan so even though the City will receive only a portion of the tax increment, it could exceed what it would have received without adoption of the Redevelopment Plan. Additionally, new development caused by redevelopment activities will be planned to be "defensible space" built to current fire and safety codes that will improve the fire and public safety of buildings in the Project Area.

HSA23 (cont'd.) **Grantville area. Please explain how Police and Fire Protection Services would be paid for once this diversion of General Funds is accomplished.**

HSA24 Section 4.13.7.6 – Solid Waste: **Please address any and all potential impacts on Solid Waste generated in the Project area.** This should include anticipated closure of West Miramar Landfill in or around the year 2011.

HSA25 Section 4.14.1.2.B – Mineral Resources/Navajo Community Plan: I understand that owners of 7188 through 7500 Mission Gorge (which includes Superior Ready Mix), submitted (then withdrew) an application to the City's Development Services for a master planned industrial development (PID) permit. This submission seems consistent with Councilmember Madaffer's written statements regarding the bio-tech/high-tech industrial area in what is not the quarry. **Please address the proposed PID for this area and what it includes. Please incorporate these proposals into the Draft EIR and address how the resulting impacts would be mitigated.**

HSA26 Section 6.0 – Growth Inducement: **Please provide me with appropriate documentation from the City's General Plan and Program Guide that includes the definition of "urbanization."** It is my understanding that mining activities do not constitute urbanized activities.

HSA27 Section 8.1.1 – No Project/No Redevelopment Plan/Description of Alternative: It is noted that, even without the Project, "the Project Area would be developed pursuant to the existing community plan land use designations and zoning. **The amount of development would be similar to the level estimated for the proposed project; however, the overall rate of development would be slower than under the Redevelopment Plan."** Given that proposals within the Project Area would occur without designating the Grantville Redevelopment Project area, it would seem that the Agency has not met the conditions required for physical and economic blight, and is merely attempting to increase its portion of the property tax increment. **I hereby request that the planning for and implementation of the Grantville Redevelopment Project be stopped immediately.**

HSA28 Section 8.2.1.15 – Conclusion – No Additional Development Alternative: As noted, "[t]his alternative is environmentally superior to the proposed project. This alternative would reduce, or avoid, the project's impact to transportation/circulation, air quality, cultural resources, biological resources, and paleontological resources." The section also notes, "this alternative would not meet most of the basic objectives of the proposed project. **It seems that, with the negative environmental impacts associated with this project, the No Additional Development Alternative would be preferable to the full implementation of the Redevelopment Project Area plan. Please address this recommendation.**

HSA29 Section 8.3 – General Plan Opportunity Areas Map Concept – This plan would "generally implement the conceptual land use patterns identified in the **City of San Diego General Plan (City of Villages) Opportunity Areas Map for the Project Area."** It appears that this alternative would generate a net increase of 50,359 daily trips, as opposed to 31,606 daily trips noted earlier in the Project Draft EIR. This alternative is unacceptable. The community has already kept the City from implementing the City of Villages in the Grantville area. Please

RESPONSE TO COMMENT LETTER FROM HOLLY SIMONETTE, DATED FEBRUARY 14, 2005 (cont.d)

Response to Comment HSA24:

The EIR provides an analysis of potential solid waste impacts (see pages 4.13-13 through 4.13-15). As discussed, the City of San Diego Environmental Services Department policy is to ensure that all requirements of a waste management plan are satisfied at the time of discretionary review, demolition, grading, or any other construction permit. Landfill capacities are discussed on pages 4.13-14 and 4.13-15 of the EIR.

Response to Comment HSA25:

An application for a Planned Industrial Development Permit for the subject property was submitted to the City approximately 5-6 years ago. There has been no action taken on the permit. The Grantville Redevelopment Plan EIR analyzes the potential impacts associated with implementation of land uses according to the existing adopted community plans. Sand and gravel and open space uses are assumed for the area referenced by the commentor in the proposed project scenario. Because no specific development is proposed for this area, it is not possible to evaluate the specific impacts and mitigation measures associated with any such project. Any future redevelopment of this area with an alternative use would require discretionary approvals including a community plan amendment and environmental review pursuant to CEQA.

Response to Comment HSA26:

The City of San Diego's General Plan and Progress Guide define "urbanized" areas within the City. The Redevelopment Project area, as well as surrounding areas are located within the City's designated urbanized area. The EIR assumes redevelopment of the Project Area according to existing adopted community plan designations. The sand and gravel area, although designated as Open Space with a sand and gravel subcategory, is within the urbanized area as set forth in the City's General Plan. Additionally, CEQA Guidelines Section 15387 defines an urbanized area as, "... a central city or a group of contiguous cities with a population of 50,000 or more, together with adjacent densely populated areas having a population density of at least 1,000 persons per square mile."

Response to Comment HSA27:

The Agency must adopt findings that show that the Project Area meets the criteria for blight as set forth in Section 33030 of California Community Redevelopment Law.

RESPONSE TO COMMENT LETTER FROM HOLLY SIMONETTE, DATED FEBRUARY 14, 2005 (cont.d)

Response to Comment HSA28:

The comment is noted. The Redevelopment Agency will consider the alternatives evaluated in the EIR and will make findings regarding the adoption of the project and rejection of alternatives pursuant to CEQA Guidelines Section 15091.

Response to Comment HSA29:

Comment noted. Please refer to responses to comments RM4 and HSA28.

HSA29 (cont'd.) **address why it is considered an alternative. Additionally, I request that this alternative be removed from the Draft EIR and not be considered as an alternative.**

Section 8.4 – Transit-Oriented Development Principals Alternatives – This alternative "assumes that land use designations would allow multi-family residential uses at 25 dwelling units per acre, within approximately 2,000 feet of the trolley station.... The area comprises approximately 100 acres of land. Under this alternative, it is assumed that existing non-residential uses would be replaced with residential uses and no additional non-residential development would occur with this area." It seems ridiculous to assume that this configuration would result in 7,200 fewer daily trips than the proposed project, as most residents in San Diego County do not use public transportation. **Please address how this assumption was made and the data/information that was used to generate this result. As this alternative would result in substantially more housing, which would result in additional strain on public safety, utilities, sewer, traffic, and other services. I hereby request that this alternative not be considered and that the zoning not be changed to accommodate this alternative, nor any proposed residential development in this area.**

HSA30

Additionally, please provide me the services and fees billed, paid, and/or budgeted for the production of the Grantville Redevelopment Project Draft Environmental Impact Report, Draft Preliminary Report, Draft Project Plan. Please include the salaries and benefits costs or City/Redevelopment Agency staff working on the Grantville Redevelopment Project.

HSA31

Thank you for accepting these written comments regarding the Draft Environmental Impact Report for the Grantville Redevelopment Project. I look forward to your written response addressing each of my concerns and comments.

HSA32

Sincerely,

Holly Simonette

Holly Simonette
Grantville Resident

cc. All Members of the San Diego City Council
Michael Aguirre, City Attorney
P. Lamont Ewell, City Manager

RESPONSE TO COMMENT LETTER FROM HOLLY SIMONETTE, DATED FEBRUARY 14, 2005 (cont.d)

Response to Comment HSA30:

The conclusion that the Transit-Oriented Development Alternative would generate less average daily trips than the existing community plan land uses is based on applying the trip generation factors as identified in the City's Trip Generation Manual associated with each land use. A net decrease of average daily trips is expected because although there would be an increase in residential uses, there would be a decrease (i.e., these uses would be replaced), of industrial and commercial uses.

Please also refer to response to comments HSA28 and HSA29.

Response to Comment HSA31:

The information requested by the commentor is public information and is available at the City Clerk's office.

Response to Comment HSA32:

Comment noted.

R.A.#2

JAN 25 2005
Esm

Public Comment

My name is Holly Simonette, and I'm a
Homeowner at 4838 Elsa Road, San Diego, 92120 (between Subareas A and C)

Honorable Mayor Murphy and Council Members:

HSB1 Thank you for allowing me to speak today about my concerns related to the Grantville Redevelopment Project and the Draft EIR. Council Members Frye and Atkins, my comments also relate to the ongoing lack of government transparency and the community's right to know.

HSB2 The entire community of Grantville and Allied Gardens has been kept in the dark about what the City's Redevelopment Agency and private developers are trying to do in our neighborhoods. Those of us who live near the project area have not received updates or notices, and have had to find out information on our own or by word of mouth. Talk about secrecy at City Hall.

HSB3 I am here today with petitions in opposition to the Grantville Redevelopment Project. They are signed by my neighbors and local business owners who live and work near the Subareas. My neighbors and I are continuing to gather signatures. We respectfully request that you stop the project immediately.

HSB4 I am also here today to address concerns about the Draft EIR. The project description on page 3-6 says that the Project will serve as a catalyst to reverse the physical and economic blight in the area. What blight? How can you say there's blight when housing prices in our neighborhood have gone up 23.5 percent in the last year and the median price is over $530,000?

RESPONSE TO COMMENT LETTER FROM HOLLY SIMONETTE, DATED JANUARY 25, 2005

Response to Comment HSB1:
Comment noted.

Response to Comment HSB2:
The Agency has complied with all public noticing requirements with respect to the California Environmental Quality Act and the California Community Redevelopment Law. In addition, the Agency has formed the Grantville Redevelopment Advisory Committee (GRAC). The formation of the GRAC is not a requirement for the formation of a redevelopment project area when no residential uses are involved. The GRAC was formed as an additional mechanism to encourage public involvement, and includes representation from portions of the community located outside of the Project Area. In addition to all noticing and meetings, all documentation related to this project has been posted on the Redevelopment Agency's website.

Response to Comment HSB3:
Comment noted. The referenced petition is included as an attachment to this responses to comments document.

Response to Comment HSB4:
Please refer to response to comment HSA27. The commentor also references housing prices. However, there is no residential use located within the Project Area.

We all know traffic in the area is bad – it's the thing people complain about the most. In fact, people already drive on Twain and Crawford near my house to avoid the traffic mess on Mission Gorge. Your own highly paid experts say the Redevelopment Project would add more than 31,000 cars along Mission Gorge and Friars Roads and other areas of the project. But they note that even with some road
HSB5 improvements, "*the cumulative impact would remain significant and unavoidable.*" This means even more cars will be driving through my neighborhood to avoid the increased traffic congestion on Mission Gorge. That puts more kids at risk for being hit by a car, more accidents, and more car exhaust around our schools. **In short, there's going to be more traffic in my neighborhood because traffic on Mission Gorge is going to stay screwed up.**

Your experts' analysis of the long-term effects on the air quality concludes that "combined emissions from the Redevelopment Project Area and other developed areas in the Basin are expected to continue to *exceed state and federal standards* in
HSB6 *the near term and emissions associated with these developments will exceed threshold levels.*" **In short, more vehicles and industry in the Redevelopment Project Area will keep the air quality unhealthy in our neighborhoods.**

Honorable Mayor Murphy, Council Members, please do not ignore the findings of your own experts and put a rubber stamp of approval on this Draft EIR or the
HSB7 Grantville Redevelopment Project. There's no reason to screw up traffic and air quality even more for a project that has no justification in the first place, because there is no blight.

Thank you.

RESPONSE TO COMMENT LETTER FROM HOLLY SIMONETTE, DATED JANUARY 25, 2005 (cont.d)

Response to Comment HSB5:
Please refer to responses to comment DOT3 and DRS17.

Response to Comment HSB6:
Please refer to response to comment HSA15, LM5, and CLB7.

Response to Comment HSB7:
Comment noted.

HS
(ATTACH.)

The College Area Community Council
THE PRESIDENT'S PERSPECTIVE

The biggest hope for the College Community may lie in. .Mission Gorge. The City Redevelopment Agency is starting the process of a Grantville redevelopment project. Good news for them, but maybe better news for us because Grantville has the positive distinction of being one trolley stop away from the heart of SDSU. The large number of students driving to and from SDSU causes a lot of congestion on our arterials. While several local projects will provide relief by adding housing within walking distance of campus, it is not enough to house all of SDSU's 34,000 students. Grantville redevelopment offers the opportunity for much more housing virtually on the doorstep of SDSU. An affordable housing component next to the trolley theere would allow students to roll out of bed and onto a train that drops them off in the heart of Aztecland. Our Mayor and Council are advocates of smart growth along major transit corridors. What could be smarter than that?

- Steve Lauh

Straight From Jim

Jim Madaffer

By Councilmember Jim Madaffer

As you know I've begun my second term in office as the Councilmember representing District 7. Let me begin by offering my thanks to the voters for re-electing me. It is an honor to serve. I'm so enthused because my job is working to make the City I was born in the very best it can be. You have my pledge of continuing as your City Councilmember on the job seven days a week - from early to late - to do everything I can to improve our neighborhoods and our quality of life.

We're facing dire issues with tremendous long-term impacts and as I see it there are four top priorities for City Hall this year. Until these basics are handled, nothing else matters. They are:

#1 Getting the City's audited financial statements completed.

#2 Resolving ongoing issues with the City's pension system and the City's finances in general.

#3 Resolving conflicts in the City's municipal code regarding elections

#4 Drafting policies, procedures and changes to the municipal code and City Council policies to implement the five-year trial "strong Mayor/City Council" form of government that goes into effect next January 1.

Please visit my website at www.JimMadaffer.com for more detailed thoughts on this and other Citywide issues that I'm particularly interested in.

As for District 7, I've already charted a course for my second term in office. Distilled to its essence, the goal is to provide the best service so that we have enough police and fire protection, that our streets are taken care of, street lights are working, we have adequate parks and ball fields for our children, that we have libraries that provide 21st century services, that we have a constant reliable source of water, that home and property codes are enforced and other important services that make San Diego such a desirable place to live.

Redevelopment will be key to making the greatest positive change in our quality of life. The unique aspect is that redevelopment enables the City to reinvest tax money in the designated redevelopment area instead of sending it to the state government in Sacramento. We have created a redevelopment area and have proposed another in my district. The Crossroads Redevelopment Area is along College Avenue, University Avenue and El Cajon Boulevard and the Grantville Redevelopment Survey Area is along Mission Gorge Road from Interstate 8 to the rock quarry near Princess View Drive. Not only will they bring opportunities for new homes and commercial areas, they also bring much needed infrastructure. Better roads, new parks and libraries are all part of the plan. Of course, we already have the College Redevelopment Area and the College Grove Redevelopment Area in our district and a portion of District 7 is included in the City Heights Redevelopment Area, which has served as a model for redevelopment projects.

The Grantville Redevelopment Survey Area will have an immediate transformation in that the entire I-8 interchange at Mission Gorge Road and Alvarado Canyon Road will be re-aligned. What is currently a convoluted section of twists and turns where traffic backs up routinely will become a more direct and efficient traffic flow area. The long-term transformation is to change what is a rock quarry and light industrial area into a bio-tech and high-tech production area.

Residents are clamoring for unsightly utility lines to be moved underground. The visual improvement is beyond compare. Newer residential areas automatically had lines installed underground when the development took place. Older neighborhoods didn't have that option until now. The City has embarked on a 20-year plan to rid our streets of those ugly utility poles and wires. I am so proud of working with this City Council that has had the vision and foresight to accomplish this. I only wish we could accomplish this in a short amount of time.

Our next median projects are in the College, Rolando and El Cerrito areas on El Cajon Boulevard from 73rd Street to 54th Street. Also, this year we'll install a new irrigation system for the trees on the Mission Gorge Road median between Princess View Drive and Margerum Avenue. Phase Two of that project includes a new irrigation system and planting trees in the Mission Gorge Road median between Margerum Avenue and Jackson Drive. These median projects increase the beauty of our City by eliminating those ugly asphalt islands of cigarette butts and trash and they calm traffic by serving as dividers in the road.

District Seven has had a string of successes with the joint-use ball fields we've completed over the last four years. The value of these new ball fields has been reinforced by the comments I hear from children and their parents. I credit strong partnerships and the grim determination to overcome all obstacles — including lack of funds — as the reasons why we finished installing grass or high-tech turf on the ball fields. Next on the list is Lake Murray Community Park in San Carlos. In the southern end of the district we're working on Paragon Park on the old South Chollas Landfill. It will have recreational facilities including a proposed baseball and golf learning center.

continued on page 11

Straight From Jim

continued from page 3

We are in the very early stages of planning for a park in the Fox Canyon neighborhood. The community is elated and so am I. The Euclid Gateway Project will break ground this month and finally new sidewalks, traffic improvements and new landscaping will be added.

The new College-Rolando Library opens early this year. I'll let you know when the dedication takes place once we set the date. Please join us if you can because it will be so exciting to have a brand new library in our district.

Once again we've set an ambitious list of goals. However, considering our track record, I know we'll be checking each item off as completed.

As always, it is an honor to serve you. Please stay in touch. I invite you to sign up for my email newsletter. It is a great way to stay current with the many wonderful projects and events taking place in my District and in the city as a whole. You can sign up by visiting my Web site at http://JimMadaffer.com which also has videos of events and projects happening in the area. I ask you to keep me informed of issues as you see them. You may call my office at (619) 236-6677 or write me at City Hall, 202 C Street, San Diego, CA 92101 or send an email to JMadaffer@sandiego.gov

HS (ATTACH.)

RTC-110

JUST SAY "NO" TO THE GRANTVILLE REDEVELOPMENT PROJECT

Hand-delivered January 2005

Dear Neighbor:

Did you know the City of San Diego is planning to declare the area around our homes a "blighted area," create more traffic on Mission Gorge and Waring Roads, develop low-income housing in our area, take away property from local business owners. And they want to do all of this in violation of State law? **It's time to tell the City Council "NO" -- the residents of Grantville do NOT want the Grantville Redevelopment Project.**

Make sure your voice is heard. The City Council will only pay attention if enough of us show up and make our voices heard. Sign the petition and attend the City Council meeting on January 25, 2005 at 10 a.m. *(Council Chambers, 12th Floor, City Administration Building, 202 C Street, downtown).*

The Grantville Redevelopment Project would:

HSLM1 ➢ **Make Traffic Congestion Worse:** The Draft Environmental Impact Report (EIR) predicts significant traffic increases in the area from the Project Activities, but does not propose anything to alleviate the traffic. No improvements are proposed for the bottle-neck on Mission Gorge Road between I-8 and Friars Road. This means even more traffic through our neighborhoods.

good MM

HSLM2 ➢ **Declare Area Around Our Homes "Blighted":** The City says this won't affect our property values, but we have no assurance of this. They say that values typically increase, but this is for areas that truly are blighted—ours is NOT!

HSLM3 ➢ **Violate State Law:** The proposal of this Project Area VIOLATES state law: Our area is NOT blighted by definition of California state law! How much more illegal activity should we tolerate from this city government?

HSLM4 ➢ **Take Away Property:** Redevelopment will give the City extraordinary powers to take property away from business owners in order to make way for pet projects from developers like Fenton Development, who has an employee sitting as Chair of the planning committee! Don't let the City put your neighbors out of business just for their own convenience.

HSLM5 ➢ **Build Low-Income Housing:** This places additional strain on social services in the area while taking money away from the very agencies that provide the services. This will result in reduced services and worse conditions for low-income residents.

HSLM6 ➢ **Take Money Away from Schools:** This project will take money away from other governmental agencies, schools, and community colleges—all of which provide valuable services to our community. They're doing this simply because they can't manage their own finances!

HSLM7 Everything that the City proposes to do to improve our area are things they should already be doing—like improving landscaping and enforcing code violations.

HSLM8 Redevelopment simply becomes a vehicle to do things that the community has repeatedly said "No!" to, like high-density housing, new development in open spaces, and more congestion! If they aren't doing their jobs now, why would they when they get more power by forming a Redevelopment Area?

City documents about the Grantville Redevelopment Project are on the Internet: http://www.sandiego.gov/redevelopment-agency/grantville.shtml. Read them! Get informed!

- Draft Redevelopment Plan
- Draft Environmental Impact Report
- Rules Governing Participation by Property Owners
- Address Ranges for Properties within the Proposed Redevelopment Project Area

Please contact us if you have any questions.

Holly Simonette
Homeowners on Elsa Road
(619) 501-7414

Lynn Murray
Homeowner on Carthage Street
(619) 582-1024

RESPONSE TO COMMENT LETTER FROM HOLLY SIMONETTE/LYNN MURRAY, DATED JANUARY 2005

Response to Comment HSLM1:

Please refer to responses to comments DOT3, AG1, RM3 and DRS17.

Response to Comment HSLM2:

Research indicates that between 2002-03 and 2003-04 the assessed value of properties in the Project Area increased 4.97% and between 2003-04 and 2004-05 increased 7.59%. This compares with 10.01% and 10.38% in the City of San Diego, and 9.92% and 11.15% in the County of San Diego. This is an indicator that property within the Project Area suffers from blighting conditions that are not present elsewhere.

Response to Comment HSLM3:

The Preliminary Report for the Grantville Redevelopment Project Area documents the existence of blighting conditions in the Project Area. Not all properties in the Project Area are blighted by blighting conditions do exist and private enterprise acting alone has not addressed these conditions. Please also refer to responses to comments DD2, DD6, JN10, and HSA27.

Response to Comment HSLM4:

The Redevelopment Plan allows the Agency to acquire property in the Project Area only after extending Owner Participation preferences to existing owners and businesses, and only after paying just compensation based upon an appraisal of the property at its highest and best use.

Response to Comment HSLM5:

Affordable housing is a documented need throughout the City of San Diego and the region. The claim that such housing places additional strain on social services while taking money away from the very agencies that provides the services is not substantiated.

Response to Comment HSLM6:

Health and Safety Code Section 33607.5 presents the legally mandated formula for paying a portion of the tax increment to all of the affected taxing entities. In the case of school districts (K-14), a portion of the tax increment paid to the district is not deemed "property taxes" for the purposes of their financing pursuant to State law, and therefore, it is funding beyond what the school district would otherwise receive had there been no redevelopment project area. This new source of school funding is available to be used for education facilities that benefit the Project Area. With regard to other taxing entities, it is probable that with redevelopment activities enhancing the

RESPONSE TO COMMENT LETTER FROM HOLLY SIMONETTE/LYNN MURRAY, DATED JANUARY 2005 (cont.d)

Response to Comment HSLM6 (cont.d):
area, the growth in assessed value will exceed what would have occurred absent the Redevelopment Plan so even though these entities will receive only a portion of the tax increment, it could exceed what they would have received absent adoption of the Redevelopment Plan.

Response to Comment HSLM7:
Comment noted.

Response to Comment HSLM8:
Comment noted.

Significant, Mitigable Impacts

Implementation of the proposed Redevelopment Project will result in significant impacts as a result of future redevelopment activities that will occur within the Project Area. Significant impacts have been identified to the following environmental issue areas:

- Air Quality (Short-term Construction)
- Noise
- Cultural Resources
- Biological Resources
- Geology/Soils
- Hazards and Hazardous Materials
- Paleontological Resources
- Aesthetics
- Water Quality/Hydrology
- Public Services

Implementation of proposed Mitigation Measures identified in this Program EIR will reduce the impact to these resource areas to a level less than significant.

Significant, Unavoidable Impacts

Based on the data and conclusions of this Program EIR, the Redevelopment Agency finds that the project will result in significant unavoidable impacts to the following resources areas:

- Transportation/Circulation
- Air Quality (Long-term Mobile Emissions)

Implementation of proposed Mitigation Measures will reduce the potential impact to these resources to the extent feasible; however, the impact will remain significant and unavoidable. These impacts are not a result of implementation of the Redevelopment Project in and of itself, rather they are a result of forecasted growth in the region, which will occur both inside and outside of the Project Area. If the Redevelopment Agency chooses to approve the Grantville Redevelopment Project, it must adopt a "Statement of Overriding Considerations" pursuant to Sections 15093 and 15126(b) of the CEQA Guidelines.

ATTACHMENT 3

THE CITY OF SAN DIEGO

DATE OF NOTICE: January 5, 2005

NOTICE OF PUBLIC HEARING

REDEVELOPMENT AGENCY, COMMUNITY AND ECONOMIC DEVELOPMENT

DATE OF HEARING:	**January 25, 2005**
TIME OF HEARING:	**10:00 AM**
LOCATION OF HEARING:	**Council Chambers, 12th Floor, City Administration Building, 202 C Street, San Diego, California 92101**
PROJECT:	**Grantville Redevelopment Project Area (Proposed)**
PURPOSE OF HEARING:	**Receive public testimony and comments regarding a draft programmatic Environmental Impact Report**
COMMUNITY PLAN AREA:	**Navajo, Tierrasanta, and College Area**
COUNCIL DISTRICT:	**District 7**

The San Diego Redevelopment Agency is pursuing the Grantville Redevelopment Project which would eliminate physical and economic blighting conditions and promote a variety of land uses, expand employment opportunities, improve public infrastructure, parking, and services. California Community Redevelopment Law (Health and Safety Code Section 33000 et. seq.) controls redevelopment activity and the Draft Grantville Environmental Impact Report (EIR) has been prepared in accordance with the California Environmental Quality Act (CEQA).

The Redevelopment Agency has scheduled a meeting on Tuesday, January 25, 2005 at 10:00 a.m. to take public testimony and comments on the draft programmatic EIR. A final EIR incorporating public input will be prepared for consideration by the Redevelopment Agency for a noticed public meeting in the future.

The draft programmatic EIR can be reviewed at www.sandiego.gov/redevelopment-agency/grantville and at the following locations: City of San Diego Redevelopment Agency, 600 B Street, 4th Floor; City of San Diego Central Library (Science & Industry Section), 820 E Street; Mission Valley Branch Library, 2123 Fenton Parkway; Tierrasanta Library, 4985 La Cuenta Drive; Benjamin Branch Library, 5188 Zion Avenue; San Carlos Branch Library, 7265 Jackson Drive; and the Navajo Community Service Center, 7381 Jackson Drive.

For additional information, contact Tracy Reed, Project Manager, at the Redevelopment Agency at (619) 533-7519 or treed@sandiego.gov.

REDEVELOPMENT AGENCY
600 B Street, Suite 400 ◆ San Diego, CA 92101-4506
Tel (619) 533-4233 Fax (619) 533-5250
Community and Economic Development

JANUARY 31, 2005

MY CONCERN HAS BEEN THE BUS AND TROLLEY SERVICE IN THE AREA OF MISSION SAN DIEGO TROLLEY STOP AND THE GRANTVILLE TROLLEY STOP.

MY UNDERSTANDING IS THAT THE #13 BUS WILL BE REROUTED IN SUCH A FASHION THAT IT WILL NO LONGER BE GOING BY THE MISSION SAN DIEGO TROLLEY STOP BUT WILL BE BROKEN INTO TWO ROUTES WITH ONE FROM FASHION VALLEY TO GRANTVILLE AND THE OTHER BEING FROM GRANTVILLE TO THE EUCLID TROLLEY.

DSA1 DISCUSSIONS WITH MTDB SEEM TO INDICATE THE GRANTVILLE TROLLEY STOP WILL BE AN EAST FASHION VALLEY WHERE SEVERAL BUS ROUTES WILL MEET WITH THE TROLLEY LOCATION.

HAS ANYONE TAKEN INTO ACCOUNT THE INCREASED AMOUNT OF TRAFFIC THAT WILL BE GENERATED DUE TO THESE PLANS OF MTDB? WHAT IMPACT WILL THERE BE ON ALVARADO CANYON ROAD, MISSION GORGE ROAD, ROUTE 8, CAMINO DEL RIO NORTH, FAIRMONT? HOW WILL BUSES BE ENTERING AND EXITING THE GRANTVILLE TROLLEY STOP?

Don Stillwell
6308 RANCHO MSN RD #173
SAN DIEGO, CA 92108
(619) 282-7760

RESPONSE TO COMMENT LETTER FROM DON STILLWELL, DATED JANUARY 31, 2005

Response to Comment DSA1:

The specific impacts of bus rerouting were not evaluated as part of the traffic analysis for the proposed project; however, vehicular trip generation was analyzed. The specific traffic impacts associated with the trolley were evaluated by MTDB (MTS) as part of the EIR prepared for the Grantville Trolley station, which is referenced by the commentor. According to MTS, there will be a maximum of six bus trips (three buses in, and three buses out) per hour at the trolley site. This number of bus trips would not significantly impact intersections in the vicinity of the station. The recent extension of Alvarado Canyon Road (the bridge connection) has also helped reduced traffic along Mission Gorge Road and Fairmount Avenue.

Additionally, the provision of trolley service in the Project Area may reduce the traffic generation by 5% for residential uses, 5% for office uses and 3% for commercial uses within 1500 feet of the trolley station (City of San Diego Trip Generation Manual). This potential trip reduction has not been taken into account in the Grantville Redevelopment Project Program EIR traffic analysis; therefore, the study is conservative.

JIM: TRACY REED FEBRUARY 8, 2005

IN RESPONSE TO YOUR REQUEST LAST TUESDAY, FEBRUARY 1, I CHECKED WITH BOTH TONI AND THE MTDB AND LEARNED THAT THERE ARE 3 BUS ROUTES THAT WILL BE USING ALVARADO CANYON ROAD BOTH IN AND OUT EVERY 30 MINUTES, THEY ARE ALSO PLANNING ON USING THE AREA FOR PARKING.

THIS WILL DEFINITELY IMPACT TRAFFIC ON MISSION GORGE ROAD YET THE REDEVELOPMENT GROUP WORKING ON THE EIR ACTED AS IF THEY DIDN'T CARE

. THE ROUTES WILL BE ROUTES 13 AND 14 (WITH 13 BROKEN INTO 2 SECTIONS, ONE FROM FASHION VALLEY, NUMBERED 14, AND THE OTHER FROM GRANVILLE TO EUCLID TROLLEY, MAINTAINING #13).

