



Final Program Environmental Impact Report

Grantville Redevelopment Project



City of San Diego
Redevelopment Agency

March 2005

Final Program Environmental Impact Report

for the proposed

Grantville Redevelopment Project

SCH # 2004071122

prepared for:

City of San Diego Redevelopment Agency

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List of Technical Appendices

(Bound with Volume I of the EIR)

Appendix A Notice of Preparation, Responses to the Notice of Preparation, and Scoping Meeting
Comments

(Bound with Volume II of the EIR)

Appendix B Traffic Impact Analysis
Prepared by Katz, Okistu & Associates

Appendix C Air Quality Worksheets
Prepared by BRG Consulting, Inc.

Appendix D Noise Modeling Worksheets
Prepared by Wieland Associates

Appendix E Cultural Resources Report
Prepared by ASM Affiliates

Appendix F Biological Resources Report
Prepared by Rocks Biological Consulting

Appendix G Geology Reconnaissance Report
Prepared by Ninyo & Moore

Appendix H Hazardous Materials Technical Study
Prepared by Ninyo & Moore

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.

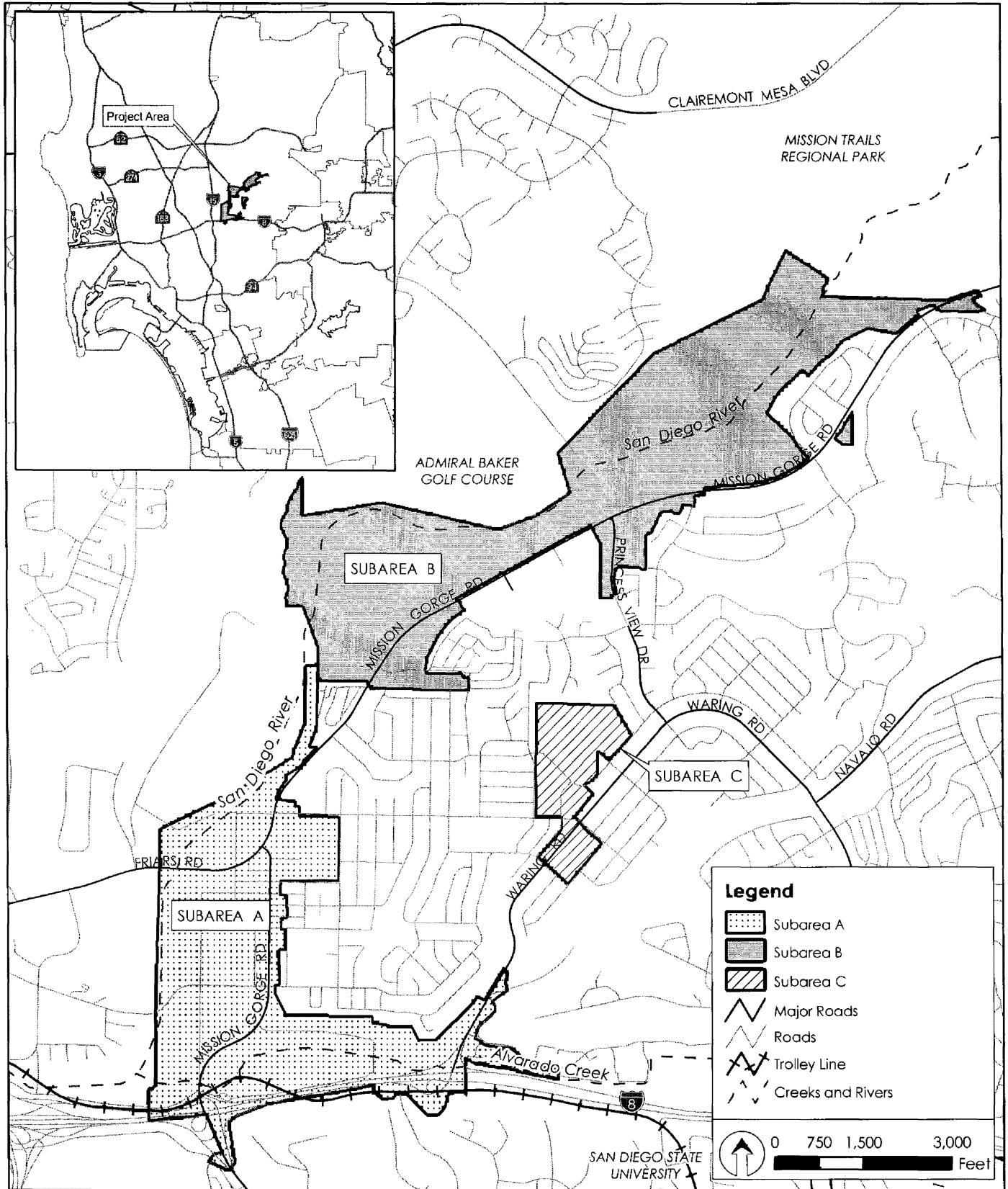
Project Location

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-1 depicts 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



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		
<p>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:</p> <ul style="list-style-type: none"> • 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). <p>The following intersections would be significantly impacted by the proposed redevelopment:</p> <ul style="list-style-type: none"> • 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). <p>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)</p>	<p>T1</p> <p>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:</p> <ul style="list-style-type: none"> • 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. 	<p>Significant and Unavoidable</p>

Impact(s)	Recommended Mitigation Measure(s)	Significance of Impact(s) After Mitigation
Section 4.3 – Air Quality		
<p>Short-term Future construction activities will result in a significant short-term air quality impact.</p>	<p>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:</p> <ul style="list-style-type: none"> • 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. 	<p>Less Than Significant</p>
<p>Long-term A significant and unavoidable air quality impact has been identified associated with future mobile related air pollutant emissions.</p>	<p>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.).</p>	<p>Significant and Unavoidable</p>

Impact(s)	Recommended Mitigation Measure(s)	Significance of Impact(s) After Mitigation
Section 4.4 - Noise		
<p>Construction Noise The potential noise generated during demolition and construction of future redevelopment activities is considered a significant, short-term impact.</p> <p>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.</p> <p>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.</p>	<p>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:</p> <ul style="list-style-type: none"> • 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. 	<p>Less Than Significant</p>

Impact(s)	Recommended Mitigation Measure(s)	Significance of Impact(s) After Mitigation
Section 4.4 – Noise (cont'd.)		
	<p>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:</p> <ul style="list-style-type: none"> • 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: <ul style="list-style-type: none"> • 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. 	<p>Less Than Significant</p>

Impact(s)	Recommended Mitigation Measure(s)	Significance of Impact(s) After Mitigation
Section 4.5 – Cultural Resources		
<p>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.</p>	<p>CR1 The following measures shall be implemented prior to proceeding with any redevelopment activities in the Project Area:</p> <ol style="list-style-type: none"> 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. 	<p>Less Than Significant</p>
	<p>CR2 The following procedures shall be implemented before any Redevelopment Project activities can occur in the Redevelopment Project Area:</p> <ol style="list-style-type: none"> 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. <p>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.</p>	<p>Less Than Significant</p>

Impact(s)	Recommended Mitigation Measure(s)	Significance of Impact(s) After Mitigation
Section 4.6 – Biological Resources		
<p>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.</p>	<p>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.</p> <p>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.</p> <p>i. <u>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.</u></p> <p>ii. <u>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.</u></p> <p>iii. <u>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.</u></p> <p>iv. <u>All post-construction structural best management practices (BMPs) such as grass swales, filter strips, and energy dissipaters, should be</u></p>	<p>Less Than Significant</p> <p>Less Than Significant</p>

Impact(s)	Recommended Mitigation Measure(s)	Significance of Impact(s) After Mitigation
Section 4.6 – Biological Resources (cont'd.)		
	<p><u>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.</u></p> <p>v. <u>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."</u></p> <p>vi. <u>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.</u></p> <p>vii. <u>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.</u></p> <p>viii. <u>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.</u></p> <p>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.</p> <p>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.</p> <p>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.</p>	

Impact(s)	Recommended Mitigation Measure(s)	Significance of Impact(s) After Mitigation
Section 4.6 – Biological Resources (cont'd.)		
	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	

Impact(s)	Recommended Mitigation Measure(s)	Significance of Impact(s) After Mitigation
Section 4.7 – Geology/Soils		
<p>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.</p>	<p>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.</p> <p>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.</p> <p>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.</p>	<p>Less Than Significant</p>

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.	<p>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.</p> <p>HM2 Any <u>underground storage tanks (USTs)</u> that are removed during redevelopment activities shall be removed under permit by the <u>Department of Environmental Health (DEH)</u>. 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.</p> <p>HM3 In the event that not previously identified <u>underground storage tanks (USTs)</u> 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 <u>Department of Environmental Health (DEH)</u> or the <u>Regional Water Quality Control Board (RWQCB)</u>, 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.</p>	Less Than Significant

Impact(s)	Recommended Mitigation Measure(s)	Significance of Impact(s) After Mitigation
Section 4.8 – Hazardous Materials (cont'd.)		
	<p>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.</p> <p>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.</p> <p>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.</p>	
Section 4.9 – Paleontological Resources		
<p>Future redevelopment activities have the potential to result in the substantial excavation of potential fossil-bearing geologic formations and the impact is considered significant.</p>	<p>PR1 Prior to preconstruction (precon) meeting:</p> <ol style="list-style-type: none"> 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. 	<p>Less Than Significant</p>

Impact(s)	Recommended Mitigation Measure(s)	Significance of Impact(s) After Mitigation
Section 4.9 – Paleontological Resources (cont'd.)		
	<p>3. Second Letter Containing Names of Monitors has been sent to Mitigation Monitoring Coordination (MMC).</p> <p>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.</p> <p>b. MMC will provide Plan Check with a copy of both the first and second letter.</p> <p>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.</p> <p>Precon Meeting:</p> <p>1. Monitor Shall Attend Precon Meetings</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	

Impact(s)	Recommended Mitigation Measure(s)	Significance of Impact(s) After Mitigation
Section 4.9 – Paleontological Resources (cont'd.)		
	<p>During Construction:</p> <ol style="list-style-type: none"> 1. Monitor Shall be Present During Grading/Excavation <ol style="list-style-type: none"> 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: <ol style="list-style-type: none"> 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: <ol style="list-style-type: none"> 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: <ol style="list-style-type: none"> (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.)		
	<ul style="list-style-type: none"> 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. <p>4. Notification of Completion: The Paleontologist shall notify MMC and the RE, or BI as appropriate, of the end date of monitoring.</p> <p>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:</p> <ul style="list-style-type: none"> 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.)		
	<p>4. Final Results Report</p> <p>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.</p> <p>b. MMC shall notify the RE or BI, as appropriate, of receipt of the Final Results Report.</p>	
Section 4.10 – Aesthetics		
<p>Future redevelopment activities within the Project Area may result in significant aesthetic impacts.</p>	<p>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 Navajo and Tierrasanta Community Plans, including:</p> <ul style="list-style-type: none"> • 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 Trails Regional Park should be sensitive to it, as proposed within the Urban Design Element of the Tierrasanta Community Plan. 	<p>Less Than Significant</p>

Impact(s)	Recommended Mitigation Measure(s)	Significance of Impact(s) After Mitigation
Section 4.9 – Paleontological Resources (cont'd.)		
	<p>4. Final Results Report</p> <p>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.</p> <p>b. MMC shall notify the RE or BI, as appropriate, of receipt of the Final Results Report.</p>	
Section 4.10 – Aesthetics		
<p>Future redevelopment activities within the Project Area may result in significant aesthetic impacts.</p>	<p>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 Navajo and Tierrasanta Community Plans, including:</p> <ul style="list-style-type: none"> • 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 Trails Regional Park should be sensitive to it, as proposed within the Urban Design Element of the Tierrasanta Community Plan. 	<p>Less Than Significant</p>

Impact(s)	Recommended Mitigation Measure(s)	Significance of Impact(s) After Mitigation
Section 4.11 – Water Quality/Hydrology		
<p>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.</p> <p>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.</p>	<p>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.</p>	<p>Less Than Significant</p>
<p>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.</p>	<p>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:</p> <ul style="list-style-type: none"> • 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, 	<p>Less Than Significant</p>

Impact(s)	Recommended Mitigation Measure(s)	Significance of Impact(s) After Mitigation
Section 4.11 – Water Quality/Hydrology (cont'd.)		
	<ul style="list-style-type: none"> • 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. <p>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:</p> <ul style="list-style-type: none"> • Silt fence, fiber rolls, or gravel bag berms • Street Sweeping • Storm drain inlet protection • Stabilized construction entrance/exit • Vehicle and equipment maintenance, cleaning, and fueling • Hydroseed, soil binders, or straw mulch 	
<p>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.</p>	<p>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:</p> <ul style="list-style-type: none"> • Infiltration basins • Retention/detention basins • Biofilters • Structural controls 	<p>Less Than Significant</p>

Source: BRG Consulting, Inc., 20042005.

1.0 INTRODUCTION

This Draft Program Environmental Impact Report (EIR) evaluates the environmental effects of the adoption of the Grantville Redevelopment Project and implementation of redevelopment project activities within the proposed Grantville Redevelopment Project Area (Project Area). The Redevelopment Plan for the Grantville Redevelopment Project Area will be implemented in accordance with the CCRL California Health and Safety Code Section 33000, *et. seq.* The Grantville Redevelopment Project is proposed as a catalyst to reverse the physical and economic blight identified by the City within 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 EIR was prepared by professional environmental consultants under contract with the Redevelopment Agency of the City of San Diego (Agency). The Agency is the lead agency for the preparation of the EIR as defined by the CEQA and the content of the document reflects the independent judgment of the Redevelopment Agency of the City of San Diego.

1.1 Purpose of the EIR

This EIR is intended to provide information to public agencies, the general public, and decision makers, regarding the environmental impacts associated with the adoption and implementation of the Grantville Redevelopment Project. Under the provisions of CEQA, "the purpose of the environmental impact report is to identify the significant effects of a project on the environment, to identify alternatives to the project, and to indicate the manner in which significant effects can be mitigated or avoided." (Public Resources Code 21002.1(a)).

1.2 Contact Person

Comments of all agencies and individuals are invited regarding the information contained in the Draft EIR. Where possible, those responding are encouraged to provide the information they believe is lacking in the Draft EIR, or indicate where the information may be found. The Agency requests that all comments on the Draft EIR be sent to the following City of San Diego Redevelopment Agency contact person:

Mr. Tracy Reed
Economic Development Division
600 B Street, Fourth Floor, MS-904
San Diego, California 92101-4506

Following the 45-day public review period for the Draft EIR, which extends from December 13, 2004 to January 31, 2005 all written comments received on the Draft EIR will be responded to by the Agency in

writing. The written comments and Agency responses will be incorporated into a Final EIR. The Final EIR will be certified by the Redevelopment Agency at the time the project is considered for approval.

1.3 Legal Requirements

This EIR is an informational document intended for use by the Agency, other departments of the City of San Diego, Planning Commission and City Council, and the members of the general public in evaluating the potential environmental effects of redevelopment within the Grantville Redevelopment Project Area.

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.

This EIR complies with all criteria, standards, and procedures of the CEQA of 1970 as amended (Public Resources Code 21000 et. seq.), State CEQA Guidelines (CAC 15000 et. seq.), and the amended procedures for Implementation of CEQA and the State CEQA Guidelines (Redevelopment Agency Guidelines) adopted by the Redevelopment Agency in 1990 and on file in the Office of the Secretary of the Agency. Per Section 21067 of CEQA and Sections 15367 and 15050 through 15053 of the State CEQA Guidelines, the Redevelopment Agency of the City of San Diego is the Lead Agency under whose authority this document has been prepared.

1.4 Public Review And Comments

In order to define the scope of the EIR, a Notice of Preparation (NOP) was distributed to city, county, and state agencies, other public agencies, and interested private organizations and individuals. The purpose of the NOP was to identify agency and public concerns regarding potential impacts of the Grantville Redevelopment Project. Additionally, a public scoping meeting was held for the proposed project in order to solicit input on the scope and content of the EIR. This meeting occurred on July 26, 2004.

Written comments received during the 30-day public review period for the NOP and at the public scoping meeting are included in Appendix A of this EIR. Also, the transcript of verbal comments received at the scoping meeting is provided in Appendix A. Technical documents prepared for this EIR are included as

additional appendices. These documents were utilized as reference material in the analysis of environmental impacts.

This Draft EIR has been made available for public inspection at the following locations:

1. City of San Diego Redevelopment Agency. 600 B Street, 4th Floor, San Diego, CA 92101
2. City of San Diego Central Library (Science & Industry Section). 820 E Street, San Diego CA 92101
3. Mission Valley Branch Library. 2123 Fenton Parkway, San Diego, CA 92108
4. Tierrasanta Library. 4985 La Cuenta Drive, San Diego, CA 92124
5. Benjamin Branch Library. 5188 Zion Avenue, San Diego, CA 92120
6. San Carlos Branch Library. 7265 Jackson Drive, San Diego, CA 92119
7. Navajo Community Service Center. 7381 Jackson Drive, San Diego, CA 92119

Copies of the Draft EIR are available to the public on payment of a reasonable charge for reproduction. Documents are available for review during regular business hours. An electronic copy of the EIR is also available for review and/or downloading on the City of San Diego Redevelopment Agency's web site at www.sandiego.gov/redevelopment-agency/grantville.shtml.

1.5 Contents Of The EIR

The structure of the EIR is identified in the Table of Contents. The EIR is organized into 13 sections, including the Executive Summary.

The Executive Summary provides a brief project description, summarizes anticipated project impacts and mitigation measures, identifies alternatives evaluated in the EIR, and discusses areas of controversy and issues to be resolved.

Section 1.0 Introduction discusses the purpose of the EIR, identifies the lead agency contact person, legal requirements, public review and comment period, availability of reports, contents of the EIR, and intended uses of the EIR.

Section 2.0 Environmental Setting provides a description of the general environmental setting of the Project Area.

Section 3.0 Project Description provides a detailed description of the proposed project including project location and boundaries, project characteristics, project objectives, potential public improvements, and the project's relationship to existing community plans.

Section 4.0 Environmental Analysis provides an analysis of project impacts and identification of mitigation measures designed to reduce significant impacts.

Section 5.0 Cumulative Impacts discusses the impact of the proposed project in conjunction with other planned and future development in the surrounding areas.

Section 6.0 Growth Inducement evaluates the potential influence the proposed project may have on growth within the surrounding communities.

Section 7.0 Effects Not Found to Be Significant lists all the issues determined to not be significant as a result of preparation of this EIR.

Section 8.0 Alternatives provides an analysis of alternatives to the proposed project that have the potential to reduce significant impacts associated with the proposed project.

Section 9.0 References lists the data references utilized in preparation of the EIR.

Section 10.0 Glossary provides a glossary of terms used in the document.

Section 11.0 Individuals and Agencies Consulted lists all the individuals and agencies consulted and cited in the EIR.

Section 12.0 Preparers of EIR lists the individuals and companies involved in the preparation of this EIR.

The NOP, Responses to the NOP, and scoping meeting comments are also contained within Volume I, Appendix A. Volume II contains the technical documents (e.g., traffic report, cultural resources report) included as appendices to the EIR.

In compliance with Public Resources Section 211081.6, a mitigation monitoring program will be prepared as a separately bound document that will be adopted in conjunction with the certification of the Final EIR.

2.0 ENVIRONMENTAL SETTING

2.1 Location

The Grantville Redevelopment Project Area (Project Area) is located in San Diego County, in the City of San Diego. The Redevelopment Project Area is approximately 970 acres in size. 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 Project Area consists of three non-contiguous subareas, referred to as Subarea A, Subarea B and Subarea C (See Figure 3-2 in Section 3.0, Project Description). 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.

2.2 Existing Conditions

A majority of the Project Area is developed. Existing development includes mostly older commercial and industrial uses, with a smaller mix of office/professional, public/institutional uses, sand and gravel operations and parks. The Project Area is generally characterized as consisting of underutilized land and buildings, incompatible land uses, parcels of irregular size and form which hinder development, insufficient parking, and inadequate vehicle access.

The following provides a brief description of the environmental setting of the Project Area. A more detailed description of the setting as it relates to each environmental issue is provided in Sections 4.1 through 4.14 of this EIR.

2.2.1 Land Use

There is a mixture of urban land uses in the Project Area, a majority of the uses comprise commercial, industrial, and office/professional uses located along Mission Gorge Road, Friars Road, and Fairmont Avenue and Waring Road. Other urban uses include sand and gravel operations located within the area of the San Diego River, and institutional uses, including Allied Gardens Community Park, Lewis Middle School, and Kaiser Permanente hospital and medical office facilities. Open space areas include portions of the San Diego River and river valley.

2.2.2 Transportation/Circulation

Major roadways within the Project Area include Mission Gorge Road, Waring Road, Friars Road, and Fairmont Avenue. The Project Area is located in proximity to Interstate 15 (I-15) located to the west, and Interstate 8 (I-8) located to the south. The existing average daily traffic on the major roadways within the Project Area ranges between approximately 18,000 to 42,000 along Mission Gorge Road, 16,000 to 18,000 along Waring Road, 46,000 to 59,000 along Friars Road, and 48,000 along Fairmont Avenue. Bus service is provided along certain portions of these roadways, including bus routes 40 and 13 along Waring Road. An existing Class III bikeway is located on portions of Zion Avenue, Twain Avenue, and Waring Road, and Class I/III bikeway facilities are proposed along Mission Gorge Road, the San Diego River, and Del Cerro Boulevard. The Metropolitan Transit Development Board is currently constructing a trolley line that traverses a portion of the Project Area, and will connect Mission Valley to San Diego State University. This trolley line will include a trolley stop within the southern portion of the Project Area near I-8.

2.2.3 Air Quality

The Project Area is located within the San Diego Air Basin. The area experiences a Mediterranean-type climate and is characterized by cool summers, mild winters, occasional rainfall confined primarily to winter months, and fresh onshore breezes. Average seasonal temperatures range from the upper 70s in the summer with an average daily maximum of 65° F in the winter. The overall average temperature is 61° F. An average of 10 inches of rainfall occurs annually between November and April.

The San Diego Air Basin is classified as a "non-attainment area" as it does not meet federal and state air quality standards for ozone and state standards for particulate matter less than ten microns in diameter (PM₁₀). Air pollutants transported into the basin from the adjacent South Coast Air Basin (e.g., Los Angeles, Orange County) substantially contribute to the non-attainment conditions in the San Diego Air Basin.

2.2.4 Noise

A majority of the Project Area fronts major roadways including the I-8 Freeway. As a result, the primary source of noise in the Project Area is generated from vehicular traffic traveling along these roadways. There are also stationary noise sources in the Project Area. These include noise generated by industrial activities (e.g., manufacturing and aggregate processing) and commercial operations (e.g., auto repair).

2.2.5 Cultural Resources

No prehistoric resources have been identified in the Project Area. However, there are two known important cultural resources sites located in close proximity to the Project Area. These include the Kumeyaay village of *Nipaguay* and the Mission San Diego Alcalá, located on the west side of the San Diego River. Therefore, there remains a high potential for previously undiscovered prehistoric and historical sites to be located along and adjacent to the San Diego River. There are no designated historic structures located within the Project Area. However, several structures may be of historical significance based on their age and unique architectural characteristics.

2.2.6 Biological Resources

A majority of the Project Area is developed and devoid of sensitive or native biological resources. However, the Project Area includes portions of the San Diego River, a regionally significant biological resource. A total of 11 vegetation communities have been delineated within the Project Area, with most of the native communities occurring within the San Diego River area. Vegetation communities include diegan coastal sage scrub, disturbed habitat, eucalyptus, freshwater marsh, giant reed, non-native grassland, open water, ornamental, riparian forest, southern riparian scrub, and urban/developed. Approximately 283 acres of the Project Area are located within the boundaries of the City of San Diego Multiple Species Conservation Program (MSCP) Conservation Area. The riparian habitat and sage habitat located along the San Diego River in the Project Area is located within the MSCP's Multiple Habitat Planning Area (90-100% conserved) and serves as part of a local wildlife corridor.

2.2.7 Geology/Soils

The Project Area is not traversed by any known active geologic faults. The Rose Canyon fault, located approximately five miles west of the Project Area is classified as "active" by the State of California. Therefore, the Project Area is subject to strong ground motion during a seismic event as is most of the Southern California region. Portions of the Project Area may also be subject to liquefaction in the event of a strong seismic event.

2.2.8 Hazards and Hazardous Materials

Properties within the Project Area are developed with a variety of uses. These include offices, medical facilities, stores, restaurants, dry cleaning, gasoline service stations, automobile repair facilities, a sand and gravel operation, and public services buildings (e.g., hospital, school). Hazardous materials issues associated with various properties and businesses in the Project Area include eighteen open Leaking Underground Storage Tank (LUST) cases, located at 14 facilities, and 13 Resource Conservation and Recovery Act (RCRA) Generator facilities. There is a possibility of soil and/or groundwater contamination at some of these facilities.

2.2.9 Paleontological Resources

The Project Area is underlain by the Lindavista Formation, Stadium Conglomerate, Friars Formation, and the Santiago Peak Volcanics. The Lindavista Formation and the Stadium Conglomerate have moderate

paleontological resources sensitivity. The Friars Formation has a high resources sensitivity and the Santiago Peak Volcanics, 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.

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.

2.3.1 Land Uses

In the City of San Diego, land use development is guided by the General Plan and the Land Development Code. The General Plan is implemented through community plans adopted for specific areas within the city. Existing community plan land uses within the Project Area include residential, commercial, industrial, sand and gravel, office/professional, public/institutional, recreational, and open space.

2.3.2 Progress Guide and General Plan

The Redevelopment Project Area is located entirely within San Diego city limits. Land use and development within the City is governed by the City of San Diego Progress Guide and General Plan, adopted by the City in 1979. The Progress Guide and General Plan provide the City's development policies in the form of findings, goals, guidelines, standards, and recommendations. The *Guidelines for Future Development, Amendment to the Progress Guide and General Plan (October 1, 1992)*, includes a Development Program that establishes goals, guidelines, and standards for redevelopment within the City of San Diego.

The Progress Guide and General Plan also establishes numerous community planning areas throughout the City. The proposed Redevelopment Project Area is located within portions of three such community plans; the Navajo Community Plan, the Tierrasanta Community Plan, and the College Area Community Plan. The following describes the general character of each of these communities as described in the adopted community plans.

2.3.3.1 Community Plans

2.3.2.1A. The Navajo Community Plan

The Navajo Community is located in the easterly portion of the City of San Diego and encompasses approximately 8,000 acres of land. The community lies generally north of Interstate 8, northwest of the city of La Mesa, west of the cities of El Cajon and Santee, and southeast of the San Diego River. The community is located among some prominent and attractive geographic features, including the San Diego River, Lake Murray, Cowles Mountain, and Mission Gorge areas of Mission Trails Regional Park.