ROUTE 81 IS TO BE DELETED AND ROUTE 18 WILL REPLACE IT, FROM FASHION VALLEY TO GRANVILLE.

DSB1 SPECIAL NOTE: BOTH ROUTE 14 AND ROUTE 18 WILL ACTUALLY BE MAKING LEFT TURNS ACROSS MISSION GORGE ROAD ONTO ALVARADO CANYON ROAD, ONE COMING FROM THE NORTH (ROUTE 13) AND ONE APPROACHING FROM THE SOUTH (NEW ROUTE 18). DURING RUSH HOURS THIS INTERSECTION AND THE ENTRANCE TO ROUTE 8 ARE ALREADY ALMOST IMPOSSIBLE TO GET THROUGH. WITH 3 BUS ROUTES ENTERING AND EXITING (6 PER EVERY ONE-HALF HOUR) I GUARANTEE THIS WILL AFFECT TRAFFIC AND SHOULD DEFINITELY BE ADDED TO THE EIR TO CHECK FOR ITS IMPACT ON THE COMMUNITY AND THE REDEVELOPMENT.

SUGGEST THIS INFORMATION, IN THIS WRITTEN FORM, BE GIVEN TO THE REDEVELOPMENT GROUP MAKING THE STUDY, AS WELL.

RECEIVED
FEB 10 2005
COMMUNITY & ECONOMIC DEV DEPARTMENT

THANKS,
Don Stillwell

6308 RANCHO MSN RD #173
SAN DIEGO, CA 92108
(619) 282-2710

RESPONSE TO COMMENT LETTER FROM DON STILLWELL, DATED FEBRUARY 8, 2005

Response to Comment DSB1:
Please refer to response to comment DSA1.

February 13, 2005

Mr. Tracy Reed
Project Manager
600 B Street
Fourth Floor, MS 904
San Diego, CA 92101

RE: Response to the Grantville Redevelopment Project Draft Program Environmental Impact Report

Dear Mr. Reed;

After reviewing the Draft EIR, I have the following concerns:

MR1 1. The increase of vehicular traffic on already crowded streets has been shown to be a considerable problem and will increase as more development occurs. In section 4.2.6 (Conclusion) roadways are listed, which are to be significantly impacted by the redevelopment project. Waring Road is omitted from this list. I do not feel adequate research was given to this roadway, especially during peak AM or PM hours. Waring Road is a major roadway through a residential area that has been documented with high speeds and traffic volume. It is the main access to subarea C of the Grantville Redevelopment Project and will become significantly more impacted, should any changes take places in that area.

MR2 2. The speed of cars on all the surface streets of the Project area is at this time a tremendous problem. Yet little is mentioned regarding that impact or how to mitigate it. Emphasis is given to volume of traffic.

MR3 3. There appears to be little discussion on height limitations for buildings in the Redevelopment Area. Visual impact on the neighboring community could be significant. Height limits need to be considered and implemented to help retain the character of the community and to prevent uncontrolled densification that would adversely impact road, utility and protective services (police and fire).

MR4 4. Section 4.13.1.1 discusses impacts to schools. I strongly disagree with table 4.13.1, which refers to future enrollment at Foster and Marvin as "falling". It is not realistic to assume that the tenants of new multifamily projects will all be, as several developers have suggested, only "young executives". Even if that were so, there is a strong probability that some of these "young executives" will be parents needing affordable housing close to schools. The homes in the Allied Gardens/Grantville area may also be more affordable for young families then in San Carlos and Del Cerro. Enrollments may increase, not decrease. Projected impacts to area schools are inadequately researched in the EIR.

MR5 5. Open space is extremely important when an area is being considered for redevelopment. Densification with little regard for parks, running trails, etc. will put the character of the

RESPONSE TO COMMENT LETTER FROM MARILYN REED, DATED FEBRUARY 13, 2005

Response to Comment MR1:
Please refer to response to comment DOT2 and DD8.

Response to Comment MR2:
The traffic impact analysis conducted for the EIR was based on the City of San Diego traffic impact manual. Impacts are based on volume to capacity ratios and increases in intersection delay. In areas where enforcement of speed limits is at issue, more specific, detailed analysis is required to ascertain speed conditions, and potential street calming measures that may be implemented to address the issue.

Response to Comment MR3:
Comment noted. Please also refer to response to comment TCC13.

Response to Comment MR4:
The existing school data and projections provided in the EIR were obtained directly from the San Diego Unified School District (2004).

Response to Comment MR5:
Comment noted. Please refer to responses to comments PRD2, PRD4, PRD5, PRD7, PRD14, and PRD17.

MR5 cont'd.) community at a disadvantage. The closest park to the Grantville Redevelopment subarea A is along Crawford Street and Vandever. Whether in Subareas A or B, any children wanting to use a park must cross busy streets to get there. Although the San Diego River Project intends to develop running or bike paths along the river, that does not leave areas for playing sports such as soccer. The need for large landscaped grass areas should be further explored.

MR6 6. Air quality is also of concern and should not be simply deemed "significant and unavoidable". The health and well being of residents in and immediately adjacent to the redevelopment area should always be of foremost concern to the City Redevelopment Agency when projects are accepted for consideration. I did not find in the EIR a discussion of locations that are presently considered California Hot Toxics Spots.

MR7 7. Adequate police and fire protection need to be maintained. With densification comes a greater need for protection and safety in a community. How will that be accomplished efficiently over time?

MR8 Finally, and perhaps out of the scope of the draft EIR, is the ability of the communities of Grantville and Allied Gardens to participate in the review and recommendation process of any proposed redevelopment project. A PAC was not established because there were no residences in the Project area. However, the GRAC will disband in May and that will leave the community lacking the ability to effective participate in the recommendation process. The Navajo Community Planners, Inc. will be the group to review projects and submit recommendations. The current makeup of the board has Grantville and Allied Gardens as a disadvantage due to its current election and representation procedures. There also are no guidelines, as required by 600-24, in NCPI Bylaws to direct the review of redevelopment projects by subcommittees, for the community directly impacted.

I appreciate your consideration of these concerns.

MR9 Sincerely,

Marilyn Reed

RESPONSE TO COMMENT LETTER FROM MARILYN REED, DATED FEBRUARY 13, 2005 (cont.d)

Response to Comment MR6:

According to the San Diego Air Pollution Control District, there is no real definition of a "hot spot." As of now, facilities are prioritized based on their health hazard. If the total score for carcinogenic compounds is above 100 and for non-carcinogenic compounds is above 10, then a health risk assessment is required for the facility. A health risk assessment (HRA) is a study of the possible public health risks that may be posed by emissions of toxic compounds. If the cancer risk per million is greater than 10 and the cronic and acute THI's are greater than 1, then the following steps are required: a public notification (for those living in the surrounding areas) and risk reduction (a plan to reduce risk to below a level of significance).

Flame Spray, Inc. (4674 Alvarado Canyon Rd, 92120) and Superior Ready Mix (7500 Mission Gorge Rd, 92120) are the only two facilities in the Project Area that were required to do an HRA. Flame Spray, Inc. performed a Public Notification in 2000, held a Public Meeting and successfully implemented a risk reduction program. The facility has reduced the potential health risk below the notification thresholds and therefore, public notifications are no longer required. Superior Ready Mix had a 5.6 per million cancer risk and chronic and acute THI's below 1. Therefore, Superior Ready Mix was not required to do public notice and risk reduction.

The Air Resources Board (ARB) is in the process of changing the emissions standards to incorporate diesel emissions. ARB has determined that diesel emissions, especially those from internal-combustion engines, are a major airborne pollutant. This is the upcoming concentration of the APCD. As of now, the available data for specific facilities does not include diesel emissions, so this data may change in the next few years.

Please also refer to responses to comments TCC10, CLB7, LM3, LM4, LM5, and HSA15.

Response to Comment MR7:

Please refer to DF1.

Response to Comment MR8:

The Draft Redevelopment Plan was amended to include Section 480 Participation of Area Planning Committees and Other Appropriate Community Organizations to encourage additional community input during the planning and review of Agency plans, policies, procedures, agreements and proposed projects and programs.

Response to Comment MR9:

Comment noted.

2-14-05

Mr. Tracy Reed

HH1 My comments regarding the EIR of the Grantville Redevelopment Project

HH2 No development is acceptable until traffic and air quality problems are fixed FIRST.

HH3 Street traffic is now intolerable. There are many projects increasing density in and near to this area.

HH4 Stop and go traffic backs up the Waring Rd hill every day as well as a longer back up on Mission Gorge Rd to Mission Gorge Place; from I 8.

HH5 Major road improvements like connecting Tierrasanta Blvd to Princess View would take excess traffic out of Grantville. Widening Mission Gorge and Fairmont will also help.

HH6 As for "Blight". Don't take pictures of violations ENFORCE them. Encourage business to restore and upgrade.

Sincerely
Helen R Hunter
P.O. BOX 600551
SAN DIEGO, CA 92160

RESPONSE TO COMMENT LETTER FROM HELEN R. HUNTER, DATED FEBRUARY 14, 2005

Response to Comment HH1:
Please refer to responses to comments HH2 through HH6.

Response to Comment HH2:
Comment noted.

Response to Comment HH3:
Comment noted. Please also refer to responses to comments DOT3 and DRS17.

Response to Comment HH4:
Comment noted. These conditions, in that existing streets and intersections within the project study area do not meet current conditions City LOS standards, are documented in the EIR. Please also refer to responses to comments DOT3 and DRS17.

Response to Comment HH5:
Please refer to responses to comments DOT3, DRS17, CLA1, CLA6, CLB1.

Response to Comment HH6:
Comment noted. Please also see responses to comments JN10 and HSLM3.

Grantville EIR Comments
Submitted by:
Lee Campbell lee@campbellot.com; 858-560-1213

General Comments

LC1 1. It is not clear what plan or plans are being referenced when referring to "plan area". I am told it refers to community plan area. Does this refer to the Navajo Plan only? The Tierrasanta Plan or the small portion of eastern Tierrasanta that is in the Development Plan? **Action**: The document should be specific, for example vol 1,para. 8.4.1.15 states that the transit oriented alternative would result in less environmental impact to transportation/circulation, air quality, noise etc.

LC2 2. The word "project" is used throughout the EIR. **Action**: Please refer to the various projects as Community Plan Project, Redevelopment Plan Project, TOD plan Project, etc. This would help the reader.

LC3 3. **Action:** Instead of using the word "alternative" when referring to a plan alternative identify the plan, such as, the TOD Plan Alternative.

LC4 4. The impact to Tierrasanta, which borders the eastern side of the basin including the San Diego River, Admiral Baker Field, Mission Gorge Road and the Grantville and Allied Gardens communities appears to be significantly impacted in particular with air quality (Ref vol 1, para 4.3.6.2.) due to the increase in traffic that the redevelopment plan and the TOD plan will generate.
Action: Address this specifically related to Tierrasanta Community Plan area and not just to the Project area included in the Tierrasanta plan. Please address the entire Tierrasanta Community Plan area for all alternatives when addressing pollution.

LC5 5. Traffic average on all Project Plan arterials increases with:
   a. Project Plan = 153% over existing 2004
   b. Transit Oriented Alternative Plan = 165% over existing 2004
   Reference vol.2 appendix D.
Volume 1 has summarized this data in charts that using the A through F levels of impact. So the F impact level designation can be 1% higher than the existing conditions or 65% or infinite.**Action:** Install the vol. 2 appendix D tables in appropriate consecutive pages in vol. 1 so all can see the scope of the impacts for comparison.

LC6 6. Volume 1 refers to areas in community plans that are not in the development area. It is suggested that when improvements are implemented in these areas the traffic impact would be improved, but these are in some instances are not specifficallyidentified. In addition there is no analysis documented in vols. 1 or 2 to show that these traffic improvements would in the long run benefit the Tierrasanta, Navajo, or College area communities or cause "significant impacts" to these communities. For example, vol. 1, page 5.3, para. 5.1.3 states," Traffic improvements are identified with the Navajo, and Tierrasanta Community Plans, ... that when implemented would help to reduce the

RESPONSE TO COMMENT LETTER FROM LEE CAMPBELL, DATED FEBRUARY 13, 2005

Response to Comment LC1:
Reference to "plan area" in the EIR is used when referencing the applicable community plan area, or portion thereof. If "plan area" is not preceded by a community name, it is located under a specific community plan heading. In response to this comment, a word search was conducted and areas of the EIR that make reference to "plan area" were reviewed to confirm this condition. Additionally, the EIR clearly states that the alternatives to the proposed project are evaluated against the potential impacts of the proposed project. No additional modification to the EIR has been made.

Response to Comment LC2:
The term "project" refers to the proposed redevelopment plan project, and/or subsequent activities that may occur under the redevelopment plan. The term does not refer to community plans or alternatives as evaluated in Section 8.0.

Response to Comment LC3:
Each alternative is evaluated within its own section and under its own heading. No further modifications to Section 8.0 of the EIR are proposed in response to this comment.

Response to Comment LC4:
The environmental impact analysis provided in the EIR is not necessarily limited to the proposed Project Area. In fact, regionally significant conditions are evaluated including air quality issues as stated by the commentor.

Response to Comment LC5:
Volume II Appendix D, as referenced by the commentor, depicts the project trip distribution. This information is also provided in EIR Volume I Figure 4.2-4. Also, as noted by the commentor, even a relatively small contribution of traffic to a significantly impacted intersection, is considered significant in some instances according to City of San Diego Traffic Significance Thresholds (see EIR Table 4.2-3).

Response to Comment LC6:
The traffic improvements identified and evaluated on EIR pages 4.2-20 through 4.2-21 are contained in the existing adopted Navajo Community Plan. Although identified in the existing adopted Tierrasanta Community plan, several roadway extensions were not assumed (please refer to response to comment AG2). The traffic impact associated with these extensions were evaluated in conjunction with the preparation and adopted of the Tierrasanta Community Plan (reference Figures 23 and 24 of the Tierrasanta Community Plan). The extension of these roadways would need to be

cumulative traffic impact. However, ... the cumulative impact would remain significant and unavoidable." Would not this transfer significant impacts to surrounding communities due to the diversion of traffic?

LC6 (cont'd.) Action: Remove these references or provide proof by analysis including traffic studies for the Caltrans impacts to 1. Mission Gorge Road at route 52; 2. Jackson Drive at route 52; 3. Tierrasanta Blvd. at I-15; 4. Navajo Rd at I-8; 5.Santo Rd. at Friars Rd and Santo Road at rt 52. Also because these "improvement" are mentioned so often it clear that these improvements are intended to be implemented "shall" be implemented when the funds are available' even though the are not covered by analysis.

LC7 7. Mission Gorge Road section from Old Cliffs Road to Katlyn Court and on to Princess View should be included in the traffic analysis and in the Redevelopment Plan.

LC8 8. The Transit Oriented Alternative Plan proposes 2500 housing units within 2000 feet of the trolley station. Does this include the current in work projects of 100+ units at Waring Road and I-8, and the units that are projected to be on the hillside above the Nazarene church; neither of which are feasibly within the transit oriented zone of 2000 feet? In any case 2500 units could probably bring 2500 to 5000 automobiles to the area within 2000 feet of the trolley. This figure could be increased if (and it is likely) the units are populated by college students. Is this included in the analysis? It appears that the traffic between I-8 and Twain Ave will increase to an average of 208% of current values if the project plan is selected and to 254% if the alternate Traffic Oriented plan is selected. Both are unacceptable. This traffic will be diverted onto local residential streets. **Action:** Please address in the EIR the probability of traffic increases due to student residents in the TOD alternative plan and mitigation suggestions.

LC9 9. There are archeological resources along the river at the terminus of Tierrasanta blvd that appear to not be referenced in the EIR. **Action:** Please identify and include in the document, or identify a city report that addresses these resources and modify the EIR to identify the impact at this portion of the redevelopment area.

LC10 10. Bicycle routes and pedestrian walkways are not covered in detail. They are not shown as existing or proposed. **Action:** How will pedestrian walkways and bicycle routes be accommodated? With the traffic increases on the major roadways and intersections it is probable that if they exist at all they will be routed to side streets or as independent paths. How much improvement in traffic can be expected by utilizing these paths/walkways? Please address in detail in the EIR

LC11 11. Along with Transportation and Circulation, area flooding is a major concern of residents and businesses in the Project area. **Action:** How is the Alvarado Creek flood potential to be addressed with the Transit Oriented plan? Will the 2500 units be on stilts, fill etc.; the cost of development within the 2000 feet of the trolley seems to be prohibitive; Is it? Please address this in the EIR.

RESPONSE TO COMMENT LETTER FROM LEE CAMPBELL, DATED FEBRUARY 13, 2005 (cont.d)

Response to Comment LC6 (cont.d):

evaluated as to their environmental impacts and potential for redistribution of traffic should they be considered in the future. The City agrees that additional analysis of the extension of these roadways would be required, and there is currently no funding identified for these improvements.

Response to Comment LC7:

The roadway segment referenced by the commentor was included in the traffic analysis. Additionally, this segment would not be excluded from consideration as part of the redevelopment plan improvements.

Response to Comment LC8:

The TOD does not propose any use or development at this time, it is included in the EIR as a potential alternative to reduce the potentially significant traffic and air quality impacts associated with the proposed project (see responses to comments SNDG3, DD10, DD12, RM5, DRS19, and LM4). Compliance with City of San Diego Municipal Code parking regulations would be required for any future development within the Project Area.

Response to Comment LC9:

Please refer to response to comment BW 1.

Response to Comment LC10:

The adopted Community Plans depict the planned circulation network for the community planning area. Any proposed traffic improvements would need to include trail systems as designated in the Community Plan and/or roadway classification. The EIR does not specifically account for a deduction in vehicular trip generated based on the availability of existing or planned trails systems; although it is widely recognized that such systems are beneficial to overall circulation and are encouraged as part of the redevelopment plan (see Draft Redevelopment Plan Objectives #2 and #3).

Response to Comment LC11:

The potential flooding of Alvarado Creek is identified in the EIR (see Section 4.11 Water Quality/Hydrology). Regardless of what type of development is proposed within the Project Area, flooding issues will need to be addressed. Mitigation Measure HD1 is proposed to ensure that a detailed hydrology study is prepared for each specific development and that drainage and flooding is addressed as part of redevelopment activities.

LC12 12. **Action:** With the TOD alternate plan, increased density in the Mission Gorge Area has the impact to the interstates been considered? How will Caltrans accommodate this? Please address this in the EIR ; provide or reference Caltrans data.

LC13 13. Per vol 2 appendix D, the average daily traffic at the interstate 8 underpass to Mission Gorge will be between 76,600 and 88,195 average daily trips. (Highway 52 currently has an average daily tip count of 80,000). **Action**: Will Mission Gorge Road qualify to be upgraded to a freeway status (e.g., 125 south)?

LC14 14. When mitigation measures are addressed, there is no cost identified. Mitigation for vegetation, biological, Lust case environmental, groundwater, paleontological, etc. impacts could be very high. **Action**: Please include a relative cost such as with the traffic impacts; i.e., significant,...insignificant for all mitigation measures and relate to overall cost of the project.

LC15 15. There are a significant number of open LUST cases in the area A Mission Gorge corridor. **Action**: Please identify how long these cases have been open. Who will pay for the cleanup? Will cleanup be funded by redevelopment return?

LC16 16. The Flooding coverage is totally inadequate. Traffic and flooding in the project area are among the top three major goals of the Redevelopment Area. Traffic has been addressed in great detail and analysis (in Vol. 2). **Action**: The issue of flooding must be addressed in its own section as is section 4.2- Transportation. In addition, there must include an analysis appendix for flooding which should include A. current volumes of water that can be accommodated, B. the Horizon year volumes that must be in place to prevent flooding, C. how the Fairmont Avenue under interstate 8 will be prevented from flooding which when flooded stops all traffic. D. Mitigation such as motorized water barriers and pumps that could be implemented in time of flooding, how the 2500 residential units of the alternate plan could be designed (on stilts or provided with pumps for ground level parking garages). In addition, include a map of current drainage facilities. Finally, flooding in the area is a concern of shop owners and residents in the area and should not be addressed on a development project by development project as mitigation HD1, page 4.11-18, suggests. Flooding is an immediate and global concern in the project area.

LC17 17. When discussing the alternatives there is a global practice within the EIR to make statements like in para. 8.1.1.1, "Overall, the land use impact would be greater than under the proposed project, as land use goals identified within applicable community plans would not be achieved." When these statements are not backed up with references to the "applicable community plan" goals or paragraphs within the EIR defining these goals, the argument looses credibility. **Action**: Please enhance all such paragraphs throughout the EIR with community plan paragraph references or list the goals with para. references.

LC18 18. Table 2 is missing from vol. 2, appendix D. It is assumed that this table should be the summary of the CNEL analysis for the 2030 horizon year with no community plan project. **Action**: Please include this table in the document.

RESPONSE TO COMMENT LETTER FROM LEE CAMPBELL, DATED FEBRUARY 13, 2005 (cont.d)

Response to Comment LC12:

CEQA does not require an evaluation of alternatives at the same level of detail as is conducted for the proposed project. Potential impacts to the circulation system are evaluated for the proposed project and the General Plan Opportunities Areas Map Concept. Although less traffic is estimated to be generated under the TOD alternative, it is anticipated that improvements would be required to the I-8/Mission Gorge Area, regardless of the future land uses in this area. As identified in the EIR, improvements are needed for this area in the existing condition. Please also refer to responses to comment DOT3 and DRS17.

Response to Comment LC13:

There are no plans to improve Mission Gorge Road to a freeway; however, Mission Gorge Road from Fairmount Avenue to Interstate 8 is planned as a six-lane major.

Response to Comment LC14:

CEQA does not require specific costs to be identified for recommended mitigation measures. According to CEQA Guideline Section 15364, "'Feasible' means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." As such, only those improvements identified in the adopted Navajo Community Plan are assumed and have been analyzed in the EIR. The cost associated with future improvements would depend on engineering, environmental, land use, and right-of-way constraints.

Response to Comment LC15:

EIR Table 4.8-1 identifies the open LUST cases and provides historical data related to each facility. The responsible entity for site remediation will be depending on property transfer agreements and/or the entity proposing improvements to the property. The Agency may contribute to site remediation.

Response to Comment LC16:

Flooding is addressed comprehensively in EIR Section 4.11 Water Quality/Hydrology. Overflow of the Alvarado drainage is identified as an existing drainage deficiency in the EIR (see EIR pages 4.11-15 and 4.11-16, and Figure 4.11-2). As identified in the Draft Redevelopment Plan, an objective of the plan is to make storm drain improvements particularly to properties affected by the Alvarado Creek and San Diego River (Objectives #3). Mitigation Measure HD1 is proposed to ensure that a detailed hydrology study is prepared for each specific development and that drainage and flooding is addressed as part of redevelopment activities. Specific mitigation measures would be developed for individual projects to ensure that flooding and

RESPONSE TO COMMENT LETTER FROM LEE CAMPBELL, DATED FEBRUARY 13, 2005 (cont.d)

Response to Comment LC16 (cont.d):

drainage improvements are made to accommodate new development, and/or repair existing drainage infrastructure. Please also refer to responses to comments DD5, DD7, BC3, DRS6, and LC11.

Response to Comment LC17:

The applicable goals of the community plan are defined in Section 2.3 Planning Context of the EIR. Because these alternatives would require community plan land use amendments for implementation, the applicable goals, as described in Section 2.3 would need to be reevaluated by the appropriate planning group to determine whether they apply to the new land uses. As an example, the existing Tierrasanta Community plan land use for the sand and gravel area is Open Space with a Sand and Gravel subcategory. The General Plan Opportunities Area Map shows this area as 50% Open Space and 50% Industrial. Development of 50% this area with industrial uses would not likely meet the community plan's goals of:

- Upon termination of the sand and gravel operations, the excavated area should be rehabilitiated and a pathway to Mission Trails park provided. Any other use of the property beyond open space uses will require an amendment to this plan.

- Designated open space areas which are not to be acquired by the City should be allowed to apply the adjacent residential density for development purposes. Clustered development should then be used to avoid development impacts on the designated open space.

Response to Comment LC18:

Table 2, Appendix D, was not reproduced due to an apparent printing error. However, as indicated on Table 4.4-7, Future Noise Levels (CNEL), the project contribution to the future with project scenario ranges between 0 and 3.5 dB(A) increase on area roadways.

LC19 19. Table 3, vol. 2, appendix D is labeled "Alternative". **Action**: Please label to identify which alternative. It is assumed that it is the alternative to the community Plan; which is the Redevelopment Plan.

LC20 20. Throughout the EIR there has been a tendency to justify an alternative by statements or phrases such as identifying the date that a community plan was adopted (ref. Para 3.6.2). These kinds of statements appear to be inserted to "sell" redevelopment since, for example, the community plan is so old. In other cases when "selling" is trying to show that redevelopment is what the people want, a statement like "and this is consistent with the community plan" is used. **Action**: Remove these phrases "and is consistent with the community plan" and similar ones since the community plans are being set aside and later rewritten to comply with whatever redevelopment 'plan' is selected. If left in identify specifically the community plan and the appropriate paragraph.

LC21 21. No concluding paragraphs include a technical summary of the data provided in the section paragraphs; instead there are statements using words or phrases like "similar", "would not meet most of the basic objectives", "superior". **Action:** Add summary data that defines what these words are describing.

LC22 22. **Action**: Please provide a timeline chart or graphs showing the Caltrans improvements needed at I-8 (and other Caltrans roads) related to the proposed development activity (all alternatives), the peak traffic and infrastructure impact in the development area during the transition, the tax increment funds expected to support the traffic and infrastructure. It is expected that this would show a lagging curve with development first, funding lagging, and city and caltrans traffic and infrastructure improvements lagging funding. It is expected that the lag from beginning of development in the area to be 8 to 10 years. Will the city issue bonds to close the gap? Please address this in the EIR (and the Draft Development Plan).

Specific Comments Volume 1

LC23 1. page 2-2; para. 2.2.1. Land uses also include restaurants which because they are leased in small retail shopping strips are a blight to the area due to parking demand of restaurants on the associated undersized parking lots.
Action: Add "restaurants" to the first sentence.

LC24 2. page 2-2; para. 2.2.3 Second paragraph- Comment: Mission Gorge is a basin of polution. This is an area that is on a smaller scale much like the city of El Cajon and pollution due to traffic and industrial activity is boxed in at periods during the day and night. This pollution is blown into Tierrasanta by the afternoon and evening winds. An increase in traffic of up to163% times 2004 traffic (TOD plan) can cause severe vs. significant pollution in the Tierrasanta community. Action: Please address and provide analysis for the entire Tierrasanta Community Plan area for all development options when addressing pollution.

RESPONSE TO COMMENT LETTER FROM LEE CAMPBELL, DATED FEBRUARY 13, 2005 (cont.d)

Response to Comment LC19:
EIR Volume II, Appendix D, Table 3 depicts the noise levels associated with the General Plan Opportunity Areas Map Concept. While the technical data is provided in the appendix, the information is also provided graphically on EIR Figure 8-5.

Response to Comment LC20:
CEQA requires the evaluation of adopted plans and the Redevelopment Plan is required to be consistent with the General Plan. The Agency is not aware that existing Community Plans are being set aside and all development in the City is reviewed for consistency with the applicable adopted community plan.

Response to Comment LC21:
CEQA only requires the analysis of alternatives on a qualitative level; although where possible, additional technical data has been provided. EIR Table 8-1 provides a summary comparison of project alternative impacts to proposed project impacts. Additionally, in certifying the EIR the Agency will adopt CEQA Findings, which will describe the specific basis for the rejection of each alternative. Please also refer to response to comment HSA28.

Response to Comment LC22:
None of the information requested by the commentor is available at this time. Please also refer to response to comment DOT3. The adoption of the redevelopment project would allow the Agency to issue bonds in order to facilitate transportation improvements in the Project Area.

Response to Comment LC23:
Commercial uses include, but are not limited to, restaurants.

Response to Comment LC24:
Sections 2-2 and 4-3 describe existing air quality conditions, which include regional air quality and neighboring communities. Please refer to response to comment LC4.

LC25 3. page 2-5, para 2.3.1 –Action: Add " retail and restaurant" to the last sentence.

LC26 4. page3-1, para. 3.1. The statement " The primary purpose of establishing this redevelopment project area is to create a strong economic base within, and for, portions of the Navajo and Tierrasanta Communities" It is not likely that there will be any economic base created "within and for" Tierrasanta except through taxes returned due to redevelopment and shared by the two communities. The redevelopment plan is clearly "for" the benefit of the Navajo community.

LC27 5. **Action**. Remove the reference to the Tierrasanta community from this paragraph.

LC28 6. page3-1, para. 3.1, first para.,- The sentence starting with "After adoption... improving the area's" should begin with "transportation/ circulation alleviate flooding."

LC29 7. page 3-10, para. 3.4.1 item 6. – Action: Insert as item 4. "alleviate flooding ..."

LC30 8. page 3-14, para 3.6.2.1 – **Action**: 1. Please add as third bullet as a goal from the Tierrasanta community plan related to the sand and grave extraction operations conditional use permit (CUP)"An access easement from Tierrasanta Boulevard to Mission Trailes Park will also be required ." (ref Tierrasanta Community Plan, page 54, second para.) . 2. Please reference Tierrasanta Community Plan paragraphs for the two bullets.

LC31 9. page 4.1-8, paras. A. and B. – states" goals applicable to the proposed project are described in Section 2.3 ...of the EIR. This is not the case para 2.3 references in general the "San Diego Progress Guide, the General Plan and the community plans and the Land Development Code". There are no specific references to community plan goals.

LC32 10. page 4.1-8, paras. A. and B. – These paragraphs should refer to "land use" Action: Remove statements identifying when the community plans of Navajo and Tierrasanta were adopted. Such references are made earlier in the document and continued reference to the age of the community plans sends a message to the reader that 'since the plans are old there should be redevelopment'.

LC33 11. page 4.1-6, paragraph 4.1.3.5 – states , "some of the existing development within the project area is not currently consistent with the land use designations identified in the ...Tierrasanta ... community plans. **Action**: Please identify specifically the developments in question for the Tierrasanta (and other community plans).

LC34 12. page 4.1-13 - Figure shows parcel 4550202500 as sand and gravel. **Action**: Please re-designate correctly as designated open space.

LC35 13. page 4.1-16, para 4.1.3.5, second para - states, "The Draft Redevelopment Plan (DRP) identifies these improvements"(related to public improvements identified in the community plans). **Action**: Since the DRP does not "identify" any specific

RESPONSE TO COMMENT LETTER FROM LEE CAMPBELL, DATED FEBRUARY 13, 2005 (cont.d)

Response to Comment LC25:
Section 2.3.1 discusses existing land uses designations. There is no specific retail and restaurant land use within the Project Area. These uses are allowed in the commercial zones.

Response to Comment LC26:
Comment noted.

Response to Comment LC27:
No change to the EIR is proposed. This EIR text is a component of the project description as defined by the Agency.

Response to Comment LC28:
Please refer to responses to comments DD2, DD5, DD7, BC3, DRS6, LC11, and LC16.

Response to Comment LC29:
Please refer to responses to comments DD2, DD5, DD7, BC3, DRS6, LC11, and LC16.

Response to Comment LC30:
The text referenced by the commentor is provided on page 54 of the Tierrasanta Community Plan, but is not a specific goal. EIR page 3-14 lists applicable goals.

EIR page 3-14 has been modified to reflect the exact language as provided in the Tierrasanta Community Plan as follows (see response to comment TCC3):

- Upon termination of the sand and gravel operations, the excavated area should be rehabilitiated and a pathway to Mission Trails park provided. Any other use of the property beyond open space uses will require an amendment to this plan. (page 56)
- Designated open space areas which are not to be acquired by the City should be allowed to apply the adjacent residential density for development purposes. Clustered development should then be used to avoid development impacts on the designated open space. (page 55)

Response to Comment LC31:
EIR page 4.1-8 states goals applicable to the proposed project are described in Section 2.3 and Section 3.6 of this EIR. Section 3.6 lists the applicable goals of the Tierrasanta Community Plan. No change to the EIR is proposed.

RESPONSE TO COMMENT LETTER FROM LEE CAMPBELL, DATED FEBRUARY 13, 2005 (cont.d)

Response to Comment LC32:
Comment noted. However, the EIR simply states the date of adoption of the applicable community plans.

Response to Comment LC33:
EIR page 4.1-16 has been modified as follows:

> The project is required to comply with the adopted Community Plans in order to guide the orderly growth of the community. Some of the existing development within the Project Area is not currently consistent with the land use designations identified in the Navajo~~, Tierrasanta and College Area~~ Community Plans;

Response to Comment LC34:
EIR Figure 4.1-2 has been modified to depict the referenced parcel as Open Space.

Response to Comment LC35:
The Community Plans identify public improvements (e.g., roadway classifications, bike facilities, parks, etc.). The Draft Redevelopment Plan does not identify specific improvements; however, these improvements will be identified in the 5-Year implementation plan. Please also refer to response to comments DD5 and RM3.

improvements, please modify para. 4.1.3.5 to identify the specific improvements that will be implemented when funds become available.

LC36 14. **page 4.2-2, para 4.2.1.2** – states, "However, the segment of Old Cliffs road to Katelyn Court is a 4-lane roadway and the segment of Katelyn Court to Princess View Drive is a 5-lane roadway." **Action:** Although not specifically stating that this area is a bottleneck it is logical to conclude that this section of Mission Gorge Road will be a bottleneck. If as alluded, the extensions of the Navajo, Santo, Tierrasanta, and Jackson roads are part of the 2030 redevelopment goals then impacts to the circulation in the Mission Gorge segments between Katelyn and Princess View are inevitable. Please add these sections of Mission Gorge Rd. to the analysis (and table 4.2-1 identifying existing LOS) .

LC37 15. page 4.2-3, table 4.2-1 – shows I-8 east bound to Camino del Rio North as 4 lane. **Action:** It is a 2 lane off ramp from the 8 to Fairmount, which is 4 lanes then Camino del Rio North is 4 lanes. EB from Camino Del Rio to 8 east is a one lane on-ramp. Please review and recalculate the LOS etc.

LC38 16. page 4.2-3, table 4.2-1 – shows I-15 NB Ramps to Rancho Mission Road as 6 lanes. **Action:** The Ramp is currently 1 lane and may be 2 lanes with re-striping Please review and recalculate LOS.

LC39 17. page 4.2-3, table 4.2-2 – shows the peak hour delay. **Action:** Please modify the table to traffic that causes the delays. Please address the peak time of day related to pollution also.

LC40 18. page 4.2-9 – Table 4.2-4 is identified as "Trip Generation for the Proposed Project" but in vol 2 page 14 the same table is labeled "Trip Generation for the Additional Land Use in the Community Plan". **Action:** Please change Table 4.2-4 title to be more descriptive and correct to "Trip Generation Added by the Redevelopment Project for the Additional Land Use in the Community Plan". Als

LC41 19. page 4.2-9 first paragraph states, "Figure 4.2-4 shows the increase in trips that the project would add to the circulation network using the distributions shown in appendix D of the traffic technical study. The same table in vol 2, page 13 is introduced by, "As shown in Table 4, the community Plan Scenario would add 31,606 daily trips to the circulation network ..." Action: Please modify the table 4.2-4 to show that Daily Trips are actually "Daily Increase in Trips".

LC42 20. **page 4.2-11, para.** 4.2.3.5 – Comment: There is reference to road extensions in the Navajo and Tierrasanta community plans. **Action:** Councilman Madaffer, recognizing the traffic, environmental, and blighting impacts to the respective communities of completing these extensions, has requested that these extensions be removed from the community plans (see attached). For example, the diversion of traffic from I-15 (at Tierrasanta Blvd) and route 52(at Santo Road) through Tierrasanta and merging with a possible 41000 vehicles per day on Mission Gorge Road at Princess View would devastate both communities. Please provide the analysis necessary for these intersections since it is

RESPONSE TO COMMENT LETTER FROM LEE CAMPBELL, DATED FEBRUARY 13, 2005 (cont.d)

Response to Comment LC36:
The segment of Mission Gorge Road between Zion Avenue and Princess View Drive is analyzed as one segment. In the future, the average daily traffic (ADT) for this segment is 33,200, 39,500, and 41,200 without any redevelopment, with the Community Plan redevelopment, and with the Alternative redevelopment, respectively. The Navajo Community Plan shows that Mission Gorge Road will be improved to a six-lane facility in the future. Therefore, the segment of Mission Gorge Road between Zion Avenue and Princess View Drive will operate at LOS C without the project as well as under the Community Plan redevelopment, and LOS D under the Alternative Plan.

Response to Comment LC37:
The segment that Table 4.2-1 is referring to is Fairmount Avenue from I-8 eastbound ramps to Camino Del Rio North, which is four lanes.

Response to Comment LC38:
The segment that Table 4.2-1 is referring to is Friars Road from I-15 northbound ramps to Rancho Mission Road, which is six lanes.

Response to Comment LC39:
Please refer to response to comment CLA3.

Response to Comment LC40:
The proposed project is the trip generation associated with buildout of the community plan land uses. No change to the EIR is proposed.

Response to Comment LC41:
EIR Table 4.2-4 depicts the Trip Generation for the Proposed Project, which is the increase in trips. EIR page 4.2-8 text explains that, "As shown in Table 4.2-4, redevelopment activities according to the existing Community Plan would add 31,606 daily trips ... " No change to the EIR is proposed.

Response to Comment LC42:
The EIR traffic analysis does not assume the extension of roadways as referenced by the commentor. Please refer to responses to comments AG2 and LC6.

stated elsewhere in the EIR (see para 4.2.5) that "when money is available" these 'improvements' will be accomplished.

LC43 21. page 4.2-14, para. 4.2.3.5 "Peak hour intersection performance" Table 4.2-6 should be labeled "Year 2030 Peak Hour Intersection Performance with and without the Redevelopment Project."

LC44 22. page 4.2-18, figure 4.2-8 – The bubble for the Princes View/Mission Gorge should have 0 (zero) on the right turn arrow pointing toward Tierrasanta.

LC45 23. page 4.2-20, para 4.2.4 – states,"Proposed redevelopment activities based on existing community plan land uses are anticipated to add 31,606 trips per day to the circulation network with 3,280 trips occurring in the morning peak hour and 4,346 trips occurring during the afternoon peak hour. **Action:** It appears it is stating that the peak trips are the added peak trips; what will be the total peak trips? (3280/60 = 55 trips/minute = approx 1/sec. --- cars are traveling at 60 mph)

LC46 24. page 4.2-20, para 4.2.5 – states, "Improvements within the Navajo and Tierrasanta Community Plans shall be implemented as sufficient financial resources become available through the establishment of the proposed redevelopment project area." **Action:** These 'improvements' are identified and alluded to throughout the EIR. It is clear from the para 4.2.5 statement that there is a "plan" to extend the Jackson Drive, Santo Road, Tierrasanta Blvd. and Navajo Roads as part of the 30 year redevelopment effort. This is the first place that specifically states these 'improvements' "shall" be completed. The city knows the opposition the respective communities have to extending these roads and it continues to inch away at every opportunity trying to weasel these community and environmentally devastating roads into a city that has a policy of 'development first and freeways will accommodate later'. Please remove every reference to these 'improvements' or conduct and publish the analysis that shows acceptability based on todays peak and average traffic and that of the horizon year 2030. What other improvements would the EIR framers be considering if not those stated above?

LC47 25. page 4.3-15, para 4.3.6.2 States: "The long term impact is considered significant and unavoidable, as there are no technologies available to reduce the future vehicular related air pollutant emissions to a level less than significant. However, the project is consistent with the General Plan (Navajo, Tierrasanta and College Area Community Plans) and no conflict with implementation of the RAQS is anticipated." **Action:** Please explain how this is consistent with the community plan of Tierrasanta. Significant impacts due to pollution will affect Tierrasanta as a whole and the community plan does not endorse more pollution. If this paragraph pertains only to the three segments in the Tierrasanta Community Plan that are also in the Redevelopment Plan then it still is not consistent. Please remove the second sentence and replace with: "Because the Grantville / Mission Gorge area lies in a basin significant air pollution will disperse into the whole of the communities of Navajo, Tierrasanta and the College Area." Also from the Tierrasanta community Plan – page 5, "Tierrasanta has become known as a high quality planned

RESPONSE TO COMMENT LETTER FROM LEE CAMPBELL, DATED FEBRUARY 13, 2005 (cont.d)

Response to Comment LC43:
Table 4.2-6 has been relabeled, "Year 2030 Peak Hour Intersection Conditions with and without the Community Plan Project."

Response to Comment LC44:
Please refer to responses to comments TCC6 and TCC7.

Response to Comment LC45:
The total trips for the redevelopment area under the Community Plan are: 172,567 daily, 14,621 AM peak hour and 21,427 PM peak hour trips.

Response to Comment LC46:
Please refer to response to comment LC42.

Response to Comment LC47:
Because no land use amendment is proposed for the Tierrasanta Community plan as part of the redevelopment plan adoption process, the project would be consistent with the RAQS as is described on EIR pages 4.3-6 and 4.3-13. No additional change to the EIR text is proposed.

community". Will it remain high quality by allowing an increase in pollution caused by traffic.

LC48 26. page 4-4-7, para 4.44.8 –Paragraph miss-numbered (and out of place in my book).

LC49 27. page 4.4-13 Table 4.4-6 This construction noise will last for a period of 30 years. How will people be encouraged to live in a long-term construction zone?

LC50 28. page 4.5-3, para 4.5.1.2 – Why is the flume south of the gravel operations on the Tierrasanta portion of the development plan not identified?

LC51 29. page 4.6-25, second paragraph, second sentence – add "Tierrasanta" before "Community Plan"

LC52 30. page 4.6-29, sub para labled "BR1" – Please summarize the "redevelopment project polices" or reference in the EIR.

LC53 31. page 4.6-31, para B. Subarea B, first sentence – add "Navajo" before "Community Plan"

LC54 32. page 4.9-2, last para. – change "is" to "are". \

LC55 33. page 4.10-5, para 4.10.5 Mitigation Measures – change third bullet second sentence to read "Road between interstate 8 to 500 feet north of ..."

LC56 34. page 4.10-5, para 4.10.5 Mitigation Measures – add new bullet - "The height of the structures adjacent to the river shall not be higher than three stories from just North of Princess View and shall be designed to be an esthetically suitable for the river park area as defined in the San Diego River Park Master Plan. \

LC57 35. page 4.10-5, para 4.10.5 Mitigation Measures – last bullet –change "should be sensitive to it, as" to "shall be sensitive to the Mission Trails Regional Park, the Goals proposed by the San Diego River Master Plan, and as"

LC58 36. page 4.11-3 para 4.11.1.2 – the issue of flooding has been avoided!!!!

LC59 37. page 5-3 last paragraph – states, "Traffic improvements are identified with the Navajo and Tierrsanta Community Plans, and also as discussed in section 4.2, that when implemented, would help to reduce the cumulative traffic impact. However, the ... cumulative impact would remain significant and unavoidable." **Action:** Were there traffic studies done? Is there some analysis to show that there 'would be a reduction in the cumulative impact' (It is not in vol 2 with the other detailed traffic analysis? Is there data to show that portions of Navajo and Tierrasanta that are outside of the development area would not be significantly impacted? Logically if the development area remains significantly impacted then any benefit gained by diverting traffic outside of the development area would result in shifting significant impacts to non-plan areas of

RESPONSE TO COMMENT LETTER FROM LEE CAMPBELL, DATED FEBRUARY 13, 2005 (cont.d)

Response to Comment LC48:
EIR page 4.4-7 has been placed in the correct location.

Response to Comment LC49:
Construction projects will occur at various locations throughout the Project Area. These noise levels will not be constant over a 30-year period. The length of any particular construction project would vary significantly depending on the size and type of project. All construction projects would need to comply with City of San Diego Municipal Code Section 59.5.0404.

Response to Comment LC50:
Please refer to response to comment BW1.

Response to Comment LC51:
EIR page 4.6-25 has been modified as follows:

> Within the area labeled 'C6' (Figure 4.6-3), there is a vacant, undeveloped lot that is designated as Industrial and Sand and Gravel use in the Tierrasanta Community Plan.

Response to Comment LC52:
EIR Mitigation Measure BR1 simply requires that redevelopment activities use of project designs, engineering, and construction practices that minimize impacts to sensitive habitats and wildlife corridor/MHPA preserve areas. This is in addition to other biological mitigation measures as identified in Section 4.6, Biological Resources.

Response to Comment LC53:
EIR page 4.6-31 has been modified as follows:

> Specifically, portions of the area labeled 'O3' in Subarea B (Figure 4.6-3) in the Navajo Community Plan Land Use are currently being used for Industrial purposes, but are designated as Open Space.

Response to Comment LC54:
EIR page 4.9-2 has been modified as follows:

> The specific location and nature of future redevelopment projects ~~is~~ are currently unknown.

RESPONSE TO COMMENT LETTER FROM LEE CAMPBELL, DATED FEBRUARY 13, 2005 (cont.d)

Response to Comment LC55:
The guidelines referenced in Mitigation Measure A1 are from the existing community plan language and no change is proposed.

Response to Comment LC56:
Limitation of building heights is not proposed as a mitigation measure at this level of environmental analysis. Please refer to response to comment TCC13.

Response to Comment LC57:
Please refer to response to comment LC55.

Response to Comment LC58:
Please refer to response to comment LC16.

Response to Comment LC59:
Traffic for traffic improvements identified within the adopted community plans were conducted in conjunction with the preparation and adoption of the community plan. Additionally, improvements identified in Section 4.2 of the EIR were studied as part of the traffic analysis. The EIR does not state that these improvements would reduce cumulative traffic. The EIR states that these improvements would help to reduce the cumulative traffic impact. Any future implementation of these improvements as identified within the adopted community plan would require additional traffic analysis based on current and projected traffic patterns. Please also refer to responses to comments DOT3, AG2, and DRS17.

Navajo and Tierrasanta. Is this not true? Please delete the last two sentences from Para 5.1.2.

LC60 38. page 6-1, para 4, next to last sentence, Please explain what "extension of new infrastructure" means and be specific.

LC61 39. page 7-1, para 7.2 – Since traffic is going to be substantially increased in the project area will there be adequate pedestrian and handicap access across Mission Gorge Road to get to the River Park?

LC62 40. para 8.0 - Please add a para that covers "Effects Found Not to Be Significant" – The Alternate plan has the highest traffic impact with 65,895 average daily traffic between Mission Gorge place and Twain Ave vs 26,268 currently. Currently it is difficult to cross the streets due to traffic and with 2500 housing units in the area a large volume of pedestrians and bicyclists would expect safe access to the River Park in addition to the shops in the area. Action: Please add this issue as a sub-paragraph when addressing the alternatives of section 8.

LC63 41. page 8.2, table 8-1 – The transit oriented development alternative transportation circulation item is listed as less impact than the proposed plan. **Action:** Refer to the attached tables 1,3 and 4 (from vol 2) showing significant increase in transportation impact over the project plan and existing plan. Please re-visit this and explain or correct.

LC64 42. **page 8.2, table 8-1** – The no-project alternative is shown as having a greater transportation/circulation impact. The attached tables 1,3 and 4 (from vol 2) show significant increases in transportation impact over the project plan. **Action:** Please re-visit this and explain or correct.

LC65 43. page 8-3 para 8.1.1.3 – states, "Overall, the air quality impact would be greater than the proposed project." With the traffic increase in the project area of near 50% higher than the no project alternative (see attached tables 1, 3, and 4 from vol 2) this appears to not be true. **Action:** Please review and amplify the discussion to clarify while considering this traffic increase. Refer to section 4.3.5 and define the "upgrading or replacing stationary air pollution control equipment" in 8.1.1.3 and 4.3.5.

LC66 44. page 8-6, para 8.1.15 – states, "..this alternative would not meet most of the basic objectives of the proposed project." **Action:** Please summarize these objectives and discus in para. 8.1.15 (referring to volume 2 would be good) so that the reader is not required to depend on faith.

LC67 45. page 8-8, para 8.2.1.15 - states, "..This alternative would not meet most of the basic objectives of the proposed project." Action: This statement is not appropriate in an engineering document. After stating that the No-additional development alternative "is environmentally superior to the proposed project" the paragraph goes on to state" this alternative will have greater impacts with hazardous materials, aesthetics and water quality/hydrology." There is a balance here that should be addressed and the statement,"

RESPONSE TO COMMENT LETTER FROM LEE CAMPBELL, DATED FEBRUARY 13, 2005 (cont.d)

Response to Comment LC60:
Reference to extension of infrastructure includes public facilities such as sewer and water pipelines, and roadways.

Response to Comment LC61:
Please refer to response to comment LC10.

Response to Comment LC62:
The comment is noted; however, the change suggested by the commentor is nor required by CEQA. CEQA requires a comparative evaluation of alternatives to the proposed project that may potentially reduce or avoid the significant impacts associated with the proposed project.

Response to Comment LC63:
The data referenced by the commentor is for the General Plan Opportunities Area Map Alternative not the Transit Oriented Development Alternative. Please also refer to response to comment LC12.

Response to Comment LC64:
The No Project Alternative is compared to the proposed project; it is not compared to the General Plan Opportunities Area Map Alternative. The proposed project assumes development of the Project Area according to existing adopted community plan land uses. The No Project also assumes that the Project Area would be developed according to existing adopted community plan land uses. The conclusion that the No Project Alternative would result in a greater impact is based on the assumption that the overall development levels would be the same (although would occur at a slower pace); however, there would not be a mechanism to initiate private property access improvements and financing for public infrastructure improvements.

Response to Comment LC65:
The conclusion of a significant and unavoidable air quality impact is a result of the projected Project Area and regional vehicular traffic. EIR page 8-3 has been modified as follows:

> However, the beneficial air quality effects of implementing a redevelopment plan, including provisions of public infrastructure improvements ~~and upgrading or replacing stationary air pollution control equipment~~ may not be implemented.

RESPONSE TO COMMENT LETTER FROM LEE CAMPBELL, DATED FEBRUARY 13, 2005 (cont.d)

Response to Comment LC66:

Because no Redevelopment Plan would be implemented, the No Project alternative would not meet most of the basic objectives of the proposed project (adoption of a redevelopment project area) as identified on EIR page 3-10.

Response to Comment LC67:

Because no Redevelopment Plan would be implemented and revitalization activities would not occur, the No Development alternative would not meet most of the basic objectives of the proposed project (adoption of a redevelopment project area) as identified on EIR page 3-10. Please also refer to response to comment HSA28.

"This alternative would not meet most of the basic objectives of the proposed project." Does not answer the question. This statement does beg the question and is not appropriate in what should be an objective engineering report. Please remove this statement here and from all other portions of the EIR.

LC68 46. page 8-9, para 8.3.1.2 **Action**: Change to read"...a net increase of 50,359 daily trips (see table 4.2-3) compared to the proposed redevelopment project which is estimated to generate an increase of 31,606 daily trips" (see table 4.2-2).

LC69 47. page 8-9, table 8-2, Action: Change table title to "Increased Trip Generation for the General Plan Area Map Opportunities Alternative" . Change summation (bottom line) of table to read, "Total Increased Alternative Project Area Trips.

LC70 48. page 8-22, para 8.3.1.15 – States this alternative would meet most of the basic objectives of the proposed project." Action: This statement does not include the restatement of the basic objective. For one, traffic will be unacceptable (see tables 1,3, and 4 of appendix D. vol. 2, attached). Traffic at I-8 currently is 48,581, with the project plan it will be 76,600 and with the general Plan Area Opportunities Map Alternative it will be 88,195. Include this data in the conclusion.

LC71 49. page 8-22, Para 8.4 – There appears to be no analysis for the TOD plan. Is it in vol. 2? Action: Add the analysis to vol. 2 shown the figures for the 2500 dwelling units. Please show how an increase of 2500 housing units would "result in less environmental impacts to transportation/circulation".

LC72 50. page 8-23, para. 8.4.1.2, From what analysis did the "7, 200 average daily trips less than the proposed project" for the TOD alternative originate. It is not covered in the vol.2 analysis. In fact the TOD alternative is not mentioned in vol. 2. **Action** : Please include the full TOD alternative analysis in vol. 2.

Additional Comments:

LC73 1. When and if the Navajo Community Plan is revised to accommodate the redevelopment plan, the communities of Allied Gardens and Grantville should become a separate area with is own community plan. The "economic vitalization" and the new character of this area that is projected due to the redevelopment of Grantville and Allied Gardens warrants strong consideration of this suggestion. Action: Please address this possibility and include in the EIR when addressing the revising of the Navajo Community plan and the Tierrasanta Community Plan.

LC74 2. The EIR appears to be a large brochure selling redevelopment. For example:
   a. using phrases such as, 'this is consistent with the community plan"
   b. using tables such as table 4.2-4 showing (increased) "trip generation for the proposed (community plan)project". And labeling in bold text (Total Community Plan Trips" is the bottom line of the table. The casual reviewer of the EIR would read the table as it literally depicts. That is, that there are 31,606 actual trips that

RESPONSE TO COMMENT LETTER FROM LEE CAMPBELL, DATED FEBRUARY 13, 2005 (cont.d)

Response to Comment LC68:
The trip generation associated with the proposed project is depicted on Table 4.2-4. The trip generation associated with the General Plan Opportunities Area Map alternative is shown in Table 8-2. The text on EIR page 8-9 has been modified as follows for clarification:

> Redevelopment of the Project Area according to the General Plan Opportunity Areas Map Alternative would generate a net increase of 50,359 daily trips (see Table 8-2). ~~(~~the proposed project is estimated to generate approximately 31,606 daily trips)(see Table 4.2-4).

Response to Comment LC69:
Table 8-2 depicts the trip generation estimated for the General Plan Opportunities Map Alternative which is 50,359. This is a net increase of 18,753 average daily trips over the proposed project.

Response to Comment LC70:
Comment noted. Please refer to response to comment HSA28.

Response to Comment LC71:
Please refer to response to comment LC12.

Response to Comment LC72:
Please refer to response to comment LC12.

Response to Comment LC73:
Comment noted. Any amendment to the Navajo Community Plan, including formation of the communities of Allied Gardens and Grantville into a new community plan area, would require review and approval by the City, including detailed CEQA analysis and preparation of a new community plan.

Response to Comment LC74:
Comment noted. The reported trip generation is based on development of existing adopted community plan land uses in the Project Area.

LC74 (cont'd.)

will affect Mission Gorge due to the "proposed" project. Same comment for table 8-2.

c. The TOD alternative is not included in the vol. 2. It appears that the TOD alternative is an afterthought after it was realized that the analysis for the (Navajo) Community Plan project, and the Redevelopment Project was not acceptable. In fact, the best alternative was the "No Additional Development Alternative". So without time to send the Transit Oriented Alternative back to the analysts it was decided to drop the TOD alternative in the EIR with conjectural analysis and hope it sells.

LC75

d. The power of tables 1,2 and 4 in the vol. 2, appendix D. produced in 3 sequential pages would allow even the causal reviewer the opportunity to easily compare the alternative plans, related to traffic, yet this data is scattered in vol. 1 in tables 4.2-1, 8-3.

LC76

Thank you,

Lee Campbell

RESPONSE TO COMMENT LETTER FROM LEE CAMPBELL, DATED FEBRUARY 13, 2005 (cont.d)

Response to Comment LC75:

Please refer to response to comment LC12.

Response to Comment LC76:

Comment noted.

Attachments to follow:

LC77

1. Letter from Jim Madaffer Requesting thet road extensions be removed.
2. tables 1, 2 and 4 from Draft Grantville EIR vol 2, Appendix d.

RESPONSE TO COMMENT LETTER FROM LEE CAMPBELL, DATED FEBRUARY 13, 2005 (cont.d)

Response to Comment LC77:
Comment noted.

Table 1. Distance to CNEL Contour Lines, Existing, BRG Granville

Arterial / Reach	Arterial Type*	Speed Limit, mph	Elev.**	% Trucks Med.	% Trucks Hev.	Avg. Daily Traffic	CNEL @ 60' From Near Lane CL	Distance to Traffic CNEL Contours From Near Lane Centerline, feet 60dB	65dB	70dB	75dB	80dB
FRIARS ROAD												
I-15 NB Ramps to Rancho Mission Rd.	6	50	ABOVE	1.84%	0.74%	59,881	73.0	225	100	78	50	—
Rancho Mission Rd. to Santo Rd.	6	50	ABOVE	1.84%	0.74%	46,477	74.8	170	95	74	—	—
FAIRMOUNT AVENUE												
I-8 EB Off Ramp to Camino Del Rio N.	6	50	ABOVE	1.84%	0.74%	48,581	74.0	170	95	74	—	—
MISSION GORGE ROAD												
Mission Gorge Pl. to Twain Ave.	4	30	AT	1.84%	0.74%	26,268	67.0	185	75	—	—	—
Twain Ave. to Vandever Ave.	4	30	AT	1.84%	0.74%	23,041	66.5	170	69	—	—	—
Friars Rd. to Zion Ave.	6	45	AT	1.84%	0.74%	42,915	72.5	428	200	83	—	—
West of Princess View Dr.	6	45	AT	1.84%	0.74%	23,717	70.0	300	130	50	—	—
West of Jackson Dr.	6	55	ABOVE	1.84%	0.74%	18,705	71.0	310	82	57	—	—
WARING ROAD												
Zion Ave. to Orant Ave.	4	35	AT	1.84%	0.74%	16,771	66.5	170	69	—	—	—
South of Orant Ave.	4	35	AT	1.84%	0.74%	18,705	66.5	170	69	—	—	—

* Arterial Types: 1) 2 lanes, 35 mph or less; 2) 2 lanes, 40 mph; 3) 2 lanes, 45 mph or more; 4) 4-6 lanes, 35 mph or less; 5) 4-6 lanes, 40 mph; 6) 4-6 lanes, 45 mph or more; 7) 4-6 lane freeway, 55 mph or more; 8) 8 lane freeway, 55 mph or more.

** 'AT', 'ABOVE', and 'BELOW' refer to the elevation of the surrounding area relative to the arterial

Where and what is Table 2?