A wide variety of land uses are represented in the western portion of the Navajo community, including detached and attached residential uses in Allied Gardens, and some significant commercial and light industrial centers in Grantville, situated along both sides of Mission Gorge Road. The central and eastern portions of the community are primarily residential neighborhoods. Pockets of neighborhood- and community-serving commercial uses are situated at the intersections of major transportation corridors, such as Navajo Road at the intersections of Jackson Drive and Lake Murray Boulevard.

The primary goal of the Navajo community plan is to retain the residential character of the area while providing basic services, which enhance the day-to-day lives of its residents, such as police and fire protection and open space amenities.

An issue discussed in the Community Plan relevant to the proposed project is that the visual clutter created by numerous curb cuts, unscreened parking areas, excessive sign and billboards, and above ground utilities, as well as much of the development along Mission Gorge Road does not project a positive impression of the community. In addition, neighborhood centers along Mission Gorge Road have developed without regard to other development, resulting in a lack of coordinated design. This portion of the Navajo Community is a part of the Grantville Redevelopment Project Area. An objective of the Community Plan is to 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. The majority of the Redevelopment Project Area, approximately ~~82~~88 percent, is located within the Navajo Community Plan Area.

2.3.2.2B. The Tierrasanta Community Plan

The Tierrasanta Community is centrally located within the greater San Diego metropolitan area. The planning area is approximately 6,700 acres in size, of which about 42 percent is within the Mission Trails Regional Park. The Tierrasanta Community Plan characterizes Tierrasanta as "a high quality, planned residential community." It includes diverse housing types, ranging from private and Naval apartment units to luxurious, custom built homes, all interspersed with open space canyons. The relative isolation of Tierrasanta from surrounding communities has enhanced the sense of community felt by its residents. Commercial areas are limited to those needed to support the community, and there is only one small, isolated industrial site within the community.

Approximately ~~18~~11 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.

2.3.2.3C. The College Area Community Plan

The College Area Community is located in the eastern part of the City of San Diego, along the southern rim of Mission Valley and approximately eight miles northeast of the downtown area. The plan area consists of approximately 1,950 acres and is developed primarily as a single-family community with approximately 56 percent of the developable land devoted to that use. The area has been impacted by San Diego State University (SDSU), located on its northern edge and a deteriorating commercial corridor on its southern edge. Traffic congestion is also an issue confronting the community and is related to the large university-orientated population and through-traffic traveling to and from adjacent communities.

The College Area Community presents a dual visual image. Entrances to the community are along heavily traveled streets leading to the high activity area surrounding SDSU. Development along El Cajon Boulevard is auto oriented and visually fragmented, resulting in a busy and confusing image along the length of the

southern boundary of the community. However, within one block of the main arteries of the community and within just a few blocks of SDSU, the character of the community changes. Here the streets are lightly traveled, tree-lined and curving, some ending in cul-de-sacs. Canyons and hillsides are visible. Houses in these neighborhoods exhibit architectural styles spanning five decades, but mature landscaping and similar scale of development give coherence to these neighborhoods.

Less than one percent of the Redevelopment Project Area is located within the College Area Community Plan Area. This small portion is comprised only of transportation related land associated with the I-8 Freeway.

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.

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3.0 PROJECT DESCRIPTION

3.1 Introduction

The Redevelopment Agency of the City of San Diego (Agency) is proposing to establish the Grantville Redevelopment Project Area, which would encompass an approximately 970-acre area within the eastern portion of the City. 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 and neighborhoods surrounding the Project Area. The establishment of a redevelopment project area will provide a catalyst to eliminate economic blighting conditions. After adoption of the proposed redevelopment project area, the Agency would implement subsequent redevelopment activities with the purpose of improving the area's quality of life, improving underutilized land and buildings, eliminating incompatible land uses and parcels of irregular size and form which hinder development, address issues such as insufficient parking and inadequate vehicle access. Redevelopment activities would also allow for the protection and enhancement of the ecologic value and function of San Diego River; as well as provide recreational opportunities adjacent to the river, and provide public/private support for the San Diego River Park.

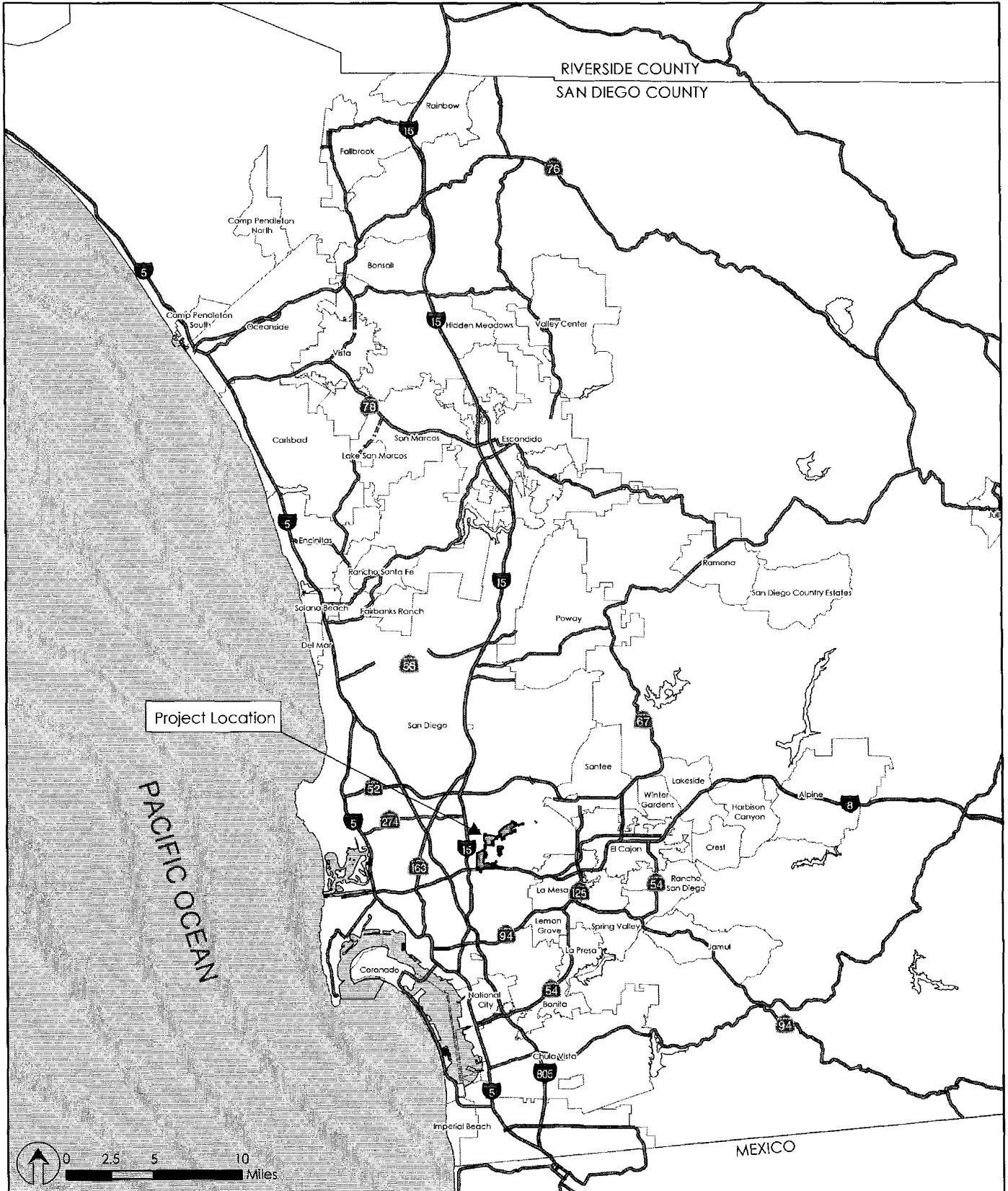
The San Diego City Council ("City Council") adopted Resolution No. R-147378, on May 6, 1958, creating the San Diego Redevelopment Agency ("Agency") for the purpose of pursuing redevelopment activities in the City pursuant to the CCRL (Health and Safety Code Section 33000 et. Seq.). The Agency is authorized by the City Council to implement redevelopment plans within designated Redevelopment Project Areas throughout the City.

On March 30, 2004 the City Council designated the Grantville Redevelopment Survey Area through adoption of Resolution No. 299047, for purposes of determining the feasibility of a redevelopment project. From that survey area, proposed Project Area boundaries were selected for further study and analysis. On August 10, 2004, the Planning Commission of San Diego approved the Preliminary Plan for the Grantville Redevelopment Project and the boundaries of the Grantville Redevelopment Project Area.

The proposed redevelopment project and subsequent redevelopment activities will be implemented by the Agency. The Agency is the "Lead Agency" for preparation of this EIR under CEQA.

3.2 Project Location and Boundaries

The proposed Grantville Redevelopment Project Area is located in San Diego County, in the City of San Diego. The City of San Diego is located adjacent to the United States International Border with Mexico and approximately 130 miles south of Los Angeles (Figure 3-1). The Project Area is situated in the eastern portion of the City and consists of three non-contiguous subareas (referred to as Subarea A, Subarea B and Subarea C). Figure 3-2 depicts the boundaries and subareas of the Grantville Redevelopment Project Area. The three subareas are described as follows:



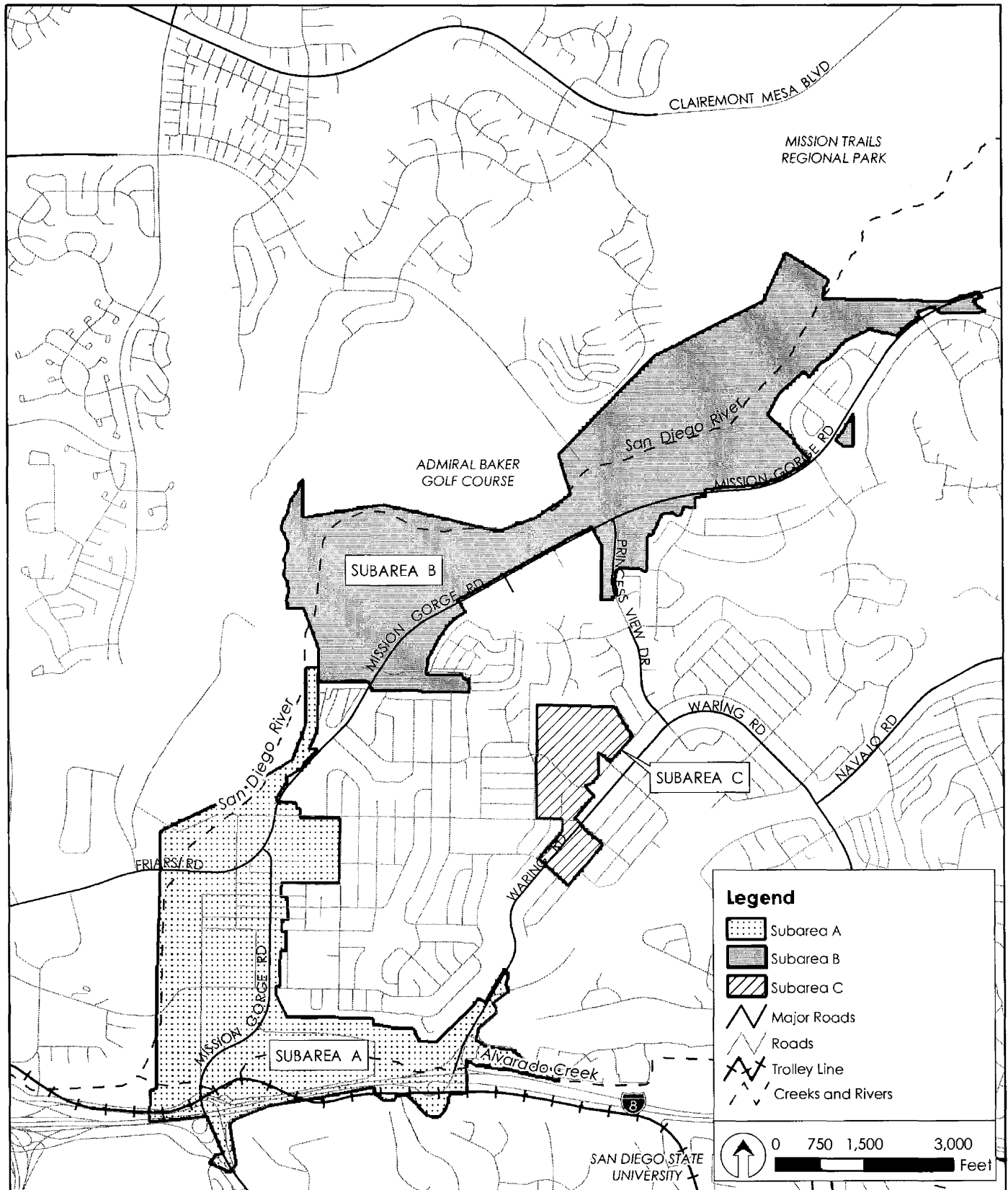
SOURCE: SANDAG and BRG Consulting, Inc., 2004

10/19/04



Grantville EIR
Regional Vicinity

FIGURE
3-1



SOURCE: SanGIS and BRG Consulting, Inc., 2005

3/10/05



Grantville EIR
Grantville Project Location

FIGURE
3-2

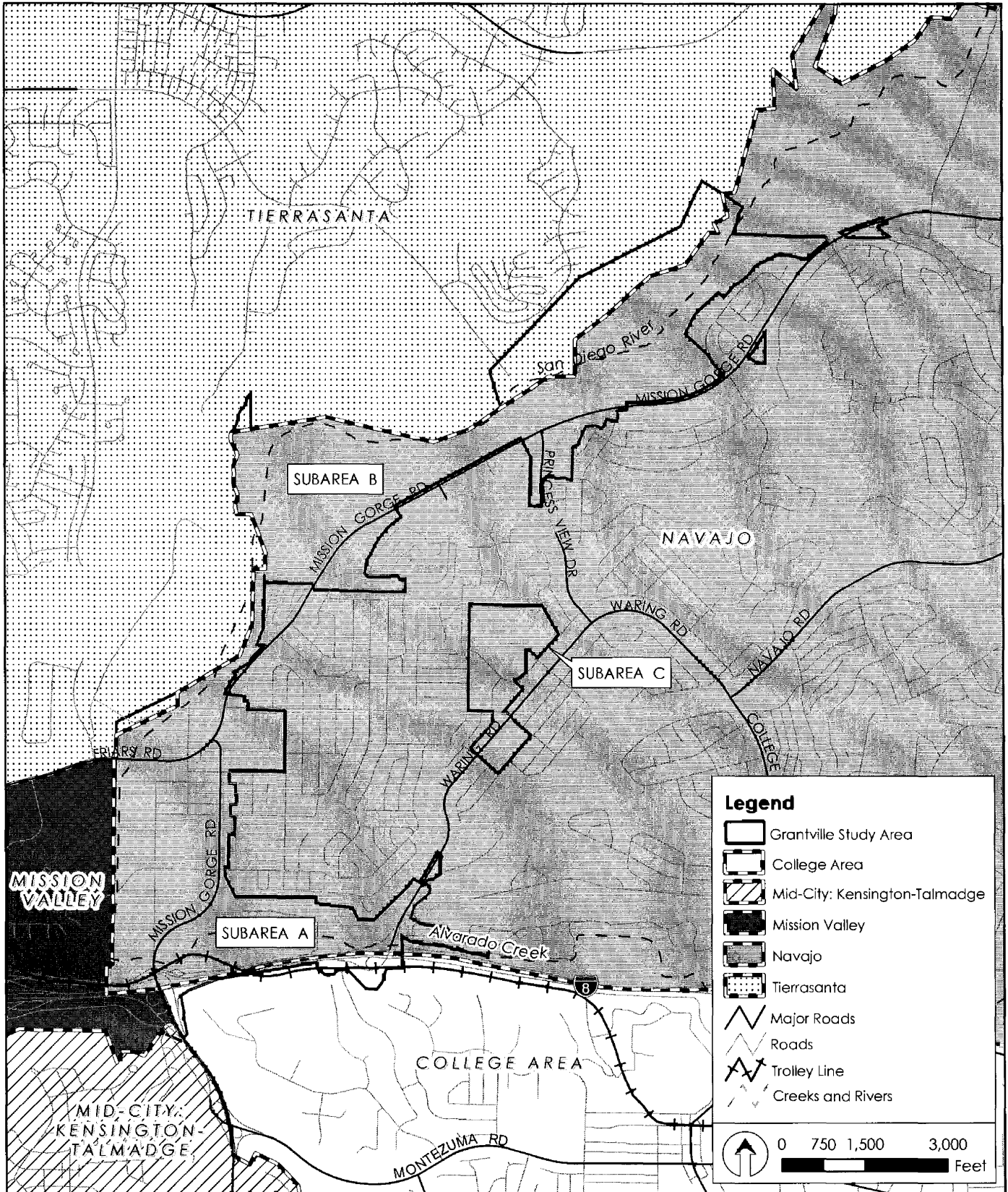
- **Subarea A** – Subarea A is comprised of commercial, office, industrial, public facility, park and open space uses immediately north of I-8 and located along both sides of Fairmount Avenue, Friars Road and Mission Gorge Road north to Zion Avenue (and including several parcels north of Zion Avenue). 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.

The City of San Diego has adopted a number of community plans that provide land use development guidelines for property within each community. The proposed Grantville Redevelopment Project lies within the boundaries of three such community plans; the Navajo Community (8-28%), the Tierrasanta Community (18-1%), and the College Area Community Plans (less than 1%). Figure 3-3 depicts the boundaries and neighborhoods of these Community Planning Areas. All redevelopment activities will need to conform to the applicable Community Plan and the City's Land Use Development Code and the approval process for activities covered by the applicable Community Plan and the City's Land Use Development Code. The only exception is the southern portion of the Interstate 8 (I-8) interchanges at Fairmount Avenue and Waring Road, which are in the College Area Community Plan. Both interchanges are California Department of Transportation (Caltrans) right-of-ways and were included in the Project Area as possible traffic improvements and would be subject to Caltrans regulations.

3.3 Project Characteristics


The Project Area is located in a primarily urbanized portion of the City; however, portions of the Project Area (north of Mission Gorge Road) include the San Diego River, and undeveloped areas associated with existing and historical sand and gravel operations. Land uses include commercial, office/professional, open space, industrial, public/institutional, recreational and open space land uses and vacant land. Problem conditions that are proposed to be addressed through redevelopment include:

- Deterioration and dilapidation;
- Defective design;
- Ineffective transportation design and conditions;
- Incompatible uses;



SOURCE: SanGIS and BRG Consulting, Inc., 2005

3/10/05

	<p>Grantville EIR</p> <h2>Community Planning Areas</h2>	<p>FIGURE</p> <h1>3-3</h1>
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- 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:

- 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.

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;

- h. Combining parcels and properties where and when necessary;
- i. Preparing building sites and constructing necessary off-site improvements;
- j. Acquiring, installing, developing, constructing, reconstructing, redesigning, planning, replanning and reusing streets, curbs, gutters, sidewalks, traffic control devices, utilities, flood control facilities, and other public improvements and public facilities;
- k. Providing additional parking throughout the Redevelopment Project Area;
- l. Providing for open space;
- m. Managing property owned or acquired by the Agency;
- n. Assisting in procuring financing for the construction of residential, commercial, industrial and office buildings to increase the residential and commercial base of the Redevelopment Project Area, and the number of jobs in the City;
- o. Disposing of property including the lease or sale of land at a value determined by the Agency for reuse in accordance with the Redevelopment Plan;
- p. Establishing controls, restrictions, or covenants running with the land, so that property will continue to be used in accordance with the Redevelopment Plan;
- q. Vacating or abandoning streets, alleys, and other thoroughfares, as necessary, and dedicating other areas for public purposes consistent with the objectives of the Redevelopment Plan;
- r. Providing replacement housing where required;
- s. Applying for and utilizing grants, loans, and any other assistance from federal, and state governments, or other sources;
- t. Taking actions the Agency determines are necessary and consistent with state, federal, and local laws to make structural repairs to buildings and structures, including historical buildings, to meet building code standards related to seismic safety;
- u. Taking actions the Agency determines are necessary and consistent with state, federal and local laws to remedy or remove a release of hazardous substances on, under or from property within the Redevelopment Project Area or to remove hazardous waste from property;
- v. Preparing and carrying out plans for the improvement, rehabilitation, and redevelopment of blighted areas and creating a variety of economic development programs which will help build a stronger economic base within the Redevelopment Project Area;
- w. Assisting businesses in the Redevelopment Project Area with façade improvements and general rehabilitation by providing loans and grants; and,
- x. Adopting specific design guidelines for projects to ensure a consistent design theme which will guide rehabilitation, new development, developers, architects, and builders.

3.3.2 General Plan Consistency

As required by the CCRL, 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. As described above, the applicable community plans are the Navajo Community Plan and the Tierrasanta Community Plan.

3.3.3 Development Potential

The land uses and intensity of development permitted in the Redevelopment Project Area would not exceed that currently allowed by the City's General Plan and associated Community Plans, and as implemented through the underlying zoning designations. The Redevelopment Project would be expected to result in the development of larger, more coordinated individual development projects, and a more rapid pace of development and redevelopment than would take place without the use of redevelopment powers. One of the purposes of the redevelopment project is to eliminate conditions of economic and physical blight in the Redevelopment Project Area, and to stimulate development.

To estimate environmental effects of the proposed project, land development expected to occur in the Redevelopment Project Area over the next 30 years has been estimated based on currently adopted Community Plan land uses, with also the consideration of current and projected market trends related to various development types in the City. Table 3-1 depicts the existing development within the Project Area and Table 3-2 depicts the estimated increase in development anticipated within the Project Area as a result of redevelopment activities and consistent with existing regulations. Assuming development of currently vacant parcels and redevelopment of existing developed parcels according to the existing Community Plan land uses, a shift in the type and intensity of development would occur in the Project Area. It is estimated that commercial development would be increased by 302,460 square feet, industrial development would be increased by 6,145,342 square feet, single-family dwelling units would be increased by 48 units, multi-family dwelling units would be increased by 86 units, and commercial recreation would increase by two acres. Assuming that parcels redevelop according to the community plan, a decrease in certain types of existing uses would occur, and include a reduction of future office development by 168,619 square feet, institutional facilities by 68,953 square feet, religious facilities by 117,148 square feet, quarry extraction by 101 acres and agriculture (nursery) by one acre.

Existing land use was derived through a comprehensive land use survey of the Project Area of existing land use type and building development on each individual parcel of the Project Area. As previously described, the development estimates depicted in Table 3-2 are based on current and projected market trends related to various development types in the City. Generally, a Floor Area Ratio (FAR) range between .34 and .40 is assumed for most non-residential uses. 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. Figure 4.1-1 in Section 4.1, Land Use, of this EIR depicts the existing land uses within the redevelopment Project Area, and Figure 4.1-2 depicts the Community Plan land use. The estimates provided in Table 3-2 are subject to variation because of the range of options available for many sites, the long development period (i.e., 30 years) being considered, and the inability to predict new market forces that may decide development potential over the life of the redevelopment project.

TABLE 3-1
Existing Land Uses

Land Use Type	Net Acres	Existing Building Square Feet
Single-Family Residential	1.45	N/A
Commercial	125.50	1,290,019.37
Office	21.26	364,829.12
Communications and Utilities	0.96	2,959.26
Commercial Recreation	18.89	0
Industry – Light	258.60	2,190,134.89
Industry – Extractive	200.38	2,503.01
Public Services	13.31	73,479.25
Schools	24.90	N/A
Transportation	112.66	0
Agriculture (Nursery)	0.10	4,552.38
Parks	68.92 ¹	0
Undeveloped/Vacant	69.02	0
Water	8.56	0
Hospital	32.98	882,278
Religious Facilities	12.53	117,147.66
TOTAL	970.02	4,972,720

Notes: 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.

Source: BRG Consulting, Inc., 2004.

TABLE 3-2
Estimated Increase in Development in the Project Area

Land Use Type	Estimated Dwelling Units	Estimated Non-Residential Square Footage
Commercial Uses		302,460
Industrial Uses		6,145,342
Single-Family Residential	48	
Multi-Family Residential	86	

Source: BRG Consulting, Inc.

3.4 Project Objectives

The overall objective of the proposed Redevelopment Plan is to eliminate and prevent the recurrence of blight in the Project Area. Physical and economic blight conditions indicate that without public action, the area will continue to stagnate, resulting in the worsening of existing problems in the future.

Redevelopment provides financial resources and implementation powers with which the Agency can encourage broad reinvestment in the Grantville Redevelopment Project Area, by making public 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.

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:

- 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 able to maintain their property even though their revenue stream may be compromised by lower lease rates.
- Multi-Family Apartment Owners Program – Organize apartment owners similar to a Business Improvement District (BID) to enable owners to coordinate marketing, security, property management, tenant issues and maintenance.
- Senior Housing – As existing residents age, the development of senior housing complexes would enable residents to stay in their neighborhood when they can no longer maintain their homes.
- Landmarks/Gateways – Develop signage, streetscape or landscaping to identify different communities.
- Urban Design Linkages – Create connections between parks and open spaces and neighborhoods. The communities could be linked to existing parks and open spaces.
- Residential Sales/Rental Office – A strategically located office should be established to market and disseminate information about residential opportunities in the community. The office would also give information about education facilities, business and retail services and employment opportunities. This office would be in close proximity to a community service center so that existing residents could also benefit.
- Residential Marketing Materials – Marketing materials could be created for prospective home buyers, realtors, banks and business people. Possible material may include a community video, neighborhood brochures, Internet home page, and maps showing landmarks and parks. These materials could be located at the sales/rental office and at the community service center.

Further, the Agency may exercise any or all of its powers, including, but not limited to, the following:

- Acquire land or building sites;
- Improve land or building sites with on- or off-site improvements;
- Donate land to private or public persons or entities;
- Acquire, rehabilitate and/or construct buildings or structures;
- Provide subsidies to or for the benefit of persons or families of very low, low, or moderate income;
- Develop plans, pay principal and interest on bonds, loans, advances, or other indebtedness, or pay financing, carrying charges or insurance premiums; and,
- Preserve the availability to lower income households of affordable housing units in housing developments which are assisted or subsidized by public entities and which are threatened with imminent conversion to market rates.

3.5 Public Improvements

Redevelopment of the Project Area in conformance with the adopted Navajo Community Plan and Tierrasanta Community Plan will require construction of public infrastructure improvements as identified as part of community plan implementation. The Agency may, when legally and financially feasible, use redevelopment funds to pay for all or a portion of these project costs.

3.6 Relation To Existing Community Plans

The proposed Redevelopment Project Area is located within three community planning areas, the Navajo, Tierrasanta, and College Area communities. The City has adopted a community plan for each of these areas. These community plans, adopted by the City of San Diego, provide land use guidelines for property within the plans. All redevelopment activities will need to conform to the applicable Community Plan and the approval process for activities covered by the applicable Community Plan.