Table 3. Distance to CNEL Contour Lines, Horizon Year 2030 With Project, BRG Granville

Arterial / Reach	Arterial Type*	Speed Limit, mph	Elev.**	% Trucks Med.	% Trucks Hvy.	Avg. Daily Traffic 2030 w/ Proj.	CNEL @ 50' From Near Lane C/L 2030 w/ Proj.	Distance to Traffic CNEL Contours From Near Lane Centerline, feet 60dB	65dB	70dB	75dB	80dB
FRIARS ROAD												
I-15 NB Ramps to Rancho Mission Rd.	6	50	ABOVE	1.84%	0.74%	77,800	76.5	335	115	84	61	—
Rancho Mission Rd. to Santo Rd.	6	50	ABOVE	1.84%	0.74%	64,400	75.5	264	105	80	54	—
FAIRMOUNT AVENUE												
I-8 EB Off Ramp to Camino Del Rio N.	6	50	ABOVE	1.84%	0.74%	76,600	76.5	335	115	84	61	—
MISSION GORGE ROAD												
Mission Gorge Pl. to Twain Ave.	4	30	AT	1.84%	0.74%	34,300	70.5	320	143	56	—	—
Twain Ave. to Vandever Ave.	4	30	AT	1.84%	0.74%	51,000	70.0	300	130	50	—	—
Friars Rd. to Zion Ave.	6	45	AT	1.84%	0.74%	58,700	74.0	320	255	110	—	—
West of Princess View Dr.	6	45	AT	1.84%	0.74%	39,500	72.0	395	185	75	—	—
West of Jackson Dr.	6	35	ABOVE	1.84%	0.74%	34,500	73.5	155	93	72	—	—
WARING ROAD												
Zion Ave. to Orcutt Ave.	4	35	AT	1.84%	0.74%	18,800	66.5	170	69	—	—	—
South of Orcutt Ave.	4	35	AT	1.84%	0.74%	20,700	67.0	185	75	—	—	—

* Arterial Types: 1) 2 lanes, 35 mph or less; 2) 2 lanes, 40 mph; 3) 2 lanes, 45 mph or more; 4) 4-6 lanes, 35 mph or less; 5) 4-6 lanes, 40 mph; 6) 4-6 lanes, 45 mph or more; 7) 4-6 lane freeway, 55 mph or more; 8) 8 lane freeway, 55 mph or more.

** 'AT', 'ABOVE', and 'BELOW' refer to the elevation of the surrounding area relative to the arterial.

WIELAND ASSOCIATES

Table 4. Distance to CNEL Contour Lines, Alternative 2030, BRG Grantville

General Plan Area Opp Map

Arterial / Reach	Arterial Type*	Speed Limit, mph	Elev.**	% Trucks Med.	% Trucks Hvy.	Avg. Daily Traffic AR 2030	CNEL @ 50' From Near Lane CL AR 2030	Distance to Traffic CNEL Contours From Near Lane Centerline, feet 60dB	65dB	70dB	75dB	80dB
FRIARS ROAD												
I-15 NB Ramps to Rancho Mission Rd.	6	50	ABOVE	1.84%	0.74%	79,008	76.5	335	115	84	61	—
Rancho Mission Rd. to Santo Rd.	6	50	ABOVE	1.84%	0.74%	65,608	75.5	268	105	80	54	—
FAIRMOUNT AVENUE												
I-8 EB Off Ramp to Camino Del Rio N.	6	50	ABOVE	1.84%	0.74%	88,195	77.0	370	120	86	64	—
MISSION GORGE ROAD												
Mission Gorge Pl. to Twain Ave.	4	30	AT	1.84%	0.74%	63,895	71.0	340	155	62	—	—
Twain Ave. to Vandever Ave.	4	30	AT	1.84%	0.74%	62,595	71.0	340	155	62	—	—
Friars Rd. to Zion Ave.	6	45	AT	1.84%	0.74%	60,391	74.0	520	235	110	—	—
West of Princess View Dr.	6	45	AT	1.84%	0.74%	41,191	72.5	428	200	83	—	—
West of Jackson Dr.	6	55	ABOVE	1.84%	0.74%	36,191	74.0	170	95	74	—	—
WARING ROAD												
Zion Ave. to Orcutt Ave.	4	35	AT	1.84%	0.74%	17,999	66.5	170	69	—	—	—
South of Orcutt Ave.	4	35	AT	1.84%	0.74%	19,899	67.0	185	75	—	—	—

* Arterial Types: 1) 2 lanes, 35 mph or less, 2) 2 lanes, 40 mph; 3) 2 lanes, 45 mph or more; 4) 4-6 lanes, 35 mph or less; 5) 4-6 lanes, 40 mph; 6) 4-6 lanes, 45 mph or more; 7) 4-6 lane freeway, 55 mph or more; 8) 8 lane freeway, 55 mph or more.

** "AT", "ABOVE", and "BELOW" refer to the elevation of the surrounding area relative to the arterial.

THE CITY OF SAN DIEGO

JIM MADAFFER
COUNCILMEMBER
SEVENTH DISTRICT

April 28, 2002

Deanna Spahn, Chair
Tierrasanta Community Council
10371 Metador Court
San Diego, CA 92124

Dear Mrs. Spahn:

Recently, there has been a lot of misinformed community dialog on the issue of the City of San Diego's Master Bicycle Plan as it relates to the terminus of Tierrasanta Boulevard and the generated fears of Tierrasanta Boulevard connecting to Mission Gorge Road. I have done my best to keep the residents of Tierrasanta informed as to my thoughts on this matter. As a resident of Tierrasanta for nearly 20 years, I have never and will never support an extension of this road.

With the revised Tierrasanta Public Facilities Financing Plan (PFFP) up for approval by the City Council, and in an effort to bring these outstanding road projects to closure, I am requesting a letter from The Tierrasanta Community Council which formally asks the Council Office to work to remove the following projects from the Tierrasanta Community Plan:

PROJECT NUMBER	PROJECT DESCRIPTION
47-04B	Tierrasanta Boulevard-Colina Dorado to Mission Gorge Road
47-06B	Clairemont Mesa Boulevard-Rueda Drive to Jackson Drive
47-07	Jackson Drive-Mission Gorge Road to SR52
47-11	Santo Road-Patriot Street to Ambrosia Drive

—Continued—

As I have stated on numerous occasions, I am not in support of these projects, and it is my hope that removing them from the Community Plan will dispel any further discussion of the possibility of such matters.

Thank you for your cooperation in this matter. I look forward to working together to see these issues resolved.

Sincerely,

Jim Madaffer
Councilmember

JM/ea

cc: Tierrasanta Community Council Members

February 14, 2005

Mr. Tracy Reed
Redevelopment Agency
600 B Street
Fourth Floor, MS-904
San Diego CA 92101-4506

Dear Mr. Reed:

BT1 There are some issues I have regarding the Grantville Redevelopment Project. There are no housing units located within the Project Area; however, there is concern that housing will become an issue in the future which would have an impact on the whole infrastructure of the community. The household use of our water supply is only one area of impact.

BT2 I have a ready addressed traffic and safety that more cars and no roads is not going to give a balanced equation.

BT3 A potential historic structure, The Ascension Lutheran Church, not my church, should not be relocated or destroyed if that issue ever comes up due to the climate of the economy unless the congregation concurs. To do so would go against one of the reasons our country was founded, i.e., freedom to worship or not to worship as one chooses.

BT4 NCPI as the body to make the decisions if Redevelopment passes is not a good idea. Del Cerro and San Carlos together have 12 votes while Allied Gardens/Grantville have 6 votes - that is not equal representation.

Thank you for your time.

Respectfully submitted,

BT5 Betty Torre

Betty Torre
7124 Keighley Street
San Diego, CA 92120
Ph: (619) 286-1355

RESPONSE TO COMMENT LETTER FROM BETTY TORRE, DATED FEBRUARY 13, 2005

Response to Comment BT1:
Comment noted. The EIR evaluates the potential buildout of the Project Area, which contains primarily industrial and commercial uses. Please refer to responses to comments PRD2, DD12, RM4, BC5, LM6 and HSA2.

Response to Comment BT2:
Comment noted. Please also refer to DOT3 and DD6.

Response to Comment BT3:
Comment noted.

Response to Comment BT4:
Comment noted.

Response to Comment BT5:
Comment noted.

City Council Hearing
Public Comment on Grantville Redevelopment Project Draft Program EIR
January 25, 2005

MALE: Call the roll.

FEMALE: Council member Peters, Deputy Mayor Zucchet, Council member Atkins, Council member Young, Council member Maienschein, Council member Frye, Council member Madaffer, Council member Inzunza, Mayor Murphy.

MAYOR: Here.

MALE: When we broke for the noon recess, ah, we still had, ah, one redevelopment agency item that had not been finished. It was entitled, get my notes here. It was #2, actions regarding the public hearing to receive comments on the draft program environmental impact report for the Grantville Redevelopment Project. Um, staff ready to go on that? Um, we do have some speakers in opposition, ah, Mr. Madaffer, I guess I'm looking to you for your thoughts on this. Do we need a brief, brief staff report?

MR. MADAFFER: Well, I think the Council would probably want to have that, but, ah, it's up to the City Council.

MAYOR: Well let's give ah, let's do ah, can you give us a briefer one? Do you have a five-minute one instead of a 15-minute one?

MALE: Um, I can just go for this, yes, yes, Mayor.

MAYOR: Okay, why don't you see what you can do in five minutes and then we'll let the speakers speak to the item.

TRACY REED: Um, good morning, Mayor and Council members. I'm Tracy Reed. I'm the Project Manager for the Grantville Redevelopment Study. The redevelopment agency's procedures for implementing CEQA requirements require the agency to conduct a public hearing in order to obtain public testimony on the draft program EIR. The draft EIR provides a programmic evaluation of the potential impacts associated with the proposed redevelopment project. Um, the proposed redevelopment project, um, the proposed redevelopment plan is the project and is consistent with the adopted community plans and I kind of emphasized that it's consistent with the adopted community plans and that's quite a bit of what the questions are that we're getting from the public. Um, a majority of the project area is within the Navajo Community Plan area. Um, the project area consists of underutilized land and buildings, incompatible land uses, parcels of irregular size and form and insufficient parking and inadequate vehicle access and recently some flooding problems. Um, the adopted planning documents that govern this area are the City's general plan, the Navajo, Tierrasanta and the

College area community plan. Um, the map behind me today is the existing land uses for the project area and I emphasize that this is the existing land uses in the project area and not what the community plan land use designations are and, ah, the project area consists of 970 acres. As part of the Grantville Draft Program EIR, we're looking at the long-term environmental effects and CEQA defines significant effects as two or more effects, which, when considered together, increase other environmental impacts. The significant mitigated items that can be mitigated, um, regarding the impacts are water quality and hydrology, hazards and hazardous materials, biological resources, public services and air quality. Just to give you an example of how we can address the hydrology issue is that new development shall prepare a detailed hydrology study to address onsite and offsite drainage. Regarding the biology issues, the redevelopment policies would require the use of project designs and engineering and construction practices that would minimize impacts to sensitive habitats and there is significant, unavoidable impacts that would take place dealing with air quality admissions because of the additional traffic and that several roadway segments and intersections within the project area would experience a level of service E or F. That doesn't mean that they're not already at E or F. It's just part of the impacts as you build out per the community plan. CEQA also requires us to look at several alternatives. We did the no-development plan alternative. We did the no-additional-development alternative. We used the opportunity concept plan, which is in the new general plan, and we also used the transit-oriented principles. Under the transit-oriented principles, it anticipates land uses that would be consistent with the transit-oriented development principles and this alternative in the draft was found to be better than the proposed project or adopted community plan. The agency has provided several opportunities for the public to review and provide comments. We did a notice of preparation in July 22 of 2004. We had a scoping meeting in July 26, 2004. The draft has been out and distributed since December 13. We are having this public hearing and at the public comment period goes to January 31, 2005. The document has been distributed across a lot of spectrums. It has gone to the State Clearing House, 23 taxing agencies, the community planning groups. We have the Grantville Redevelopment Advisory Committee. It has been at the Navajo Service Center. It's a four different libraries and it's been available on the Internet since December 13. Regarding the Internet, we've had about 150 people access the document and look at different portions of it since it's been on the Internet. The map behind now illustrates the land uses per the Community Plan and you can see how the designations and the uses are a little bit more in mass areas instead of a mismatched quilt like the existing uses. The proposed redevelopment plan and project will reduce the occurrence of incompatible land uses that exist within the project area. And new development within the project area will comply with the adopted community plans and the City's land development code. And that concludes the status report.

MALE: Your Honor.

MAYOR: Okay, Mr. Madaffer, before I call on people you want to say something?

MR. MADAFFER: Yes, if that's okay with you, Your Honor. I just wanted to mention for, especially for those that might be testifying today, just my interest and I've checked with redevelopment staff on this of actually extending the public comment period beyond today's hearing to the 14th of February and I just wanted to have, that's Monday, February 14, just in the abundance of having the most time possible, I just want to make sure that that's okay with staff.

MALE: Yes, that works within our time-frame and schedule.

MAYOR: Okay? All right, we do have several speakers. Ah, let's begin with um, ah, hmh, Ray Bealman and then Albert Gotleib.

MALE: I'm Ray Billman.

MAYOR: Ray Billman, excuse me.

RB1 RB2 RB3

RAY BILLMAN: I'll start this out with the excitement, I called Mr. Reed quite awhile back and I, he answered the phone and he said where do you live. I says I live in Grantville. He says you're not involved, so we had a little turn there, but what happened was, I believe, is the houses were okay, but Mission Valley, the road down there and near the Mission and all the problems that they're having in that area. The thing that most people in Allied Gardens don't have have jobs and they don't know the details of what's going on. We just had another lot vacant up by the library. There was a single-housing unit. Immediate, shortly after the house was bought, they went condominiums for senior citizens. So right away, they want to change it to smaller units and these things keep happening on. The Allied Garden group, they're part of the Navajo. They had a meeting and they said an area wanted, the area was too high. You could only go so high. The developers wanted to go longer. They had a meeting and this is in the Allied Gardens area. They lost by one point, by one vote, and we had two members of that meeting there. So what happened is they got it, the Navajo got together again and left Allied Gardens out and then beyond that, they have voted again and they won by one vote. In other words, we were not part of it when we're not wanted, we're not part of it, that simple. A Tierrasanta gentleman sat next to me at a meeting and he says I'm glad that to be part of this. We're right together, you're so close and everything. He said, yeah, and we want to be sure that this area goes, that's being built doesn't go too high and lose just Tierrasanta's view of the mountains and whatever. So we are not veterans of work in this. I was, it said there are 17 of these units. I've only heard of one in City Heights. I went down there and I was seeing how things were going and you know, the answer was this. We love it, it's great, it's going, but he said, they said, but then they kept on going and going until it suddenly became some kind of big crowded area once again. The City Heights Development, that's a City Heights area. So I have one more thing to say since that gentleman got up and condemned the Council people. I was following that along with the one with the County Board of Supervisors who set up a 9/11 practice and worked with the FBI and the police and I know it's not part of it, but that gentleman yelled at those guys. I'm saying this, they should had, these were new people and they went out on their own into something as serious as that without leadership and now one of them died and they still want to, they still want to ___ the others, but I'm going to say.

MAYOR: Okay, I got to stop you, Mr. Billman, because I got a lot of people here this afternoon.

MR. BILLMAN: Okay.

MAYOR: Everybody gets three minutes.

RESPONSE TO COMMENT FROM THE CITY COUNCIL HEARING, PUBLIC COMMENT ON GRANTVILLE REDEVELOPMENT PROJECT DRAFT PROGRAM EIR TRANSCRIPT, JANUARY 25, 2005

Response to Comment RB1:

No existing residences are located within the Project Area. Any future project proposing residential uses within the Project Area would require approval of a community plan amendment and subsequent environmental review pursuant to CEQA.

Response to Comment RB2:

Comment noted. Please refer to response to comment TCC13.

Response to Comment RB3:

Comment noted.

MR. BILLMAN: But I just want to know that they should not do this because if something happens to either one of 'em, the people, the young man who died, their folks won't feel any better.

MAYOR: Okay, remember we have three large groups who all want to be heard this afternoon. This Council is willing to stay as late as you want, but I want to try to be sensitive to those that, ah, have already waited a long time. Albert Gotleib? Not here? Okay. Ah, Charles Little. And on deck, ah, Jarvis Ross and just so the rest of you know, when I say "on deck" that means if you sit in the front row like Mr. Ross is or we have a seat in the front called with a little yellow sign that says "reserved for next speaker" so if you're called on deck it'll save just a little bit of time if you come up and sit in either that seat or some other seat in the front row. Ah, Mr. Little, go ahead.

CHARLES LITTLE: Ah, Charles Little. Um, thank you, Mr. Mayor, members of the Council. I, I really am against the, the redevelopment, not for the fact that the area couldn't use redevelopment, but so far everything I've seen down there, for example, when Honda came in, I called the previous council member's office and asked them to give me some indication how they were going to take care of the problem with the traffic there. Oh, we've got that taken care of and I said, there's no way you can take care of it. They assured me that they were going to take care of it. Well, they dam sure did, they just made it that much worse. And then we come in and we have ah, the Home Depot next door to it and that adds more traffic to it. We put in Sav-On and that adds more traffic. This morning, you've got before you or should have before you the draft EIR report. I would ask you to look at that very carefully. In there, they have numbers of the traffic going through the intersection of Fairmont and Mission Gorge. Two friends of mine and myself came through there this morning. We came down to the light at Mission Gorge. It was green, nobody in front of us. It took us three minutes to get through on to Mission Gorge and to get through the next light. It took is four minutes to get on the Highway 8 East. Now, we've got a problem there with traffic and it's a very serious problem. Ah, if you bring more, as the report would indicate, they're not going to alleviate traffic. You've said that in as one of the goals and we're going to alleviate traffic. Well, you're not. There's no way you can do it. The physical constraints of that we now have the trolley going across there. That's going to bring more people in. And with the on, onramps and off ramps there, there's no way, Mr. Medapher, that we're going to be able to take care of increasing the traffic flow and I would defy anybody to come up with something that is cost effective that we could do it. Now the other thing is that, well I'll stop now, thank you.

MAYOR: Jarvis Ross followed by Holly Simonette.

JARVIS ROSS: Jarvis Ross, first let me compliment Council member Tony Young and Ryan Manshine for their comments with regard to the College Grove Shopping Center. Those were pertinent remarks and questions that both of you made. Why am I here? Why am I concerned about a Grantville Redevelopment Zone? Because it's past time for this City to examine redevelopment abuse and ineptitude. John Moores celebrates his successful con job downtown
JR1 in getting acres of land at below value in return for a ballpark and no infrastructure levies for police and fire on his developments. The latecomers will have to pick up that tab. Let us fantasize for a moment. How much money would we save annually by doing away with the

RESPONSE TO COMMENT FROM THE CITY COUNCIL HEARING, PUBLIC COMMENT ON GRANTVILLE REDEVELOPMENT PROJECT DRAFT PROGRAM EIR TRANSCRIPT, JANUARY 25, 2005 (cont.d)

Response to Comment JR1:
Comment noted.

redevelopment agency? The salaries, the retirement benefits, the consultants, the attorneys, the condemnation appraisals, the lawsuits, the dog and pony slide shows, the land give-aways to developers, the charades of public involvement served with coffee and sweet rolls. Need I mention the agencies, bond issues and interests. Add it up on all a year-after-year basis and we can fix some of those neglected potholes and broken sidewalks. The biggest con of all is those people who own property and think they're going become rich when the appraisals come in. If
JR1 (cont'd.) they are shocked at the low appraisals and threats of condemnation, they are dumbfounded when they find out that any environmental clean-up will be deducted from the appraised price. They're even more shocked when the land is frequently given to wealthy developers for pennies on the dollar. Have people so soon forgotten what happened downtown. Some of the one-of-a-kind, viable businesses and the give-away of the $300 million NTC property to Corky-Macmillan for $8.00. Even that paltry sum was refunded to him along with 8 plus million dollars. Grantville is just another attempt at City subsidizing the Small Business Association and their full-age ads in the UT on one hand while destroying viable businesses in a redevelopment area. What happened to free enterprise? Stop the con job. It's not only here, it's all over the city.

MAYOR: Holly Simonette followed by Don Stillwell.

HOLLY SIMONETTE: My name is Holly Simonette and I am a homeowner between sub areas A and C. Honorable Mayor Murphy and Council members, thank you for allowing me to speak today about my concerns related to the Grantville Redevelopment Project and the Draft EIR.
HS1 Council members Frye and Atkins, my comments also relate to the ongoing lack of government transparency and the community's right to know. The entire community of Grantville and Allied
HS2 Gardens has been kept in the dark about what the City's redevelopment agency and private developers are trying to do in our neighborhoods. Those of us who live near the project area have not received updates or notices and have had to find out information on our own or by word of mouth. Talk about secrecy at City Hall. I am here today with petitions in opposition to the Grantville Redevelopment Project. They are signed by my neighbors and local business owners,
HS3 who live and work near the sub areas. My neighbors and I are continuing to gather signatures, Mr. Medapher. We respectfully request that you stop the project immediately. I am also here to address concerns about the Draft EIR. The project description on page 3-6 says the project will
HS4 serve as a catalyst to reverse the physical and economic blight in the area. What blight? How can you say there's blight when housing prices in our neighborhood have gone up 23.5% in the last year and the median price is over $530,000? We all know traffic in the area is bad. It's the thing people complain about the most. In fact, people already drive on Twain and Crawford near my house to avoid the traffic mess on Mission Gorge. Your own highly paid experts say the redevelopment project would add more than 31,000 cars along Mission Gorge and Friars Roads
HS5 and other areas of the project, but they note that even with some road improvements, "the cumulative impact would remain significant and unavoidable." This means even more cars will be driving through my neighborhood to avoid the increased traffic congestion on Mission Gorge. That puts more kids at risk for being hit by a car, more accidents and more exhaust around our schools. In short, there's going to be more traffic in my neighborhood because traffic on Mission Gorge is going to stay screwed up. Your expert's analysis of the long-term effects on the air quality concludes that combined emissions from the redevelopment project area and other
HS6 developed areas in the basin are expected to continue to exceed State and Federal standards in

5

RESPONSE TO COMMENT FROM THE CITY COUNCIL HEARING, PUBLIC COMMENT ON GRANTVILLE REDEVELOPMENT PROJECT DRAFT PROGRAM EIR TRANSCRIPT, JANUARY 25, 2005 (cont.d)

Response to Comment HS1:
Please refer to response to comment HSB1.

Response to Comment HS2:
Please refer to response to comment HSB2.

Response to Comment HS3:
Please refer to response to comment HSB3.

Response to Comment HS4:
Please refer to response to comment HSB4.

Response to Comment HS5:
Please refer to response to comment HSB5.

Response to Comment HS6:
Please refer to response to comment HSB6.

HS5 (cont'd.) the near term and the emissions associated with these developments will exceed threshold levels. In short, more vehicles in industry in the redevelopment project area will keep the air quality unhealthy in our neighborhoods. I just have two sentences, please. Honorable Mayor Murphy, Council members, do not ignore the findings of your own experts.

MAYOR: Ma'am, you got to give us one sentence to sum up.

HS6 HOLLY SIMONETTE: I am almost done. And put a rubber-stamp of approval on this Draft EIR or the Grantville Redevelopment Project. There is no reason to screw up traffic and air quality even more for a project that has no justification in the first place because there is no blight. Thank you.

MAYOR: Don Stillwell followed by Joel Stillwagon.

DS1 DON STILLWELL: I'm one of those people that have to use public transportation. I came down here and spoke to you about the buses at the Mission San Diego trolley stop that are incapable of being there when the trolley gets there. They get three minutes before the trolley and the MTS just told me, well be sure to use the trolley that makes a connection, don't use the one that happens to get there three minutes late. Now that's really classy. The trolley stop at Mission San Diego is to be avoided when they change the bus routes. They're going to come down and miss it by _ of a mile. They say that's close enough, use the trolley stop that's another _ of a mile from the house. Well, I love to walk, but I don't think that everybody that lives on my street loves to walk. Interestingly, I am really intrigued by the fact that the trolley stop at Grantville was such a huge trolley stop. Go up 77 steps. We got two elevators. I mean it's wonderful, but why did they put it there, such a huge monstrosity, when there's nothing there. And so I was waiting for somebody to say, we're going to have an Indian casino there or something, I mean, there's got to be some reason that it was put there and then all of a sudden I read in the paper about this redevelopment thing. Those guys there said they spent two years deciding how they were going to build a trolley stop. I finally walked down to see it because I don't live that close to it to walk by it most of the time, but what I'm trying to say is you want people to use public transportation. They talk about they're going to have buses coming in and out of that new trolley stop and it uses Alvarado Canyon Road. I told the MTS Board they'd be a whole lot better to have people come and look down and see all the traffic and say that's a good reason for using the trolley. I don't know why or what their plans are and I don't know whether you guys all knew the same thing at the same time. It just seems to me that as if all of a sudden we got both things and I said, okay, somebody worked together and there's some reason why you want this set up. Well, then it says, okay, they have the right of condemnation or something like that. I don't know what you call it. Is somebody making some bucks out of this thing? I mean, don't look at me sadly. I mean, I ride the bus and I use the trolley all the time. I may use them four or five times a day. My point is they can't send a bus to make connections with the existing trolley, the next trolley they want to change the bus so that it goes close to the original stop, they won't take it away, but what in the world are you planning on doing down there? You've got to have some ideas of something there that's going to help people get rid of the traffic, not make more. I just, hey, I hope you think real strongly about that.

MAYOR: Joel Stillwagon.

RESPONSE TO COMMENT FROM THE CITY COUNCIL HEARING, PUBLIC COMMENT ON GRANTVILLE REDEVELOPMENT PROJECT DRAFT PROGRAM EIR TRANSCRIPT, JANUARY 25, 2005 (cont.d)

Response to Comment DS1:

Please refer to response to comment DSA1.

JOEL STILLWAGON: Mayor, Council members. I'm Joel Stillwagon of _____. I'm a second-generation business owner in that area. We've been walking around our neighborhood checking all our other businesses and we've all been kind of been upgrading our business fronts. Myself, I've already spent around $25,000 on the building and just to find out yesterday in the
JS1 newspaper that they're going to pretty much demolish my area and my business and I'm just about ready to get a government grant for doing work for the Department of the Defense but now that gets put on hold because we don't know what we're going to do with our building. Other than that, the traffic is always going traffic no matter what. Even LA shows that we're just going to have more people moving to the area, more traffic, more businesses, more people working
JS2 there, so it's going to be congested anyway. And, ah, I'd like to be informed, you know, at least like to know what's going on and I've never received any flyers, like I said I heard word of mouth and then by accident the newspaper yesterday that this was actually coming down today. Thank you.

MAYOR: All right, that ends the people who put in speaker slips. I'll go to Mr. Madaffer.

MR. MADAFFER: Thank you, Your Honor, and I first want to start off and thank those that came down today to provide input. My intention all along has been to be able to promote what we're doing with this concept and to hear your input as much as possible. It's one of the reasons I wanted to extend the public comment period. You know, I've formed something called the Grantville Redevelopment Advisory Committee. Gosh it's been well over a year ago now as a tool really to take more community input on this thing. There was no requirement to have to even do that in the law, but I thought it was just important especially hearing people concerned about redevelopment issues. I wanted to do the opposite of what had been happening in the past where maybe there wasn't enough public dialogue and I can't think of an issue in the local area that has had more public publicity and opportunity for comment than this Grantville Redevelopment Area. I think we've all heard the story, you're very familiar with the area Grantville is a conglomeration of a lot of older, underutilized properties, irregular shaped parcels, it's a traffic nightmare, it's a flooding nightmare, it's a problem in so many respects, and yet after hearing some of the testimony, it sounds like we might be better off just doing nothing. You know, I don't happen to share that. I totally agree with the comments of Mr. Little wherever you are in what you had to say. What happened in building Home Depot and that Sav-On is exactly the reason why this redevelopment area should be formed. Right now, all those things are done what's called by right, pursuant to the community plan. There is no governing oversight really beyond what their property is zoned at, so you end up with a hodge-podge of things that come in there where they don't provide the mitigation that we should be exacting from a traffic standpoint. They end up causing more problems than what we get and what does the City of San Diego get out of it? To build, fix roads, nothing. You really the City gets what you get out of property tax, 17 cents on the dollar. In a redevelopment area, you've heard this and you say at ad nauseam probably, but you end up with 67 cents on the dollar for the additional value that that property becomes and those are funds that can only be spent in the area and the wish list for the Grantville area are extensive. They include many of the things that I heard today. The traffic issues will not materialize under a plan where you actually have monies to take care of these traffic issues. If you take, for example, the ridiculous off-ramp from Interstate 8 right now at Mission Gorge Road where cars are merging into Alvarado Canyon Road. That's

RESPONSE TO COMMENT FROM THE CITY COUNCIL HEARING, PUBLIC COMMENT ON GRANTVILLE REDEVELOPMENT PROJECT DRAFT PROGRAM EIR TRANSCRIPT, JANUARY 25, 2005 (cont.d)

Response to Comment JS1:
Comment noted.

Response to Comment JS2:
Comment noted. Please refer to response to comment HSB2.

got to get replaced and that's on the plan. Synchronization of lights at Mission Gorge Road. There's parks, there's libraries, there's flood control issues. Those things will all come from Grantville Redevelopment and it, I believe in the end, through a public deliberative process will provide for a much better planned area and one that citizens are going to have a freer flow of traffic than what they have now so my interest in Grantville is simple. It is to preserve the quality of life that the neighbors enjoy in adjacent Grantville and Allied Gardens communities #1 and #2 to provide a vehicle and a tool through redevelopment to make that happen and that's really what we're all about here and that's why this thing was initiated. Today, obviously what we're here to do is really nothing more than to receive public testimony on the draft environmental impact report. I've asked, as I said, that we extend the comment period to February 14th. I would hope that many of you submit comments in writing one way or the other and that most importantly that you stay involved with the process. For those of you that aren't familiar, I'll give you my website address. It's simple, it's just jimmadapher.com/email. If you just do that, jimmadapher.com/email, sign up for my email newsletter. We'll keep you informed. Go to sandiego.gov and sign up for the redevelopment agency's mailing list for Grantville and get involved. Come to the community meetings. Come to the Grantville Redevelopment Advisory Committee meetings. I want public participation. I want public input in this process. I believe I want what you all want and that is the best community we can have and using the laws of redevelopment, we can actually capture more of the tax increment to be able to make those public facility improvements to eliminate the problems that we've been having in the area, traffic, flooding, etc. So with that, I don't know what's the action that we're. It's just simply accepting.