3.6.1 The Navajo Community Plan

The Navajo Community Plan establishes goals and objectives to guide the growth and revitalization of the Navajo area. Some of the goals and objectives contained in the Community Plan that are relevant to the proposed Redevelopment Project Area include:

3.6.1.1 *Transportation*

- Address substandard level of service for vehicle movement along Mission Gorge Road.
- Complete the extension of the Mission Valley Light Rail Transit Lane to serve the College Area Community.

3.6.1.2 *Commercial Revitalization*

- Continue the ongoing efforts to revitalize the commercial areas along Mission Gorge and Waring Roads.
- Promote interest and commitment by local businesses and the community-at-large in the revitalization of all commercial areas of the community.

3.6.1.3 *Industrial Revitalization*

- Ensure that the appearance and character of industrial uses are compatible with the character of the surrounding commercial and residential areas.
- Develop a circulation network that will provide for less congested access to the Grantville industrial area.

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.

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 its 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.~~ 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 rehabilitated 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)
- 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.
- 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 environment 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.

3.6.3 College Area Community Plan

Transportation land use of the College Area Community Plan is located within the proposed Redevelopment Project Area. This area is right-of-way associated with the Interstate 8 Freeway.

3.7 Intended Uses of the EIR

The following public agencies are expected to use the information contained in this EIR for approvals of actions related to adoption and implementation of the redevelopment project activities:

3.7.1 Redevelopment Agency of the City of San Diego

- Prepare, adopt, and implement Redevelopment Project for Grantville Redevelopment Area;
- Implement projects consistent with Redevelopment Project objectives by means other than redevelopment;
- In conjunction with the Redevelopment Project, undertake some or all of the following activities:
 - a) Approval and implementation of Disposition and Development Agreements (DDAs) and/or Owner Participation Agreements (OPAs);

- b) Sale of Tax Increment Bonds;
- c) Approval of funding of public improvements;
- d) Acquisition and disposition of property;
- e) Relocation of residents and businesses;
- f) Construction or rehabilitation of replacement housing; and,
- g) Approval of other actions incidental to implementation of the above actions.

3.7.2 San Diego City Council

- Adoption of Redevelopment Project;
- Adoption of other plans, or policies for the Redevelopment Area;
- Approval and funding of public improvements;
- Approval of disposition of property; and,
- Approval of General Plan, Community Plan, and rezoning which may be necessary to implement the development/redevelopment of specific sites within the Redevelopment Project Area.

3.7.3 Various City Departments of Commissions

Issuance of any necessary permits which may include:

- a) Permission for construction in public ways;
- b) Excavation and shoring in public ways;
- c) Grading and approval of haul routes for export and import of soil materials;
- d) Demolition, foundations, structural steel, and other building permits;
- e) Installation of public utilities;
- f) Construction of public improvements;
- g) Subdivision maps, parcel maps, lot line adjustments;
- h) Environmental mitigation programs;
- i) Streetscape improvements;
- j) Approval of individual development projects; including conditional use permit, design review, zoning variances, and related other actions;
- k) Subarea improvement plans, streetscape plans, design guidelines and standards and other plans and programs; and,
- l) Related activities.

4.0 ENVIRONMENTAL ANALYSIS

This section of the EIR addresses the existing conditions for each impact area, the impact threshold for determining significance of environmental impacts, identification of environmental impacts and the significance of the impact, mitigation measures for those environmental impacts which are deemed significant, and the conclusion after implementation of mitigation measures.

This EIR examines all of the environmental issue areas identified by the Agency and through comments received on the Notice of Preparation (NOP) and at the public scoping meeting. Each impact is discussed and analyzed in the sections that follow. Each environmental impact issue area is addressed according to the following format:

Existing Conditions: A discussion of the existing conditions, services, and physical environment of the Project Area.

Impact Threshold: The amount or type of impact which contributes a substantial or potentially substantial adverse change in the environment, based on the thresholds contained in the Environmental Checklist contained in Appendix G of the California Environmental Quality Act (CEQA) Guidelines and/or applicable City of San Diego thresholds and standards. Based on this criterion, project impacts can be classified as: significant and unavoidable; significant, but can be mitigated, avoided, or substantially lessened; or less than significant.

Impact: A discussion of the impacts of the proposed project in quantitative and/or qualitative terms, based on the uses of land identified in the project description.

Significance of Impact: A brief statement as to the significance of the impact.

Mitigation Measures: A discussion of the measures required to avoid, mitigate, or substantially lessen significant impacts.

Conclusion: A discussion of the level of impact of the project following the implementation of required or recommended mitigation measures.

4.0.1 Areas Of Potential Environmental Impact

- | | |
|-------------------------------|------------------------------------|
| 1. Land Use | 8. Hazards and Hazardous Materials |
| 2. Transportation/Circulation | 9. Paleontological Resources |
| 3. Air Quality | 10. Aesthetics |
| 4. Noise | 11. Water Quality/Hydrology |
| 5. Cultural Resources | 12. Population/Housing |
| 6. Biological Resources | 13. Public Services |
| 7. Geology/Soils | 14. Mineral Resources |

Detailed discussions of these environmental issue areas are found in the following sections. Additionally, cumulative impacts are discussed in Section 5.0, growth-inducing impacts and significant irreversible environmental changes are discussed in Section 6.0, and areas of no significant impact are discussed in Section 7.0 of this EIR.

4.1 Land Use

4.1.1 Existing Conditions

4.1.1.1 Existing Land Uses

A. Project Site

The Project Area is located in a generally urbanized area of the City, with a majority of the land parcels fronting Mission Gorge Road, Friars Road, Waring Road and Fairmount Avenue. There are a variety of existing development types within the Project Area, including commercial and office, commercial recreation (portions of the Admiral Baker golf course), light industrial uses, sand and gravel extractive industry, public facilities (e.g. a post office), schools, transportation, commercial agriculture (nursery), parks, open space, and vacant land uses. Figure 4.1-1 depicts the existing land uses within the Project Area, as derived from SANGIS and a land use survey conducted by BRG Consulting on September 1 and 6, 2004. Based on the SANGIS data and land use survey, the existing land use is currently comprised of approximately 16.5 percent commercial and office (including commercial recreation), 25.4 percent industrial (light and extractive), 7.6 percent public services, 6.4 percent schools, 0.12 percent military, 13.5 percent transportation, 14.3 percent parks, 0.10 percent agriculture, 4.5 percent water, and 11.4 percent undeveloped and vacant land uses. Table 4.1-1 provides a statistical summary of the existing land uses within the Project Area based on the land use survey.

The approximately 165 acres of existing commercial, office and commercial recreation land uses in the Project Area are primarily located along Mission Gorge and Friars Road.

The existing industrial uses, which include light and extractive, total approximately 459 acres. Industrial uses are located throughout the entire Project Area, with the largest acreages occurring in the northern portion of the Project Area, along Mission Gorge Road.

Existing public services (including transportation) and school land uses total approximately 152 acres of land. The school uses total approximately 25 acres. The 186 acres of public and institutional (e.g., church, hospital) land uses are located adjacent to land uses located along Mission Gorge Road, Waring Road, and north of the Interstate 8 (I-8) freeway.

Parks, open space, and water land uses, total approximately 77 acres in the Project Area. A majority of this acreage consists of the open space associated with the San Diego River, located along the northern and western boundaries of the Project Area. The Allied Gardens Community Park is also located within Subarea C of the Project Area.

Vacant land (not including existing sand and gravel areas) in the Project Area totals approximately 69 acres. The majority of the vacant land within the Project Area is located in the northern area along Mission Gorge Road. A small portion of vacant/undeveloped land is located in the southern portion of the Project Area along Waring Road.

TABLE 4.1-1
Existing Land Uses

Land Use Type	Net Acres
Single-Family Residential	1.45
Commercial	125.68
Office	21.26
Communications and Utilities	0.96
Commercial Recreation	18.89
Industry – Light	258.60
Industry – Extractive	200.38
Public Services	13.31
Schools	24.90
Transportation	112.66
Agriculture	0.10
Parks	68.92 ¹
Undeveloped/Vacant	69.02
Water	8.56
Hospital	32.98
Religious Facilities	12.53
TOTAL	970.02

Notes: 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.

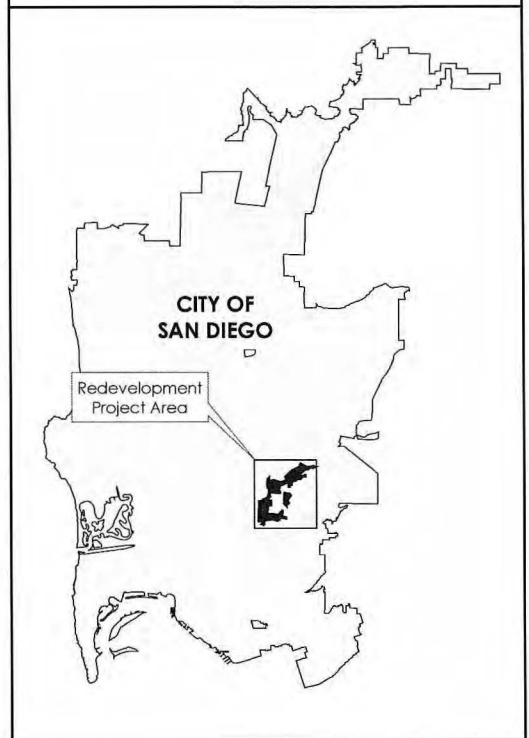
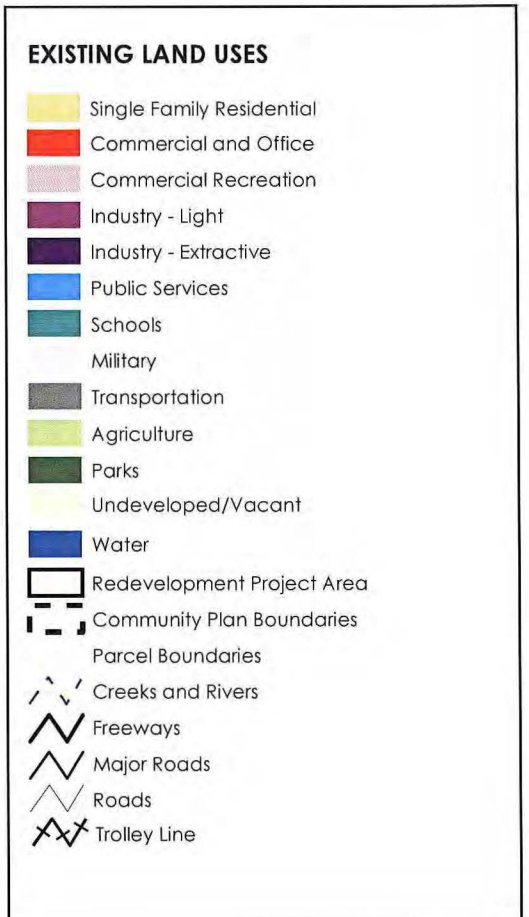
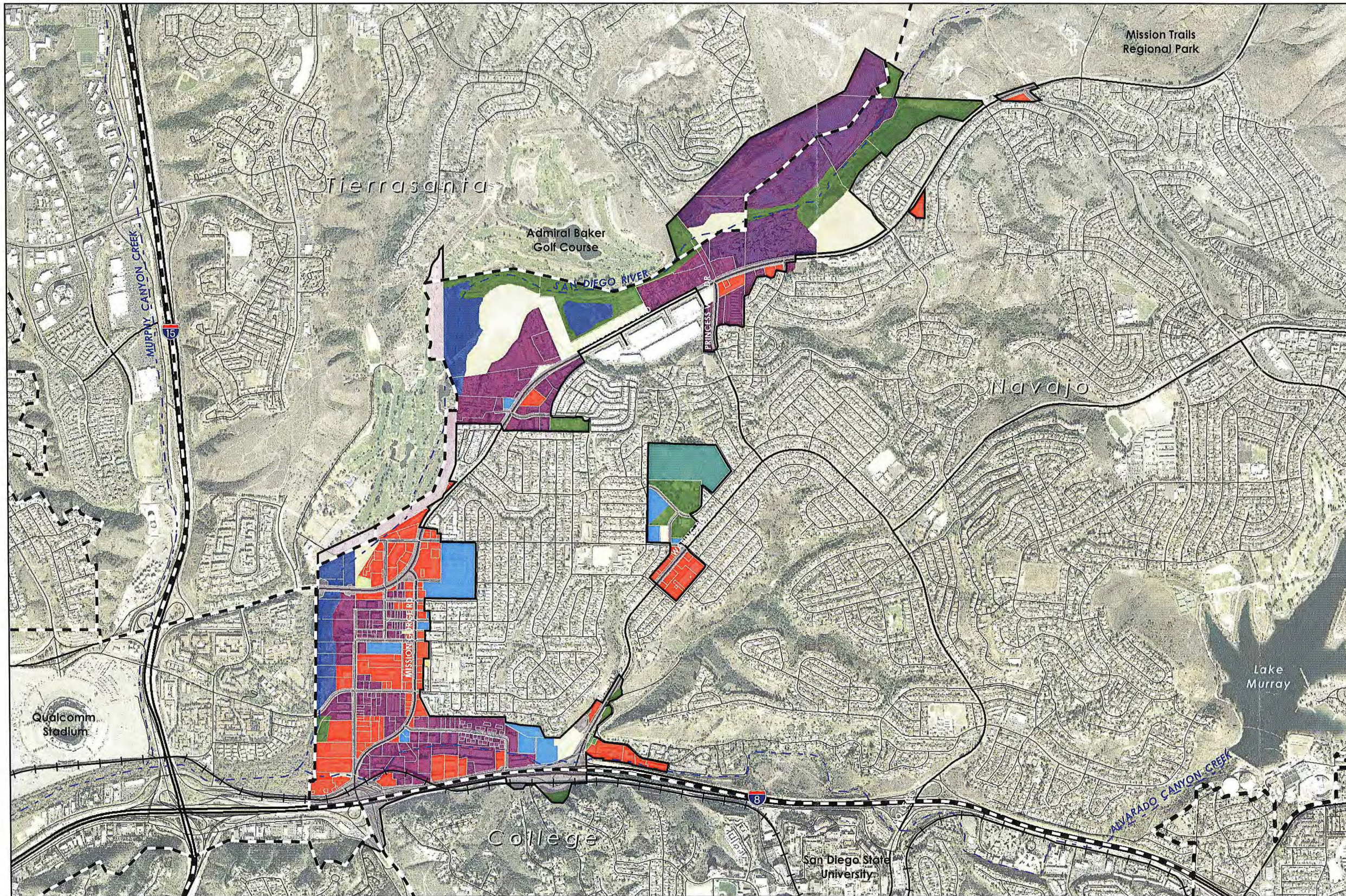
Source: BRG Consulting, Inc., 2004.

B. Surrounding Land Uses

Because the Project Area is relatively large, it is surrounded by a variety of land uses, all of which are similar to the types of urban land uses that are located within the Project Area. In a more regional perspective, the Community of Tierrasanta, Admiral Baker Golf Course, Mission Trails Regional Park, and residential land uses are located to the north and northeast; the City of La Mesa and residential uses are located to the east; San Diego State University, I-8, and residential uses are located southeast and south, and residential uses, the San Diego River, I-15 and the Qualcomm Stadium are located west of the Project Area.

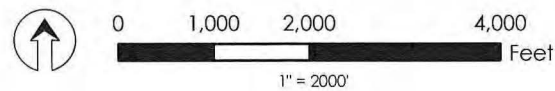
4.1.1.2 San Diego Progress Guide and General Plan

The Project Area is located entirely within the San Diego City limits. Land use and development within the City is governed by the City of San Diego Progress Guide and General Plan, adopted by the City in 1979. The Progress Guide and General Plan provide the City's development policies in the form of findings, goals, guidelines, standards, and recommendations. *Guidelines for Future Development*, Amendment to the Progress Guide and General Plan (October 1, 1992), includes a Development Program that establishes specific guidelines to phase the level of new growth and development to the carrying capacity of programmed public facilities over time. The following lists the Goals, Guidelines and Standards for Redevelopment and reinvestment within the City of San Diego as identified in the Progress and Guide and General Plan.



SOURCE: Landiscor (1/14/04), SanGIS and BRG Consulting, Inc., 2005

3/10/05



Grantville EIR
Existing Land Uses

FIGURE
4.1-1

A. Goals

1. Stimulate private investment in order to remove and prevent physical, economic, and social blight.
2. Assure quality development in redevelopment areas.
3. Rehabilitate and creatively reuse older structures whenever possible.
4. Provide mechanisms so that housing is not allowed to deteriorate into substandard conditions.
5. Preserve and increase affordable housing and minimize additional effects of displacement due to redevelopment.
6. Encourage in-fill development in redevelopment areas where revitalization is desired as a means to provide housing, employment, and transit opportunities.

B. Guidelines and Standards

1. The City should subsidize impact fees, voluntary advance payments and other revenue sources for development proposals in designated redevelopment areas.
2. Rehabilitation and adaptive reuse of buildings should be encouraged where appropriate. Buildings should be protected for historical significance as well as social significance.
3. Redevelopment projects should be evaluated through the community planning process to determine the impact on the social and economic fabric of the community.
4. Provide incentives, through zoning and other mechanisms, for revitalization and rebuilding of older neighborhoods in ways that respect the character of the existing neighborhood.

4.1.1.3 Adopted Community Plans

The Project Area is located in portions of three Community Planning Areas – Navajo, Tierrasanta, and College. Existing Community Plan land use designations of the Project Area consist of single-family residential, multi-family residential, commercial, office, industrial, sand and gravel, schools, parks, open space, libraries, and hospitals.

A. The Navajo Community Plan

The Navajo community, encompassing approximately 14 square miles, lies roughly north of Interstate 8, northwest of the city of La Mesa, west of the cities of El Cajon and Santee, and southeast of the San Diego River. The community includes the neighborhoods of Grantville, Allied Gardens, Del Cerro, and San Carlos. The community is located among several prominent geographic features, including the San Diego River, and the Lake Murray, Cowles Mountain, and Mission Gorge areas of Mission Trails Regional Park.

A wide variety of land uses are represented in the western portion of the Navajo community, including detached and attached residential in Allied Gardens, and some significant commercial and light industrial centers in Grantville, situated along both sides of Mission Gorge Road. The central and eastern portions of Navajo are primarily residential in character in the Del Cerro and San Carlos neighborhoods. Pockets of neighborhood- and community-serving commercial are situated at the intersections of major

transportation corridors, such as Navajo Road at the intersections of Jackson Drive and Lake Murray Boulevard.

The primary goal of the Navajo community plan is to 'retain the residential character of the area' while providing basic services which enhance the day to day lives of its residents, such as police and fire protection and open space amenities. The plan recognizes the delicate balance between the community and the San Diego River. Much of the community's urban runoff during storm events is conveyed to the river and the occasional flooding of the river impacts future land use planning in the floodplain. The plan calls for a continuous trail along the San Diego River. It is also designated that all structures within 150 feet of the 100-year floodway will provide at least one pedestrian access path from the main trail to the structure. Other goals applicable to the proposed project are described in Section 2.3 and Section 3.6 of this EIR.

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.

The Navajo Community Plan was adopted by the City Council on July 29, 1982, with the Grantville Amendment adopted on April 4, 1989.

B. The Tierrasanta Community Plan

The Tierrasanta community is centrally located within the greater San Diego metropolitan area. The industrial area of Kearney Mesa is located to the west, Miramar Naval Air Station to the north and Mission Valley is to the southwest. Grantville lies to the south and the City of Santee to the east. The boundaries of the planning area are Interstate 15 on the west, Friars Road and the San Diego River on the south, the City of Santee on the east and Miramar Naval Air Station on the north. The planning area is approximately 6,700 acres in size, of which about 42 percent is within the proposed Mission Trails Regional Park.

The Tierrasanta community is described as a relatively low-density residential community. Commercial areas are limited to those needed to support the community, and only one small, industrial area is depicted on the community plan land use map. A number of open space canyons enhance the character of the community. The community is further characterized by a large Naval housing facility in the southwesterly sector of the community. Goals applicable to the proposed project are described in Section 2.3 and Section 3.6 of this EIR.

The Tierrasanta Community Plan was adopted by the City Council on July 27, 1982.

C. The College Area Community Plan

The College Area Community is located in the central part of the City of San Diego, along the southeastern rim of Mission Valley and approximately eight miles northeast of the downtown area. The plan area consists of approximately 1,950 acres and is developed primarily as a single-family community with approximately 56 percent developable land devoted to that use. The College Area Community Plan

describes this area as having been impacted by San Diego State University located on its northern edge, with deteriorating commercial corridor (generally along El Cajon Boulevard) on its southern edge. Traffic congestion is also an issue confronting the community and its neighborhoods and is related to the large University-oriented population and through-traffic traveling to and from adjacent communities. The two main arteries, Fairmount Avenue/Montezuma Road and College Avenue, connect Interstate 8 to the community. Goals applicable to the proposed project are described in Section 2.3 and Section 3.6 of this EIR.

The College Area Community Plan was adopted on May 2, 1989.

4.1.1.4 Multiple Species Conservation Program (MSCP)

The Multiple Species Conservation Program (MSCP) is a comprehensive habitat conservation planning program for southwestern San Diego County. The MSCP is designed to preserve a network of habitat and open space, protecting biodiversity and enhancing the region's quality of life. The MSCP study area covers approximately 900 square miles (582,243 acres) in southwestern San Diego County. The study area is bordered by Mexico to the south, National Forest Lands to the east, Pacific Ocean to the west and the San Dieguito River valley to the north.

Within the Project Area, approximately 283 acres of habitat is located along the San Diego River and adjacent to the Mission Trails Regional Park is located within the Multiple Habitat Planning Area. Section 4.6 Biological Resources of this EIR provides a detailed discussion of the project's relationship to the MSCP.

4.1.15 San Diego River Park Draft Master Plan

The City of San Diego, under a Joint Powers Authority (JPA) is preparing a Master Plan for the San Diego River Park. As identified in the draft Master Plan, the river and adjacent land uses are currently disconnected. The river is not a focus of the communities that it flows through. The draft Master Plan envisions the creation of a river-long park, stretching from the San Diego River headwaters near Julian to the Pacific Ocean at Mission Bay.

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.

4.1.2 Impact Threshold

The City of San Diego Significance Determination Guidelines under CEQA outlines the thresholds for determining significance for land use. The following will be considered a significant land use impact:

- *Inconsistency/conflict with the environmental goals, objectives, or guidelines of a community or general plan;*
- *Inconsistency/conflict with an adopted land use designation or intensity and indirect or secondary environmental impacts occur (for example, development of a designated school or park site with a more intensive land use could result in traffic impacts);*
- *Substantial or extreme use incompatibility, for example, a rock crusher in a residential area; CUPs sometimes create impacts because conflicting uses are proposed;*
- *Development or conversion of general plan or community plan designated open space to a more intensive land use; or*
- *Inconsistency/conflict with adopted environmental plans for an area. For example, development of a non-designated use within the boundaries of park master plan would fall into this category.*

4.1.3 Impact

4.1.3.1 Development Potential

Currently, the City has identified that each of the three Project Area sub-areas share common characteristics including a large amount of underutilized land and buildings, existing incompatible land uses, parcels of irregular form and shape which hinder development, insufficient parking, inadequate vehicle access, and environmental constraints. The primary goals of the Redevelopment Project are: to create a strong economic base within, and for, the Navajo Community and neighborhoods; improve the quality of life; eliminate physical and economic blighting conditions; improve traffic flows; protect and enhance the San Diego River; provide residents with recreational opportunities adjacent to the river; promote a variety of land uses; and, provide public/private support for the San Diego river park.

Redevelopment is defined pursuant to Section 33020 of the CRL 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 CRL 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 describe in Section 3.0 of this EIR, no land use plan amendment is proposed associated with this project, and the Redevelopment Plan will be implemented in accordance with the densities and distributions of land use allowed under these adopted Community Plans.

The Redevelopment Project will facilitate new development and revitalization in the Project Area. Redevelopment activities can be categorized as new residential, commercial and recreational development that occurs on currently vacant parcels, redevelopment of existing developed, partially developed or under utilized parcels, and public improvements (e.g., parks, street improvements, lighting, landscaping). Figure 4.1-2 depicts the expected future land uses within the Project Area under the Redevelopment Project, which are based on the existing Navajo, Tierrasanta, and College Community Plan land use maps.

Table 4.1-2 provides a summary of the acreage of land use for each Community Plan category. The net development potential of the Project Area has been estimated and is provided in Section 3.0 of this EIR. The proposed project is required to be consistent with the adopted General Plan (or Community Plan) in which it is located. The project does not propose an amendment to the community plan land use designations, nor does the project propose an increase in the intensity of development potential beyond the density and intensity allowed by the existing Community Plans and underlying zoning categories. All future redevelopment activities will be required to be consistent with the provisions of the community plan in which the activity is located. No impact associated with inconsistency/conflict with an adopted land use designation or development or conversion of a General Plan or Community Plan designated open space to a more intensive is anticipated.

TABLE 4.1-2
Community Plan Land Use Acreage

Land Use Type	Net Acres
Single-Family Residential	11.84
Multi-Family Residential	7.60
Commercial	80.29
Office	11.82
Industrial	457.10
Sand and Gravel	108.12
Schools	24.90
Parks	26.75
Open Space	96.03
Libraries	0.52
Hospitals	32.98
Transportation	112.66
TOTAL	970.61

Source: BRG Consulting, Inc., 2004.