MAYOR: I don't think there's any action, really, it's just a public hearing to provide public input. I don't think we even need an action to accept a report, do we Mr. City Attorney? Or maybe I should ask the staff. There's no action right?

MALE: No, no action on this one.

MR. MADAFFER: Okay, thank you.

MAYOR: Ms. Frye.

MS. FRYE: Thank you and I and I am glad that was explained so that people understood that this was just, um, a hearing to receive comments on the draft environmental impact report, which is sort of an unusual action or lack of action, I guess. Generally, um, acting as a member of the City Council, I don't recall ever actually being able to provide any comments to you on the draft EIR, so could you explain to me how acting as a member of the redevelopment agency, how that role is different.

MALE: Well the agency has, you know, has basically certifies the document as the agency and as part of those procedures that have actually been in existence since 1990, the agency calls for a public testimony period while the draft EIR is out. It is unique and.

MS. FRYE: Yeah, it is.

MALE: And it does bring in the public like we want to and gets us the comments and I think it's a very positive.

MS. FRYE: And then the draft or the final EIR, when it's finalized, that will have to go before the entire Council as well as well as the redevelopment agency.

MALE: Planning Commission, yes all the different groups.

MS. FRYE: Um and so then it's appropriate then for me to provide some comments on the draft Environmental Impact Report as a member of the Agency.

MAYOR: Ms. Frye, let me just.

MS. FRYE: Is that correct?

MAYOR: I'm not, I think that is, but I think we need to have the City Attorney clarify it for the records.

MALE: Actually, I misspoke earlier, there is a resolution in front of you that does have two action items, one is to just accept the comments and requiring them to be incorporated into the final EIR and also directing the Executive Director, the City Manager, to provide responses to those comments and also include them in the EIR.

MALE: Now some of that.

MALE: That is the action that is requested.

MAYOR: Is there a second? All right, Ms. Frye, you're back on.

MS. FRYE: Okay and so then, then the question, then my next question is so it is not inappropriate, um, acting as a member of the redevelopment agency to provide to staff comments for me to provide comments on the draft EIR.

MALE: I'd have to default to the City Attorney. Our redevelopment consultant is saying it's no problem.

MALE: I don't see any reason legally why you cannot provide comments.

MS. FRYE: Okay and.

MALE: That would be responded to as well.

DF1 MS. FRYE: And I'll make them very brief, but the issue of public safety which would be police and fire issues. For example, I would ask that staff, um, if you would go to page 4-13-9, there is an existing condition statement related to the police services. It would be 4.13.5.1 and the only reason that I focused on this is because it's an issue I've been dealing with for quite awhile and

RESPONSE TO COMMENT FROM THE CITY COUNCIL HEARING, PUBLIC COMMENT ON GRANTVILLE REDEVELOPMENT PROJECT DRAFT PROGRAM EIR TRANSCRIPT, JANUARY 25, 2005 (cont.d)

Response to Comment DF1:

The information provided in the EIR was provided directly by the public service providers. Each of these agencies (fire, police, schools, etc.) was contacted directly regarding the proposed project so as to assess the potential environmental impact associated with the provision of public services. The threshold of significance utilized in the EIR, for each of these services is whether the project would create an environmental impact as a result of the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts.

In response to the apparent discrepancy in information regarding police staffing (EIR page 4.13-9), the San Diego Police Department was re-contacted to verify the service information provided related to the proposed project. The Eastern Division of the San Diego Police Department (pers. comm. Officer Robert Carroll, March 7, 2005) indicates that the Eastern Division is currently staffed with 87 patrol officers. This division is currently 60% staffed, with the resources to hire up to 40 more officers, for a total of 127. The SDPD is hiring, and the projected time frame to have the officers hired is 2-5 years. Additionally, the City of San Diego Fire-Rescue Department was also re-contacted to verify the service information provided in the EIR. No changes to the information related to fire services is necessary (pers. comm. Sam Oates, Fire Marshal, City of San Diego Fire and Hazard Prevention, March 2005).

It is recognized by both police and fire agencies that as traffic becomes more congested in the Project Area, the police and fire response times may increase. It should also be noted that as indicated in Section 4.2, traffic conditions in the Project Area are currently at unacceptable service levels. SDPD is hoping that the improvements made to the Mission Gorge/Fairmount Ave/I-8 interchange will help address the congestion. The proposed Five-Year Implementation Plan also identifies the initiation, design, and construction of Mission Gorge Road traffic improvements, including the Interstate 8 interchange at Alvarado Road. SDPD will not respond to the potential increase in response times by building another substation. Instead, SDPD indicates that the increase in officers on the street should keep the response times similar to what they currently are. The fire department indicates (see EIR page 4.13-12), that if the National Fire Protection Association 1710 Standard is exceeded in the future, there could be the need for a new fire station and equipment; however, no such determination has been made at this time.

the information contained within the draft EIR states that the station houses approximately 127 patrol officers and that would be in Eastern Division, I believe, is the area that services and the reason I'm familiar with that because it's actually in District 6, which is Serra Mesa. The information that I have in front of me from the Chief of Police tells me that there's actually 87 not 127 patrol officers, so my concern being is that your existing condition statements and I'm just selecting one just as that there may be a problem on some of the information that is being provided that perhaps is not accurate and maybe needs to be looked at. Additionally with the existing conditions for fire protection as far as the response times, um, I would ask that you maybe review that more closely because I'm not sure if it's if the information provided again in the draft EIR is actually addressing what the existing conditions are. The other areas that we may need to maybe beef up the analysis would be the impacts on police and fire response times and that would include emergency medical services based on the traffic, which is, according to your document, um, not not able to be mitigated so as we go towards build-out, what is going to be the ability of police and fire services to respond, um, based on those on those impacts that we can't mitigate, at what point does that have an impact on the public safety. The other issue is, um, in the water quality hydrology portion of your, um, draft EIR, there is, um, a discussion about sewer and water, but we don't necessarily talk about, um, storm drains. And existing conditions on storm drains, again many of the storm drains in District 6, which potentially, this redevelopment area might be feeding into them, I would just like to know what impact that might have sort of overall, um, that might be shoved into, um, downstream areas or even upstream areas and the impact and again I did not see any discussion on the flooding issues. If it was there, I didn't see it. Was there a flooding section?

DF1 (cont'd.)

MALE: Give us a second.

MS. FRYE: Yes, it's, while a few of these things are fresh in our minds.

MALE: It's in 4.11, it's part of that one section.

DF2

MS. FRYE: And do you know if it's.

MALE: And it's not called out as a separate one, it's just all under the water quality hydrology.

MS. FRYE: So, we're looking at the the watershed management plan. I guess my question would be is there anything, um, as far as, ah, flooding, okay it's 4.11.1.2 that that talks about the existing conditions and essentially, um, not only which areas are located within the 100-year flood plain, but which areas are are maybe be prone to flooding more so than others and what sort of, um, sort of mitigation could be provided to address the flooding issues, the existing flooding issues as you go through the. I mean, is it in there or is the.

MALE: Well it's definitely something that's part of our, um, we list as a project like Alvarado Creek. That's where the recent problems are and there's different parts of that that some parts of the creek are improved, some parts aren't, some are privately owned, so that's what kind of contributes to some of those problems in those areas.

RESPONSE TO COMMENT FROM THE CITY COUNCIL HEARING, PUBLIC COMMENT ON GRANTVILLE REDEVELOPMENT PROJECT DRAFT PROGRAM EIR TRANSCRIPT, JANUARY 25, 2005 (cont.d)

Response to Comment DF2:

Section 4.11-Water Quality/Hydrology of the EIR identifies the portions of the Project Area that are subject to flooding. Flooding in the Project Area is attributable to several factors including the Project Area's location within the floodplain, the cumulative growth and urbanization that has occurred within the San Diego River watershed, and the existence of inadequate drainage/flooding infrastructure. As indicated in Figure 4.11-2, a large portion of the Project Area is located within the 100-year floodplain associated with the Alvarado Creek drainage. This flooding is attributed to portions of the channel being unimproved, as well as inadequate sized culvert facilities.

Correcting the Alvarado Creek flood control deficiencies are among the priorities identified in the Draft Redevelopment Plan and have been included in the Five-Year Implementation Plan. This is consistent with the San Diego River Park Draft Master Plan which includes recommendations to improve the stream condition of the Alvarado Creek confluence to increase channel width and potential meander to improve water quality and ground water recharge. The Redevelopment Plan provides an opportunity to comprehensively address flood improvements to Alvarado Creek. The Five-Year Implementation Plan identifies the following related to Alvarado Creek and flooding in the Project Area:

First Program Year (Fiscal Year 2005-06):

- Identify storm drain improvements for the Project Area in coordination with the affected community and appropriate public agencies.
- Initiate planning phase of Alvarado Creek enhancements including hydrology studies.

Second Program Year (Fiscal Year 2006-07)

- Complete design phase of Alvarado Creek improvements in anticipation of bond proceeds the following fiscal year (2007-08)
- Coordinate design of storm drain improvements in the Project Area

Third Program Year (Fiscal Year 2007-08)

- Identify funding sources for Alvarado Creek improvements.
- Develop funding sources for identified storm drain improvements in the Project Area.

Response to Comment DF2 (cont.d):

Fourth Program Year (Fiscal Year 2008-09)

- Begin construction of Alvarado Creek improvements.
- Begin construction of storm drain improvements in the Project Area.

Fifth Program Year

- Continue construction of Alvarado Creek improvements.
- Continue construction activities for storm drain improvements in the Project Area.

EIR Mitigation Measure HD 1 is also proposed which requires that a detailed hydrology study be prepared for each specific development in order to address onsite and offsite hydrology as a result of new development. As stated in Mitigation Measure HD 1, for development projects located within or adjacent to the 100-year floodplain, additional consideration shall be given to the design of the project. An appropriate drainage control plan that controls runoff and drainage in a manner acceptable to City Engineering Standards for the specific project shall be implemented. The drainage control plan shall be implemented in accordance with the recommendations of the hydrology study and shall address on-site and off-site drainage requirements to ensure on-site runoff will not adversely affect off-site areas or alter the existing drainage pattern of the site or off-site areas. The drainage study shall incorporate the recommendations of the San Diego River Park Master Plan the San Diego River Watershed Management Plan relative to hydrology/drainage and flooding to the maximum extent practicable.

Page 5-5 of the EIR has also been modified as follows:

As discussed in Section 4.11 – Water Quality/Hydrology, the Project Area is located within the Mission San Diego Hydrologic Subarea of the Lower San Diego Hydrologic Area, within the San Diego River Hydrologic Unit (HU). This HU is approximately 440 square miles, includes a population of approximately 475,000 and contains portions of the City of San Diego, El Cajon, La Mesa, Poway, and Santee, as well as unincorporated areas. Figure 4.11-1 depicts the San Diego Watershed. Flooding within the Project Area (see Figure 4.11-2 Floodplain Map), is partially a result of the cumulative development that has occurred within the watershed, incrementally creating impervious surfaces that has increased the rate and volume of runoff carried by the San Diego River and tributaries, including Alvarado Creek. With respect to the proposed Project Area, the cumulative development is partially attributed to existing flooding events of Alvarado Creek. This drainage runs through the southern portion of the Project Area, and is improved only in certain locations. Improvements to this

Response to Comment DF2 (cont.d):

drainage are needed in order to accommodate flows during storm events. The continued future cumulative growth has the potential to further exacerbate this existing problem, as well as flooding associated with certain portions of the San Diego River. Redevelopment activities have the potential to contribute to the cumulative impact; however, a majority of the Project Area is already developed and contains impervious surfaces. ~~alter localized drainage patterns within the San Diego River Watershed, as well as potentially causing erosion or siltation on- or off-site.~~ The Mitigation Measure HD 1s identified in *Section 4.11 – Hydrology/Water Quality* will reduce the potential impact as a result of specific redevelopment activities ~~is impact~~ to a level less than significant. With implementation of the hydrology/drainage mitigation, no project-level impact will occur and redevelopment in the Project Area will not contribute to a cumulatively considerable hydrology/water quality impact. Correcting the Alvarado Creek flood control deficiencies is a priority identified in the Draft Redevelopment Plan and has been included in the proposed Five-Year Implementation Plan. Implementation of this improvement would address the cumulative flooding impact in the Project Area.

MS. FRYE: Okay, well maybe, maybe that might be something that you might want to look at in the cumulative impact portion of it.

MALE: It's it's what we've gotten from some of the comments already, especially with the recent flooding and it is something that we are going back and looking at.

MS. FRYE: All right, well just maybe I could, I could get some responses to that cumulative impact of this, um, and then, finally, the section on growth inducement where it talks about that the project is is supposed to foster economic growth in the area and, um, and that's exactly what the notice is. I guess I was having a little bit of problems understanding how we can expand employment opportunities which seems to be somewhat growth inducing and then say that the growth inducement that they're it would not encourage or facilitate activities that could significantly effect the environment individually or cumulatively and I'm just not sure how you arrived at that conclusion so it might be helpful to provide some sort of an analysis on how you arrived that there is no potential, um, for any, um, growth inducement because obviously traffic is going, there's so anyways, I would just think it might be helpful to the community and then any of the, um, the impacts that might affect the surrounding communities as far as traffic because as you're increasing traffic in this redevelopment area, um, I'm just wondering what impact it's going to have on surrounding communities because to me that, um, those might be part of your cumulative impacts. And then the last thing and I would just, I would just, um, say I think it's a really good idea that, um, council member Medapher had as far as, um, extending a time-frame because it sounds to me that people that came out here today a lot of them weren't aware of this and I know that happens, no matter how many public hearings you have, there's always somebody that we're going to miss, but I'm just wondering if the, you know, you were saying about how inviting people to the community meetings if there's a way to.

DF3

DF4

MALE: The next one is.

MS. FRYE: Yeah.

MALE: The next GRAC meeting is when.

MALE: The next GRAC meeting is the 31st at.

MALE: Tell everybody when and where it is.

MALE: I knew you would ask me that. Ah, it's the 31st at the Church of the Nazarene, which is on Mission Gorge Place. It's this.

MALE: It's behind the post office.

MALE: Right, behind the post office. I think it's like 7700 or something like that. It's at the end of the street, you can't miss it.

MALE: End of Mission Gorge Place and it's at 7 p.m. Church of the Nazarene.

RESPONSE TO COMMENT FROM THE CITY COUNCIL HEARING, PUBLIC COMMENT ON GRANTVILLE REDEVELOPMENT PROJECT DRAFT PROGRAM EIR TRANSCRIPT, JANUARY 25, 2005 (cont.d)

Response to Comment DF3:

The EIR considers the potential growth-inducing impacts of the project, and recognizes that the project will foster economic growth in the area. While the impacts of future redevelopment of the Project Area and cumulative development are considered significant with respect to many environmental issues, including significant and unavoidable traffic and air quality impacts, the growth-inducing impact, in and of itself is not considered significant. The Project Area is located in an area of the City of San Diego that has been designated an urbanized portion of the City by the City's General Plan and Progress Guide. The proposed project is consistent with the City's requirements for these development tiers. Induced growth is any growth, which exceeds planned growth and results from new development (i.e., the extension of infrastructure), which would not have taken place in the absence of the proposed project. Because the EIR evaluates the potential buildout of the Project Area according to the existing adopted community plan land uses for the Project Area, the project (implementation of the Redevelopment Plan) would not exceed planned growth as identified in the existing adopted community plans. The Project Area is also located in an urban portion of the City where public services and infrastructure are available. Potential growth inducement in neighboring areas is also limited by the existence of developed single-family residential neighborhoods located immediately outside of the Project Area, the location of the San Diego River, the MSCP MHPA, and federal lands north and west of the Project Area, and Interstate 8 to the south.

Response to Comment DF4:

Please refer to response to comment OPR1.

MALE: 6 o'clock.

MALE: 6 PM. Excuse me.

MALE: 6 PM.

MALE: 6 PM.

MALE: 6 PM to 8 and it's monthly meeting, the fourth Monday of the month. It's the fifth Monday this month because of the holidays and some other problems with using the church hall.

MS. FRYE: And I just want to say even though Council member Madaffer and I on the redevelopment agencies don't particularly see eye to eye, I will say and I think it's important to say that, um, as far as the trying to get a public process established, I mean he really has and every time he holds these hearings, people do come down and he keeps extending times and trying to get and maybe it might not be a bad idea for your Allied Gardens people to ask and have staff go out and.

MALE: I'm actually going to their meeting tonight.

MS. FRYE: Well there you go, see?

MALE: I've been in committee meetings all week.

MS. FRYE: That's fast.

MALE: He was at Navajo until 11 last night.

MS. FRYE: Because I think part of the problem at least for this particular item not for the redevelopment in general, but this particular item, which is just to receive testimony, is that some people might not be clear on what the environmental or draft environmental impact report, you know, includes and that they really do have an opportunity to comment. It doesn't have to be particularly technical comments.

MAYOR: All right, we have a motion and a second. Please vote. Call the roll. Passes 9-0. That concludes the redevelopment agency agenda. We'll adjourn as the redevelopment agency and reconvene as the City Council.

Grey

(RA-2005-82)

REDEVELOPMENT AGENCY OF

THE CITY OF SAN DIEGO

RESOLUTION NUMBER R- 03863

ADOPTED ON JAN 25 2005

A RESOLUTION OF THE REDEVELOPMENT AGENCY OF THE CITY OF SAN DIEGO ACCEPTING PUBLIC COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED GRANTVILLE REDEVELOPMENT PROJECT.

WHEREAS, the San Diego City Council [City Council] on March 30, 2004 designated the Grantville Redevelopment Survey Area by Resolution No. 299047, for purposes of determining the feasibility of a redevelopment project; and

WHEREAS, the Redevelopment Agency of the City of San Diego [Agency] on December 13, 2004, authorized the distribution of the draft Environmental Impact Report [EIR] for the proposed Grantville Redevelopment Project [Project]; and

WHEREAS, the Agency on July 17, 1990, by Resolution No. 1875, adopted the Procedures for Implementation of the California Environmental Quality Act [CEQA] and the State CEQA Guidelines which require that the Agency conduct a public hearing on a draft EIR for a proposed redevelopment project; and

WHEREAS, on January 25, 2005, the Agency conducted a public hearing on the draft EIR for the Project pursuant to the above referenced procedures; NOW THEREFORE

BE IT RESOLVED, by the Redevelopment Agency of the City of San Diego, as follows:

1. That the Agency accepts the comments made at the public hearing on the draft Environmental Impact Report for the proposed Grantville Redevelopment Project and approves incorporation of the comments in summary form into the final EIR.

2. That the Executive Director of the Agency, or designee, is hereby directed to prepare a written response to the comments, also to be included in the final EIR.

APPROVED: MICHAEL J. AGUIRRE, General Counsel

By _____
Sung L. Phillips
Deputy General Counsel

SLP:ai
12/29/04
Or.Dept:REDV
Aud.Cert:n/a
RA-2005-82
Council:n/a

Passed and adopted by The Redevelopment Agency of The City of San Diego JAN 25 2005
by the following vote:

Members	Yeas	Nays	Not Present	Ineligible
Scott Peters	☑	☐	☐	☐
Michael Zucchet	☑	☐	☐	☐
Toni Atkins	☑	☐	☐	☐
Anthony Young	☑	☐	☐	☐
Brian Maienschein	☑	☐	☐	☐
Donna Frye	☑	☐	☐	☐
Jim Madaffer	☑	☐	☐	☐
Ralph Inzunza	☐	☐	☑	☐
Chair Murphy	☑	☐	☐	☐

AUTHENTICATED BY:

DICK MURPHY
Chair of The Redevelopment Agency of The City of San Diego, California

CHARLES G. ABDELNOUR
Secretary of The Redevelopment Agency of The City of San Diego, California

(Seal) By _____ Deputy

Office of The Redevelopment Agency, San Diego, California

Resolution Number R-03863 Adopted JAN 25 2005

GRANTVILLE REDEVELOPMENT ADVISORY COMMITTEE

(DRAFT) MEETING MINUTES OF Monday, January 31, 2005

The members of the Grantville Advisory Committee (RAC) held their meeting at Mission Valley Church of the Nazarene, at 4675 Mission Gorge Place from 6:03 p.m. to 7:50 p.m.

The following members were present at Roll Call:, Bill Brenza, Lee Campbell, Daniel Dallenbach, Eric Germain, Rick McCarter, Cindy Martin, Mike Neal, John Peterson, John Pilch, Dan Smith, Marilyn Reed and Don Teemsma Jr. [12]
Arrived after Roll Call: Diane Strum and Arnie Veldkamp [2] ?
Following members were not present: Brian Caster (excused) [1]
Staff in attendance: Kathy Rosenow, (RSG), Tim Ginbus (BRG), Maureen Ostrye (RA), and Tracy Reed (RA).

CALL TO ORDER: Called to order at approximately 6:03 p.m. by Mike Neal.

1. **ROLL CALL:** A quorum was established when 12 of the 15 members were present at Roll Call.

2. **APPROVAL OF MINUTES:**
   - Draft – December 13, 2004

MOTION – Dan S/John Pe; Approve, passed (8-1-3).

3. **UPDATE:** (synopsis)
   - **Information** – Status of Survey
     Tracy: The Draft EIR went to the agency for public comment on January 25, 2005 spoke. The comment period has been extend to Monday February 14, 2005.

4. **OLD BUSINESS:** (synopsis)
   - **Review:** Draft – Grantville Program Environmental Report.
     Tim: The document is out for the 45-day public review period. The review period has been extended. All comments must be in writing. Responses to the comments will be included in the final PEIR. Our schedule is to distribute and make the final PEIR available on March 17, 2005. CEQA analysis the impacts on the area per the existing community plan according to estimates regarding build out. Mitigation measures will be prepared and included in the final PEIR.

Public –

CL1 Charles L.: Report needs more specifics on E-4 regarding traffic.

HS1 Holly S.: Question regarding EIR overriding considerations and why project by project basis used in some instances.

BT1 Betty T.: I have read most of the EIR and feel cumulative impacts are greater than stated.

BW1 Bill W.: The history section does not indicate the an aqueduct flume exists with the project area (Landmark #52).

RESPONSE TO COMMENT FROM THE GRANTIVLLE REDEVELOPMENT ADVISORY COMMITTEE MEETING MINTUES, JANUARY 31, 2005

Response to Comment CL1:

Please refer to responses to comments CLA1 through CLA9 and CLB1 through CLB7.

Response to Comment HS1:

Please refer to responses to comments CLB7, AG1, and HSA15.

Response to Comment BT1:

Comment noted.

Response to Comment BW1:

Mr. Bill White commented regarding the Mission Dam and Flume. The record search for this study conducted at the South Coastal Information Center indicates that this resource is located within one mile of the Project Area. This resource (CA-SDI-6660H) is discussed on pages 24, 25, and 27 of the report (EIR pages 4.5-1 and 4.5-2). An archaeological survey of the sand and gravel works in Subarea B conducted by Recon in 2001 did identify portions of the flume intact. As the technical report for that project was never finalized, no site record was submitted to SCIC for this resource and it therefore did not show up in our record search. ASM obtain a copy of the report and has confirmed the existence of portions of the Mission flume in Subarea B. ASM's report does state that portions of the Mission flume are known to be located along the San Diego River and signals that there is a high potential for prehistoric and historic sites adjacent to the river in Subarea B. As stated:

> No prehistoric or historic archaeological sites are recorded within the study area. However, a number of important sites are recorded in close proximity to the study area. Prime amongst these is the site of the ethnohistoric Kumeyaay village of Nipaquay and the Mission San Diego de Alcala (CA-SDI-35/202), located on the west side of the San Diego river. Sites associated with these historic properties, such as the Mission flume and dam, are known to be located along the San Diego river drainage. There remains a high potential for prehistoric and historic sites adjacent to the San Diego river in Subarea B (page 27)."

DS1 Don S.: No pleased with the bus and trolley service currently and the changes planned by MTDB/MTS.

Committee –

MR1 Marilyn R.: Problems with the discussion of traffic in table 4.2-1. The intersection of Friars Rd. and I-15 is supposed to be one of the most impacted intersections in the City.

LC1 Lee C: Concerned about the increase in traffic is unavoidable. The Draft does not address the breezes in the evening or flooding. The TOD alternative is in an area prone to recent flooding.

AV1 Arnie V.: I have a report regarding the flume.

DS1 Dan S.: Hydrology and circulations. What about a reference to bus service at trolley station and MTDB's projections.

- **Review/Actions:** 3rd Draft – Grantville Owner Participation Rules (OP Rules)
  Mike: The 3rd Draft of the OP Rules that we have been provided with have been revised to address the concerns and comments of the committee and public. I think we should form a subcommittee to review the recommended revisions. The subcommittee will make a recommendation regarding the OP Rules at our next meeting. I would suggest the subcommittee be Cindy, Brian, Rick and Marilyn.

5. **NEW BUSINESS** (synopsis)
   - **Distribute:** Draft – Grantville Preliminary Report
     Tracy: The purpose of preparing the Grantville Preliminary Report is to distribute it to all affected taxing entities. However, the Agency's procedures are to distribute to the public also. The preliminary report can answer many of the questions that have been asked regarding what is blight. It is also available on the Internet. We will review the preliminary report briefly at the next meeting.

6. **COMMENT ON NON-AGENDA ITEMS:** (synopsis)

Committee –

John Pi: Update on the next Navajo Planners it will be on Tuesday February 22nd. The main agenda item is the SDSU master plan.

Public –

Charles L.: Cost of project, table E-4.
Ray B.: Happy with ADA improvements to Grantville Park.
Al V.: I am in favor for a better Grantville but not eminent domain authority should be eliminated from the redevelopment plan. I am a business owner in Grantville.
Don S.: Concerned about bus and trolley service. What about MTDB (Bus) traffic impacts?
Dick R.: VFW manager. We are concerned about traffic and flooding along Fairmount and Vandever.

RESPONSE TO COMMENT FROM THE GRANTIVLLE REDEVELOPMENT ADVISORY COMMITTEE MEETING MINTUES, JANUARY 31, 2005 (cont.d)

Response to Comment DS1:
Please refer to response to comment DS-A1.

Response to Comment MR1:
Please refer to responses to comments MR1 through MR9.

Response to Comment LC1:
Please refer to responses to comments LC1 through LC76.

Response to Comment AV1:
Please refer to response to comment BW1.

Response to Comment DS1:
Please refer to response to comments DRS1 through DRS29.

7. **Next Meeting Dates:**
   Mike; GRAC February 28, 2005.

8. **Adjournment:** 7:50 p.m.

This information will be made available in alternative formats upon request.

Prepared: 2/16/05 (tr)
Revised: n/a

Draft (Final) Approved:
Motion was by:
was:

Revisions are in *Italic & Double Underlined*
Vote

GRANTVILLE RESIDENTS OPPOSED TO THE GRANTVILLE REDEVELOPMENT PROJECT

We, the undersigned residents and business owners of the Grantville community, are opposed to the City of San Diego's plans to adopt the Grantville Redevelopment Project.

We urge the City Council to IMMEDIATELY STOP THE PROJECT.

Print Name	Sign Name	Address
1. Stephanie Tait	Stephanie Tait	4814 ELSA Rd. SD 92120
2. LaVera Tye	LAVERA TYE	6055 48th ST. 92120
3. Edgar D Tye	Edgar D TYE	" " "
4. Stephanie Zambrana	[illegible]	4801 Twain Ave S.D. CA 92120
5. Kathy Layritz	Kathy Layritz	4817 Twain Av. SD. CA. 92120
6. Gordon Bowman	[illegible]	4829 Twain Av SD CA 92120
7. STEPHANIE BOWMAN	G Bowman	4829 Twain Ave SD CA 92120
8. LISA LEONETTI	Lisa Leonetti	4841 TWAIN AV SD CA 92120
9. Dennis Cooney	[illegible]	4847 Twain Ave SD CA 92120
10. Catherine Jessop	Catherine Jessop	4853 Twain Ave., S.D 92120
11. DANNY T CASTILLO	[illegible]	4865 TWAIN AVE. SD 92120
12. JUSTIN PENICHE	Justin Peniche	4877 TWAIN AVE SD. CA 92120
13. RICHARD RAMSEY	Richard Ramsey	4883 TWAIN AVE 92120
14. Keith Bryenton	Keith Bryenton	4893 Twain Ave 92120
15. Steve Rodriguez	[illegible]	4923 TWAIN AVE 92120
16. Kelsey Joyce	Kelsey Joyce	4929 Twain Ave 92120
17. EDWARD HENRY	[illegible]	4959 Twain Ave 92120
18. JOHN TILLMAN	John Tillman	4965 TWAIN AVE SD CA 92120
19. Laura Tillman	[illegible]	4965 Twain Ave SD CA 92120
20. Adeline Rauk	ADELINE RAUK	

4971 Twain Av.

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Print Name	Sign Name	Address
1. Bonnie Wells	[illegible]	4995 Elsa Rd. San Diego, 92120
2. John Wells.	[illegible]	4995 Elsa Rd. San Diego Ca 92120
3. Mark Valdez	[illegible]	4979 ELSA Rd 92120
4. DENNIS CONYER	[illegible]	4973 Elsa RD 92120
5. Laurie Kantor	[illegible]	6525 Crawford St. San Diego Ca. 92120
6. Armand Ani Jr	[illegible]	4701 Orcutt Ave.
7. Stacy Williamson	Stacy Williamson	6301 Crawford St. 92120
8. Robert K Baker	Robert K Baker	6337 Crawford St 92120
9. Ernest L. Ettel	[illegible]	6373 Crawford St 92120
10. Dorothy L. Ettel	Dorothy L. Ettel	6373 Crawford St 92120
11. Sam Patterson	[illegible]	6417 Crawf St 92120
* 12. Melissa Bacall	[illegible]	6417 Crawford St San Diego Ca 92120
13. E.P. Kuchenmeister	E.P. KUCHENMEISTER	6447 Crawford. 92120
14. ROB PEDLEY	Rob Pedley	6346 CRAWFORD ST.
15. Michael Couture	[illegible]	6319 Crawford St 92120
16. [illegible]	Dorothy Mauly	4830 Elsa Rd
17. Jennifer Nelson	[illegible]	4997 Twain Ave
18. Jennifer Petrucci	[illegible]	6315 50th St SD 92120
19. Judy Gervais	JUDY M. GERVAIS	6329 50th Street
20. [illegible] Straub	[illegible]	6359 50th St

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Print Name	Sign Name	Address
1. Elizabeth M. Strab	Elizabeth M. Strab	6354 50th St. SD, CA 92120
2. Neil Patterson	Neil Patterson	6369 50th St. SD, CA 92120
3. JUNE R. CARROLL	June R. Carroll	6377 50th St SD 92120
4. JACK B CARROLL	Jack B. Carroll	6377 50th St SD 92120
5. Brandon Lemmon	[illegible]	6405 50th St 92120
6. Thomas Graham	Thomas Graham	6425-50th St 92120
7. SHARON L. GRAHAM	Sharon L Graham	6425-50th St. 92120
8. Holly Simionette	Holly Simionette	4838 Elsa Rd, SD 92120
9. Paul Simonette	Paul Simonette	4838 Elsa Rd SD 92120
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GRANTVILLE RESIDENTS OPPOSED TO THE GRANTVILLE REDEVELOPMENT PROJECT

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We urge the City Council to IMMEDIATELY STOP THE PROJECT.

Print Name	Sign Name	Address
1. LYNN MURRAY	Lynn Murray	6549 Carthage St
2. Carol Carlson	Carol Carlson	6514 Eldridge St.
3. Eric Carlson	Eric Carlson	6514 ELDRIDGE ST.
4. ETSUKO LOWE	Etsuko Lowe	6601 CARTHAGE ST
5. Jennifer Nickles	[illegible]	6511 Carthage St
6. TODD PAPPENFUS	[illegible]	6555 CARTHAGE ST.
7. Veronica Pappenfus	Veronica Pappenfus	6555 Carthage St.
8. Chris Kutches	[illegible]	6543 Carthage St.
9. Aric Petersen	Aric Petersen	6532 Delfern st.
10. Jody Petersen	Jody Petersen	6532 Delfern St
11. Steve Przybylo	[illegible]	6579 Carthage St
12. Marlene DeMers	Marlene DeMers	6511 Eldridge st
13. PETER D. MARKERT	[illegible]	6599 ELDRIDGE ST.
14. LOIS E LARSON	Lois E Larson	6522 Delfern
15. Cindy Storey	C Storey	6552 Delfern St
16. C R Storey	[illegible]	6552 Delfern St
17. TODD DOGGETT	[illegible]	6553 Delfern St
18. Ronald Purcell	Ronald Purcell	6563 DELFERN
19. Cora Dillaway	Cora Dillaway	4982 Alfred Ct.
20. Bonnie Dunn	Bonnie Dunn	6562 Delfern St.

GRANTVILLE RESIDENTS OPPOSED TO THE GRANTVILLE REDEVELOPMENT PROJECT

We, the undersigned residents and business owners of the Grantville community, are opposed to the City of San Diego's plans to adopt the Grantville Redevelopment Project.

We urge the City Council to IMMEDIATELY STOP THE PROJECT.

Print Name	Sign Name	Address
1. DAVID GARDNER	[illegible]	6543 CARTHAGE ST SAN DIEGO, CA 92120
2. Earl Murray	Earl Murray	6549 CARTHAGE ST SAN DIEGO CA 92120
3. Jeff Myers	Jeff Myers	6612 CARTHAGE ST SD CA 92120
4. Mary Myers	Mary Myers	6631 Carthage ST
5. Heather Myers	[illegible]	6612 Carthage St San Diego, CA 92120
6. Jennifer Rence	Jennifer Rence	6612 Carthage St San Diego 92120
7. Brandon Myers	[illegible]	6611 Carthage St
8. Jeanetta L. Chafe	Jeanetta L. Chafe	6561 CARTHAGE ST.
9. Lisa Digby	[illegible]	5959 Mission Gorge Rd #206 San Diego CA 92120
10. Charles Digby	[illegible]	5959 Mission Gorge Rd #206 San Diego CA 92120
11. John W. Williamson	John W. Williamson	owner of rental @ 4951 Havenwood Ave
12. ALISON C. MANROP	Alison C. Manrop	6713 Carthage St. SD, CA 92120
13. Katherine Clark	Katherine Clark	6543 Carthage ST SD, CA 92120
14. Joel Stibunga	[illegible]	4319 Twain Ave SD CA 92120
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20.		

San Diego River Conservancy

9174 Sky Park Court, Suite 100, San Diego, California 92123-4340
(858) 467-2972 • Fax (858) 571-6972
http://resources.ca.gov/sdrc.html

Dick Murphy, Chair
Mayor, City of San Diego

Donna Frye, Vice-Chair
Councilmember, City of San Diego

Arnold Schwarzenegger
Governor

Mike Chrisman
Secretary, Resources Agency

March 13, 2005

Mr. Tracy Reed, Project Manager
City of San Diego, Redevelopment Agency
600 B St, Fourth Floor, MS 904
San Diego, CA 92101-4506

Dear Mr. Reed:

DRAFT PRELIMINARY COMMENTS ON DRAFT PROGRAM GRANTVILLE REDEVELOPMENT PROJECT DRAFT ENVIRONMENTAL IMPACT REPORT (EIR)

On February 11, 2005 the Governing Board of the San Diego River Conservancy unanimously voted to (1) direct its Executive Officer to develop and submit comments on the Grantville Redevelopment Project Draft Environmental Impact Report (EIR) dated December 13, 2004; and (2) request an extension of the comment period of at least 30 days or longer to allow adequate time for comment on the Draft EIR and on its consistency with the City of San Diego River Park Master Plan, the Conservancy's Enabling Statute, and other relevant documents.

SDRC1 Accordingly, I have enclosed the Conservancy's Draft Preliminary Comments on the Grantville Redevelopment Project Draft Program EIR. Although the Conservancy was not "officially" granted the requested extension, we are submitting the attached preliminary draft comments at this time and plan to submit final comments upon completion. The attached document contains (1) a brief summary of the Conservancy's initial concerns based on our preliminary review of the Draft EIR (and relevant documents); and (2) verbatim transcript of the oral public comments made directly by the Governing Board members on February 11. I want to emphasize that the attached comments are summary and very preliminary in nature, designed primarily to make you aware of the Conservancy's initial concerns at this time. At a minimum, I request that you attach the Conservancy's preliminary comments to the next public release of the EIR.

Tracy, on behalf of the Governing Board, I want to thank you and Ms. Maureen Ostrye again for your February 11 presentation and for your consideration of the Conservancy's comments. If you have questions or would like to discuss our comments further, please contact me at (858) 467-2972 or by e-mail at djayne@waterboards.ca.gov. We look forward to working with you in the future.

Sincerely,

Deborah S. Jayne
Executive Officer

cc: Ms. Maureen Ostrye, Acting Deputy Director of Redevelopment, City of San Diego

RESPONSE TO COMMENT LETTER FROM SAN DIEGO RIVER CONSERVANCY, SIGNED BY DEBORAH S. JAYNE, DATED MARCH 13, 2005

Response to Comment SDRC1:

As indicated in response to comment OPR1, the original 45-day public review period for the Grantville Redevelopment Project Draft Program EIR extended from December 13, 2004 to January 31, 2005. However, the Agency extended the public review period to February 14, 2005. The total public review period was 64 days. The comment letter submitted by the San Diego River Conservancy was received by the Redevelopment Agency on March 14, 2005; approximately 30 days after the close of the 64-day public review period; however, a good faith effort has been provided in responding to these comments.

San Diego River Conservancy

DRAFT PRELIMINARY
COMMENTS ON DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT
GRANTVILLE REDEVLOPMENT PROJECT
March 13, 2005

The San Diego River Conservancy's (Conservancy's) Draft Preliminary Comments on the Draft Program Environmental Impact Report (Draft Program EIR or draft EIR) for the Grantville Redevelopment Project are organized into two sections: (I) Summary of Initial Concerns Based on Preliminary Review; and (II) Verbatim Public Comments by Governing Board Members. The "Summary of Initial Concerns" is consistent with and builds upon the Board Member's public comments.

Draft Preliminary Comments

The Conservancy wishes to emphasize that the "Summary of Initial Concerns" below is very *preliminary* in nature. It represents a list of issues that staff has initial or potential concerns about and wishes to review in greater detail. Because the time schedule for moving the Grantville Redevelopment Project forward is very tight, we have decided to submit Preliminary Draft
SDRC2 Comments *in advance of completing our review* in order to make you aware as early as possible that we have concerns. Because these comments are preliminary (made before our review is complete), the Conservancy reserves the right to refine, modify, and expand its comments. It is likely that some concerns below will be developed further while others may fall off the list upon further review. In addition it is possible that new concerns may be identified upon closer examination.

The Conservancy's comments below speak ***only*** **to the** ***adequacy of the environmental analyses***
SDRC3 contained the in the Draft Program EIR. The comments do not address the relative merits of the Redevelopment Project itself (or whether or not the area should be designated as a redevelopment area).

I. Summary of Initial Concerns Based on Preliminary Review

Based on a preliminary review of the Grantville Redevelopment Project Draft EIR, the San Diego River Conservancy has the following initial concerns which warrant Conservancy staff's further review:

SDRC4 1. *Adequacy of Impact Analyses*
Several *Impact Analyses* contained in the draft EIR appear to be incomplete, inadequate, or incorrect and require further evaluation including:
- Hydrology / Water Quality
- Biological Resources
- Air Quality

RESPONSE TO COMMENT LETTER FROM SAN DIEGO RIVER CONSERVANCY, SIGNED BY DEBORAH S. JAYNE, DATED MARCH 13, 2005 (cont.d)

Response to Comment SDRC2:

It is acknowledged that comments submitted by the San Diego River Conservancy are preliminary in nature. The Agency has made a good faith effort to respond to the comments as submitted. The Agency also recognizes that the Master Plan has not been adopted by the City and that appropriate environmental documentation, in accordance with CEQA, will need to be prepared and certified by the City in conjunction with the adoption of the Master Plan. The Agency will look forward to reviewing and responding to the environmental documentation for the Master Plan at the time it is prepared and available for public review.

Response to Comment SDRC3:

Comment noted.

Response to Comment SDRC4:

Comment noted. However, this comment does not provide specificity as to the inadequacies of the EIR; therefore, a specific response is not possible.

SDRC4 (cont'd.)

- Cumulative Impacts Analysis
- Alternative Analyses
- Growth Inducement
- Cultural Resources
- Aesthetics (views, light/glare)
- Noise

2. ***Consistency with Relevant Planning and Regulatory Documents***
It appears that portions of the draft EIR may not consistent with the "letter" or "spirit" of the following planning or regulatory documents (or portions thereof):

SDRC5

- Navajo Community Plan
- Tierrasanta Community Plan
- City's MSCP Subarea Plan
- City's Environmentally Sensitive Lands Regulations & Biology Guidelines
- City of San Diego's River Park Master Plan
- San Diego Conservancy Act (Enabling Statute)
- Conceptual Plan for the San Diego River Park
- Resource Agencies' wildlife corridor "minimum width" recommendations
- SANDAG's Regional Growth Management Strategy
- San Diego Municipal Storm Water Permit (MS4 NPDES permit issued by Regional Water Quality Control Board)

In addition it appears that the two major applicable Community Plans may not be fully consistent with each other. Also it appears that portions of the documents listed above are inconsistent with portions of other documents listed above.

3. ***Evidence and Conclusions Must be Persuasive***
Several conclusions reached in the draft Program EIR are not convincing and appear to not be supported by the evidence provided. Portions of the Program EIR appear too broad and generic to facilitate meaningful comment and review.

SDRC6

4. ***Further Environmental Review of Specific Development in Project Area***
By using a "Program EIR" it was not necessary for the City of San Diego to address the impacts of specific future development projects (which will be part of the overall redevelopment) since these component projects are "currently unknown". They appear to be mentioned only in a very superficial way. Furthermore the use of "Program EIR" *may* allow the City to circumvent the need for additional environmental review of these future projects (beyond the Program EIR). Pursuant to CEQA regulations, if specific development activities (which are components of the overall redevelopment program) involve no new significant impacts (beyond those already analyzed in the Program EIR) OR if any new impacts can be adequately handled by mitigation measures (previously

SDRC7

RESPONSE TO COMMENT LETTER FROM SAN DIEGO RIVER CONSERVANCY, SIGNED BY DEBORAH S. JAYNE, DATED MARCH 13, 2005 (cont.d)

Response to Comment SDRC5:
The proposed project is the adoption of a redevelopment plan, and no specific development project is proposed. The EIR recognizes that future redevelopment activities will need to be compliance with the adopted plans and regulations at the time the subsequent development is proposed. EIR Section 4.1 Land Use addresses the existing adopted community plans of the Project Area, including the Navajo, Tierrasanta, and College Area Community Plans. The City's MSCP Subarea Plan and Environmentally Sensitive Lands Regulations, and wildlife corridor width recommendations are discussed in Section 4.6 Biological Resources (please also refer to responses to comment DFG1 through DFG19. The City of San Diego's River Park Draft Master Plan is addressed in EIR Sections 2.0 Environmental Setting, 4.1- Land Use, and 4.6 Biological Resources. Please also refer to responses to comments PRD1 through PRD23. The San Diego Municipal Storm Water Permit is addressed in Section 4.11-Water Quality/Hydrology of the EIR.

Response to Comment SDRC6:
Comment noted.

Response to Comment SDRC7:
The Program EIR provides an analysis of potential environmental impacts associated with the adoption of the proposed redevelopment project. Because no specific development is known, it is not possible to provide a specific detailed analysis of the potential impact associated with a specific project. As indicated in response to comment TCC 13 all future will need to be evaluated for compliance with the provisions of the California Environmental Quality Act. The type of environmental document depends on the size, nature, and scope of redevelopment activities. Please refer to response to comment TCC13.

SDRC7 (cont'd.)

identified in the Program EIR), *there is no need for additional environmental analyses of subsequent projects* because they are components of the overall Program EIR

(footnote citation). For this reason, it becomes even more important that the impact analyses in the Program EIR be thorough and accurate.

SDRC8

5. ***Consideration of Environmentally Superior "Project Alternative"***
The draft EIR identifies a *project alternative* that is "environmentally superior" to the *proposed project* (i.e., results in fewer environmental impacts) *and* would meet most of the basic objectives of the proposed project. When such an alternative can be identified, it is the intent of CEQA that the alternative be given full consideration and should be implemented in lieu of the proposed project unless it is found to be infeasible.

SDRC9

6. ***Comprehensive Area-Wide Hydrology Assessment***
The draft EIR lacks a comprehensive area-wide hydrology assessment to evaluate current conditions (establish baseline), predict the individual and cumulative impacts of the overall redevelopment project and its component projects, and recommend improvements to restore (or improve) the functions and benefits of the River's natural hydrologic regime. In light of the major existing flooding problems in this area, including recent motorist rescues, we recommend that a large-scale hydrology study (that covers the project area at a minimum) be conducted before any redevelopment activities are allowed to commence in the area.

SDRC10

7. ***Cumulative Impacts Assessment***
"Program EIRs" should be particularly effective in evaluating cumulative impacts over time. It appears however that the draft Grantville Program EIR fails to adequately evaluate the cumulative impacts of the Redevelopment Project on a long-term basis. The draft EIR repeatedly recommends evaluation of the impacts of each specific redevelopment project on an individual case-by-case basis. This approach seems short-sighted and may miss the long-term "cumulative" impacts of the overall redevelopment project over time (next 30 years).

SDRC11

8. ***SDSU Development Project: Cumulative Impacts***
The draft EIR fails to evaluate (or even mention?) the concurrently proposed San Diego State University (SDSU) development project immediately upstream which will certainly exacerbate the hydrologic and water quality impacts of the Grantville Redevelopment Project on the San Diego River. The individual and cumulative impacts of these significant projects must evaluated thoroughly.

SDRC12

9. ***Floodplain / Floodway Guidelines***
The Draft EIR fails to establish project development guidelines to protect the River (e.g.,

RESPONSE TO COMMENT LETTER FROM SAN DIEGO RIVER CONSERVANCY, SIGNED BY DEBORAH S. JAYNE, DATED MARCH 13, 2005 (cont.d)

Response to Comment SDRC8:
The Redevelopment Agency will consider the alternatives evaluated in the EIR and will make findings regarding the adoption of the project and rejection of alternatives pursuant to CEQA Guidelines Section 15091. With respect to the TOD Principles Alternative, any further consideration of this conceptual land use pattern by the City would require a community plan update, involving an environmental review process in accordance with CEQA.

Response to Comment SDRC9:
Please refer to responses to comments DD5, BC3, LC11, LC16, and DF2.

Response to Comment SDRC10:
The Program EIR provides a comprehensive analysis of potential cumulative impacts. For example, the traffic analysis evaluates the impact of redevelopment of the Project Area as a whole over a 30-year period, as well as in conjunction with other cumulative development within the region, based on SANDAG Series 10 traffic forecasts. The air quality analysis considers the impacts of redevelopment of the Project Area as a whole, as well as regional conditions in the area that are a result of cumulative growth. Please also refer to DF2.

Mitigation Measures have been identified to address project level impacts where appropriate. The project is also proposed in an effort to address regional/cumulative issues such as traffic and flooding improvements. Please refer to responses to comments DOT2, DOT3, RM3, DRS15, CLA1, CLA6, CLB1, CLB2, DD5, DD6, BC3, LC11, LC16, and DF2.

Response to Comment SDRC11:
Please refer to responses to comments DD5, BC3, LC11, LC16, and DF2.

Response to Comment SDRC12:
Future development of the Project Area would be subject to applicable floodplain/floodway guidelines and regulations at the time the development occurs. This includes regulations addressing flooding, as well as wetland issues (e.g. Environmentally Sensitive Lands Ordinance). In the event that the proposed San Diego River Park Draft Master Plan is adopted by the City, future redevelopment activities will need to be consistent with the adopted policies of the Master Plan. It should be noted that adoption and implementation of the Master Plan is also subject to review in accordance with CEQA. Future redevelopment may also be subject to specific mitigation measures identified in the environmental document certified in conjunction with the future adoption of the Master Plan.

SDRC12 (cont'd.) no building in the floodway / floodplain).

10. ***Commitment to Enforce City Building Code or Other Ordinances***
The Draft EIR relies on the fact that redevelopment activities will be subject to, and must be compliant with, existing regulations and permits. Yet it fails to commit to conduct the associated assessment and enforcement needed to ensure that compliance is achieved. Further there is no evidence to suggest that the City will be more inclined to use its legal authority after Grantville is redeveloped than it currently is. At the present time, the City appears to be unwilling (or unmotivated?) to enforce the numerous existing building code violations that are currently identified in the Granville draft EIR. City staff have indicated that the City's lack of code enforcement is due, at least in part, to "limited resources". Given the tract record, why should the public have confidence that the City will enforce the BMPs and mitigation measures promised in the Draft EIR (or ensure compliance with regulatory permits) when it seems unwilling to enforce the numerous building code violations already documented in the Grantville Redevelopment Project draft EIR? SDRC13

11. ***Underlying Cause of Flooding***
The draft EIR (barely acknowledges) and fails to address/remedy the underlying cause of the major flooding problems near the Alvarado Creek / San Diego River confluence. The proposed redevelopment activities will likely exacerbate (rather than mitigate) the existing flooding problems. SDRC14

12. ***Underlying Cause of Water Pollution***
The draft EIR fails to adequately address/remedy the underlying cause of water pollution and water quality impairments near the Alvarado Creek / San Diego River confluence. Pollution prevention and source control appear to not be mentioned. The draft EIR relies on treatment controls to remove pollutants at the end-of-pipe, rather than identifying and abating pollutants at their source. Proposed redevelopment activities will likely exacerbate (rather than mitigate) existing water quality problems. SDRC15

13. ***Minimum Wildlife Corridor Widths***
The draft EIR fails to comply with minimum wildlife corridor width recommendations provided by the Department of Fish and Game and US Fish and Wildlife. SDRC16

14. ***Significant Unavoidable Impacts***
The draft EIR finds that the proposed project will result in significant unavoidable impacts to (1) Transportation /Circulation; and(2) Air Quality. To move forward with the proposed project, despite these impacts, the City need only make a "finding of overriding consideration". SDRC17

RESPONSE TO COMMENT LETTER FROM SAN DIEGO RIVER CONSERVANCY, SIGNED BY DEBORAH S. JAYNE, DATED MARCH 13, 2005 (cont.d)

Response to Comment SDRC13:
Building code violations are addressed in responses to comments JN9, JN10, JN11, and HSA12. With respect to issues such as BMP and mitigation measures referenced in the EIR, a Mitigation Monitoring and Reporting Program (MMRP) will be adopted in conjunction with certification of the EIR. The MMRP will ensure compliance with proposed mitigation measures. Other measures, such as implementation of BMPs and compliance with regulations such as the Environmental Sensitive Land Regulations, are enforced through review of specific development projects for compliance with these regulations and permit approval is typically contingent upon demonstration of compliance with specific permit conditions.

Response to Comment SDRC14:
Please refer to responses to comments DD5, BC3, LC11, LC16, and DF2.

Response to Comment SDRC15:
The EIR identifies that the lower portion of the San Diego River is currently identified on the Section 303(d) list for fecal coliform, low dissolved oxygen, phosphorus, and total dissolved solids. Alvarado Creek is not included in the Section 303(d) list. However, the Alvarado Creek is a tributary to the San Diego River (see EIR Figure 4.11-2), and beneficial uses, as established by the Regional Water Quality Control Board are identified on page 4.11-5. The EIR identifies the recommendations contained in the San Diego River Park Draft Master Plan for Alvarado Creek. As described:

> The Confluence segment is the area between Interstate 15 and Friars Road Bridge. This segment is partially enclosed by the steep wall of the knob topped by Mission San Diego de Alcala. Encroaching development on the east and Interstate 8 on the south further emphasize the sense of enclosure. The river corridor is also constrained by a series of old gravel mine ponds below the Friars Road Bridge: these ponds impede the normal hydrologic activities of the river system. In this area, extensive exotic vegetation infestation is present both in the ponds and in the river. The Plan provides the following recommendations applicable to hydrology and water quality for the Confluence area:
>
> - Create a connection with Alvarado Canyon and on to Collwood and Navajo Canyons.
> - Acquire land or establish easements.
> - Establish a minimum 300-foot wide-open space corridor.
> - Separate stream channel from ponds, additional land is necessary.
> - Coordination with the Grantville Redevelopment Study presents the potential opportunity for the San Diego River Park to positively influence redevelopment as well as to benefit from new activities along the river corridor.

RESPONSE TO COMMENT LETTER FROM SAN DIEGO RIVER CONSERVANCY, SIGNED BY DEBORAH S. JAYNE, DATED MARCH 13, 2005 (cont.d)

Response to Comment SDRC15 (cont.d):
The EIR also discusses applicable water quality regulations including the City of San Diego Municipal Code (Chapter 4, Article 3, Division 3 – Stormwater Management and Discharge Control, Chapter 14, Article 2, Division 1 – Grading Regulations, Chapter 14, Article 2, Division 2 – Storm Water Runoff and Discharge Regulations), the General Municipal Stormwater Permit, and the General Construction Stormwater Permit. Compliance with these regulations would address both treatment (point) and non-point measures to reduce water quality impacts. Because a majority of the Project Area has been developed without consideration of water quality regulations (current regulations were not in place at the time development occurred), it is anticipated that redevelopment activities would not further exacerbate existing water quality problems, as appropriate water quality treatment controls can be implemented in conjunction with new development.

Response to Comment SDRC16:
Please refer to responses to comment DFG1 through DFG19.

Response to Comment SDRC17:
Comment noted. Please refer to responses to comments AG1 and CLB7.

SDRC18 15. *Valuable Cultural Resources*

Very valuable cultural resources are located in the Project area but are not identified the draft EIR and will therefore not be protected. These resources are of statewide and national significance and are currently at risk of being lost forever.

II. Verbatim Public Comments By Governing Board Members

The following comments on the Grantville Redevelopment Project Draft Program Environmental Impact Report were made by the Governing Board Members of the San Diego River Conservancy at their public meeting on February 11, 2005. Yellow highlighting has been added to emphasize key sentences.

Jim Peugh, Board Member:

I noticed that you mentioned that there is some flooding in the area and I noticed in the objectives that there is a number 13 "Support habitat conservation and restoration" but there is nothing that I noticed in the objectives or in your talk about what to do about the hydrologic problems. The fact that you have flooding in the area now where you are going to invest more money into it and you know and the approach well you could do it in a number of ways. One is to say well we will just rip out all vegetation from the river down stream so it will flow faster. Or you can say we'll just build a big concrete channel so the water will flow faster. But all of those are really destructive and, you know, we have all learned that. It seems like there should be some discussion of public investment that is needed to make the river serve the area better. The more that we invest money both private and public around rivers really we should be making them bigger because the risk of them flooding is a lot more than it was previously when the river was surrounding with ag fields but unfortunately we do just the opposite because the land is valuable we keep making the mistake of making the river smaller and smaller. I guess I am just a little surprised to see that there is no objective that has to do with making the river function better hydrologically so that your developments won't be put at risk. And from my point of view, of course, that the wildlife won't be put at risk.

SDRC19

Tracy Reed, Redevelopment Agency:

I mean, that is the input we are looking for. We have been working on the Five year Implementation Plan and putting creek restoration... And that is kind of some of the input I am trying to get regarding the River. Alvarado Creek I have gotten pretty good experience on that one- that you have some parts improved and then unimproved parts. The unimproved part is actually where the curve is in it so that is where you typically get your overflow problems into the neighborhood. But that is some of the input we are looking for is that we

RESPONSE TO COMMENT LETTER FROM SAN DIEGO RIVER CONSERVANCY, SIGNED BY DEBORAH S. JAYNE, DATED MARCH 13, 2005 (cont.d)

Response to Comment SDRC18:

Please refer to responses to comments NAHC1 through NAHC3, and BW1.

Response to Comment SDRC19:

Please refer to response by Tracy Reed below the comment. In addition, please refer to responses to comments DD5, BC3, LC11, LC16, and DF2.

went with general terms and can get more specific on some of what those issues that we need to look at.

Jim Peugh, Board Member:

SDRC20 I would hope that you would be looking at property acquisition for places that the river needs to be expanded or for properties that are constantly at risk of flooding so they could be converted to some other use that flooding wouldn't be a problem for. But I didn't see any of that here or in your presentation so I was a little surprised.

Dick Murphy, Chairman:

SDRC21 I just want to say that this is a classic example of they channelized up stream and they didn't channelize down stream and so the water races like a super highway through the channelized concreter channel and then where they don't have it channelized it floods. Talk about poor planning. The solution is to rip out the concrete not to channelize the whole thing.

Jim Peugh, Board Member:

SDRC22 In some cases, you actually have to acquire property that has been filled in the past. And that takes public investment. I would hope that would be addressed in this project.

Dick Murphy, Chairman:

SDRC23 There was a big effort in the 80s to channelize the whole thing because of the flooding but many of us didn't feel like that was the right solution. But the problem is that the flooding has continued. The ultimate better solution is to dechannelize Alvarado Creek, but it is expensive and it is hard to achieve.

Donna Frye, Vice-Chair:

SDRC24 One of the issues is to discuss the existing land uses that you are showing on the survey map. Because this particular document isn't actually changing any of the land uses, because the purpose of this is to make sure that whatever you do in the Redevelopment Area is consistent with the community plans, right.

Tracy Reed:

Correct. That is what the other map was. You can see the difference.

Donna Frye, Vice-Chair:

I am trying to see where there is any park, where the color is for park.

Tracy Reed, Redevelopment Agency:

RESPONSE TO COMMENT LETTER FROM SAN DIEGO RIVER CONSERVANCY, SIGNED BY DEBORAH S. JAYNE, DATED MARCH 13, 2005 (cont.d)

Response to Comment SDRC20:
Comment noted. Please refer to response to comment SDRC19.

Response to Comment SDRC21:
Please refer to responses to comments DD5, BC3, LC11, LC16, and DF2.

Response to Comment SDRC22:
Please refer to responses to comments DD5, BC3, LC11, LC16, and DF2.

Response to Comment SDRC23:
Please refer to responses to comments DD5, BC3, LC11, LC16, and DF2.

Response to Comment SDRC24:
As required by California Community Redevelopment Law, the land uses designated in the Redevelopment Plan will be consistent with those called for by the City of San Diego Progress Guide and General Plan (i.e., adopted community plans).