4.1.3.2 *Compatibility of Uses within the Project Area*

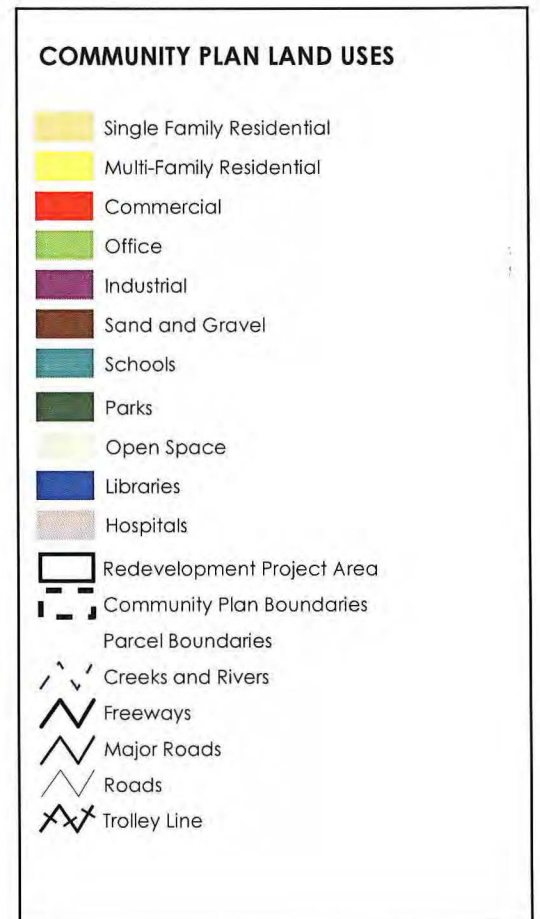
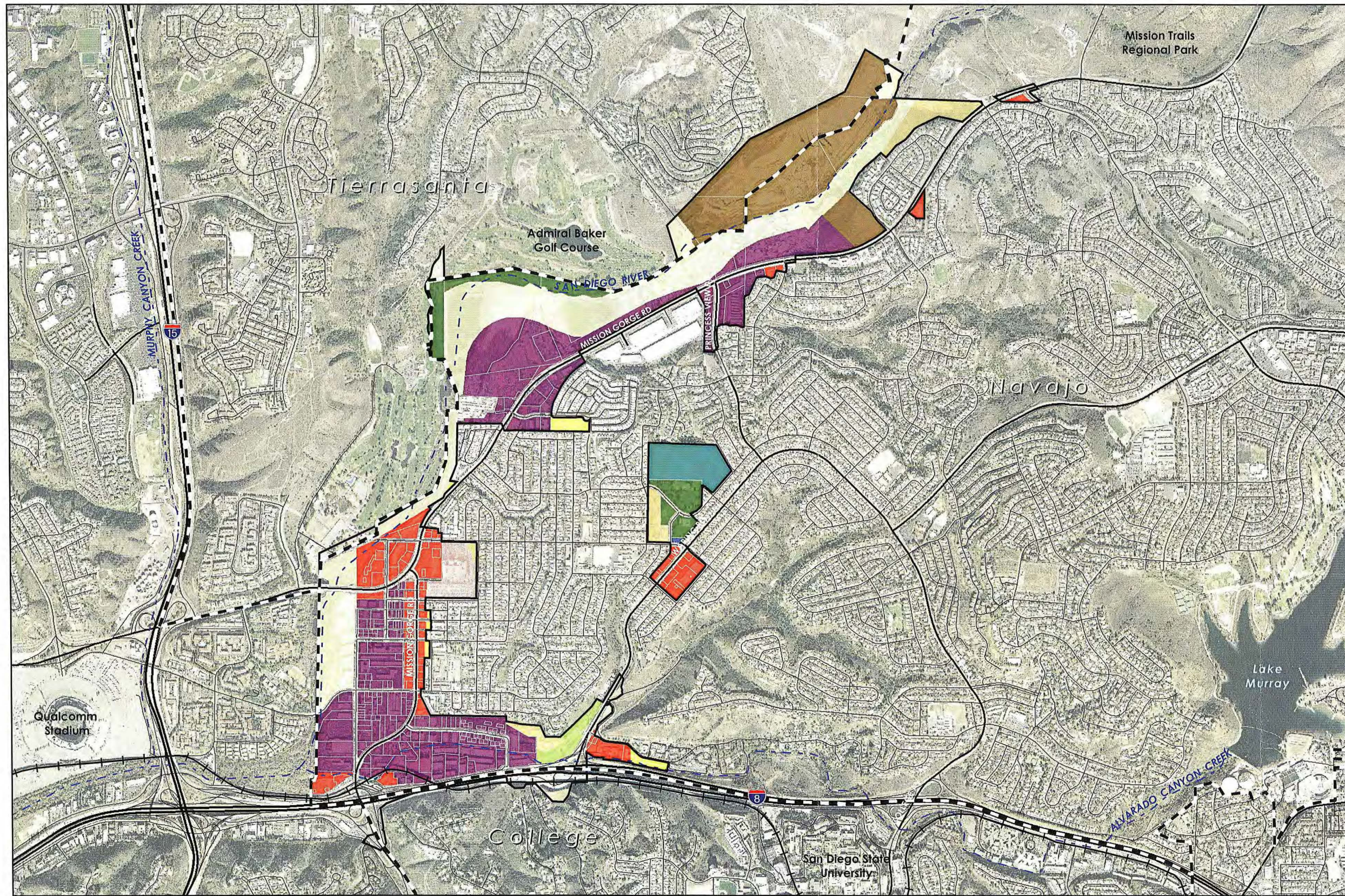
CCRL requires that the land uses designated in the Redevelopment Project Area be consistent with the City's General Plan. The Redevelopment Project is proposed as a catalyst to create more efficient use of the land and reduce or eliminate incompatible uses and blight. The proposed public improvements and private improvements to existing commercial, public services, parks, open space, transportation right-of-ways, and vacant/undeveloped land areas is anticipated to attract new business and improve development. Obsolete and undersized structures will be replaced with structures that meet current design standards and provide for more effective use of the land. On-site land use compatibility can be improved through consolidation of parcels, and provide a comprehensive plan for the Project Area, replacing previous development that occurred through piece-meal development in the past.

The proposed Redevelopment Project is anticipated to reduce the occurrence of incompatible land uses that exist within the Project Area, as new projects constructed within the Project Area will need to comply with adopted General Plan land use and Land Development Code regulations. Redevelopment of various properties in the Project Area to current standards is expected to improve the appearance of these properties, provide enhanced landscaping, and improve the buffering between adjacent uses as compared to the condition of existing development throughout most of the Project Area. Land use conflicts can be avoided or reduced through implementation of proper design and buffering techniques as specific private development proposals come forward in the Project Area. Any new development regulations of the City's Land Development Code and other regulations which are intended to minimize land use conflicts would be implemented as the City reviews projects. New development within the Project Area will bring existing non-conforming and substandard uses up to code and would reduce the amount of existing land use conflicts. As a result blight conditions would be eliminated. Additionally, as the Redevelopment Project is required to be consistent with the City of San Diego Progress Guide and General Plan and the Land Development Code, no impact associated with these plans will occur. The project will not result in substantial or extreme use incompatibility.

4.1.3.3 *Compatibility of Uses with Surrounding Areas*

The areas surrounding the Project Area are designated with similar land uses as the Project Area. Commercial, industrial, office, recreational, parks, open space and residential exist in the surrounding areas. The Project Area is geographically separated by other community planning areas by the I-8 and I-15 Freeways, and the San Diego River. As the proposed Redevelopment Project is consistent with the land use designations of the Project Area, the project is expected to be compatible uses with the surrounding areas.

Additionally, as the Redevelopment Project Area will eliminate the physical and economic blight on the Project Area, the surrounding areas are anticipated to result in the reduction or elimination of blight conditions as well. No impact associated with land use compatibility with the areas surrounding the Project Area will occur.



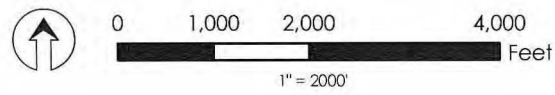
SOURCE: Landiscor (1/14/04), City of San Diego (College Area Community Plan (1989) and Tierrasanta Community Plan (1992)), SanGIS and BRG Consulting, Inc., 2005

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Navajo, Tierrasanta, and College Community Plan Areas

FIGURE
4.1-2



4.1.3.4 Consistency with the San Diego Progress Guide and General Plan

The following repeats the goals, guidelines and standards for redevelopment and reinvestment within the City of San Diego Progress Guide and General Plan, and describes how the project is consistent with the goals, guidelines, and standards within the Progress Guide and General Plan:

A. Goals

- Stimulate private investment in order to remove and prevent physical, economic, and social blight.
The proposed Redevelopment Project will stimulate private sector activity through public investment in infrastructure. This generally includes: traffic circulation and street reconstruction, streetscape improvements, signalization upgrades and park improvements. By implementing these and other projects to abate the blighting conditions affecting the Project Area, the public sector will signal its confidence in the area and provide a catalyst for private investment.
- Assure quality development in redevelopment areas.
The Redevelopment Project is required to redevelop the Project Area in accordance with the General Plan, Community Plans, and the Land Development Code of the City of San Diego, as amended from time to time, and all other applicable state and local codes and guidelines.
- Rehabilitate and creatively reuse older structures whenever possible.
The Redevelopment Project will reflect the desirable historic character of commercial areas in form and function of new development.
- Provide a mechanism so that housing is not allowed to deteriorate into substandard conditions.
The Agency is required to set aside no less than 20 percent of the tax increment revenue generated by the Project into a special Low and Moderate Income Housing Fund. These funds are to be used to increase, improve, and preserve the supply of low and moderate income housing in the community.
- Preserve and increase affordable housing and minimize the additional effects of displacement use to redevelopment.
The Agency is required to set aside no less than 20 percent of the tax increment revenue generated by the Project into a special Low and Moderate Income Housing Fund. These funds are to be used to increase, improve, and preserve the supply of low and moderate income housing in the community.
- Encourage in-fill development in redevelopment areas and where revitalization is desired as a means to provide housing, employment, and transit opportunities.
The Redevelopment Project will establish landmark/gateways to establish a sense of place, incorporating urban design linkages or connections between land uses, a first time home buyers program, promote employment, business clusters and other improvement throughout the project Area.

The Redevelopment Project will facilitate new development and revitalization in the Project Area. Redevelopment activities can be categorized as new development that occurs on currently vacant parcels, redevelopment of existing developed, partially developed or under utilized parcels, and public improvements (e.g., parks, street improvements, lighting, landscaping). Figure 4.1-2 depicts the expected land uses within the Project Area under the Redevelopment Project.

The proposed project is required to be consistent with the adopted General Plan (or Community Plan). The project will not result in an increase in the intensity of land uses than is allowed under the Community Plan and Land Development Code. No impacts associated with inconsistency/conflict with an adopted land use designation or development or conversion of a General Plan designated open space to a more intensive lands use would occur.

4.1.3.5 Consistency with Adopted Community Plans

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; however, any new development that occurs with the implementation of the Redevelopment Project will be consistent with the applicable Community Plan. Because future redevelopment activity will be in compliance with all three Community Plans, no impact associated with this issue will occur.

Various public improvements, intended to mitigate the impact of the increase in population that is expected to occur pursuant to the adopted Community Plans, as well as to mitigate existing deficiencies in certain public facilities are identified in the Navajo, Tierrasanta and College Area Community Plans. These improvements will be implemented as sufficient financial resources become available. The Draft Redevelopment Plan identifies these improvements, and they will be implemented as part of the Redevelopment Project as sufficient funding becomes available. The proposed project will be consistent with the adopted Community Plan by providing a mechanism whereas the funding of these improvements can take place.

4.1.3.6 Multiple Species Conservation Program (MSCP)

With the exception of one parcel (APN 456-011-10) all 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. The Redevelopment Project will be consistent with these Community Plans and therefore park and open space uses will be consistent with the MSCP. Therefore, no impact associated with MSCP will occur. Section 4.6 Biological Resources of this EIR provides a more detailed discussion of the project's consistency with the MSCP. The project will not result in an inconsistency/conflict with adopted environmental plans in the area.

4.1.4 Significance of Impact

No significant land use impact is anticipated.

4.1.5 Mitigation Measures

No mitigation measure is proposed, as no significant land use impact has been identified.

4.1.6 Conclusion

Implementation of the proposed project will not result in a significant land use impact.

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4.2 Transportation/Circulation

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

Fairmount Avenue. Fairmount Avenue consists of two separate segments, Interstate 8 (I-8) to Mission Gorge Road and Mission Gorge Road to Sheridan Lane. Between I-8 and Mission Gorge Road, Fairmount Avenue is classified as a four-lane major road with posted speeds of 30 MPH. The segment between Mission Gorge Road and Sheridan Lane is a two-lane collector street servicing light industrial and business uses. Parking is limited to the segment between Mission Gorge Road and Sheridan Lane. Bus service is only provided on the segment of Fairmount Avenue between I-8 and Mission Gorge Road. No bike lanes are provided.

Friars Road. Friars Road is classified as a 6-lane primary arterial, which runs in an east-west direction between Interstate 15 (I-15) and Mission Gorge Road. Speeds are posted at 50 MPH. At the east end of the segment, the through movement becomes Mission Gorge Road and Friars Road effectively ends. Bus service is provided on Friars Road between I-15 and Rancho Mission Road via Route 13, but there is no service on the segment between Rancho Mission Road and Mission Gorge Road. There are no bike lanes on Friars Road.

Mission Gorge Road. Mission Gorge Road consists of two separate segments, between Fairmount Avenue and Friars Road and between Friars Road and Jackson Drive. Between Fairmount Avenue and Friars Road, Mission Gorge Road is a 4-lane north-south major roadway with existing bus service. Speeds are posted along this segment at 30 MPH. Mission Gorge Road is an east-west arterial between Friars Road and Jackson Drive, with a majority of the roadway classified as a 6-lane primary arterial transitioning to a 6-lane major roadway. 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. The posted speeds range on these segments between 45 and 55 MPH and no bus service is provided along this route. There is an existing shared bicycle route (class III) along this segment.

Waring Road. Waring Road is classified as a north-south 4-lane major roadway, which provides access to I-8. Speeds are posted along this segment at 35 MPH. Existing bus service is provided along the entirety of this route by bus Routes 40 and 13. In addition, an existing bicycle route (Class III) is provided between Zion Avenue and Princess View Drive.

4.2.1.3 *Daily Roadway Segment Operations*

Table 4.2-1 and Figure 4.2-1 summarize the results of the existing daily roadway segment analysis. All roadway segments currently operate at LOS D or better except:

- Friars Road between I-15 North Bound Ramps and Rancho Mission Road (LOS E)
- Fairmount Avenue between I-8 East Bound Off Ramp and Camino Del Rio North (LOS F)

4.2.1.4 *Peak Hour Intersection Performance*

Table 4.2-2 summarizes the existing peak hour operating conditions for the study intersections. Figures 4.2-2 and 4.2-3 show existing morning and evening peak hour traffic volumes for study intersections. The worksheets used in this analysis are provided in the traffic study technical report (Appendix B) of this EIR.

TABLE 4.2-1
Existing Daily Roadway Segment Conditions

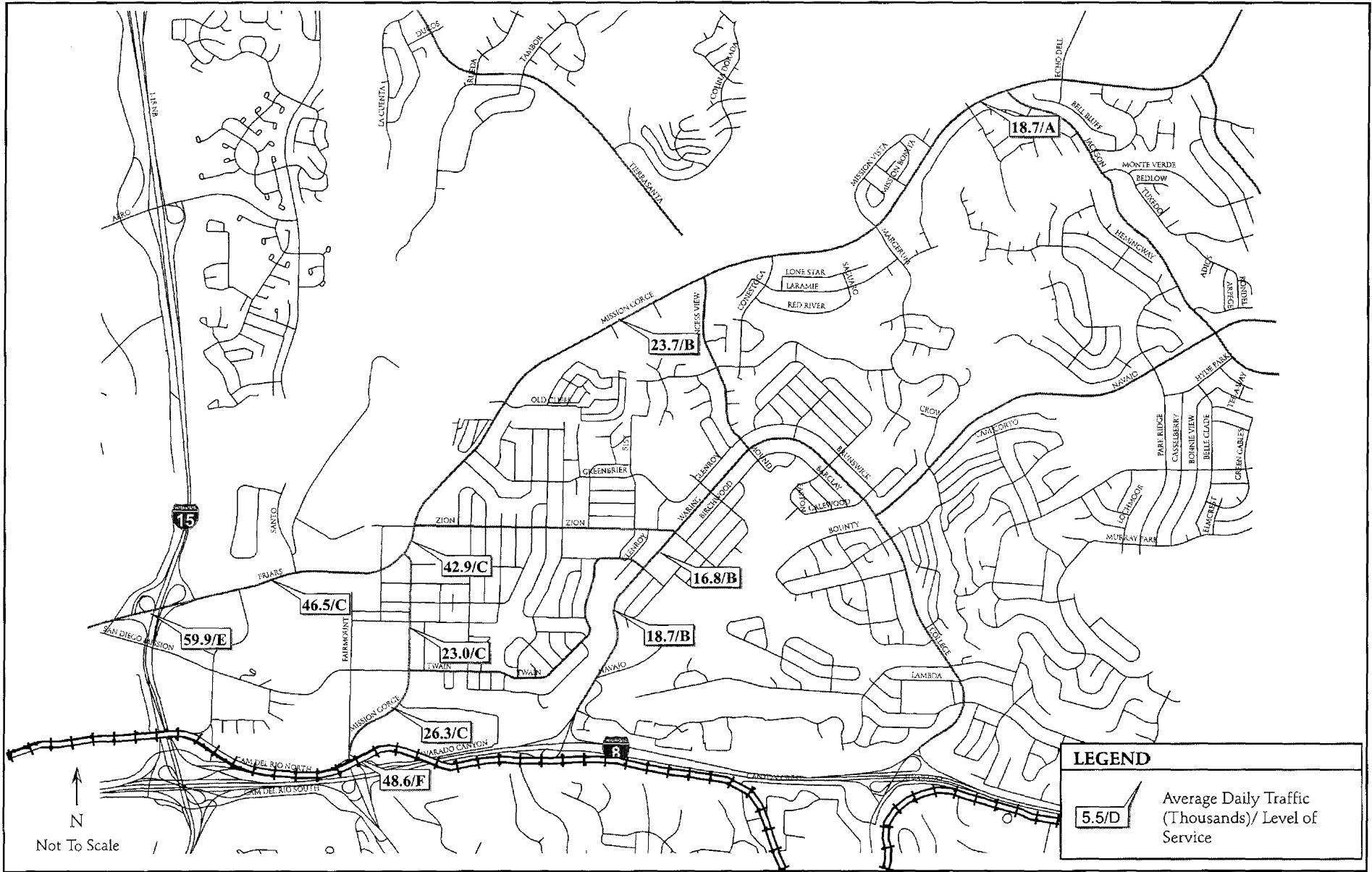
Roadway Segment	Lanes/Classification	LOS E Capacity	Average Daily Traffic (ADT)	Volume to Capacity Ratio	Level of Service
Friars Road					
I-15 NB Ramps to Rancho Mission Road	6 Lane Prime	60,000	59,881	1.00	E
Rancho Mission Road to Santo Road	6 Lane Prime	60,000	46,477	0.78	C
Fairmount Avenue					
I-8 EB Off Ramp to Camino Del Rio North	4 Lane Major	40,000	48,581	1.22	F
Mission Gorge Road					
Mission Gorge Place to Twain Avenue	4 Lane Major	40,000	26,268	0.66	C
Twain Avenue to Vandever Avenue	4 Lane Major	40,000	23,041	0.58	C
Friars Road to Zion Avenue	6 Lane Prime	60,000	42,915	0.72	C
West of Princess View Drive	5 Lane Prime	50,000	23,717	0.47	B
West of Jackson Drive	6 Lane Major	50,000	18,703	0.37	A
Waring Road					
Zion Avenue to Twain Avenue	4 Lane Major	40,000	16,771	0.42	B
South of Twain Avenue	4 Lane Major	40,000	18,705	0.47	B

Notes: NB = North Bound, EB = East Bound
Source: Katz, Okitsu & Associates, 2004.

TABLE 4.2-2
Existing Peak Hour Intersection Conditions

Intersection	AM Peak Hour		PM Peak Hour	
	Average Intersection Delay (sec.)	Level of Service	Average Intersection Delay (sec.)	Level of Service
1. Friars & I-15 SB Ramps	24.8	C	33.8	C
2. Friars & I-15 NB Ramps	6.7	A	10.5	B
3. Friars & Rancho Mission Rd	18.7	B	16.6	B
4. Friars & Mission Gorge Rd	13.3	B	26.4	C
5. Zion & Mission Gorge Rd	32.0	C	30.2	C
6. Princess View & Mission Gorge Rd	14.5	B	14.9	B
7. Jackson & Mission Gorge Rd	14.7	B	11.8	B
10. Twain & Mission Gorge Rd	30.9	C	38.4	D
11. Fairmont Ave & Mission Gorge Rd	15.8	B	19.2	B
12. Cam. Del Rio/ I-8 WB Off & Fairmount Ave	72.8	E	141.3	F
13. Fairmont Ave & I-8 WB On Ramp*	0.0	A	0.0	A
14. I-8 EB On and Off Ramps & Fairmount Ave	19.8	B	17.5	B
25. Zion & Waring Rd	25.5	C	26.2	C
26. Twain & Waring Rd	15.4	B	13.2	B

Notes: * = Unsignalized Intersection
Source: Katz, Okitsu & Associates, 2004.



SOURCE: Katz, Okitsu & Associates, 2004

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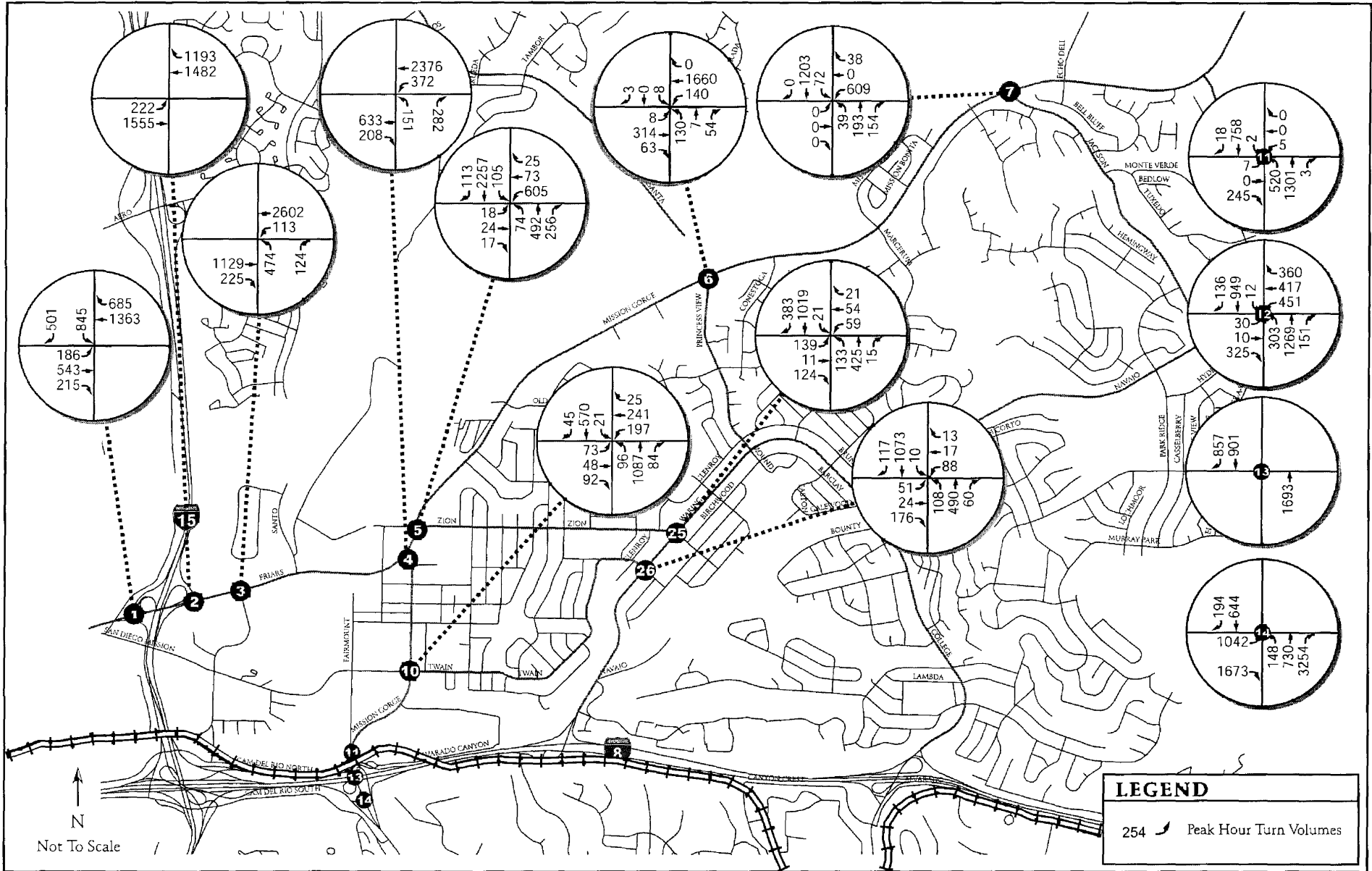
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Existing Daily Roadway Segment Conditions

FIGURE

4.2-1





SOURCE: Katz, Okitsu & Associates, 2004

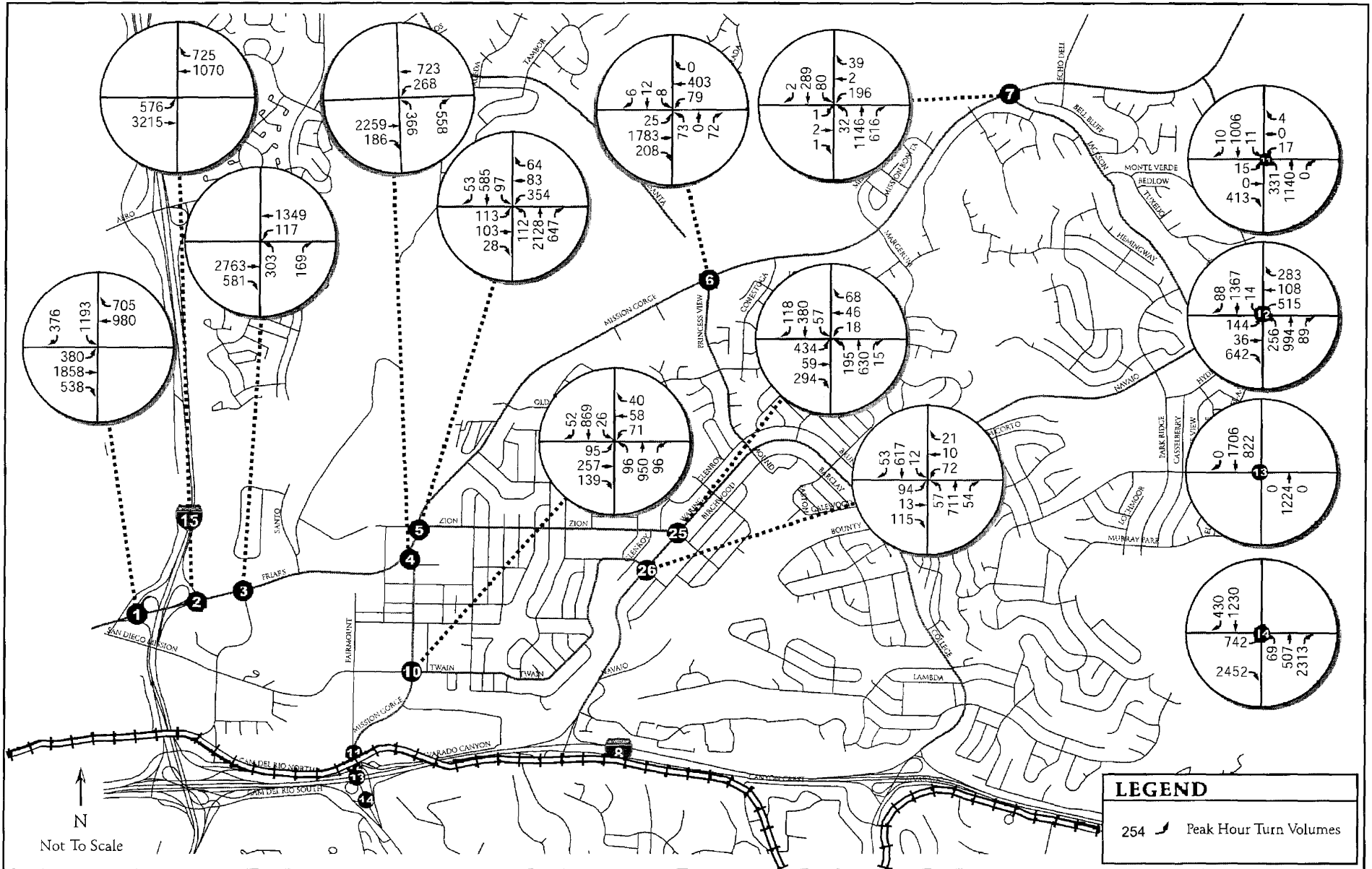
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Existing AM Peak Hour Turning Movements

FIGURE
4.2-2



SOURCE: Katz, Okitsu & Associates, 2004

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Grantville EIR

Existing PM Peak Hour Turning Movements

FIGURE

4.2-3

As shown, all intersections operate at LOS D or better in the morning peak hour except:

- Camino Del Rio/I-8 WB Off & Fairmount Avenue (LOS E).

4.2.2 Impact Threshold

For the purposes of this EIR, a significant impact would occur if the proposed project would:

- Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections).

To determine project impacts, the City of San Diego has developed a series of thresholds based on allowable increases in volume-to-capacity ratios, which become more stringent as level of service worsens. Table 4.2-3 summarizes these thresholds.

The acceptable level of service for roadway segments and intersections in San Diego is level of service D. However, for undeveloped areas, the goal is to achieve level of service C. Where roadway segments and intersections operate at LOS D or better, findings of significant impacts may occur, but no mitigation is required. Where the roadway segment is forecast to operate at LOS E or F, and the increase v/c or delay is greater than 0.02 or the delay increases by more than two seconds, the determination of significance (Yes/No) is shown in bold type to indicate a significant project impact.

TABLE 4.2-3
Significant Transportation Impact Measure

Level of Service With Project	Allowable Increase/Decrease Due to Project Impacts*		
	Intersections	Roadway Sections	
	Delay (Sec)	V/C	Speed (MPH)
A	N/A	0.10	5
B	6	0.06	3
C	4	0.04	2
D**	2	0.02	1
E**	2	0.02	1
F**	2	0.02	1

Notes: V/C = Volume/Capacity Ratio

* =If a proposed project's traffic impacts exceed the values shown in the above table, then the impacts are deemed "significant." The project applicant shall identify "feasible mitigations," to bring the facility back to the level previously held by the facility prior to the project's traffic impacts.

** = The acceptable level of service standard for roadways and intersections in San Diego is level of service D. However, for undeveloped locations, the goal is to achieve a level of service C.

Source: City of San Diego Traffic Impact Manual, 1998.

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.

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.

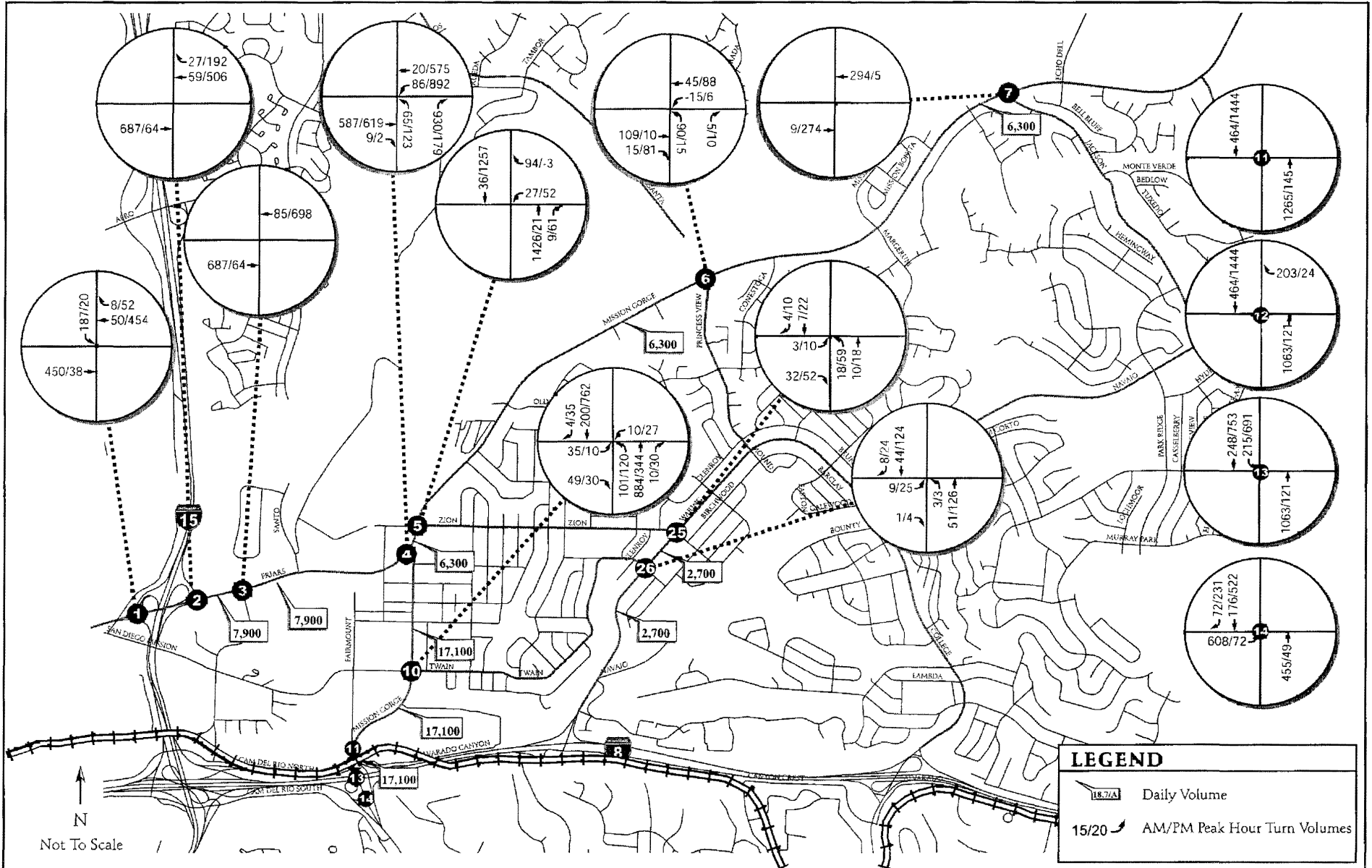
TABLE 4.2-4
Trip Generation for the Proposed Project

Land Use	Intensity	Trip Rate	Per	Daily Trips	AM Trips	In	Out	PM Trips	In	Out
Community Plan Land Use Intensities										
Neighborhood Commercial	-241 KSF	72	KSF	-17,366	-695	-417	-278	-1,910	-955	-955
Community Shopping Center	349 KSF	49	KSF	17,087	513	308	205	1,709	854	854
Specialty Retail/ Strip Commercial	195 KSF	36	KSF	7,018	211	126	84	632	316	316
Industrial (Manufacturing/ Assembly)	4,110 KSF	4	KSF	16,439	3,288	2,959	329	3,288	658	2,630
Industrial (Business Park)	629 KSF	16	KSF	10,057	1,207	398	809	1,207	241	966
Industrial (Small Industrial Park)	371 KSF	15	KSF	5,569	613	551	61	668	134	535
Industrial (Large Industrial Park)	1,036 KSF	8	KSF	8,285	911	820	91	994	199	795
Commercial Office	-169 KSF	20	KSF	-3,161	-411	-370	-41	-443	-89	-354
Institutional (Library)	-69 KSF	20	KSF	-1,379	-28	-19	-8	-138	-69	-69
Residential Single Family	48 DU	10	DU	485	39	8	31	48	34	15
Residential Multi-Family	86 DU	8	DU	686	55	11	44	69	48	21
Religious Facility	-117 KSF	9	KSF	-1,054	-42	-34	-8	-84	-42	-42
Park (Developed)	-19 AC	50	AC	-957	-38	0	0	-77	0	0
Industrial Extraction (Quarry)	-101 AC	100	AC	-10,114	-1,517	-1,062	-455	-1,618	-647	-971
Agriculture	-1 AC	2	AC	-1	0	0	0	0	0	0
Hospital	0 KSF	20	KSF	0	0	0	0	0	0	0
Commercial Recreation (Golf)	2 AC	8	AC	12	1	1	0	1	0	1
TOTAL COMMUNITY PLAN TRIPS				31,606	4,107	3,280	863	4,346	682	3,741

Notes: KSF = thousand square feet, DU = dwelling units, AC = acres
 Source: City of San Diego Trip Generation Manual, September 1998.

Figure 4.2-4 shows the increase in trips that the proposed project would add to the circulation network using the distributions shown in Appendix D of the traffic technical study.

The Grantville trolley station, located on Alvarado Canyon Road, is under construction as part of the Mission Valley East (MVE) extension of the Blue Line light rail corridor. The station is one of four new stations located along the line. The 5.9-mile MVE extension will connect the Blue and Orange lines, completing a loop that will give San Diegans new mobility and easier access to some of the region's most popular destinations and commercial and employment centers, including San Ysidro, Downtown, Old Town, Mission Valley, La Mesa, El Cajon, and SDSU. Connecting bus service will be offered at the Grantville Station. MTS is scheduled to complete construction on the extension in 2005 with operation beginning in June 2005. 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.



SOURCE: Katz, Okitsu & Associates, 2004

3/10/05

Grantville EIR

Daily and Peak Hour Trip Assignment

FIGURE

4.2-4



4.2.3.5 *Horizon Year (Year 2030) Conditions*

Horizon Year volumes were collected from the SANDAG Series 10 future forecast model. These volumes are assumed to include redevelopment traffic; therefore, project trips were backed out of the forecasted volumes to estimate base conditions. Horizon Year conditions assume that no circulation network improvements will be in place.

Planned Improvements. Katz, Okitsu & Associates reviewed the City of San Diego Capital Projects Program (CPP) to determine if any funded improvements are planned for the study area. No new CIP improvements are planned for the study area under both the existing and horizon year scenarios. No developer impact fee programs are in place either. In order to be conservative, it has been assumed that no future improvements are in place in the Horizon Year; however, the community plan identifies a number of transportation improvements, as discussed below.

The Navajo Community Plan (adopted in 1982) suggests that Mission Gorge Road be widened to a six-lane facility north of Zion Avenue with no left-turn lanes except at signalized intersections. The existing conditions analysis revealed that the majority of the roadway is a 6-lane facility. 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. The only non-intersection left-turn lane along the corridor is approximately 150 feet north of Princess View Drive where a southbound left-turn lane serves the existing retail.

The Community Plan also states that Mission Gorge Road be improved to a six-lane major street between Fairmount Avenue and Interstate 8. The existing conditions analysis showed that this has not yet been completed.

The Navajo Community Plan identifies the following circulation improvements. The community plan identifies the extension of Navajo Road east of College Avenue connecting to Waring Road. The community plan specifies that this extension should be designed to parkway standards and limited to a two-lane facility with four lanes at the intersection with College Avenue and Waring Road.

The following improvements are specified in the Tierrasanta Community Plan but are not found in the Navajo Community Plan. These three improvements, which would affect the Navajo Community Plan area, are the extensions of Santo Road, Princess View Drive and Jackson Drive into the Tierrasanta Community. These three extensions have not been included in the analysis.

Daily Roadway Segment Performance. Table 4.2-5 summarizes the horizon year conditions both with and without the project. Figure 4.2-5 graphically presents the results of this analysis.

Table 4.2-5 shows that without the project all segments operate at LOS D or better except:

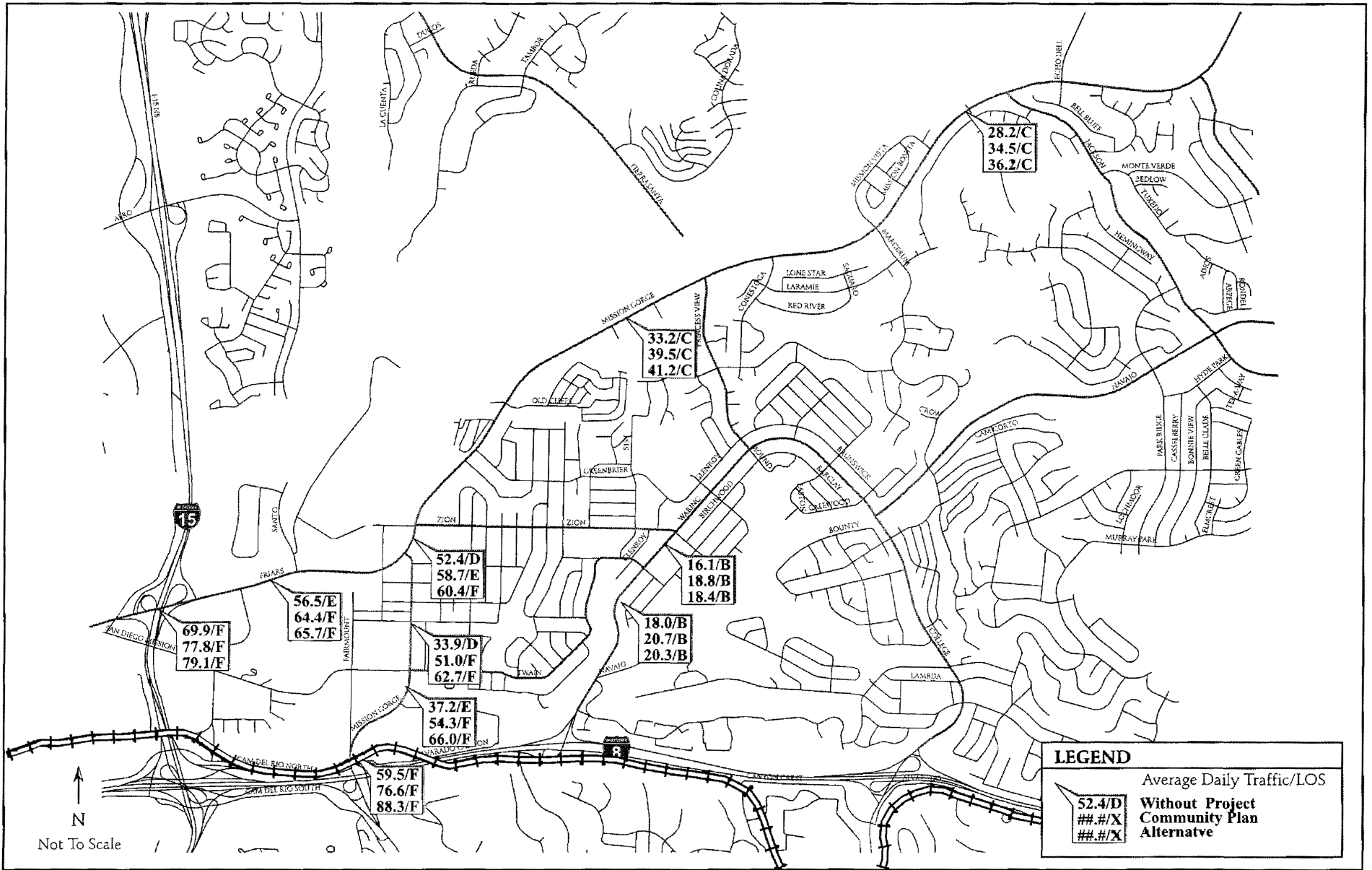
- Friars Road from I-15 North Bound Ramps to Rancho Mission Road (LOS F);
- Friars Road from Rancho Mission Road to Santo Road (LOS E);

TABLE 4.2-5
Horizon Year 2030 Daily Roadway Segment Conditions
with the Community Plan Project

Roadway Segment	Lanes/Class	Horizon without Project			Project Added	Horizon with Project			Comparison	
		ADT	V/C	LOS		ADT	V/C	LOS	Increase in V/C	Sig?
Friars Road										
I-15 NB Ramps to Rancho Mission Road	6/Prime	69,000	1.165	F	7,900	77,800	1.297	F	0.132	Yes
Rancho Mission Road to Santo Road	6/Prime	56,500	0.942	E	7,900	64,400	1.073	F	0.132	Yes
Fairmont Avenue										
I-8 EB Off Ramp to Camino Del Rio North	4/Major	59,500	1.488	F	17,100	76,600	1.915	F	0.428	Yes
Mission Gorge Road										
Mission Gorge Place to Twain Avenue	4/Major	37,200	0.930	E	17,100	54,300	1.358	F	0.428	Yes
Twain Avenue to Vandever Avenue	4/Major	33,900	0.848	D	17,100	51,000	1.275	F	0.428	Yes
Friars Road to Zion Avenue	6/Prime	52,400	0.873	D	6,300	58,700	0.978	E	0.105	Yes
West of Princess View Drive	5/Prime	33,200	0.664	C	6,300	39,500	0.790	C	0.126	No
West of Jackson Drive	6/Major	28,200	0.564	C	6,300	34,500	0.690	C	0.126	No
Waring Road										
Zion Avenue to Twain Avenue	4/Major	16,100	0.403	B	2,700	18,800	0.470	B	0.067	No
South of Twain Avenue	4/Major	18,000	0.450	B	2,700	20,700	0.518	B	0.067	No

Notes: V/C = Volume/Capacity Ratio
 Sig = Significant

Source: Katz, Okitsu & Associates, 2004



SOURCE: Katz, Okitsu & Associates, 2004

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Horizon Year Daily Roadway Segment Conditions

FIGURE

4.2-5



- Fairmount Avenue from I-8 East Bound Off Ramp to Camino Del Rio North (LOS F); and,
- Mission Gorge Road from Mission Gorge Place to Twain Avenue (LOS E).

With the addition of Community Plan project traffic, the following 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).

Peak Hour Intersection Performance. Table 4.2-6 summarizes the results of the peak hour intersection performance analysis and the significance of the project's impacts. Figures 4.2-6 and 4.2-7 show the horizon year morning and evening peak hour intersection turning movements without the project. Figures 4.2-8 and 4.2-9 show the horizon year morning and evening peak hour intersection turning movements with the project. Appendix E of the traffic technical study (see Volume II, Appendix B of this EIR) contains the worksheets used in this analysis.

The following intersections would be significantly impacted by the proposed project:

- Friars Road & I-15 South Bound Ramps (PM Peak hour);
- Friars Road & 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. Ramp meter analysis was also conducted for the proposed project. This analysis indicates impacts would occur to the following ramp meter locations:

- Friars Road to I-15 North (AM Peak hour);
- Friars Road to I-15 South (loop) (PM Peak Hour); and,
- Friars Road (HOV) to I-15 North (PM Peak Hour).

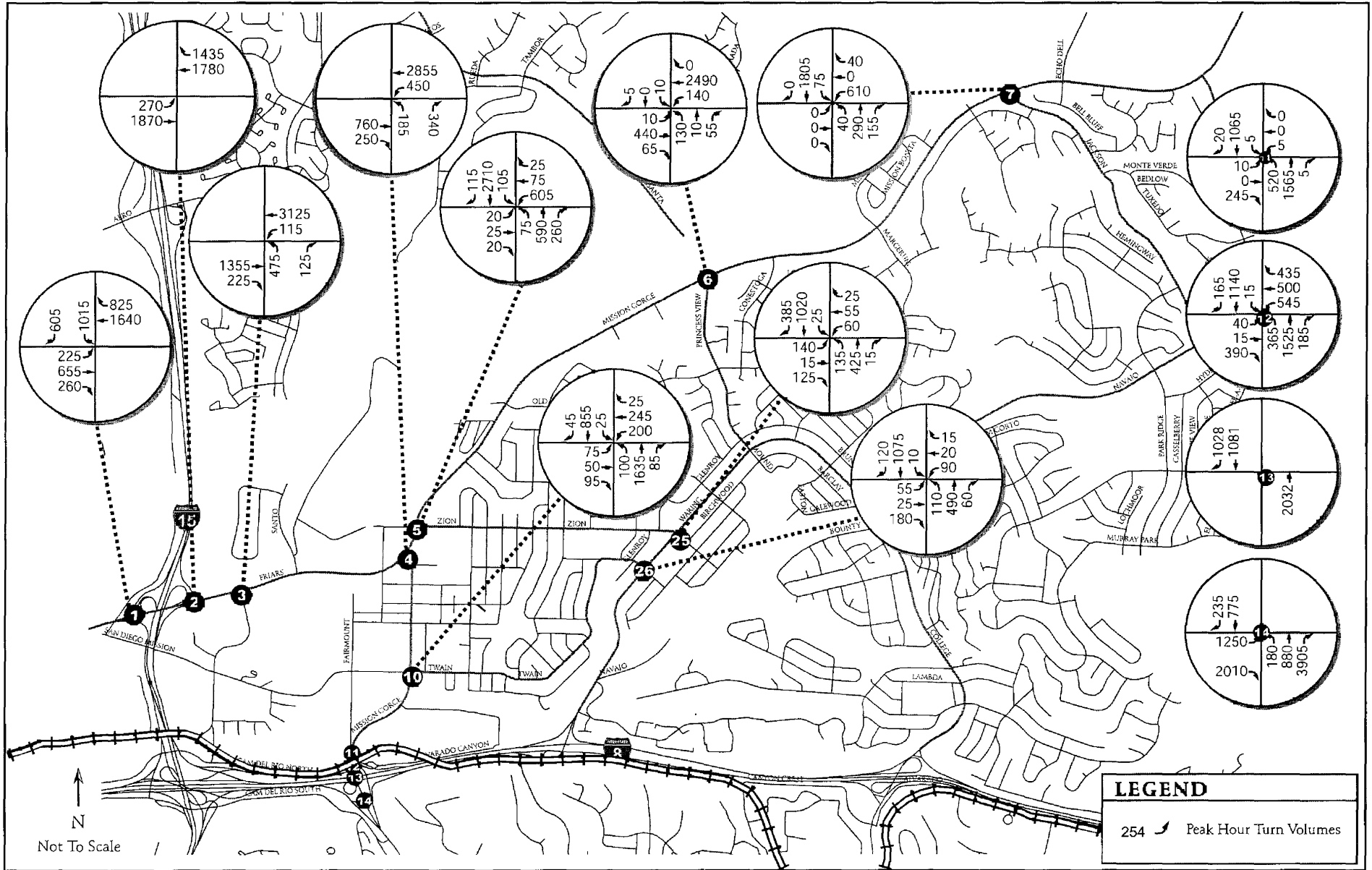
Tables 9a and 9b provided in the traffic technical appendices (see Volume II, Appendix B) summarizes the peak operating conditions for the freeway ramp meters.