Right now along that part of the river, there isn't any. The only real parks in the area are a little league field here, you have the parks up in here, and have some parks which are part of Mission Trails Park up here. And the community plan talks about this whole area here becoming a business tech park and having different improvements. The Navajo Community Plan talks about River improvements all through in here. But like most community plans it doesn't have any implementation methods or financing plan for that.

Donna Frye, Vice-Chair:

SDRC25 And you had mentioned something, I think in your presentation, about inconsistencies within the community plans depending on which side of the river they were on.

Tracy Reed, Redevelopment Agency:

Right, what it is, is you have got this boundary right here is the boundary of the Tierrasanta Community Plan with the Navajo Community Plan. And the Tierrasanta Plan talks about this area becoming open space if they are able to purchase it and if not, it would revert to residential which is what is adjacent to it. The Navajo Plan identifies this as all future industrial park. So what would happen technically is that if this didn't become open space you could have residential next to an industrial park in those two areas. I was thought that the boundary was the River, but it is not. It is actually halfway across on that side. And that may be why how it came about was when "what was county and what wasn't at that time that maybe the Tierrasanta part was in the City and the other part wasn't at that time. That may make sense of why you have it split that way.

Donna Frye, Vice-Chair:

SDRC26 And so the middle portion of that is specifically designated or the plans are to use that area as Industrial Area.

Tracy Reed Redevelopment Agency:

That's right. But it also talks about open space and improving the River. It talks about all of it. And it talks about doing a precise plan, in the Navajo Community Plan, doing a precise plan for that there is no circulation element in that portion.

Donna Frye, Vice-Chair:

Ok. I guess this would be my concern. Because once again I am not real clear on what specific action it is to provide input that Deborah is supposed to make comments to the EIR. I am assuming that is the action.

Deborah Jayne, Executive Officer:

Yes. That is the action. For you to hear the report and then accept it. And then I will document the comments to the Redevelopment Agency.

RESPONSE TO COMMENT LETTER FROM SAN DIEGO RIVER CONSERVANCY, SIGNED BY DEBORAH S. JAYNE, DATED MARCH 13, 2005 (cont.d)

Response to Comment SDRC25:

Please see Tracy Reed response below comment.

Response to Comment SDRC26:

Please see Tracy Reed response below comment.

Donna Frye, Vice-Chair:

SDRC27 So I guess in the process of reviewing, with that purpose in mind, the environmental documents the things to look for would be any inconsistencies with the San Diego River Master Plan, and inconsistencies with the enabling documents, or goals/programs, etc with this particular board's duties. And what it is we are trying to accomplish. It would be to look for those inconsistencies and to point out those inconsistencies or to comment on where there are omissions. Such as the areas in flooding. That type of discussion. As well as the core principle that Mr. Peugh is talking about is that when we established the enabling legislation, I believe part of that was to make sure we didn't channelize the river. The way it was set up was to make sure we restored the river, not tried to control the river. There was pretty specific language about that. In order to do that, we probably want to look at what SDRC28 the plans are to build in the flood plain, because if most of those lands are located in areas where its continually flooding, it seems awfully strange to me that you would then want to encourage more industrial uses in areas that are already prone to flooding or residential uses in areas that are already prone to flooding.

The other thing that I am concerned about and part of this was a city issue, was the fact that The San Diego River Master Plan what we had looked at here at the Conservancy was held up at the city level to have comments made related to the Grantville Redevelopment Project. My concern, which I expressed when we originally had the meeting, was to make sure the Master Plan was not modified to reflect changes in order to facilitate Grantville Redevelopment. If there are changes made to that plan, that plan would have to go back out to the public who had already approved it on the basis that they didn't know that there was going to be more changes made. I do not know if more changes have been made, but I have SDRC29 very serious concerns that there will be. And that the purpose of holding up the actually San Diego River Park Master Plan was to accommodate the changes that were going to be made in this Granville Redevelopment Project. So if there have been, then I would say that that document has to be recirculated. Because that to me is not the purpose to modify it outside the public process. And Councilmember Madaffer and I had a go around on this, and I made my point very clear and I tried to make it very clear at that meeting that I didn't think it was an appropriate action to be taking or ways that you go about dealing with the plan that affects all portions of the River.

Those would be my comments.

Jim Bartell, Board Member:

One area that interests me is the area south of Friars Road

Tracy Reed, Redevelopment Agency :

Pretty much Subarea A?

RESPONSE TO COMMENT LETTER FROM SAN DIEGO RIVER CONSERVANCY, SIGNED BY DEBORAH S. JAYNE, DATED MARCH 13, 2005 (cont.d)

Response to Comment SDRC27:

Please refer to response to comment SDRC5. There are no apparent inconsistencies with the plans referenced by the commentor, as the redevelopment plan must be consistent with the General Plan and any future redevelopment activities would need to be in compliance with applicable adopted plans and regulations.

Response to Comment SDRC28:

Please refer to responses to comments DD5, BC3, LC11, LC16, and DF2.

Response to Comment SDRC29:

The proposed redevelopment plan does not propose any changes to the San Diego River Park Draft Master Plan. If adopted by the City, future development of the Project Area would need to be consistent with the provisions of the Master Plan, regardless of whether or not the proposed redevelopment project is adopted by the City.

Jim Bartell, Board Member:

SDRC30 Where the industrial area is there. I imagine that it sits right on the floodplain area; it butts right up against the pond area.

Tracy Reed, Redevelopment Agency:

You mean in this portion here?

Jim Bartell, Board Member:

I thought I saw in the community plan that was designated as open space?

Tracy Reed, Redevelopment Agency:

Yeah. You could see the lighter brown area is what the community plan designates as open space.

Jim Bartell, Board Member:

SDRC31 That would be one area that I would like to have Deborah look into for a potential project for this group for restoration. That is designated as open space and it is consistent with the community plan. And there is currently blighted industrial up against that that I would imagine is causing runoff issues and pollution issues it might be an area that we would want to take a look at more closely.

Dick Murphy, Chairman:

I haven't watch this as closely, you know the last year as perhaps Donna and Jim have, but I sort of have a long history with this. The Navajo Plan was adopted when I was the City Council person (which is always dangerous to say, because I am sure there is something in there that I now regret, but anyways...)

SDRC32 Deborah, this is just an enormous opportunity for us. As Jim Bartell points out, the area there, south of Friars Rd, in which there is an equipment lay down yard right next to the River and that Industrial Area opens to the River that is one of our listed acquisition possibilities. Is that the Denton Sand Sites? It is a tremendous acquisition opportunity for us and then all the way up the River to Mission trails Park is designated open space as part of this redevelopment project there is this great opportunity for us to through redevelopment in that are to acquire the land and we need for the park. As I look around at all the opportunities that are going on right now, Deborah, this has got to be at the very top. One that you and everybody else are interested in. Really, really needs to watched carefully with a fine tooth comb. I know Mr. Madaffer and Ms. Frye have had some difference of opinion on this, and since I was a little districted by elections and lawsuits and everything, I didn't really have the time to get into it like I would have liked to, but I am just pointing out that this is the greatest opportunity area that we have right now and you need to watch it like a hawk. This has acquisition opportunities, open space easement opportunities. When

RESPONSE TO COMMENT LETTER FROM SAN DIEGO RIVER CONSERVANCY, SIGNED BY DEBORAH S. JAYNE, DATED MARCH 13, 2005 (cont.d)

Response to Comment SDRC30:

Please refer to responses to comments DD5, BC3, LC11, LC16, and DF2.

Response to Comment SDRC31:

Comment noted.

Response to Comment SDRC32:

Comment noted.

people said that the River as it runs through the City of San Diego is going to be difficult to reclaim and restore, that is a true statement, there are always this type of opportunity that if we let pass, will make it all that much more difficult.

SDRC32 (cont'd.)

What I would say to Tracy is: You have this great opportunity here to take what is a truly blighted area, to say the least, the northern part anyway, and redevelop it. But at the same time, help make good on our vision of a River Park.

Tracy Reed, Redevelopment Agency:

We do talk about the data in the Navajo Plan, and there is actually language in there that says the plan would guide development until the year 2000. So I have always wondered "Does it expire after the year 2000? But one of the main things that is going to be a part of our Five Year Implementation Plan is for the Redevelopment Agency to help with the updating of the community plan for several reasons. But that that community plan definitely needs to be updated for a lot of the items and stuff that has come along since then. But that is one of the things that is going to be built into the Five Year Implementation Plan.

Dick Murphy, Chairman:

I am sure those that adopted the plan were quite visionary and were looking toward the year 2020 but I don't think it has expired. But I am sure it could use updating. Other specific comments?

Jim Peugh, Board Member:

SDRC33

It is good to hear that you both know a lot about this. Do we know that the Redevelopment Plan does not do anything that we are going to regret as far as river restoration and river protection? That is what I am worried about.

Dick Murphy, Chairman:

You have to ask Donna that question. What I am saying is that I am very familiar with the area. I don't live in the immediate area anymore, but I used to live up at the Northern part of the area, up along Mission Gorge Road. So I drove past that area for 10 years of my life and I know every inch of it very well. But, I haven't lived there for 15 years now.

Donna Frye, Vice Chair:

SDRC34

And the answer to Mr. Peugh's question is No, we don't know that. And that is pretty much the direction that the River Conservancy's comments should be addressing. Where in fact there are inconsistent land uses (TAPE BREAK) and what's been provided as part of this plan. And again the problem is that you have community plans that are already in

RESPONSE TO COMMENT LETTER FROM SAN DIEGO RIVER CONSERVANCY, SIGNED BY DEBORAH S. JAYNE, DATED MARCH 13, 2005 (cont.d)

Response to Comment SDRC33:

Please refer to responses to comments SDRC24, SDRC27, and SDRC29.

Response to Comment SDRC34:

Comment noted. Please also refer to responses to comments SDRC24, SDRC27, and SDRC29.

SDRC34 (cont'd.)

existence and so it is kind of a difficult document to comment on. The role of the SDRC should be to make it very clear what it is that the SDRC does and the level of involvement as far as making consistency findings with the plan and opposed to making specific recommendations as to whether an area should be designated as a redevelopment area. I think they are quite different things. That is why I was trying to get clarity on what we are doing here. I think it is very appropriate for us to comment on environmental impact reports and how the SDRC can offer up suggestions and recommendations and point out areas where the proposal is not consistent with our particular task. To go much beyond that concerns me.

Tracy Reed, Redevelopment Agency:
I just want to say that the Redevelopment Plan has to be consistent with the community plans. So the Redevelopment Plan is not trying to change land uses at all. It just has to be consistent with the community plans. And the redevelopment plan is not trying to hold up anything regarding the park plan because we are following the community plan.

Donna Frye, Vice-Chair:

SDRC35

I guess the challenge, as far as the appropriate action, as far as how we can provide you information about the consistencies with this particular organization versus the community plans. Because that is not really our role. Our role is to address the issues as it relates to the SDRC and where there might be inconsistencies in the environmental document or failure to address issues that need to be addressed or inadequate analysis or incomplete analysis or inaccurate analysis.

Tracy Reed, Redevelopment Agency:
I understand.

Donna Frye, Vice-Chair:
That is just how I see it.

Dick Murphy, Chairman:
Given the importance of this to our mission, to really stay on top of this we will need to have Susan start going to RAC meetings. That is Deborah's call not mine. We need to be paying close attention so that when there are inconsistencies between the San Diego River Master Plan vision, the Community Plan and the Redevelopment Plan that these things aren't happening when we are busy doing other things.

Donna Frye, Vice-Chair:

SDRC36

And that is exactly the opportunity, and I don't know how much of an extension of time you have asked for and been given, in order to comment on this and spend the time necessary, I would say that you are going to need at least 30 days or longer. It is something that is not that simple.

RESPONSE TO COMMENT LETTER FROM SAN DIEGO RIVER CONSERVANCY, SIGNED BY DEBORAH S. JAYNE, DATED MARCH 13, 2005 (cont.d)

Response to Comment SDRC35:
Please also refer to responses to comments SDRC24, SDRC27, and SDRC29.

Response to Comment SDRC36:
Please refer to response to comment SDRC1.

Dick Murphy, Chairman:

SDRC37 My comment is only slightly different. I agree with Donna. This issue will still evolve. Things are never final final. There should be someone from the Conservancy who is participating in this process so when specific plans come along, there is someone who is watching it. Someone should be attending those meetings and know what is going on. Then when there are inconsistencies we can intervene early on. So it doesn't happen, like it did on this Wetlands Project, after it was all designed that they forgot to put a path in it. I am just saying that this is a big opportunity area and we should be watching it. So if you are become a student of this area, you will salivate when you go to these meetings because of the opportunity which exists. At least going to the meetings so we know what is going on.

Donna Frye, Vice-Chair:

SDRC38 Motion to accept report from Deborah Jayne and add to that the extension to allow adequate time to comment about the EIR and the consistencies with the San Diego River Park Master Plan. To be aware of what is going on in the best way that that should be handled.

Donna Frye, Vice-Chair:

Leave to staff discretion how to participate. Attending a meeting or meeting with staff.

Jim Peugh, Board Member:

SDRC39 It is fine to a say that we want it consistent with the River Plan, but there wasn't a lot of intense hydrology analysis when we put the River Plan together. So I would hope that our comments should address the function of the River, that we don't do any public investment which will preclude enhancing the river as far as its capability to carry water. Because we know that upstream there is going to be development in the County too, and so the amount of water the River carries now doesn't necessarily represent the amount of water it will carry in the future. I see Sorrento Creek written all over this. And I just don't want to see us investing huge amounts of private money and then discover later that a stream or even the River itself is no longer able to carry it. And then so doing draconian flood management and saying "we have no other option", I just don't want to see us putting ourselves in a position where we have no other option. So I just hope that some kind of words about making sure that we are not reducing the capability that the river needs for the future.

Donna Frye, Vice-Chair:

SDRC40 And that, I think, and Deborah Jayne can probably help me on this, but I think when we talk about the beneficial uses, and some of those other issues, that that is in the Conservancy's enabling legislation. There are issues related to flooding and that the goal is not to channelize the river. It was broad language, but I remember that we put that in there. And I think that would talk about all the functions that you are talking about as specifically related to the

RESPONSE TO COMMENT LETTER FROM SAN DIEGO RIVER CONSERVANCY, SIGNED BY DEBORAH S. JAYNE, DATED MARCH 13, 2005 (cont.d)

Response to Comment SDRC37:
Comment noted.

Response to Comment SDRC38:
Comment noted. Please also refer to response to comment SDRC1.

Response to Comment SDRC39:
Comment noted. Please also refer to responses to comments DD5, BC3, LC11, LC16, and DF2.

Response to Comment SDRC40:
Comment noted.

SDRC40 (cont'd.) beneficial uses. And I think that would probably get us there. Because I agree with you. I absolutely agree with you so just the consistencies with what the role of the conservancy is.

Dick Murphy, Chairman:
All in favor of passing the motion say "aye"

Dick Murphy, Chairman:
Passes unanimously.

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Executive Summary

Project Description

The proposed project is the adoption and subsequent implementation of the Grantville Redevelopment Project, located in portions of the Navajo, Tierrasanta, and College Area Community Planning Areas of the City of San Diego. The primary discretionary action associated with the proposed project is the adoption of the Grantville Redevelopment Project Area by the Redevelopment Agency of the City of San Diego. The Redevelopment Agency proposes the establishment of the Grantville Redevelopment Project Area as a catalyst to reverse the physical and economic blight in the Project Area. A variety of redevelopment activities will be implemented subsequent to the adoption of the Redevelopment Project Area in order to achieve the objectives of the project. These activities will include, but not be limited to, the acquisition of land or building sites, improvement of land and building sites, rehabilitation of structures, improving public facilities and infrastructure, expanding employment opportunities, expanding recreational opportunities in the Project Area, and providing other public improvements and landscaping.

The Grantville Redevelopment Project will be implemented in accordance with the California Community Redevelopment Law (CCRL), Health and Safety Code Section 33000 et. seq. Approval of the project will implement a plan, with subsequent redevelopment, and private and public improvements within the Redevelopment Project Area encompassing approximately 970 acres of land.

Redevelopment is defined pursuant to Section 33020 of the CCRL as "the planning, development, replanning, redesign, clearance, reconstruction, or rehabilitation, or any combination of these, of all or part of a survey area, and the provision of those residential, commercial, industrial, public, or other structures or spaces as may be appropriate or necessary in the interest of the general welfare, including recreational and other facilities incidental or appurtenant to them." Redevelopment also includes the activities described in Section 33021 of the CCRL which comprise the following:

a) Alteration, improvement, modernization, reconstruction or rehabilitation, or any combination of these, of existing structures in a Project Area;

b) Provision of open space and public or private recreation areas; and,

c) Replanning or redesign or development of undeveloped areas in which either of the following conditions exist:

   1) the areas are stagnant or improperly utilized because of defective or inadequate street layout, faulty lot layout in relation to size, shape, accessibility or usefulness, or for other causes; or

   2) the area requires replanning and land assembly for development in the interest of the general welfare because of widely scattered ownership, tax delinquency or other reasons.

As a basis for the redevelopment of the Project Area under consideration, it is proposed that uses be permitted in compliance with the City of San Diego Progress Guide and General Plan, Navajo, Tierrasanta and College Area Community Plans, and the Land Development Code (Zoning Ordinance) of the City of San Diego, as amended from time to time, and all other applicable state and local codes and guidelines.

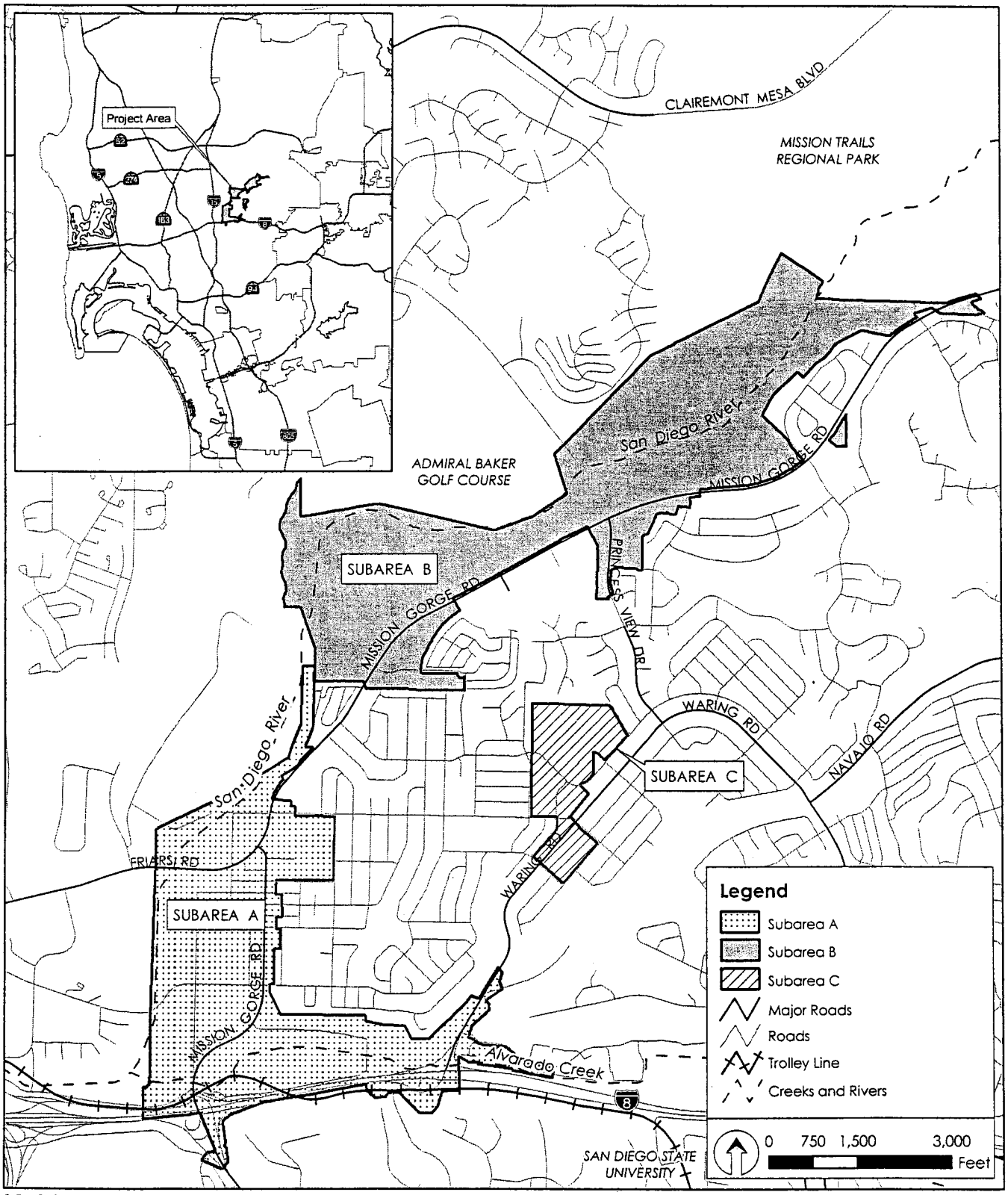
Project Location

The proposed Grantville Redevelopment Project Area is located in San Diego County, in the eastern portion of the City of San Diego north of Interstate 8 and east of Interstate 15. A majority of the Project Area is located within the Navajo Community Planning Area, and generally includes the existing industrial and commercial areas along Friars Road, Mission Gorge Road, Fairmount Avenue and Waring Road. The approximately 970-acre Project Area consists of three non-contiguous subareas, referred to in this EIR as Subarea A, Subarea B and Subarea C. Figure ES-1depicts the location of each subarea. The three subareas are described as follows:

- ***Subarea A*** – Subarea A is comprised of commercial, office, industrial, public facility, park and open space uses immediately north of I-8 and located along both sides of Fairmount Avenue, Friars Road and Mission Gorge Road north to Zion Avenue (and including several parcels north of Zion Avenue). The southeast portion of Subarea A also includes the first seven parcels on the southern side of Adobe Falls Road (starting at Waring Road). Subarea A comprises approximately 400 acres.
- ***Subarea B*** – Subarea B consists of the commercial, office, industrial, sand and gravel, and open space uses located along Mission Gorge Road from Zion Avenue, northeast to Margerum Avenue. Within this subarea, sand and gravel processing operations take place on both sides of the San Diego River. The western boundary is defined by the residential neighborhood along Colina Dorada Drive. Subarea B comprises approximately 505 acres.
- ***Subarea C*** – Subarea C includes a shopping center, retail uses and community facilities, at and adjacent to, the intersection of Zion Avenue and Waring Road. The Allied Gardens Community Park, and other community services such as the Edwin A. Benjamin Library, Lewis Middle School, and two churches are included as the community facilities in this subarea. Subarea C comprises approximately 65 acres.

Environmental Impacts

The Redevelopment Agency determined that a Program EIR is required pursuant to the California Environmental Quality Act (CEQA). The environmental issue areas identified by the Agency and as a result of input received on the Notice of Preparation (NOP) and public scoping meeting for the project include the following: land use, transportation/circulation, air quality, noise, cultural resources, biological resources geology/soils, hazards and hazardous materials, paleontological resources, aesthetics, water quality/hydrology, population/housing, public services, mineral resources, cumulative impacts, growth-inducing impacts, and significant irreversible environmental changes. Table ES-1 presents a summary of the environmental impacts of the proposed project, mitigation measures to reduce potential significant impacts for the proposed project, and the level of significance of each impact after implementation of proposed mitigation measures.



SOURCE: SanGIS and BRG Consulting, Inc., 2005

3/10/05

BRG CONSULTING, INC.

Grantville EIR

Grantville Project Location and Subareas

FIGURE ES-1

Significant, Mitigable Impacts

Implementation of the proposed Redevelopment Project will result in significant impacts as a result of future redevelopment activities that will occur within the Project Area. Significant impacts have been identified to the following environmental issue areas:

- Air Quality (Short-term Construction)
- Noise
- Cultural Resources
- Biological Resources
- Geology/Soils
- Hazards and Hazardous Materials
- Paleontological Resources
- Aesthetics
- Water Quality/Hydrology
- Public Services

Implementation of proposed Mitigation Measures identified in this Program EIR will reduce the impact to these resource areas to a level less than significant.

Significant, Unavoidable Impacts

Based on the data and conclusions of this Program EIR, the Redevelopment Agency finds that the project will result in significant unavoidable impacts to the following resources areas:

- Transportation/Circulation
- Air Quality (Long-term Mobile Emissions)

Implementation of proposed Mitigation Measures will reduce the potential impact to these resources to the extent feasible; however, the impact will remain significant and unavoidable. These impacts are ~~not a result of implementation of the Redevelopment Project in and of itself, rather they are~~ a result of implementation of the Redevelopment Project combined with forecasted growth in the region, which will occur both inside and outside of the Project Area. If the Redevelopment Agency chooses to approve the Grantville Redevelopment Project, it must adopt a "Statement of Overriding Considerations" pursuant to Sections 15093 and 15126(b) of the CEQA Guidelines.

Alternatives To The Proposed Project

The alternatives evaluated in this Program EIR include the following:

1. **No Project/No Redevelopment Plan.** This alternative assumes that the proposed redevelopment project area would not be adopted by the Redevelopment Agency and subsequent redevelopment activities would not be implemented.

2. **No Additional Development.** This alternative assumes that no additional development would occur within the Project Area.

3. **Redevelopment Area Pursuant to General Plan Opportunities Map Concept.** This alternative considers the environmental impacts associated with redevelopment activities occurring over the 20 to 30 year redevelopment timeframe anticipating land uses that would implement the conceptual land use patterns identified in the City of San Diego General Plan (City of Villages) Opportunity Areas Map for the Project Area.

4. **Redevelopment Area Pursuant to Transit-Oriented Development Principals.** This alternative considers the environmental impacts associated with redevelopment activities occurring over the 20 to 30 year redevelopment timeframe and anticipating land uses within the Project Area that would be consistent with Transit-Oriented Development principals.

These alternatives are discussed in detail in Section 8.0 of this document.

Areas Of Controversy And Issues To Be Resolved

The CEQA Guidelines require potential areas of controversy to be identified in the Executive Summary. Issues identified during the Notice of Preparation and public scoping period include: definition of the Project Area boundaries; land use compatibility, including the San Diego River Park Master Plan and MSCP adjacency issues; traffic and circulation related issues, including existing levels of congestion on Project Area roadways and access to adjacent freeway systems; air quality, seismic and geotechnical issues, including faulting and liquefaction potential in portions of the Project Area; hydrology and flooding; the potential presence of hazardous materials and industries in, and near the Project Area; the project's potential impact to biological and cultural resources located in the San Diego River area; aesthetics; noise, including traffic generated noise and potential noise impacts from overflight of military aircraft; and the adequate provision of public services.

Mitigation, Monitoring And Reporting Program

A Mitigation, Monitoring and Reporting Program (MMRP) will be prepared in accordance with Section 21081.6 of CEQA. The MMRP will be adopted by the Redevelopment Agency if the proposed Grantville Redevelopment Project is approved. The MMRP will ensure compliance with the mitigation measures adopted by the Redevelopment Agency.