TABLE 4.2-6
Year 2030 Peak Hour Intersection Conditions with and without the Community Plan Project

Intersection	2030 Without		2030 With		Increase in Delay (sec.)	Significant?
	Delay (sec.)	Level of Service	Delay (sec.)	Level of Service		
AM Peak Hour						
1. Friars & I-15 SB Ramps	42.5	D	43.8	D	1.3	No
2. Friars & I-15 NB Ramps	8.3	A	8.2	A	-0.1	No
3. Friars & Rancho Mission Rd	25.1	C	25.8	C	0.7	No
4. Friars & Mission Gorge Rd	17.6	B	48.0	D	30.4	No
5. Zion & Mission Gorge Rd	42.4	D	54.7	D	12.3	No
6. Princess View & Mission Gorge Rd	22.9	C	28.9	C	6.0	No
7. Jackson & Mission Gorge Rd	15.0	B	15.7	B	0.7	No
10. Twain & Mission Gorge Rd	48.5	D	151.5	F	103.0	Yes
11. Fairmont Ave & Mission Gorge Rd	18.6	B	77.0	E	58.4	Yes
12. Cam. Del Rio/ I-8 WB Off & Fairmount Ave	138.0	F	268.1	F	130.1	Yes
13. Fairmont Ave & I-8 WB On Ramp*	0.0	A	0.0	A	0.0	No
14. I-8 EB On and Off Ramps & Fairmount Ave	25.0	C	77.2	E	52.2	Yes
25. Zion & Waring Rd	26.5	C	33.1	C	6.6	No
26. Twain & Waring Rd	15.6	B	15.8	B	0.2	No
PM Peak Hour						
1. Friars & I-15 SB Ramps	67.2	E	86.0	F	18.8	Yes
2. Friars & I-15 NB Ramps	16.5	B	22.3	C	5.8	No
3. Friars & Rancho Mission Rd	24.5	C	24.7	C	0.2	No
4. Friars & Mission Gorge Rd	50.9	D	161.1	F	110.2	Yes
5. Zion & Mission Gorge Rd	40.3	D	50.4	D	10.1	No
6. Princess View & Mission Gorge Rd	24.1	C	22.2	C	-1.9	No
7. Jackson & Mission Gorge Rd	13.3	B	14.5	B	1.2	No
10. Twain & Mission Gorge Rd	70.0	E	177.6	F	107.6	Yes
11. Fairmont Ave & Mission Gorge Rd	25.1	C	133.8	F	108.7	Yes
12. Cam. Del Rio/ I-8 WB Off & Fairmount Ave	222.1	F	387.9	F	165.8	Yes
13. Fairmont Ave & I-8 WB On Ramp*	0.0	A	0.0	A	0.0	No
14. I-8 EB On and Off Ramps & Fairmount Ave	19.8	B	26.4	C	6.6	No
25. Zion & Waring Rd	26.6	C	31.1	C	4.5	No
26. Twain & Waring Rd	13.3	B	13.7	B	0.4	No

Notes: * = Unsignalized Intersection, NB = North Bound, SB = South Bound, EB = East Bound, WB = West Bound

Source: Katz, Okitsu & Associates, 2004



SOURCE: Katz, Okitsu & Associates, 2004

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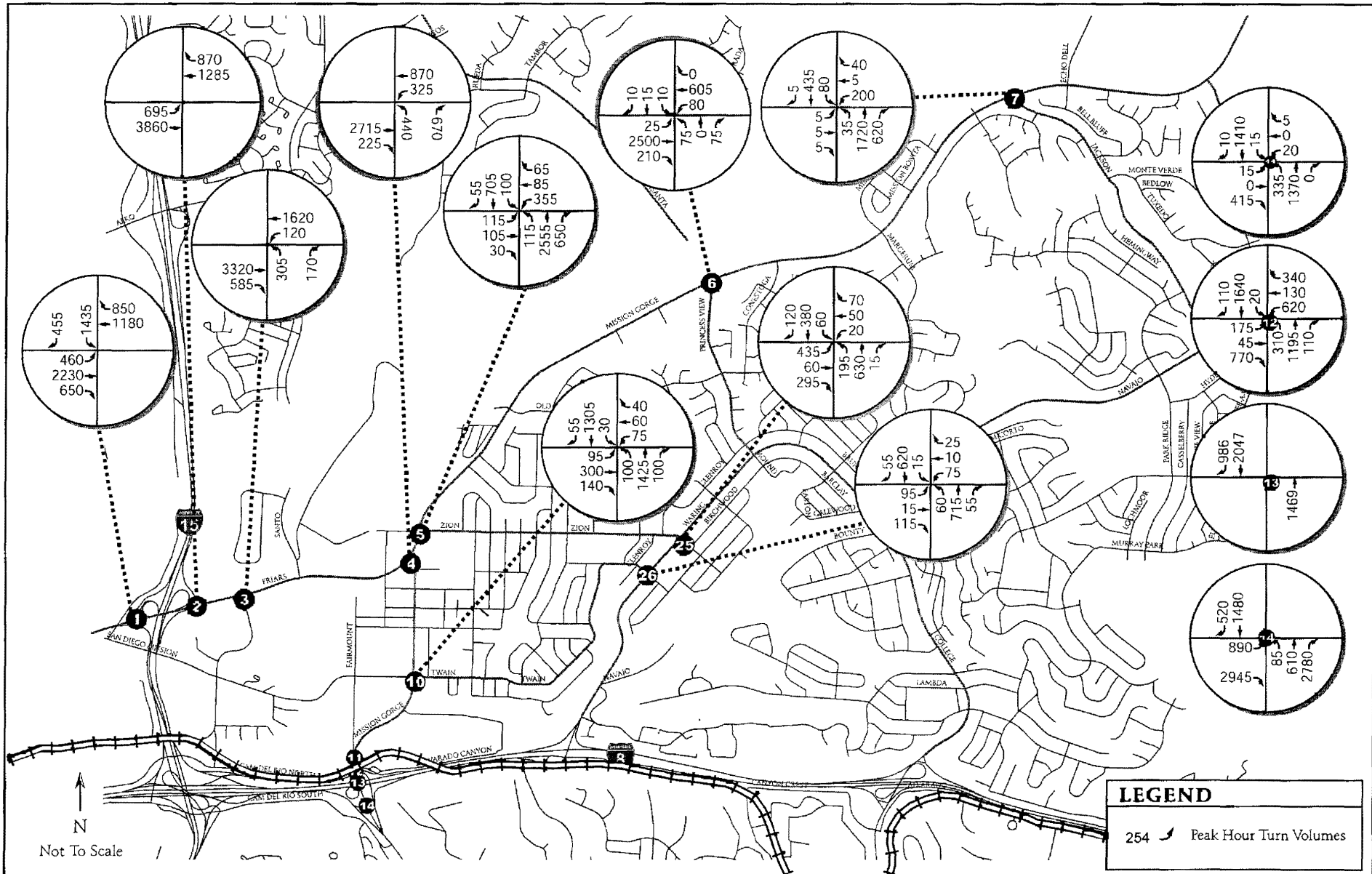
Grantville EIR



Horizon Year AM Peak Hour Turning Movements without Project

FIGURE

4.2-6



SOURCE: Katz, Okitsu & Associates, 2004

3/10/05

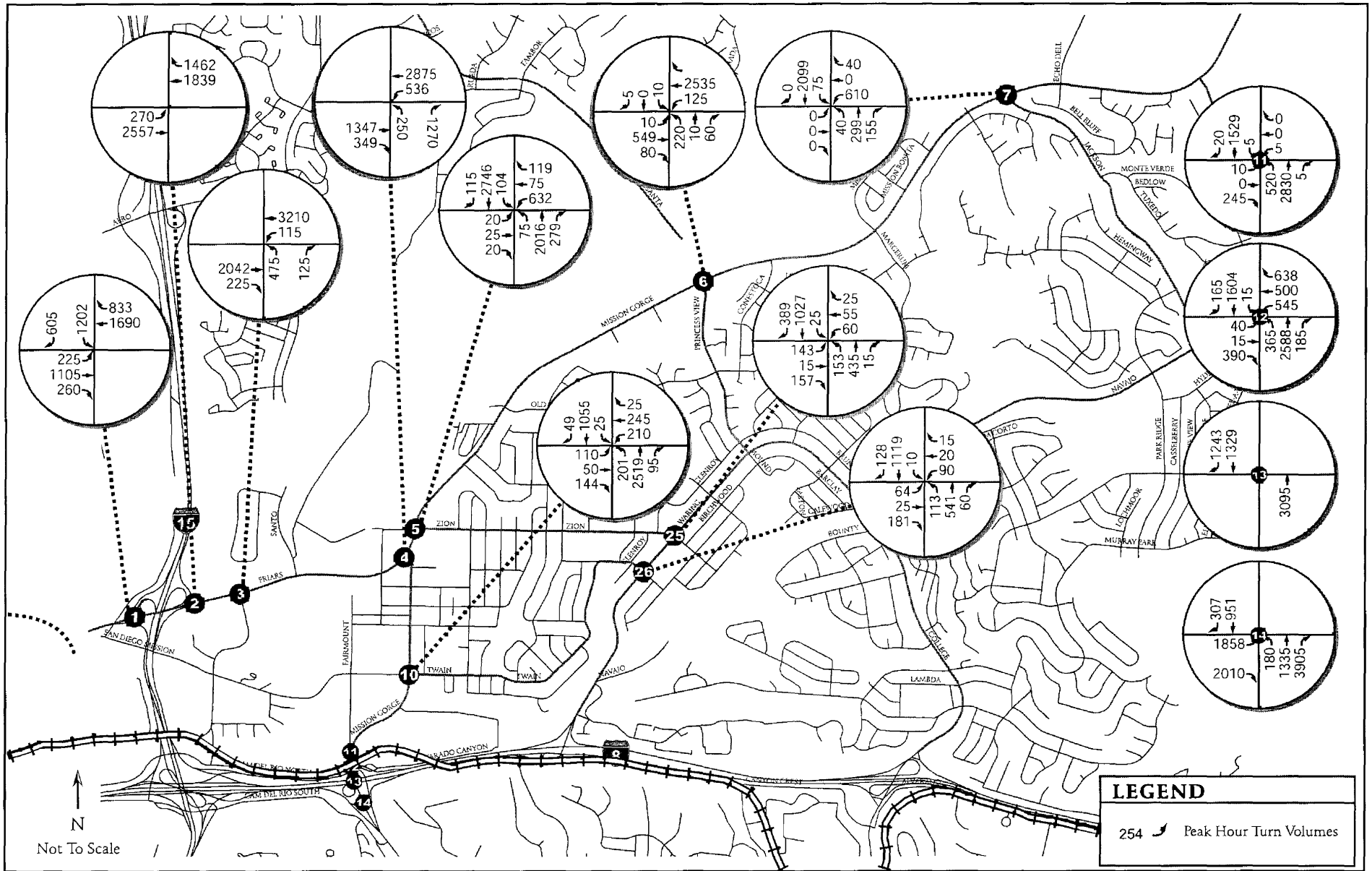
Grantville EIR



Horizon Year PM Peak Hour Turning Movements without Project

FIGURE

4.2-7



SOURCE: Katz, Okitsu & Associates, 2004

3/10/05

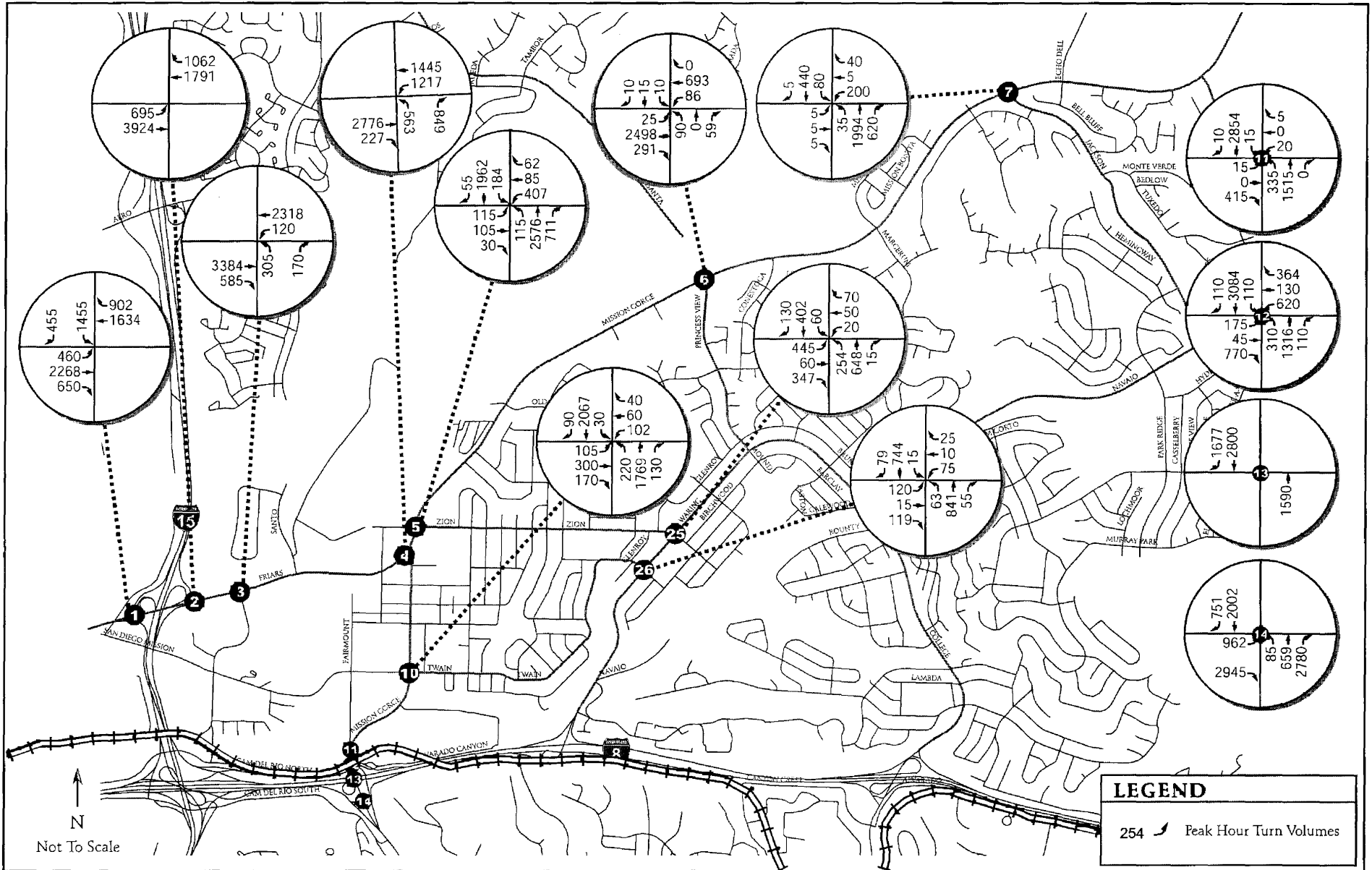
Grantville EIR



Horizon Year AM Peak Hour Turning Movements with Project

FIGURE

4.2-8



SOURCE: Katz, Okitsu & Associates, 2004

3/10/05

Grantville EIR



Horizon Year PM Peak Hour Turning Movements with Project

FIGURE

4.2-9

4.2.4 Significance of Impact

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:

- 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 WB Off Ramp & Fairmount Avenue (AM and PM Peak hours); and,
- I-8 EB On and Off Ramps & Fairmount Avenue (AM Peak hour).

The following ramp meter locations would be significantly impacted:

- Friars Road to I-15 North (AM Peak hour);
- Friars Road to I-15 South (loop) (PM Peak Hour); and,
- Friars Road (HOV) to I-15 North (PM Peak Hour).

4.2.5 Mitigation Measures

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.

The Navajo Community Plan (adopted in 1982) suggests the widening of Mission Gorge Road to a six-lane facility north of Zion Avenue with no left-turn lanes except at signalized intersections as well as the widening of Mission Gorge Road to a six-lane major street between Fairmount Avenue and Interstate 8.

Mission Gorge Road north of Zion Avenue is a 6-lane facility for most of its length. 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. The only non-intersection left-turn lane along the corridor is approximately 150 feet north of Princess View Drive where a southbound left-turn lane serves the existing retail. The Grantville Redevelopment Traffic Impact Analysis analyzed the Mission Gorge Road segments north of Friars Road as 5-lane prime arterials west of Princess View Drive and a 6-lane major arterials for the segments west of Jackson Drive. The widening of Mission Gorge Road at the 4-lane and 5-lane segments would improve the vehicle capacity along these segments. However, the analysis found that no existing or future capacity constraint exists and the roadway segments operate in the worst-case at LOS C.

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.

TABLE 4.2-7
Horizon Year 2030
Mitigated Daily Roadway Segment Conditions

Street Segment	Horizon with Project (4-Lane Major)			Horizon with Project (6-Lane Major)			Increase in V/C
	ADT	V/C	LOS	ADT	V/C	LOS	
Fairmont Avenue							
I-8 East Bound Off Ramp to Camino Del Rio North	76,600	1.915	F	76,600	1.532	F	-.383

Notes: V/C = Volume/Capacity Ratio
ADT = Average Daily Trip

Source: Katz, Okitsu & Associates, 2004.

4.2.6 Conclusion

The following roadway segments would be significantly impacted as a result of proposed redevelopment activities:

- 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 as a result of proposed redevelopment activities:

- 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).

The following ramp meter locations would be significantly impacted as a result of proposed redevelopment activities:

- Friars Road to I-15 North (AM Peak hour);
- Friars Road to I-15 South (loop) (PM Peak Hour); and,
- Friars Road (HOV) to I-15 North (PM Peak Hour).

Implementation of mitigation measures identified in the preceding section will reduce the impact to the extent feasible; however, the impact to traffic circulation will remain significant and unavoidable.

4.3 Air Quality

4.3.1 Existing Conditions

4.3.1.1 *Climate*

The Grantville Redevelopment Project Area is located within the San Diego Air Basin (SDAB), an area of mild Mediterranean climate, with moderate year-round temperatures. A repetitive pattern of frequent early morning cloudiness, hazy afternoon sunshine, daytime onshore breezes and little temperature change is characteristic of the San Diego climate throughout the year. The average daily maximum in downtown San Diego during the summer is in the upper 70s Fahrenheit (F) with an average daily maximum of 65°F in winter. The thermostat action of the nearby oceanic heat reservoir keeps the daily oscillation of temperature close to 15 degrees. Summer nights in the downtown San Diego area are around 65°F, while early winter mornings drop to the upper 40s F.

Limited rainfall occurs in winter, while summers are often completely dry. An average of ten inches of rain falls each year from November to early April. Year-to-year variations in rainfall amounts are the rule rather than the exception. Rainfall amounts of one-half or twice the annual average are not uncommon. Rain typically falls only 20 days per year with only six days of moderate (0.5" in 24-hours) rainfall per year.

4.3.1.2 *Smog and Ozone*

Air quality levels tend to decline in some areas of the SDAB during the summer months, when a warm air mass frequently descends over the cool, moist marine layer produced by the interaction between the ocean's surface and the lowest layer of the atmosphere. The warm upper layer forms a cap over the cool marine layer and prevents pollutants from dispersing upwards, trapping them within the lower layer. As the pollutants become more concentrated, photochemical reactions occur that produce oxidants, or smog. Abundant sunshine typical in the area furthers this process.

Ozone (O₃) levels in the SDAB have not exceeded the federal one-hour clean air standard since August 30, 1998. O₃, the chief component of smog, is the region's primary criteria pollution problem. This is a vast improvement from the 1970's when O₃ levels in San Diego exceeded the standard about 1 out of 4 days. San Diego has not recorded a Stage I episode (commonly called a Smog Alert) since 1991 and no Stage II episodes since 1979. The number of days exceeding the state standard has decreased dramatically during the past two decades. In 1981, the SDAB exceeded the state standard on 192 days; in 2000, there were 24 days where the state standard was exceeded. The long-term decreases in the number of days the standard has been exceeded reflects the cumulative effect of continued implementation of stationary and mobile source air pollution control programs.

4.3.1.3 *Regional and Local Conditions*

The SDAB has had a transitional-attainment status of federal standards for O₃. The Basin is either in attainment or unclassified for federal standards of carbon monoxide (CO), sulfur dioxide (SO₂), nitrogen dioxide (NO₂), total suspended particulate matter smaller than ten microns in diameter (PM₁₀), and lead.

The SDAB is also in attainment of state air quality standards for all pollutants with the exception of O₃ and PM₁₀. Air pollutants transported into the Basin from the adjacent South Coast Air Basin (Los Angeles, San Bernardino County, Orange County, and Riverside County) substantially contribute to the non-attainment conditions in the SDAB. Figure 4.3-1 depicts the SDAB in relation to the other air basins in Southern California.

4.3.1.4 *Ambient Air Quality*

The United States Environmental Protection Agency (USEPA) (under the Federal Clean Air Act of 1970, and amended in 1977) established the National Ambient Air Quality Standards (NAAQS) to define and regulate specific pollutants. Individual states have the option to add additional pollutants, require more stringent compliance, or include different exposure periods, then adopt changes as their own state standards. Because California had established the more stringent California Ambient Air Quality Standards (CAAQS) before the federal action in 1971 and because of the unique air quality problems introduced by the restrictive dispersion meteorology, there is a difference between California and national clean air standards, as seen in Table 4.3-1.

The California Air Resources Board (CARB) monitors ambient air quality at approximately 250 air-monitoring stations across the state. Air quality monitoring stations usually measure pollutant concentrations 10 meters (approximately 30 feet) above ground level; therefore, air quality is often referred to in terms of ground-level concentrations. Ambient air pollutant concentrations in the SDAB are measured at 10 air-monitoring stations operated by the San Diego Air Pollution Control District (SDAPCD).

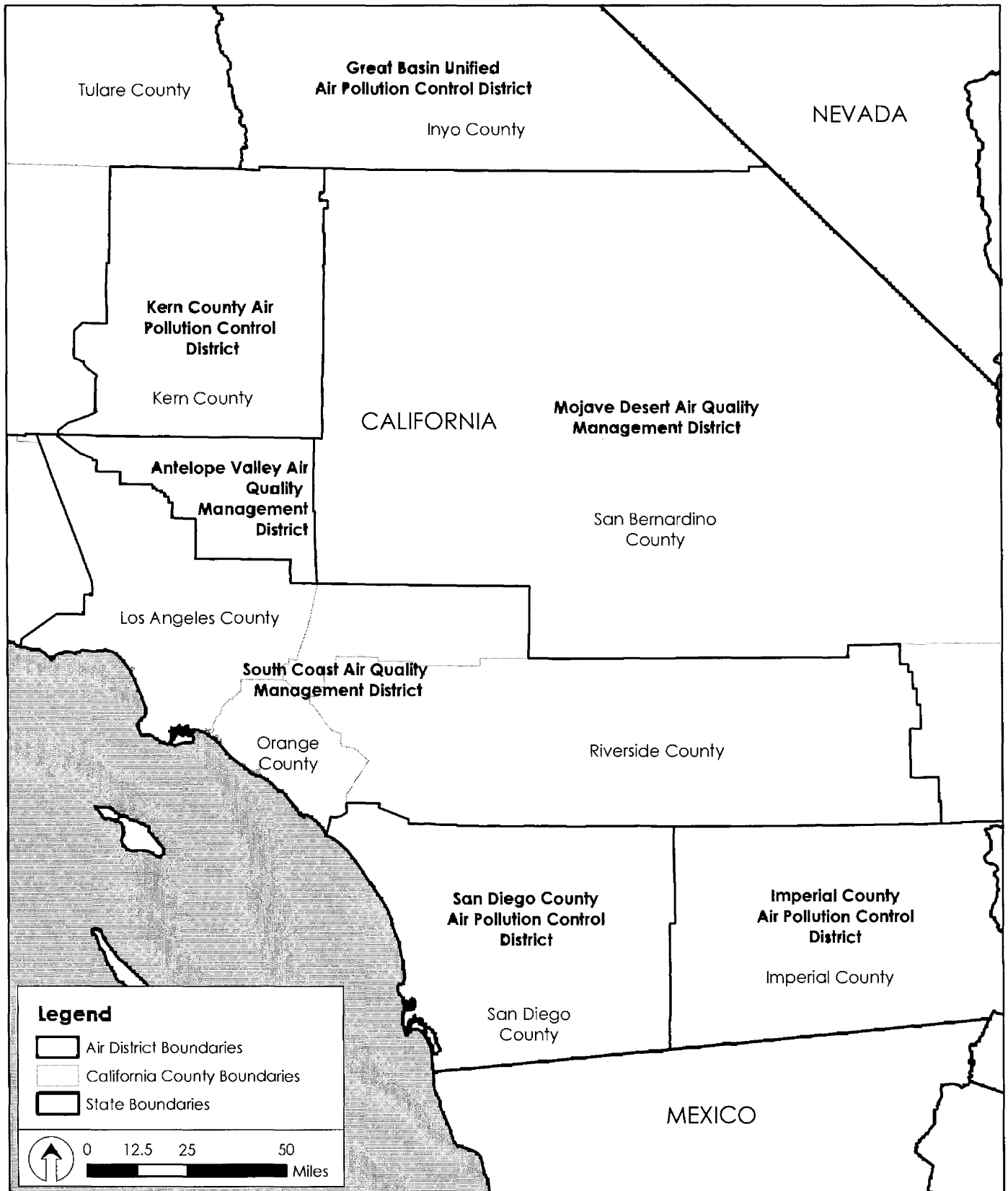
The SDAB is administered by the SDAPCD which maintains air quality monitoring stations throughout San Diego County. The downtown San Diego air quality monitoring station is the station nearest to the Project Area. In general, the City of San Diego has good air quality with the exception of O₃ and PM₁₀. Air quality monitoring data obtained from the downtown San Diego monitoring station indicates that in 2003, the CO, O₃, NO_x, and SO_x levels did not exceed the state standards; however, PM₁₀ levels did exceed the state standard 11 days out of the year. Table 4.3-2 depicts the ambient air quality summary for the downtown San Diego monitoring station from 2000 through 2003.

4.3.1.5 *Sensitive Receptors*

Smog poses a health hazard to the general population, but particularly to the young, the elderly and the sick. Typical health problems attributed to smog include respiratory ailments, eye and throat irritations, headaches, coughing, and chest discomfort. Table 4.3-3 depicts typical health problems associated with O₃ and other pollutants. Certain land uses are considered to be more sensitive to the effects of air pollution, and concentrations of pollutants are referred to as "sensitive receptors." Sensitive receptors located within and adjacent to the Project Area include schools, residential areas, child and senior care facilities, hospital facilities, and parks.

4.3.1.6 *Regional Air Quality Strategy Plan*

The continued violations of ambient air quality standards in the SDAB, particularly for O₃ in inland foothill areas, requires that a plan be developed outlining the pollution controls that will be undertaken to improve



SOURCE: SanGIS and BRG Consulting, Inc., 2004

10/19/04



Grantville EIR
Air District Boundaries

FIGURE
4.3-1

TABLE 4.3-1
California and Federal Ambient Air Quality Standards

Pollutant	Average Time	California Standards ⁽¹⁾		Federal Standards ⁽²⁾			
		Concentration ⁽³⁾	Method ⁽⁴⁾	Primary ^(3,5)	Secondary ^(3,6)	Method ⁽⁷⁾	
Ozone (O ₃)	1 Hour	0.09 ppm (180 ug/m ³)	Ultraviolet Photometry	0.12 ppm (235 ug/m ³) ⁽⁸⁾	Same as Primary Standard	Ultraviolet Photometry	
	8 Hour	—		0.08 ppm (157 ug/m ³) ⁽⁸⁾			
Respirable Particulate Matter (PM ₁₀)	24 Hour	50 ug/m ³	Gravimetric or Beta Attenuation	150 ug/m ³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis	
	Annual Arithmetic Mean	20 ug/m ³		50 ug/m ³			
Fine Particulate Matter (PM _{2.5})	24 Hour	No Separate State Standard		65 ug/m ³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis	
	Annual Arithmetic Mean	12 ug/m ³	Gravimetric or Beta Attenuation	15 ug/m ³			
Carbon Monoxide (CO)	8 Hour	9.0 ppm (10 mg/m ³)	Non-dispersive Infrared Photometry (NDIR)	9 ppm (10 mg/m ³)	None	Non-dispersive Infrared Photometry (NDIR)	
	1 Hour	20 ppm (23 mg/m ³)		35 ppm (40 mg/m ³)			
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m ³)		—			
Nitrogen Dioxide (NO ₂)	Annual Arithmetic Mean	—	Gas Phase Chemiluminescence	0.053 ppm (100 ug/m ³)	Same as Primary Standard	Gas Phase Chemiluminescence	
	1 Hour	0.25 ppm (470 ug/m ³)		—			
Lead ⁽⁹⁾	30 Days Average	1.5 ug/m ³	Atomic Absorption	—	—	—	
	Calendar Quarter	—		1.5 ug/m ³			Same as Primary Standard
Sulfur Dioxide (SO ₂)	Annual Arithmetic Mean	—	Ultraviolet Fluorescence	0.030 ppm (80 ug/m ³)	—	Spectrophotometry (Pararosaniline Method)	
	24 Hour	0.04 ppm (105 ug/m ³)		0.14 ppm (365 ug/m ³)			
	3 Hour	—		—			0.5 ppm (1300 ug/m ³)
	1 Hour	0.25 ppm (655 ug/m ³)		—			—

TABLE 4.3-1
California and Federal Ambient Air Quality Standards (cont'd.)

Pollutant	Average Time	California Standards ⁽¹⁾		Federal Standards ⁽²⁾		
		Concentration ⁽³⁾	Method ⁽⁴⁾	Primary ^(3,5)	Secondary ^(3,6)	Method ⁽⁷⁾
Visibility Reducing Particles	8 Hour	Extinction of coefficient of 0.23 per kilometer – visibility of ten miles or more (0.07 – 30 miles or more for Lake Tahoe) due to particles when relative humidity is less than 70 percent. Method: Beta Attenuation and Transmittance through Filter Tape.		No Federal Standards		
Sulfates	24 Hour	25 ug/m ³	Ion Chromatography			
Hydrogen Sulfide	1 Hour	0.03 ppm (42 ug/m ³)	Ultraviolet Fluorescence			
Vinyl Chloride ⁹	24 Hour	0.01 ppm (26 ug/m ³)	Gas Chromatography			

- Notes:
- (1) California standards for ozone, carbon monoxide (except Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, suspended particulate matter – PM 10, PM 2.5, and visibility reducing particles, are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.
 - (2) National standards (other than ozone, particulate matter, and those based on annual averages or annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest eight hour concentration in a year, averaged over three years, is equal to or less than the standard. For PM 10, the 24 hour standard is attained when the expected number of days per calendar year with a 24 hour standard concentration above 150 ug/m³ is equal to or less than one. For PM 2.5, the 24 hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact U.S. EPA for further classification and current federal policies.
 - (3) Concentrations expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25° C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25° C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.
 - (4) Any equivalent procedure which can be shown to the satisfaction of the ARB to give equivalent results at or near the level of the air quality standard may be used.
 - (5) National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.
 - (6) National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.
 - (7) Reference method as described by the EPA. An "equivalent method" of measurement may be used, but must have a "consistent relationship to the reference method" and must be approved by the EPA.
 - (8) New federal 8-hour ozone and fine particulate matter standards were promulgated by U.S. EPA for further classification and current federal policies.
 - (9) The ARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementations of control measures at levels below the ambient concentrations specified for these pollutants.