TABLE S-1
Summary of Significant Impacts and Mitigation Measures

Impact(s)	Recommended Mitigation Measure(s)	Significance of Impact(s) After Mitigation
Section 4.2 – Transportation/Circulation		
Proposed redevelopment activities based on existing community plan land uses are anticipated to add 31,606 daily trips to the circulation network with 3,280 trips occurring in the morning peak hour and 4,346 trips occurring during afternoon peak hour. The following roadway segments would be significantly impacted: • Friars Road from I-15 North Bound Ramps to Rancho Mission Road (LOS F); • Friars Road from Rancho Mission Road to Santo Road (LOS F); • Fairmount Avenue from I-8 East Bound Off Ramp to Camino Del Rio North (LOS F); • Mission Gorge Road from Mission Gorge Place to Twain Avenue (LOS F); • Mission Gorge Road from Twain Avenue to Vandever Avenue (LOS F); and, • Mission Gorge Road from Friars Road to Zion Avenue (LOS E). The following intersections would be significantly impacted by the proposed redevelopment: • Friars & I-15 South Bound Ramps (PM Peak hour); • Friars & Mission Gorge Road (PM Peak hour); • Twain & Mission Gorge Road (AM and PM Peak hours); • Fairmount Avenue & Mission Gorge Road (AM and PM Peak hours); • Camino Del Rio & I-8 West Bound Off Ramp & Fairmount Avenue (AM and PM Peak hours); and, • I-8 East Bound On and Off Ramps & Fairmount Avenue (AM Peak hour). Ramp meter analysis was also conducted for the proposed project. This analysis indicates impacts would occur to the following ramp meter locations: Friars Rd. to I-15 North (AM Peak Hour); Friars Rd. to I-15 South (loop) (PM Peak Hour); and, Friars Rd. (HOV) to I-15 North (PM Peak hour)	**T1** Improvements identified within the Navajo and Tierrasanta Community Plans shall be implemented as sufficient financial resources become available through the establishment of the proposed redevelopment project area. These improvements include: • Widen Mission Gorge Road to a six-lane facility north of Zion Avenue with no left-turn lanes except at signalized intersections. • Widen Mission Gorge Road to a six-lane major street between Fairmount Avenue and Interstate 8. • Improve Mission Gorge Road to a six-lane major street between Fairmount Avenue and Interstate 8.	Significant and Unavoidable

Impact(s)		Recommended Mitigation Measure(s)	Significance of Impact(s) After Mitigation
Section 4.3 – Air Quality			
Short-term Future construction activities will result in a significant short-term air quality impact.	**AQ1**	A project-specific air quality analysis shall be prepared for future redevelopment projects to determine the emissions associated with construction activities and identify measures to reduce air emissions. In addition, future redevelopment projects shall implement appropriate federal, state, and local development standards and requirements that are designed to minimize short-term construction related air quality emissions. These measures typically include, but are not limited to the following: • Apply water or dust control agents to active grading areas, unpaved surfaces, and dirt stockpiles as necessary. Protect all soil to be stockpiled over 30 days with a secure tarp or tackifiers to prevent windblown dust. • Properly maintain diesel-powered on-site mobile equipment and use gasoline-powered on-site mobile equipment instead of diesel-powered mobile equipment, to the maximum extent possible. • Wash-off trucks leaving construction sites. • Replace ground cover on construction sites if it is determined that the site will be undisturbed for lengthy periods. • Reduce speeds on unpaved roads to less than 15 miles per hour. • Halt all grading and excavation operations when wind speeds exceed 25 miles per hour. • Sweep or vacuum dirt and debris spilled onto paved surfaces at the project site and on the adjacent roadways and dispose of these materials at the end of each workday. • Cover all trucks hauling dirt, sand, soil or other loose material to and from the site and/or maintain a two-foot minimum freeboard. • Use zero emission volatile organic compound (VOC) paints.	Less Than Significant
Long-term A significant and unavoidable air quality impact has been identified associated with future mobile related air pollutant emissions.	**AQ2**	A project-specific air quality analysis shall be prepared for each subsequent redevelopment project in order to assess the potential air quality impact associated with the activity and identify measures to reduce air emissions. The air quality assessment shall include an evaluation of construction-related emissions, stationary and mobile source emissions, including CO "hot spot" emissions, if necessary. Measures shall be identified and implemented on a project-by-project basis to reduce emissions to the extent feasible (e.g., solar heating and energy, building design and efficient heating and cooling systems, maximize opportunities for mass transit, etc.).	Significant and Unavoidable

Impact(s)		Recommended Mitigation Measure(s)	Significance of Impact(s) After Mitigation
Section 4.4 - Noise			
Construction Noise The potential noise generated during demolition and construction of future redevelopment activities is considered a significant, short-term impact. **Stationary Noise** Redevelopment activities within the Project Area may result in increases in stationary noise as a result of operations of commercial, industrial, and public service uses. Since redevelopment activities may include noise-generating land uses located in vicinity of noise-sensitive uses, this impact is considered significant. **Traffic Noise Exposure** The noise generated by roadways that carry large volumes of traffic may expose future redevelopment to noise levels that exceed City standards and/or Title 24 standards and is considered a significant impact.	**N1**	Future redevelopment activities shall be subject to applicable City regulations regarding control of construction noise at the time the redevelopment activity is constructed. Applicable regulations include limiting the days and hours of construction and limiting the maximum noise levels from construction equipment. City regulations that address construction noise include: • The construction hours for construction activities on sites adjacent to residences, schools, and other noise-sensitive uses shall be reviewed and adjusted as determined appropriate by the City. • To the extent feasible, construction activities will be screened from adjacent noise-sensitive land uses, with solid wood fences or other barriers as determined appropriate by the City. • All construction equipment, fixed or mobile, operating within 1,000 feet of dwelling unit(s), school, hospital, or other noise-sensitive land use shall be equipped with properly operating and maintained muffler exhaust systems. • Stockpiling and vehicle staging areas shall be located as far as practical from occupied dwellings, classrooms, and other sensitive receptors. • Construction routes shall be established where necessary and practicable to prevent noise impacts on residences, schools, and other noise-sensitive receptors. • Where the City undertakes major street widening improvements where residential uses are adjacent to streets, the City evaluates the potential for noise exposure to residents and implementation of soundproofing as required.	Less Than Significant

Impact(s)	Recommended Mitigation Measure(s)	Significance of Impact(s) After Mitigation
Section 4.4 – Noise (cont'd.)		

	N2 New development within the Project Area shall be subject to applicable City regulations at the time the redevelopment activity is proposed, Title 24 – Noise Insulation Standards, and implementation of site-specific building techniques. The site-specific building techniques include:
	• Multi-family residential buildings or structures to be located within exterior CNEL contours of 60 dB or greater of an existing or adopted freeway, expressway, parkway, major street, thoroughfare, railroad, rapid transit line, or industrial noise source shall prepare an acoustical analysis showing that the building has been designed to limit intruding noise to the level prescribed (interior CNEL of 45 dB).
	• Individual developments shall, implement site-planning techniques such as:
	  • Increase the distance between the noise source and the receiver.
	  • Using non-noise sensitive structures such as garages to shield noise-sensitive areas.
	  • Orienting buildings to shield outdoor spaces from a noise source.
	• Individual developments shall incorporate architectural design strategies, which reduce the exposure of noise-sensitive spaces to stationary noise sources. These design strategies shall be implemented based on recommendations of acoustical analysis for individual developments as required by the City to comply with City noise standards.
	• Individual developments shall incorporate noise barriers, walls, or other sound attenuation techniques, based on recommendations of acoustical analysis for individual developments as required by the City to comply with City noise standards.
	• Elements of building construction (i.e., walls, roof, ceiling, windows, and other penetrations) shall be modified as necessary to provide sound attenuation. This may include sealing windows, installing thicker or double-glazed windows, locating doors on the opposite side of a building from the noise source, or installing solid-core doors equipped with appropriate acoustical gaskets.
		Less Than Significant

Impact(s)	Recommended Mitigation Measure(s)	Significance of Impact(s) After Mitigation
Section 4.5 – Cultural Resources		
Implementation of future redevelopment activities has the potential to result in an impact to previously unrecorded cultural resources sites (archaeological and historical) as well as potentially significant historic structures. This potential impact is considered significant.	**CR1** The following measures shall be implemented prior to proceeding with any redevelopment activities in the Project Area: 1. Any areas proposed for development that have not previously been surveyed for cultural resources within the last five years shall be surveyed to identify presence/absence of cultural resources. 2. Any proposed development which may disturb subsurface soils, including removal of existing buildings or construction activities located adjacent to the San Diego River, shall include archaeological monitoring. 3. All potential prehistoric sites located within the San Diego River alluvial plain that will be impacted by proposed development shall be tested under City of San Diego and CEQA Guidelines to determine significance. Testing through subsurface excavation provides the necessary information to determine site boundary, depth, content, integrity, and potential to address important research questions. 4. Alternative options for significant sites under City of San Diego and CEQA Guidelines can include: 1) avoidance, and preservation, or 2) mitigation of impacts from proposed development through completion of a data recovery program in compliance with CEQA Guidelines.	Less Than Significant
	CR2 The following procedures shall be implemented before any Redevelopment Project activities can occur in the Redevelopment Project Area: 1) Conduct a historical resource survey of properties located within the Project Area that are 45 years of age and older resulting in a report with determinations of potential eligibility of said properties to the California Register of Historic Places and the City of San Diego Historic Resources List. 2) Obtain a concurrence on these determinations from the State Office of Historic Preservation and City Historical Resources Board. If any potential historical resources are identified and are found to be eligible, identify potential impacts from the proposed redevelopment project actions, and determine appropriate mitigations as defined in CEQA Guideline Section 15064.5 to reduce such impact to a level below significance.	Less Than Significant

Impact(s)	Recommended Mitigation Measure(s)		Significance of Impact(s) After Mitigation
Section 4.6 – Biological Resources			
Future redevelopment activities have the potential to impact sensitive habitats and species located within, and adjacent to portions of the Project Area. Sensitive habitats potentially impacted include Diegan coastal sage scrub, riparian, and freshwater marsh habitats. Potential direct and indirect impacts to biological resources located within the Project Area are considered significant.	**BR1**	The redevelopment project policies shall include a requirement to make use of project designs, engineering, and construction practices that minimize impacts to sensitive habitats and wildlife corridor /MHPA preserve areas.	Less Than Significant
	BR2	Further environmental review shall be conducted in accordance with appropriate CEQA documentation requirements where specific actions would result in impacts to sensitive habitats and/or wildlife corridor/MHPA preserve areas. These reviews shall be conducted at the earliest possible period of tiered project review to ensure the most flexibility in planning and project design, and resolve conflicts with significant biological resources. i. Trails should be kept out of the biological buffer except in areas of lower biological sensitivity. Trails within the buffer should be limited to trails that provide access to biological and /or cultural interpretive areas along the River, and aligned roughly perpendicular to the length of the buffer (i.e., spur trails). These interpretive areas and spur trails should be carefully chosen and should not be placed in biologically sensitive areas or areas with strong potential for effective habitat restoration and enhancement of species diversity. ii. As required by the MSCP Subarea Plan, native vegetation should be restored as a condition of future development proposals along the Urban Habitat Areas of the San Diego River corridor. iii. Permanent fencing and signage should be installed at the outside edge of the buffer areas. The limits of spur trails within the buffer should be effectively demarcated and/or fenced to avoid human encroachment into the adjacent habitat. The fencing should be designed to prevent encroachment by humans and domestic animals into the buffer areas and riparian corridor. The signage should inform people that sensitive habitat (and, if appropriate, mitigation land) lie beyond the fencing and that entering the area is illegal. iv. All post-construction structural best management practices (BMPs) such as grass swales, filter strips, and energy dissipaters, should be	Less Than Significant

Impact(s)	Recommended Mitigation Measure(s)	Significance of Impact(s) After Mitigation
Section 4.6 – Biological Resources (cont'd.)		
	outside of the riparian buffer and the riparian corridor (i.e., they should be within the development footprint). All filtration and attenuation of surface flows provided by the proposed BMPs should occur prior to the discharge of the flows into the buffer areas. v. Brush management zones should be outside the riparian buffer. The City's proposed brush management regulations state "no brush management is required in areas containing wetland vegetation." vi. No additional lighting should be added within the vicinity of both upland and wetland sensitive habitats, and where possible, existing lighting within such areas should be removed. vii. As to noise, methods should be employed to attenuate project-related construction and operational noise levels in excess of ambient levels at the edge of sensitive habitats to avoid or minimize further degradation by noise of conditions for wildlife, particularly, avian species. Where possible, existing sources of noise audible within the buffer should be removed. viii. All areas within biological buffers should be added to the MHPA, if not already within it, and should be accordingly managed in perpetuity to maintain the biological functions and values the buffers are intended to protect. **BR3** Prior to any project impacts occurring within areas under the jurisdiction of federal, state, or local biological resource regulatory agencies, the project applicant for the specific work shall obtain any and all applicable resource agency permits which may include, but are not limited to, Clean Water Act 404 and 401 permits and California Department of Fish and Game Code 1601 and 1603 Streambed Alteration Agreements. **BR4** Significant impacts to City of San Diego Tier I-III habitats shall be mitigated as shown in Table 4.6-5 and as described in Section 4.6.1.4. **BR5** Any significant wetland resource impacts to the San Diego River identified during lower tier environmental review shall be mitigated within the immediate area of the impact action.	

Impact(s)	Recommended Mitigation Measure(s)	Significance of Impact(s) After Mitigation
Section 4.6 – Biological Resources (cont'd.)		
	BR6 Where potential impacts to non-MSCP covered federal and/or state listed sensitive species and/or narrow endemic species may occur as a result of proposed project actions, coordination with responsible listing agencies (USFWS and/or CDFG) shall be completed as early as practicable and in conjunction with, or prior to, the CEQA process for actions that may affect these species. Specific actions necessary to protect these sensitive species shall be determined on a case-by-case basis.	
	BR7 Project actions resulting in impacts to nesting migratory birds (as defined under the Migratory Bird Treaty Act [MBTA]) shall incorporate seasonal timing constraints for any wetland habitat clearing or shall require work corridor surveys for nesting birds. Where active nests are identified, these shall be avoided if practical, and if necessary, a MBTA Special Purpose Permit (50 CFR §21.27) shall be completed before removal of active nests of MBTA covered species.	
	BR8 All future specific actions undertaken at or near the San Diego River shall be reviewed for consistency with the MSCP preserve and development requirements, as well as the MHPA Land Use Adjacency Guidelines.	
	BR9 Assurance that mitigation areas will be adequately protected from future development shall be provided through 1) the dedication of fee title for the mitigation land to the City of San Diego; or 2) the establishment of a conservation easement relinquishing development rights to a conservation entity; or 3) a recorded covenant of easement against the title of the property for the remainder area, with the USFWS and CDFG named as third party beneficiaries, where a project has utilized all of its development area potential as allowed under the OR-1-2 zone.	

Impact(s)	Recommended Mitigation Measure(s)	Significance of Impact(s) After Mitigation
Section 4.7 – Geology/Soils		
Existing geotechnical conditions of the Project Area related to the potential presence of near surface groundwater, ground shaking during a seismic event, and liquefaction is considered a significant geotechnical condition that may impact future development. As future development activities are proposed within the Project Area, a site specific geotechnical evaluation will need to be conducted for each project to identify the specific geotechnical conditions of the site and measures that would need to be implemented in order to address potential site constraints.	**GS1** A comprehensive geotechnical evaluation, including development-specific surface exploration and laboratory testing, shall be conducted prior to design and construction of any development within the Project Area. The purpose of the subsurface evaluation would be to: 1) further evaluate the subsurface conditions in the area of future structures or improvements; and, 2) provide information pertaining to the engineering characteristics of earth materials of each development. From these data, recommendations for grading, earthwork, surface and subsurface drainage, foundations, pavement structural sections, sedimentation mitigation, and other pertinent geotechnical design considerations may be formulated. The Rose Canyon fault has been mapped approximately five miles to the west of the site. Accordingly, the site has a potential for moderate ground motions due to an earthquake on the active Rose Canyon fault. Therefore, the potential for moderate seismic accelerations will need to be considered in the design of future structures or improvements. The level of risk associated with these seismic accelerations is the level of risk assumed by the UBC minimum design requirements. The settlement of potential underlain fill soils will likely require that multi-level structures be supported on deep foundations. The settlement potential of these soils would be evaluated as part of the geotechnical design phase of any redevelopment activity. Measures may include removal of these soils and replacement with compacted fill.	Less Than Significant

Impact(s)	Recommended Mitigation Measure(s)	Significance of Impact(s) After Mitigation
Section 4.7 – Geology/Soils (cont'd.)		
	Lower portions of Subareas A and B are underlain by alluvium which may be subject to liquefaction. Mitigation may include removal of loose alluvium and replacement with compacted fill or supporting any future structures on deep foundations which extend through the alluvium.	
Section 4.8 – Hazardous Materials		
The potential presence of hazardous materials and existing areas of contamination in the Project Area is considered a significant impact.	**HM1** Prior to the development of specific properties within the Redevelopment Project Area, a Phase I Environmental Site Assessment (ESA) shall be performed. The Phase I ESA shall identify the potential for the site to contain hazardous materials (including asbestos and lead-based paints) and contaminated soils. Recommendations of the Phase I ESA shall be implemented to ensure that the site is suitable for redevelopment activities. Recommendations of the Phase I ESA may range from no further action, to preparation of a Phase II ESA that identifies specific further action required in order to remediate the hazardous materials so that they do not pose a significant health risk. **HM2** Any underground storage tanks (USTs) that are removed during redevelopment activities shall be removed under permit by the Department of Environmental Health (DEH). The soil and groundwater within the vicinity of the USTs shall be adequately characterized and remediated, if necessary, to a standard that would be protective of water quality and human health, based on the future site use. **HM3** In the event that not previously identified underground storage tanks (USTs) or undocumented areas of contamination are encountered during redevelopment activities, work shall be discontinued until appropriate health and safety procedures are implemented. A contingency plan shall be prepared to address contractor procedures for such an event, to minimize potential for costly construction delays. In addition, either Department of Environmental Health (DEH) or the Regional Water Quality Control Board (RWQCB), depending on the nature of the contamination, shall be notified regarding the contamination. Each agency and program within the respective agency has its own mechanism for initiating an investigation. The appropriate program shall be selected based on the nature of the contamination identified. The contamination remediation and removal activities shall be conducted in accordance with pertinent local, state, and federal regulatory guidelines, under the oversight of the appropriate regulatory agency.	Less Than Significant

Impact(s)	Recommended Mitigation Measure(s)	Significance of Impact(s) After Mitigation
Section 4.8 – Hazardous Materials (cont'd.)		
	HM4 A risk assessment shall be performed at all facilities in the Project Area where contamination has been identified or is discovered during activities, and at which soil is to be disturbed, to address non-water quality risks posed by any residual contamination, and to establish appropriate mitigation measures (e.g., natural attenuation, active remediation, and engineering controls) that would be protective of human health and the environment. All assessment and remediation activities shall be conducted in accordance with a Work Plan which is approved by the City of San Diego having oversight of the activities. **HM5** During construction activities, it may be necessary to excavate existing soil at a specific project site, or to bring fill soils to the site from off-site locations. In areas that have been identified as being contaminated or where soil contamination is suspected, appropriate sampling is required prior to disposal of excavated soil. Complete characterization of the soil shall be prepared prior to any excavation or removal activity. Contaminated soil shall be properly disposed at an off-site facility. Fill soils also shall be sampled to ensure that imported soil is free of contamination. **HM6** Caution shall be taken during excavation activities near existing groundwater monitoring wells, so that they are not damaged. Existing groundwater monitoring wells may have to be abandoned and reinstalled if they are located in an area that is undergoing redevelopment.	
Section 4.9 – Paleontological Resources		
Future redevelopment activities have the potential to result in the substantial excavation of potential fossil-bearing geologic formations and the impact is considered significant.	**PR1** Prior to preconstruction (precon) meeting: 1. Land Development Review (LDR) Plan Check Prior to the issuance of a Notice to Proceed (NTP) or any permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits, the Assistant Deputy Director (ADD) of LDR shall verify that the requirements for Paleontological Monitoring have been noted on the appropriate construction documents. 2. Letters of Qualification have been Submitted to ADD Prior to the NTP, and/or issuance of a Grading Permit, Demolition Permit or Building Permit, the applicant shall provide a letter of verification to the ADD of LDR stating that a qualified Paleontologist, as defined in the City of San Diego Paleontological Guidelines, has been retained to implement the monitoring program.	Less Than Significant

Impact(s)	Recommended Mitigation Measure(s)	Significance of Impact(s) After Mitigation
Section 4.9 – Paleontological Resources (cont'd.)		
	3. Second Letter Containing Names of Monitors has been sent to Mitigation Monitoring Coordination (MMC). a. At least thirty days prior to the Preconstruction Meeting (Precon), a second letter shall be submitted to MMC which shall include the name of the Principal Investigator (PI) and the names of all persons involved in the Paleontological Monitoring of the project. b. MMC will provide Plan Check with a copy of both the first and second letter. 4. Records Search Prior to Precon Meeting At least thirty days prior to the Precon meeting, the qualified Paleontologist shall verify that a records search has been completed, and updated as necessary, and be prepared to introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities. Verification includes, but is not limited to, a copy of a confirmation letter from the San Diego Natural History Museum, other institution, or, if the record search was in-house, a letter of verification from the PI stating that the search was completed. Precon Meeting: 1. Monitor Shall Attend Precon Meetings a. Prior to beginning of any work that requires monitoring, the Applicant shall arrange a Precon Meeting that shall include the Paleontologist, Construction Manager and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), and MMC. The qualified Paleontologist shall attend any grading related Precon Meetings to make comments and/or suggestions concerning the Paleontological Monitoring Program with the Construction Manager and/or Grading Contractor. b. If the Monitor is not able to attend the Precon Meeting, the RE, or BI as appropriate, shall schedule a focused Precon Meeting for MMC, Monitors, Construction Manager and appropriate Contractor's representatives to meet and review the job on-site prior to start of any work that requires monitoring. 2. Identify Areas to be Monitored At the Precon Meeting, the Paleontologist shall submit to MMC a copy of the site/grading plan (reduced to 11x17) that identifies areas to be monitored. 3. When Monitoring Will Occur Prior to the start of work, the Paleontologist also shall submit a construction schedule to MMC through the RE, or BI, as appropriate, indicating when and where monitoring is to begin and shall notify MMC of the start date for monitoring.	

Impact(s)	Recommended Mitigation Measure(s)	Significance of Impact(s) After Mitigation
Section 4.9 – Paleontological Resources (cont'd.)		
	During Construction: 1. Monitor Shall be Present During Grading/Excavation a. The qualified Paleontologist shall be present full-time during the initial cutting of previously undisturbed formations with high and moderate resource sensitivity, and shall document activity via the Consultant Site Visit Record (form). This record shall be faxed to the RE, or BI as appropriate, and MMC each month. 2. Discoveries: a. Minor Paleontological Discovery In the event of a minor Paleontological discovery (small pieces of broken common shell fragments or other scattered common fossils) the Paleontologist shall notify the RE, or BI as appropriate, that a minor discovery has been made. The determination of significance shall be at the discretion of the qualified Paleontologist. The Paleontologist shall continue to monitor the area and immediately notify the RE, or BI as appropriate, if a potential significant discovery emerges. b. Significant Paleontological Discovery In the event of a significant Paleontological discovery, and when requested by the Paleontologist, the city RE, or BI as appropriate, shall be notified and shall divert, direct, or temporarily halt construction activities in the area of discovery to allow recovery of fossil remains. The determination of significance shall be at the discretion of the qualified Paleontologist. The Paleontologist with Principal Investigator (PI) level evaluation responsibilities shall also immediately notify MMC staff of such finding at the time of discovery. MMC staff will coordinate with appropriate LDR staff. 3. Night Work: a. If night work is included in the contract When night work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting. The following procedures shall be followed: (a) No Discoveries In the event that nothing was found during the night work, the PI shall record the information on the Site Visit Record Form.	

Impact(s)	Recommended Mitigation Measure(s)	Significance of Impact(s) After Mitigation
Section 4.9 – Paleontological Resources (cont'd.)		
	b. Minor Discoveries All Minor Discoveries shall be processed and documented using the existing procedures under 2. a., with the exception that the RE shall contact MMC by 9 A.M. the following morning. c. Potentially Significant Discoveries If the PI determines that a potentially significant discovery has been made, the procedures under 2.b., shall be followed, with the exception that the RE shall contact MMC by 8 A.M. the following morning to report and discuss the findings. d. If night work becomes necessary during the course of construction The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin. The RE, or BI, as appropriate, shall notify MMC immediately. e. All other procedures described above shall apply, as appropriate. 4. Notification of Completion: The Paleontologist shall notify MMC and the RE, or BI as appropriate, of the end date of monitoring. **Post Construction** The Paleontologist shall be responsible for preparation of fossils to a point of curation as defined by the City of San Diego Paleontological Guidelines: 1. Submit Letter of Acceptance from Local Qualified Curation Facility. The Paleontologist shall be responsible for submittal of a letter of acceptance to ADD of LDR from a local qualified curation facility. A copy of this letter shall be forwarded to MMC. 2. If Fossil Collection is not Accepted, Contact LDR for Alternatives If the fossil collection is not accepted by a local qualified facility for reasons other than inadequate preparation of specimens, the project Paleontologist shall contact LDR, to suggest an alternative disposition of the collection. MMC shall be notified in writing of the situation and resolution. 3. Recording Sites with San Diego Natural History Museum The Paleontologist shall be responsible for the recordation of any discovered fossil sites at the San Diego Natural History Museum.	

Impact(s)	Recommended Mitigation Measure(s)	Significance of Impact(s) After Mitigation
Section 4.9 – Paleontological Resources (cont'd.)		
	4. Final Results Report a. Prior to the release of the grading bond, two copies of the Final Results Report (even if negative), which describes the results, analysis, and conclusions of the above Paleontological Monitoring Program (with appropriate graphics) shall be submitted to MMC for approval by the ADD of LDR. b. MMC shall notify the RE or BI, as appropriate, of receipt of the Final Results Report.	
Section 4.10 – Aesthetics		
Future redevelopment activities within the Project Area may result in significant aesthetic impacts.	**A1** As redevelopment activities proceed within the Project Area, each individual development proposat shall be reviewed by the Agency and City to comply with the development standards of the City of San Diego Land Development Code and the adopted design guidelines of the Community Plans. Specific redevelopment projects shall incorporate appropriate design details and principals consistent with the Navajo and Tierrasanta Community Plans, including: • The rear elevations of buildings which face the San Diego River or are visible from the street should be as well-detailed and visually interesting as the front elevations; • Buildings developed adjacent to the river should be set back from the river to avoid glare and shading impacts to the habitat; • Improve the appearance of the existing strip commercial development on Mission Gorge Road between Interstate 8 and Zion Avenue by reducing signs, improving landscaping and architectural design, providing consistent building setbacks and providing adequate off-street parking; • Site design should provide adequate visual buffers surrounding uses, such as with the use of landscaping or grade separation; • Develop commercial areas which have desirably distinctive qualities in their design, appearance and operation; • Ensure that industrial appearance and effects of industrial uses are compatible with the character of the surrounding residential and commercial areas and the sensitive resources of the San Diego River; • Development along Mission Gorge Road shall comply with the regulations included in the Community Plan Implementation Overlay Zone (CPIOZ); and, • Future development of areas within the Tierrasanta Community that abut the Mission Trials Regional Park should be sensitive to it, as proposed within the Urban Design Element of the Tierrasanta Community Plan.	Less Than Significant

Impact(s)	Recommended Mitigation Measure(s)	Significance of Impact(s) After Mitigation
Section 4.9 – Paleontological Resources (cont'd.)		
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Impact(s)		Recommended Mitigation Measure(s)	Significance of Impact(s) After Mitigation
Section 4.11 – Water Quality/Hydrology			
Hydrology/Drainage Redevelopment activities in the Project Area may require grading or alteration of the topography that could affect the hydrologic function of these drainages, altering localized drainage patterns and runoff. This issue is considered a significant impact. **Flooding** Redevelopment activity in these areas has the potential to impede or redirect flood flows and each redevelopment project will need to be evaluated to ensure they do not adversely impact flooding. This issue is considered a significant impact.	**HD1**	A detailed hydrology study shall be prepared for each specific development that addresses the onsite and offsite hydrological and drainage characteristics of each proposed development project. For development projects located within or adjacent to the 100-year floodplain, additional consideration shall be given to the design of the project. An appropriate drainage control plan that controls runoff and drainage in a manner acceptable to City Engineering Standards for the specific project shall be implemented. The drainage control plan shall be implemented in accordance with the recommendations of the hydrology study and shall address on-site and off-site drainage requirements to ensure on-site runoff will not adversely affect off-site areas or alter the existing drainage pattern of the site or off-site areas. The drainage study shall incorporate the recommendations of the San Diego River Park Master Plan and the San Diego River Watershed Management Plan relative to hydrology/drainage and flooding to the maximum extent practicable.	Less Than Significant
Water Quality – Short-Term Future redevelopment activities have the potential to result in a violation of water quality standards through sedimentation/siltation or emissions from construction related activities of the local surface waters and groundwaters. This issue is considered a significant impact.	**WQ1**	Prior to commencement of construction activities for future redevelopment activities, in compliance approval documentation with the City of San Diego Municipal Code, General Construction Stormwater Permit (Order No. 99-08, NPDES CAS000002) and the General Municipal Stormwater Permit (Order No. 2001-01, NPDES CAS0108758) shall be obtained. Under the General Construction Stormwater Permit, the following components are required, a Notice of Intent (NOI), Stormwater Pollution Prevention Plan (SWPPP), and a Monitoring Program and Reporting Requirements. Required elements of SWPPP include: • Site description addressing the elements and characteristics specific to the site; • Description of Best Management Practices (BMPs) for erosion and sediment controls; • BMPs for construction waste handling and disposal; • Implementation of approved local plans; • Proposed post-construction controls, including description of local post-construction erosion and sediment control requirements; • Non-storm water management; • Identify a sampling and analysis strategy and sampling schedule for discharges from construction activity which discharge into water bodies listed on the 303 (d) list of impaired water bodies; and,	Less Than Significant

Impact(s)	Recommended Mitigation Measure(s)	Significance of Impact(s) After Mitigation
Section 4.11 – Water Quality/Hydrology (cont'd.)		
	• For all construction activity, identify a sampling and analysis strategy and sampling schedule for pollutants which are not visually detectable in stormwater discharges, which are known to occur on the construction site, and which could cause or contribute to an exceedance of water quality objectives in receiving waters. Some of the BMPs that shall be used during construction for compliance with the City of San Diego Municipal Code, General Construction Stormwater Permit, and General Municipal Stormwater Permit include, but are not limited to: • Silt fence, fiber rolls, or gravel bag berms • Street Sweeping • Strom drain inlet protection • Stabilized construction entrance/exit • Vehicle and equipment maintenance, cleaning, and fueling • Hydroseed, soil binders, or straw mulch	
Water Quality – Long-Term Given the current status of the San Diego River on the 303(d) list of impaired waters and the potential for future non-compliance with the water quality regulations, this issue is considered a significant impact.	**WQ2** All future redevelopment projects shall obtain compliance approval with the City of San Diego Municipal Code, General Municipal Stormwater Permit (Order No. 2001-01, NPDES NO. CAS0108858), and the General Industrial Stormwater Permit (Order No. 97-03-DWQ, NPDES NO. CAS000001). Future redevelopment project design shall also take into consideration to the maximum extent practicable the recommendations contained in the San Diego River Park Master Plan and the San Diego River Watershed Management Plan. Components of future redevelopment project design that will help achieve compliance with these long-term water quality regulations include, but are not limited to: • Infiltration basins • Retention/detention basins • Biofilters • Structural controls	Less Than Significant

Source: BRG Consulting, Inc., ~~2004~~2005.