Source: California Air Resources Board (7/9/03)

TABLE 4.3-2
Ambient Air Quality Summary
Downtown San Diego Monitoring Station
2000 Through 2003

Year	Carbon Monoxide (CO)		Ozone (O ₃)		Nitrogen Dioxide (NO _x)		Sulfur Dioxide (SO _x)		Fine Particulate Matter (PM ₁₀)	
	Max. 8-hour Concentration (ppm)	Days State Standard Exceeded >0.09 ppm 8-hour	Max. 1-hour Concentration (ppm)	Days State Standard Exceeded >0.09 ppm 1-hr	Max. 1-hour Concentration (ppm)	Days State Standard Exceeded >0.25 ppm 1-hour	Max. 24-hour Concentration (ppm)	Days State Standard Exceeded >0.05 ppm 24-hr	Max. 24-hour Concentration (ppm)	Days State Standard Exceeded >50 µg/m ³ 24-hour
2000	4.6	0	0.188	1	0.117	0	0.010	0	65	4
2001	4.9	0	0.098	1	0.098	0	0.012	0	66	1
2002	3.5	0	0.090	0	0.102	0	0.007	0	85	7
2003	3.9	0	0.075	0	0.111	0	0.008	0	139	11

Notes: hr = hour

Source: California Air Resources Board (CARB) ADAM Ambient Air Quality Inventory.

air quality. In San Diego County, this attainment planning process is embodied in the Regional Air Quality Strategies (RAQS) developed jointly by the SDAPCD and the San Diego Association of Governments (SANDAG).

A plan to meet the federal standard for O₃ was developed in 1994 during the process of updating the 1991 state-mandated plan. This local plan was combined with plans from all other California non-attainment areas having serious O₃ problems and used to create the California State Implementation Plan (SIP). The SIP was adopted by the Air Resources Board (ARB) after public hearings on November 9th through 19th in 1994, and was forwarded to the USEPA for approval. After considerable analysis and debate, particularly regarding airsheds with the worst smog problems, the EPA approved the SIP in mid-1996.

The proposed project is related to the SIP and/or RAQS through the land use and growth assumptions that are incorporated into the air quality planning document. If a proposed project is consistent with the applicable General Plan of the jurisdiction where it is located, then the project presumably has been anticipated within the regional air quality planning process. Such consistency would ensure that the project would not have an adverse regional air quality impact. If the relocation or change of vehicular emission patterns from a proposed project would not create any further unacceptable microscale impacts immediately adjacent to the proposed Project Area, then the project would have a less than significant air quality impact.

4.3.2 Impact Threshold

For purposes of this EIR, a significant air quality impact would occur if implementation of the proposed project would:

- Conflict or obstruct the implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP);

TABLE 4.3-3
Health Effects Associated with Air Pollutants

Pollutant	Most Relevant Effects
Ozone	(a) Short-term exposures: (1) Pulmonary function decrements and localized lung edema in humans and animals. (2) Risk to public health implied by alterations in pulmonary morphology and host defense in animals; (b) Long-term exposures: Risk to public health implied by altered connective tissue metabolism and altered pulmonary morphology in animals after long-term exposures and pulmonary function decrements in chronically exposed humans; (c) Vegetation damage; (d) Property damage
Carbon Monoxide (CO)	(a) Aggravation of angina pectoris and other aspects of coronary heart disease; (b) Decreased exercise tolerance in persons with peripheral vascular disease and lung disease; (c) Impairment of central nervous system functions; (d) Possible increased risk to fetuses.
Nitrogen Dioxide (NO ₂)	(a) Potential to aggravate chronic respiratory disease and respiratory symptoms in sensitive groups; (b) Risk to public health implied by pulmonary and extra-pulmonary biochemical and cellular changes and pulmonary structural changes; (c) Contribution to atmospheric discoloration.
Sulfur Dioxide (SO ₂)	(a) Bronchoconstriction accompanied by symptoms which may include wheezing, shortness of breath and chest tightness, during exercise or physical activity in persons with asthma.
Suspended Particulate Matter (PM ₁₀)	(a) Excess deaths from short-term exposures and exacerbation of symptoms in sensitive patients with respiratory disease; (b) Excess seasonal declines in pulmonary function, especially in children.
Sulfates (SO ₂)	(a) Decrease in ventilatory function; (b) Aggravation of asthmatic symptoms; (c) Aggravation of cardio-pulmonary disease; (d) Vegetation damage; (e) Degradation of visibility; (f) Property damage
Lead (Pb)	(a) Increased body burden; (b) Impairment of blood formation and nerve conduction.
Visibility-Reducing Particulates	(a) Visibility impairment on days when relative humidity is less than 70 percent

Notes: ppm = parts per million; hr. = hour; avg. = average, ann. = annual; µg/m³ = micrograms per cubic meter

Source: Black & Veatch Corporation, 1999.

- Violate any air quality standard or contribute substantially to an existing or projected air quality violation;
- Result in cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including release emissions which exceed quantitative thresholds for ozone precursors);
- Expose sensitive receptors to substantial pollutant concentrations including air toxics such as diesel particulates; or
- Create objectionable odors affecting a substantial number of people.

The San Diego Air Pollution Control District (SDAPCD) provides criteria in Regulation II, Rule 20.2, Table 20-2-1, "Air Quality Impact Assessment (AQIA) Trigger Levels." These were established for air quality permitting purposes for stationary source emissions. These thresholds were not established specifically for CEQA purposes or to assess mobile source emissions. AQIA Trigger levels currently enforced by the County of San Diego are shown quantitatively in Table 4.3-4. However, in lieu of established CEQA thresholds, these standards are utilized for assessment of significance as the standards are compatible with those utilized elsewhere in the State (such as South Coast Air Quality Management District [SCAQMD] standards, etc.). Table 4.3-4 depicts the thresholds for determining significance of this project.

TABLE 4.3-4
SDAPCD Thresholds of Significance for Air Quality Impacts

Pollutant	Thresholds Significance		
	Pounds Per Hour	Pounds Per Day	Tons Per Year
Carbon Monoxide (CO)	100	550	100
Oxides of Sulfur (SO _x)	25	250	40
Volatile Organic Compounds (VOC's) ⁽¹⁾	---	137	15
Reactive Organic Gases (ROG's)	---	137	15
Oxides of Nitrogen (NO _x)	25	250	40
Particulate Matter (PM ₁₀)	---	100	15

Notes 1=VOC thresholds based upon SCAQMD levels per SDAPCE/DPLU requirements (9/01).

Source: SDAPCD Rule 1501, 20.2(d)(2).

4.3.2.1 CO "Hotspot" Thresholds

Exhaust emissions from motor vehicles can potentially cause a direct, localized "hotspot" impact at or near proposed developments or sensitive receptors. CO is a product of incomplete combustion of a fossil fuel; unlike O₃, CO is emitted directly out of a vehicle exhaust pipe and is heavier than air. The optimum condition for the occurrence of a CO hotspot would be cool and calm weather at a congested major roadway intersection with sensitive receptors nearby, and where vehicles are idling or moving at a stop-

and-go pace. Criteria for vehicular emission impacts include significance determinations for intersection and parking structure hotspots.

A significant impact would occur if the CO hotspot analysis of vehicular intersection emissions exposes sensitive receptors to concentrations that are in excess of the following thresholds:

- 20 parts per million (ppm) for 1-hour average, and/or
- 9.0 ppm for 8-hour average.

A proposed project would have a significant air pollution impact associated with parking structures if it would expose sensitive receptors to CO pollution concentrations that are in excess of the following thresholds:

- 50 ppm for 8-hour average for attendants, and
- 9.0 ppm for 8-hour average for the general public.

4.3.3 Impact

4.3.3.1 Construction Impacts

The proposed project is the adoption and implementation of the Redevelopment Plan. The Redevelopment Plan identifies potential redevelopment activities; however, no specific development is proposed. Implementation of the Redevelopment Plan will involve the development of projects throughout the Project Area over the life of the Redevelopment Plan (20 to 30 years). Most redevelopment is anticipated to occur within a 20 to 30 year timeframe, with the rate of development determined by market demand and absorption of commercial, office, and industrial space in the Project Area. Projects will vary from redevelopment of existing parcels with newer commercial and industrial uses, to infrastructure and public utility improvements. Construction associated with redevelopment activities within the Project Area will generate emissions as a result of demolition activity, grading and site preparation, and building construction. Demolition, grading, and site preparation generates primarily PM₁₀ emissions (dust) and oxides of nitrogen (NO_x) which are generated by diesel-powered construction vehicles and equipment. The construction of buildings will primarily generate emissions of reactive organic compounds (ROC) as a result of the application of architectural coatings (paint). Future construction activities within the Project Area will be required to comply with City of San Diego development regulations. During future construction activity within the Project Area, federal, state, and local development standards and requirements that are designed to minimize air quality emissions will be implemented through standard development procedures. These measures typically include, but are not limited to the following:

- Water or dust control agents will be applied to active grading areas, unpaved surfaces, and dirt stockpiles as necessary. All soil to be stockpiled over 30 days will be protected 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.
- Dirt and debris spilled onto paved surfaces at the project site and on the adjacent roadways will be swept or vacuumed and disposed of at the end of each workday to reduce suspension of particulate matter caused by vehicle movement.
- Cover all trucks hauling dirt, sand, soil or other loose material to and from the construction site and/or maintain a two-foot minimum freeboard.
- Use zero emission volatile organic compound (VOC) paints.

The construction emissions associated with the redevelopment activities have the potential to exceed the pollutant emission thresholds. This issue is considered a significant impact. Implementation of Mitigation Measure AQ1 will reduce this impact to a level less than significant. Mitigation Measure AQ1 requires future redevelopment projects to prepare a project-specific air quality analysis to determine if construction emissions will exceed local air quality significance thresholds, and implement measures to reduce these emissions. Future redevelopment projects shall implement federal, state, and local development standards and requirements that are designed to minimize air quality emissions.

4.3.3.2 Long-Term Emissions

Redevelopment of the Project Area according to existing Community Plan land uses will generate an increase of average daily vehicular trips (ADTs) over the 20 to 30 year redevelopment timeframe (refer to Section 4.2 Transportation/Circulation). The increase in ADT reflects the increase in land use intensity and changes in land uses that will occur as properties are redeveloped and vacant parcels are developed. Future land uses will generate mobile emissions associated with project related ADT's and stationary emissions through on-site consumption of energy (i.e., lighting, water, fireplaces, and space heating and cooling). Stationary sources include two types: point and area. Point sources are those which are specific sites that have one or more emission sources at a facility with an identified location (e.g., industrial operations, power plant). Area sources comprise many small emission sources (e.g., homes, offices, and retail shops) which do not have specifically identified locations, but for which emissions can be calculated using per unit standards. Related to stationary emissions, redevelopment activities will generate both point and area source emissions.

In order to determine the mobile and stationary air pollutant emission levels generated by future redevelopment activities, the net increase in land use development under the Community Plan was modeled using the South Coast Air Quality Management District's URBEMIS 2002 for Windows, version 7.5.0 air quality modeling program. Table 4.3-5 identifies the projected air pollutant emissions based on estimated future development, and illustrates that the stationary pollutant emission levels will be below the significance threshold limits for the criteria pollutants. With the exception of SO_x, mobile pollutant emission levels generated by the proposed Redevelopment Plan will exceed the significance threshold limits for the criteria pollutants.

TABLE 4.3-5
Projected Long-Term Air Pollutant Emissions

Pollutant	Community Plan			Significance Thresholds	Exceeds Significance Thresholds?
	Stationary Emissions	Mobile Emissions	Total Emissions		
CO	2.28	4,095.15	4,097.43	550	Yes
ROG	6.89	328.21	335.10	137	Yes
NO _x	2.95	376.10	379.05	250	Yes
PM ₁₀	0.01	1,148.39	1,148.40	100	Yes
SO _x	0.01	6.58	6.59	250	No

Notes: CO – carbon monoxide
 ROG – reactive organic gases
 NO_x – nitrogen dioxide
 PM₁₀ – fine particulate matter
 SO_x – sulfur dioxide

Source: BRG Consulting, Inc., URBEMIS 2002 for Windows 7.5.0

Table 4.3-6 identifies the existing stationary and mobile pollutant emissions currently generated within the Project Area. The table is provided to illustrate that existing pollutant emissions also exceed the significance threshold limits. In the long-term, air pollutant emissions are projected to decrease, which reflects the cumulative effect of continued implementation of mobile source air pollution control programs. The effectiveness of air quality management regulations is demonstrated by the historical decreases in pollution concentrations as discussed in Section 4.3.1. The primary reduction factor for these pollutants will be due to federal regulations (the federal Clean Air Act) requiring automobile manufacturers to continually reduce emission levels generated by automobiles. As identified in Table 4.3-5, the net increase in mobile source air emissions generated by redevelopment according to the Community Plan will exceed the emission thresholds of significance as identified in Table 4.3-4. This is considered a significant unavoidable impact. The redevelopment activities are considered to be consistent with the General Plan (Navajo, Tierrasanta, and College Area Community Plans) and future redevelopment activities and associated pollutant emissions have been contemplated in the RAQS Plan. The project will not conflict with implementation of the RAQS Plan.

Implementation of Mitigation Measure AQ2 will reduce the potential increase in air emission levels in the Project Area to the extent feasible. Mitigation Measure AQ2 requires that a project-specific air quality analysis be prepared for each specific redevelopment activity to determine the potential air quality impact associated with the activity and identify measures to reduce air emissions. The following foreseeable future changes to the Project Area and surrounding communities are also anticipated to reduce air pollutant emissions:

TABLE 4.3-6
Existing Air Pollutant Emissions
Year 2004

Pollutant	Existing Land Uses			Significance Thresholds	Exceeds Significance Thresholds?
	Stationary Emissions	Mobile Emissions	Total Emissions		
CO	11.95	20,882.54	20,894.49	550	Yes
ROG	2.00	1,643.14	1,645.14	137	Yes
NO _x	19.69	2,023.21	2,042.90	250	Yes
PM ₁₀	0.05	1,582.07	1,582.12	100	Yes
SO _x	0.00	15.97	15.97	250	No

Notes: CO – carbon monoxide
 ROG – reactive organic gases
 NO_x – nitrogen dioxide
 PM₁₀ – fine particulate matter
 SO_x – sulfur dioxide

Source: BRG Consulting, Inc., URBEMIS 2002 for Windows 7.5.0

- Implementation of roadway infrastructure improvements may provide better operational efficiency and alternative travel routes.
- The expansion of mass transit opportunities, including the San Diego Trolley line and trolley station in the Project Area and surrounding communities.

While the air pollution reduction measures and policies identified above and vehicle technological advancements will reduce CO, ROG, and NO_x emissions, mobile air quality impacts will remain significant and unavoidable.

4.3.3.3 Odor

The inhalation of volatile organic compounds causes smell sensations in humans. There are four primary ways in which these odors can affect human health:

- The VOCs can produce toxicological effects;
- The odorant compounds can cause irritations in the eye, nose, and throat;
- The VOCs can stimulate sensory nerves that can cause potentially harmful health effects; and,
- The exposure to perceived unpleasant odors can stimulate negative cognitive and emotional responses based on previous experiences with such odors.

Future redevelopment activity could generate emissions that are known to produce odorous conditions. However, sources of odor generation that would be anticipated due to future redevelopment activity (such as diesel emissions due to construction, roofing material application, etc.) are not expected to result in a significant impact. Odor generation as a result of construction activity would be intermittent and

would terminate upon completion of the construction phase of a redevelopment project. In the long-term, the project does not propose any specific uses that would generate odors, and future activities would be required to comply with City of San Diego and APCD regulations that control odor emissions. No significant odor impact is anticipated from future redevelopment activities.

4.3.3.4 CO Hotspots

Redevelopment activities within the Project Area have the potential to generate traffic on area roadways and increase the exposure of sensitive receptors to carbon monoxide (CO) levels in excess of state and federal standards. The potential for CO "hot spots" or places where CO concentrations exceed applicable standards, to impact sensitive receptors, such as residences, hospitals, and schools is a primary concern. CO hotspots typically occur in areas where there is a poor level of service on a roadway and vehicles are idling at congested intersections. These hotspots occur mostly in the early morning hours when winds are stagnant, temperatures are relatively low, and ambient CO concentrations are elevated. Table 4.3-7 depicts the intersections that were identified by the traffic analysis to perform at LOS E or below. Vehicles idling at these intersections could create CO hot spots which may impact sensitive receptors in the vicinity of the intersections.

TABLE 4.3-7
Poorly Operating Intersections

Intersections	Level of Service
Friars & I-15 south bound ramps	F
Friars & Mission Gorge Road	F
Twain & Mission Gorge Road	F
Fairmont Avenue & Mission Gorge Road	F
Camino Del Rio & I-8 west bound off-ramp & Fairmont Avenue	F
I-8 east bound on- and off-ramps & Fairmont Avenue	E

Source: Katz, Okitsu & Associates, 2004.

The Level of Service indicated for each of these intersections is for the Year 2030 traffic conditions. Therefore, air quality impact analyses required as part of Mitigation Measure AQ2 will need to include an analysis of the potential CO Hot Spot concentrations utilizing CALINE-4 (or equivalent) line dispersion modeling. This model calculates the highest possible CO concentrations from worst-case wind angle and factors micro-climate conditions, geometrics of the intersection, distance to the receptor, etc.

4.3.3.5 Regional Air Quality Strategy

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.

The Redevelopment Plan is consistent with the Navajo, Tierrasanta and College Area Community Plan land uses as no community plan amendment is proposed; therefore, the project is consistent with the goals and policies of the RAQS.

4.3.4 Significance of Impact

A. Short-term

Future construction activities will result in a significant short-term air quality impact.

B. Long-term

A significant and unavoidable air quality impact has been identified associated with future mobile related air pollutant emissions.

4.3.5 Mitigation Measures

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.

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.)

4.3.6 Conclusion

4.3.6.1 *Short-Term*

Mitigation Measure AQ1 will reduce the significant short-term air quality impact associated with project-specific construction activities to a level less than significant.

4.3.6.2 *Long-Term*

The long-term air quality 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.

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4.4 Noise

Existing and future roadway noise levels were modeled based on traffic data and forecasts discussed in Section 4.2. Roadway Noise Model Worksheets (Wieland Associates, November 2004) are provided in Volume II, Appendix D of this EIR.

4.4.1 Existing Conditions

The Grantville Redevelopment Project Area is located in an urbanized area of the City of San Diego. The primary sources of noise within the Project Area are caused by vehicular traffic on the roadways within and adjacent to the Project Area and by day-to-day operations of existing uses including commercial and industrial operations and sand and gravel operations. The Project Area also experiences noise events as a result of periodic overflight of aircraft.

4.4.1.1 *Effects of Noise on People*

Noise is generally defined as an unwanted sound. Whether a sound is considered a noise depends on the source of the sound, the loudness relative to the background noise, the time of day, the surroundings, and the listener. The difference in people's reaction to different noises or sounds is explained by the perceived noisiness, or how undesirable the sound is to the people in the vicinity of the source. An unwanted sound may be extremely irritating although it is not unreasonably loud. The areas most vulnerable to the harmful effects of sound are residential locations, particularly at night. All human activities can be adversely affected by excessive noise.

Noise can result in speech interference, and disrupt activities at home and work, sleep patterns, and recreational pursuits. The long-term effects of excessive noise exposure are physical as well as psychological. Physical effects may include headaches, nausea, irritability, constriction of blood vessels, changes in heart and respiratory rate, and increased muscle tension. Prolonged exposure to high noise levels may result in hearing damage. Psychological effects may result from the stress and irritability associated with a change in sleeping patterns due to excessive noise.

4.4.1.2 *Measures of Noise Level And Noise Exposure*

The standard unit of measurement of the loudness of sound is the decibel (dB). The decibel measurement is logarithmic; meaning each increase in one decibel is a tenfold increase in the level of noise. Typically, the quietest environmental conditions (extreme rural areas with extensive shielding) yield sound levels of approximately 20 dB. Normal speech has a sound level of approximately 60 dB. Sound levels above 120 dB roughly correspond to the threshold of pain and would be associated with sources such as jet engine noise. The minimum change in sound level that the human ear can detect is approximately 3 dB. A change in sound level of 10 dB is usually perceived by the average person as a doubling (or halving) of the sounds loudness.

Because the human ear is not equally sensitive to sound at all frequencies, a special frequency-dependent rating scale has been devised to relate noise to human sensitivity. The method commonly used to quantify environmental sounds consists of determining all of the frequencies of a sound according to a weighting

system that reflects the nonlinear response characteristics of the human ear. This is called "A" weighting, and the decibel level measured is called the A-weighted sound level (or dBA). Community noise levels are measured in terms of the A-weighted decibel.

4.4.1.3 *Community Noise Equivalent Level (CNEL)*

A given level of noise may be more or less tolerable depending on the duration of exposure experienced by an individual. There are numerous measures of noise exposure, which consider not only the A-weighted sound level variation of the noise but also the duration of the disturbance. The State Department of Aeronautics and the California Commission of Housing and Community Development have adopted the community noise equivalent level (CNEL) measure of noise exposure. This measure considers an energy averaged A-weighted noise level for the evening hours, 7:00 p.m. to 10:00 p.m. increased by 5dB, and the late evening and early morning hourly noise levels, 10:00 p.m. to 7:00 a.m., increased by 10dB. The daytime noise levels are combined with these weighted levels and then averaged, on an energy basis, to obtain a CNEL value.

4.4.1.4 *City of San Diego General Plan*

Table 4.4-1 depicts the land use-noise compatibility matrix of the City of San Diego General Plan. This matrix identifies various land use types and the average CNEL that is considered compatible for that use. Compatible is defined as the average noise level such that indoor and outdoor activities associated with the land use may be carried out with essentially no interference from noise.

4.4.1.5 *City of San Diego Noise Ordinance*

Table 4.4-2 depicts the City of San Diego noise standards for various land use types. The Noise Ordinance states that "It shall be unlawful for any person to cause noise by any means to the extent that the one-hour average sound level exceeds the applicable limit given in Table 4.4-2, at any location in the City of San Diego on or beyond the boundaries of the property on which the noise is produced. The noise subject to these limits is that part of the total noise at the specified location that is due solely to the action of said person."

Construction noise in the City of San Diego is regulated by Division 4, Section 59.5.0404 of the Municipal Code, which states that:

- It shall be unlawful for any person, between the hours of 7:00 PM of any day and 7:00 AM of the following day, or on legal holidays as specified in Section 21.04 of the San Diego Municipal Code, with exception of Columbus Day and Washington's Birthday, or on Sundays, to erect, construct, demolish, excavate for, alter or repair any building or structure in such a manner as to create disturbing, excessive or offensive noise unless a permit has been applied for and granted beforehand by the Noise Abatement and Control Administrator.
- It shall be unlawful for any person, including the City of San Diego, to conduct any construction activity so as to cause, at or beyond the property lines of any property zoned residential, an average sound level greater than 75 decibels during the 12-hour period from 7:00 AM to 7:00 PM.

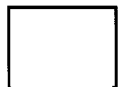
TABLE 4.4-1
City of San Diego Noise Land Use Compatibility Chart

LAND USE	Annual Community Noise Equivalent Level in Decibels					
	50	55	60	65	70	75
1. Outdoor Amphitheaters (may not be suitable for certain types of music).	Compatible	Compatible	Compatible	Incompatible	Incompatible	Incompatible
2. Schools, Libraries	Compatible	Compatible	Compatible	Incompatible	Incompatible	Incompatible
3. Nature Preserves, Wildlife Preserves	Compatible	Compatible	Compatible	Incompatible	Incompatible	Incompatible
4. Residential-Single Family, Multiple Family, Mobile Homes, Transient Housing	Compatible	Compatible	Compatible	Incompatible	Incompatible	Incompatible
5. Retirement Home, Intermediate Care Facilities, Convalescent Homes	Compatible	Compatible	Compatible	Incompatible	Incompatible	Incompatible
6. Hospitals	Compatible	Compatible	Compatible	Incompatible	Incompatible	Incompatible
7. Parks, Playgrounds	Compatible	Compatible	Compatible	Incompatible	Incompatible	Incompatible
8. Office Buildings, Business and Professional	Compatible	Compatible	Compatible	Incompatible	Incompatible	Incompatible
9. Auditoriums, Concert Halls, Indoor Arenas, Churches	Compatible	Compatible	Compatible	Incompatible	Incompatible	Incompatible
10. Riding Stables, Water Recreation Facilities	Compatible	Compatible	Compatible	Incompatible	Incompatible	Incompatible
11. Outdoor Spectator Sports, Golf Courses	Compatible	Compatible	Compatible	Incompatible	Incompatible	Incompatible
12. Livestock Farming, Animal Breeding	Compatible	Compatible	Compatible	Incompatible	Incompatible	Incompatible
13. Commercial-Retail, Shopping Centers, Restaurants, Movie Theaters	Compatible	Compatible	Compatible	Incompatible	Incompatible	Incompatible
14. Commercial-Wholesale, Industrial Manufacturing, Utilities	Compatible	Compatible	Compatible	Incompatible	Incompatible	Incompatible
15. Agriculture (except Livestock), Extractive Industry, Farming	Compatible	Compatible	Compatible	Incompatible	Incompatible	Incompatible
16. Cemeteries	Compatible	Compatible	Compatible	Incompatible	Incompatible	Incompatible



COMPATIBLE

The average noise level is such that indoor and outdoor activities associated with the land use may be carried out with essentially no interference from noise.



INCOMPATIBLE

The average noise level is so severe that construction costs to make the indoor environment acceptable for performance of activities would probably be prohibitive. The outdoor environment would be intolerable for outdoor activities associated with the land use.

Source: City of San Diego (1989).

TABLE 4.4-2
Sound Level Limits

Land Use Zone	Time of Day	One-Hour Average Sound Level (decibels)
All R-1 residential	7 AM to 7 PM	50
	7 PM to 10 PM	45
	10 PM to 7 AM	40
All R-2 residential	7 AM to 7 PM	55
	7 PM to 10 PM	50
	10 PM to 7 AM	45
R-3, R-4, and all other residential	7 AM to 7 PM	60
	7 PM to 10 PM	55
	10 PM to 7 AM	50
All commercial	7 AM to 7 PM	65
	7 PM to 10 PM	60
	10 PM to 7 AM	60
Manufacturing all other industrial including agriculture and extractive industry	Anytime	75

Source: City of San Diego Municipal Code, Chapter 5 – Public Safety, Morals, and Welfare, Article 9.5 – Noise Abatement and Control, Division 4 – Limits (59.5.0404).

4.4.1.6 State Of California Noise Insulation Standards

The California Commission on Housing and Community Development officially adopted the Noise Insulation Standards (Title 24) in 1974. The regulations became effective on August 22, 1974. The ruling states the "interior CNEL attributable to exterior sources shall not exceed an annual CNEL of 45 dB in any habitable room." Additionally, the Commission specified that 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 require an acoustical analysis showing that the building has been designed to limit intruding noise to the level prescribed (interior CNEL of 45 dB).

4.4.1.7 Existing Noise Levels

The primary and most consistent noise in a majority of the Project Area is generated by vehicular traffic. Other noise generators in the Project Area include the commercial, industrial, and sand and gravel extraction land uses. Table 4.4-3 provides the ambient noise levels measured at four locations within the Project Area. Figure 4.4-1 depicts the location of the ambient noise level measurement locations. Location 1 is located on the southern portion of Subarea B within an industrial land use. Residential land uses are nearby and to the south. Location 2 is located on the eastern side of Subarea C within a front yard of a residential unit. Commercial uses within Subarea C are located adjacent and to the south. Location 3 is located in the central portion of Subarea A along Mission Gorge Road within a commercial/office land use. Location 4 is located in the southern portion of Subarea A in a parking lot adjacent to Alvarado Canyon Road within a commercial/office land use. As identified in Table 4.4-3, the lowest ambient noise level of 65.8 dB(A) was measured at location 3 and the highest ambient noise level of 74.4 dB(A) was measured at location 4.

TABLE 4.4-3
Ambient Noise Level Measurements

Monitoring Locations	Measured Noise Levels, Leq (dB(A))
#1 – 6955 Mission Gorge Road, adjacent to front yard	71.3
#2 – 5205 Waring Road, front yard	67.1
#3 – 6206 Mission Gorge Road, front yard	65.8
#4 – In parking lot adjacent to 4460 Alvarado Canyon Road	74.4

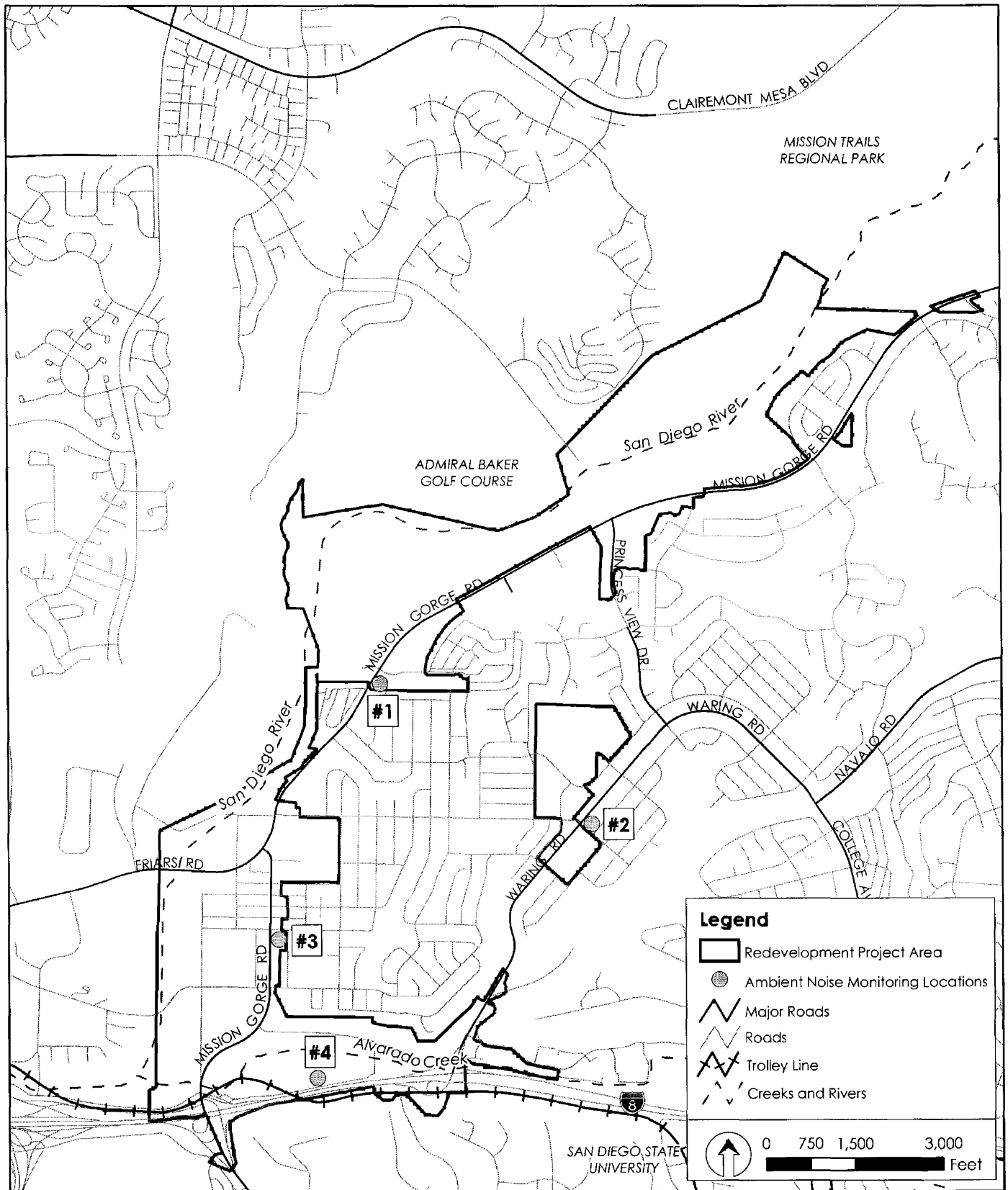
Note: Leq is the equivalent (i.e., average) noise level during the measurement period.
Source: Wieland Associates, 2004

Existing roadway noise levels were modeled based on existing traffic levels on Project Area roadways, as discussed in Section 4.2. Table 4.4-4 summarizes the existing vehicular noise levels at 50 feet from the centerline of major roadways serving the Project Area. Streets with the highest volumes of traffic generate the highest noise levels.

TABLE 4.4-4
Existing Roadway Noise Levels

Road Segments	Noise Level (50 Feet from near lane centerline, CNEL)
Friars Road	
I-15 Northbound ramps to Rancho Mission Road	75.0
Rancho Mission Road to Santo Road	74.0
Fairmount Avenue	
I-8 Eastbound ramp to Camino Del Rio North	74.0
Mission Gorge Road	
Mission Gorge Place to Twain Avenue	67.0
Twain Avenue to Vandever Avenue	66.5
Friars Road to Zion Avenue	72.5
West of Princess View Drive	70.0
West of Jackson Drive	71.0
Waring Road	
Zion Avenue to Twain Avenue	66.5
South of Orcutt Avenue	66.5

Source: Wieland Associates, 2004



SOURCE: Wieland Associates, SanGIS and BRG Consulting, Inc., 2005

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Ambient Noise Monitoring Locations

FIGURE
4.4-1

Figure 4.4-2 depicts the roadway noise contour distances to the 60dBA, 65dBA, 70dBA, and 75dBA in the Project Area. Through the central portion of Subarea A, along Mission Gorge Road, the noise level at 50 feet from the near lane centerline ranges from a low of 66.5dBA to a high of 72.0dBA. The existing land uses in this area consist of commercial and industrial. Based on City of San Diego noise standards, the commercial and industrial land uses fronting Mission Gorge Road currently experience noise levels below the maximum acceptable exterior noise level of 75dBA.

In Subarea B, along Mission Gorge Road, the noise level at 50 feet from the near lane centerline ranges from a low of 70.0dBA to a high of 71.0dBA. Industrial land uses dominate this area and based on City noise standards, the industrial land uses experience noise levels below the City's noise standard of 75dBA for industrial uses. It should be noted that from Jackson Drive west, through Subarea B to Zion Avenue, there are pockets of residential dwelling units (not included in the Project Area) that are currently exposed to noise levels above the City's exterior noise standard of 65dBA.

In Subarea C, along Waring Road, the noise level at 50 feet from the near lane centerline is 66.5dBA. Based on City of San Diego noise standards, the commercial land uses fronting Waring Road currently experience noise levels below the maximum acceptable exterior noise level of 75dBA. The existing park and school uses are currently exposed to noise levels that slightly exceed the City's exterior noise standard of 65dBA. The residential dwelling units located adjacent to Subarea C are currently exposed to noise levels above the City's exterior noise standard of 65dBA.

4.4.1.8 Stationary Noise Sources

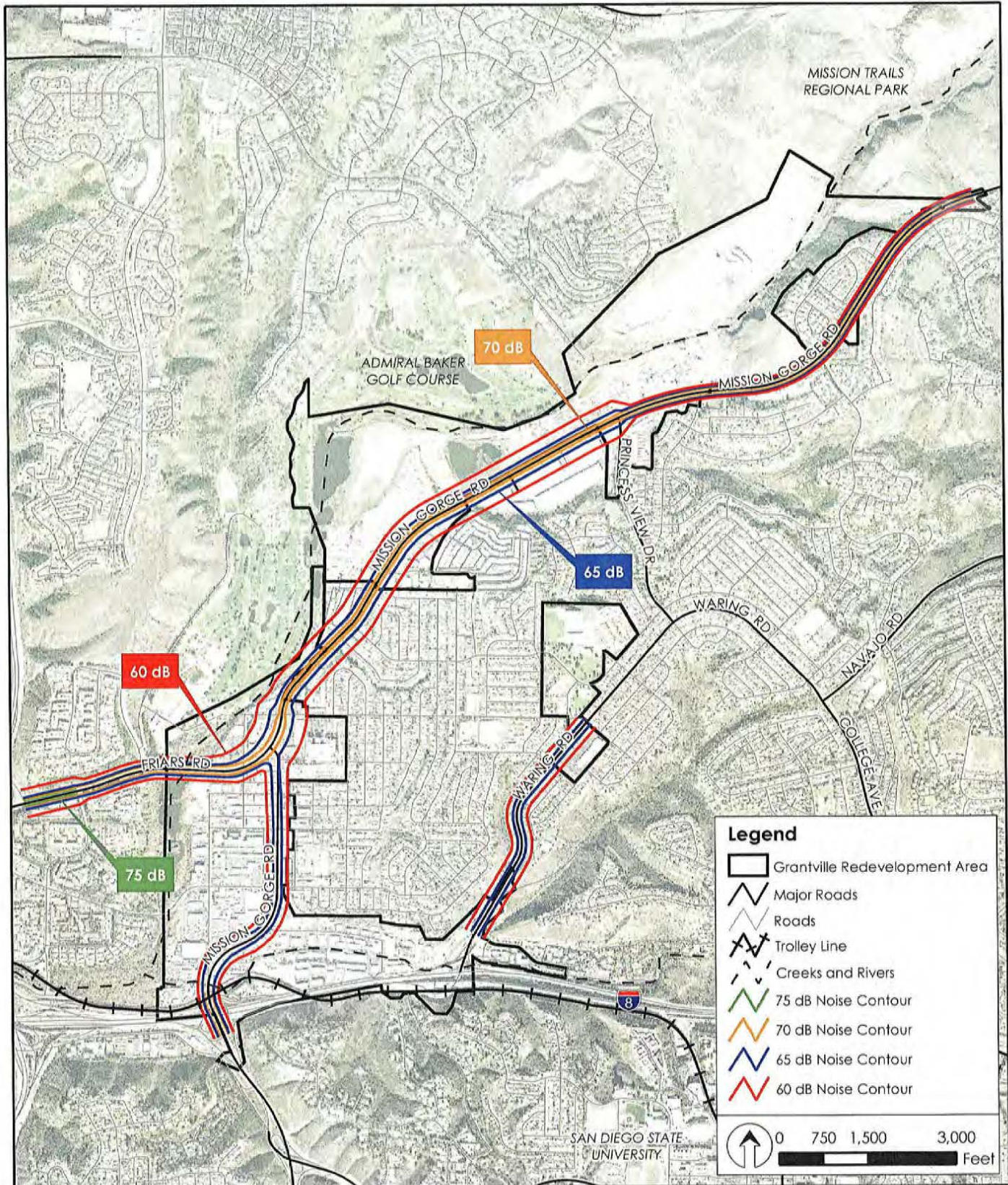
Commercial, industrial, sand and gravel extraction, residential, schools, and public services generate noise within the Project Area. Stationary noise sources can be generated by delivery vehicles, communication systems (e.g., a drive-thru restaurant speaker), car alarms, car door shutting, and mechanical equipment (e.g., air conditioning or heating units).

Sand and Gravel Extraction. In Subarea B, a sand and gravel extraction operation creates noise during extraction and hauling activities. The noise level from this particular operation has not been measured, although, some of the activities below, such as truck deliveries and vehicles moving in parking areas represent an example of the type of noise that is generated at the sand and gravel operation.

Truck Deliveries. Light industrial and commercial uses often result in truck deliveries of goods to and from the site. Large 18 wheel trucks generate a maximum noise level of 86 dBA at a distance of 50 feet.

Vehicle Movements in Parking Areas. Parking lot activities primarily generate two sources of noise, break squeal and door slams. Of these, door slamming is the more intense source of noise. Car door slamming can result in maximum noise levels of approximately 86 dBA at 50 feet.

Trash Pickup and Compacting. Trash pickup and compacting are additional sources of noise near commercial uses. Typical noise levels range from 80 to 85 dBA at 50 feet during the raising, lowering and



SOURCE: Landiscor (1/14/04), Wieland Associates, SanGIS and BRG Consulting, Inc., 2005

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Existing Noise Contours

FIGURE
4.4-2

compacting operations. A typical trash pickup takes approximately three minutes. The higher noise levels occur during about one-half of the operation.

Trash compactors. Many commercial uses require the use of on-site trash compactors. On-site trash compactors typically generate a noise level of 78 to 82 dBA at a distance of 50 feet.

Parking Lot Sweepers. Parking lot sweepers are typically required for commercial uses in order to reduce the potential for pollution-laden runoff from the site. Sweepers typically generate noise levels that range from 74 to 79 dBA at a distance of 50 feet.

School Yard. The level of noise generated by a school is greatest with respect to playground activity. Depending on the number of children, noise levels from a playground range between 62 dBA (100 children in a playground) to 72 dBA (900 children in a playground).

4.4.1.9 Sensitive Receptors

As identified in Section 4.1, Land Use, the Project Area predominantly consists of commercial, industrial, public service, and undeveloped land. Very few sensitive receptors exist in the Project Area. However, a majority of the Project Area is located within the Navajo community, which is comprised of primarily residential uses. These residential uses are located immediately adjacent to the Project Area. A large hospital and medical office complex is located east of the Friars Road/Mission Gorge Road intersection.

4.4.2 Impact Threshold

4.4.2.1 Temporary Construction Noise

Temporary construction noise that exceeds 75 dB during the 12-hour period from 7:00 a.m. to 7:00 p.m. at or beyond the property lines of any property zoned residential would be considered significant. Additionally, where temporary construction noise would substantially interfere with normal business communication, or affect sensitive receptors, such as day care facilities, a significant noise impact may be identified. This threshold is based on City of San Diego Municipal Code Section 59.5.0404.

4.4.2.2 Traffic Noise

The City of San Diego has established noise standards for various land uses. As identified in Table 4.4-5, the City's standard for the exterior noise level compatible with residential and other noise-sensitive uses is 65 dBA CNEL or less for usable outdoor living space (including patios, balconies, courtyards, seating areas, children's play areas, picnic and barbeque areas, and swimming pools). The maximum acceptable exterior noise level is 70 dBA CNEL for offices, churches, business and professional uses, and 75 dBA CNEL for commercial, retail, industrial, and outdoor spectator sport uses.

The California Administrative Code, Title 24 – Noise Insulation Standards, requires that the interior noise level of all new multi-family residences, hotels, and motels do not exceed 45 dBA CNEL. If the exterior noise level

TABLE 4.4-5
Traffic Noise Significance Thresholds
(dBA CNEL)

Structure or Proposed Use that would be Impacted by Traffic Noise	Interior Space	Exterior Usable Space ¹	General Indication of Potential Significance
Single-family detached	45 dB	65 dB	Structure or outdoor usable area ² is less than 50 feet from the corner of the closest (outside) lane on a street with existing or future ADTs greater than 7500
Multi-family, schools, libraries, hospitals, day care, hotels, motels, parks, convalescent homes.	Development Services Department (DSD) ensures 45 dB pursuant to Title 24	65 dB	
Offices, Churches, Business, Professional Uses.	N/A	70 dB	Structure or outdoor usable area ² is less than 50 feet from the corner of the closest (outside) lane on a street with existing or future ADTs greater than or equal to 20,000
Commercial, Retail, Industrial, Outdoor Spectator Sports Uses.	N/A	75 dB	Structure or outdoor usable area ² is < 50 feet from the corner of the closest (outside) lane on a street with existing or future ADTs greater than or equal to 40,000

Notes: 1= If a project is currently at or exceeds the significance thresholds for traffic noise described above and noise levels would result in less than a 3 dB increase, then the impact is not considered significant.

2 =Exterior usable areas do not include residential front yards or balconies, unless the areas such as balconies are part of the required usable open space calculation for multi-family units.

Source: 1) City of San Diego Acoustical report Guidelines (December 2003) and 2) City of San Diego Progress Guide and General Plan (transportation Element).

exceeds 60 dBA CNEL, Title 24 requires the preparation of a site specific acoustical analysis showing that the proposed design will limit interior noise to 45 dBA CNEL or less. The City of San Diego also applies Title 24 standards to single-family residences. In addition, the City of San Diego Planning Department's policy is that interior noise levels for business and professional office uses are not to exceed 50 dBA CNEL.

4.4.2.3 Long-term Stationary Noise

Noise levels generated at the property line which exceed the City's Noise Ordinance Standards (see Table 4.4-1) would be considered a significant impact.

4.4.3 Impact

4.4.3.1 Construction Noise

The implementation of the proposed Redevelopment Project will result in additional private and public development within the Project Area, which will generate noise from construction activity. The construction phase of the redevelopment activities may require demolition of existing structures on the site, grading activities, and construction of new structures. The noise produced by the grading, excavation, demolition, and construction activity is not expected to be substantially annoying to the established residential areas adjacent to the Project Area. This will be the case for activities occurring during the daytime working hours (7:00 a.m. to 7:00 p.m.) specified in City of San Diego Municipal Code Section 59.5.0404. However, extended construction activity (after 7:00 p.m.) would cause considerable annoyance. Construction

activity also has the potential to impact sensitive receptors as well as certain businesses adjacent to individual construction sites. Table 4.4-6 identifies the typical construction equipment noise levels at a distance of 50 feet.

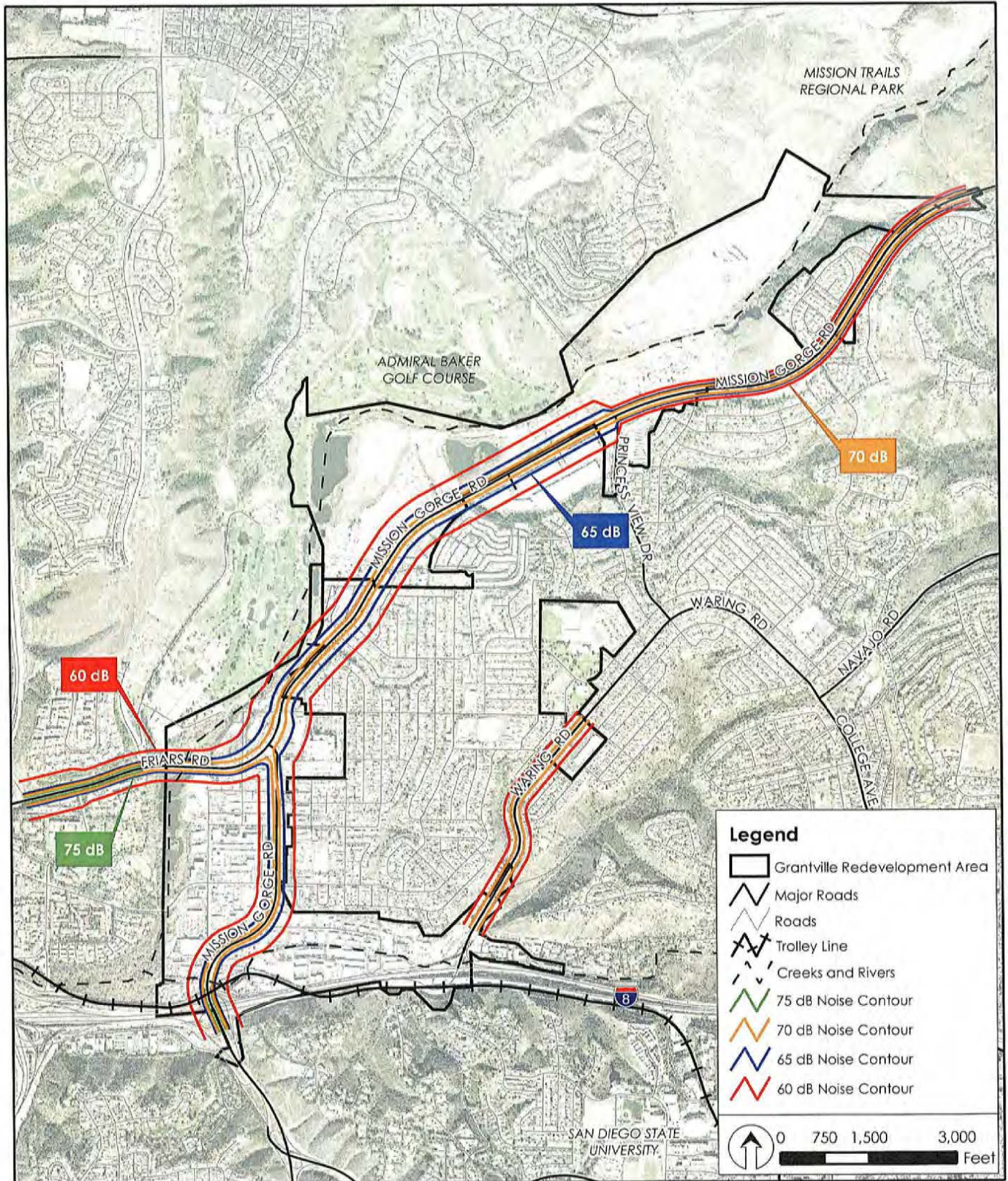
The potential noise levels that could be generated during demolition and construction for redevelopment activities is considered a significant, short-term impact. Implementation of Mitigation Measure N1 will reduce the impact to a level less than significant. Mitigation Measure N1 requires construction activities within the Project Area to comply with existing City regulations, including limits on hours of construction and maximum noise levels from construction equipment.

4.4.3.2 *Traffic Noise Exposure*

A version of the highway traffic noise prediction model developed by the Federal Highway Administration was used to model existing traffic noise levels and to predict future traffic noise levels. This model predicts noise levels based on traffic volumes, speeds, traffic mix, and distance from the roadway. Traffic volumes are obtained from the traffic report provided in Appendix B of this EIR, and as discussed in Section 4.2.

Table 4.4-7 summarizes the future noise levels from roadways serving the Project Area. Figure 4.4-3 depicts the modeled future noise contours along roadway segments within the Project Area. As shown, increased future traffic volumes will result in increased noise levels along some roadway segments. The net increase in noise levels over existing levels as a result of project-generated traffic is projected to range from no change to 3.5dBA CNEL at a distance of 50 feet from the near lane centerline along major streets. The largest increase in noise levels will occur along Mission Gorge Road where the noise level increase will be approximately 3.5 dBA CNEL between Mission Gorge Place and Twain Avenue and Twain Avenue and Vandever Avenue. Future noise levels will range between 66.5dBA CNEL to 76.5dBA CNEL within 50 feet of the near lane centerline within the Project Area.

Noise levels on roadways adjacent to most commercial and industrial uses would continue to be within acceptable levels. Assuming that existing land uses redevelop consistent with Community Plan land uses, there would be single-family and multi-family residential uses near I-8 as well as Mission Gorge Road. In terms of future residential development in the Project Area, the CNEL at 50 feet from the centerline of the roadway will be above the 65 CNEL threshold for residential uses, with noise levels ranging between 66.5 dBA CNEL and 76.5dBA CNEL. Future land use types, including residential have the potential to be exposed to traffic noise levels that currently exceed and in the future will continue to exceed City standards. Depending on the type and location of the particular redevelopment project, measures may need to be incorporated into the project to ensure both exterior and interior noise standards are met. In many cases, existing land uses that already experience noise levels that exceed City standards would be replaced with new uses that are constructed of modern building materials and meet modern code requirements, thereby the number of structures in the Project Area that experience interior noise levels above City standards would actually be reduced. However, because the Project Area is located adjacent to roadways that carry large volumes of traffic, future redevelopment activities may be exposed to noise levels that exceed City standards or Title 24 standards. Implementation of Mitigation Measure N2 will reduce the impact to a level less than significant. Mitigation Measure N2 requires redevelopment activities within the Project Area



SOURCE: Landiscor (1/14/04), Wieland Associates, SanGIS and BRG Consulting, Inc., 2005

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Community Plan Noise Contours

FIGURE
4.4-3

TABLE 4.4-6
Construction Equipment Noise Levels

Equipment Item	Range of Noise Level at 50 Feet	Nominal Noise Level, Leq, at 50 Feet
Earthmoving		
Backhoes, 200 HP	71 to 93 dB(A)	85 dB(A)
Berm Machine, 100 HP	74 to 84 dB(A)	80 dB(A)
Dozers	72 to 96 dB(A)	86 dB(A)
Front Loaders, 300 HP	71 to 96 dB(A)	82 dB(A)
Grader	73 to 95 dB(A)	85 dB(A)
Paver	80 to 92 dB(A)	89 dB(A)
Roller, 180 HP	78 to 84 dB(A)	79 dB(A)
Scrapers	73 to 95 dB(A)	88 dB(A)
Tractors, 200 HP	72 to 96 dB(A)	84 dB(A)
Trencher, 80 HP	76 to 86 dB(A)	82 dB(A)
Truck/Trailer, 200 HP	70 to 92 dB(A)	82 dB(A)
Truck: 125 HP, 150 HP	76 to 85 dB(A)	80, 82 dB(A)
Materials Handling		
Concrete Mixer	70 to 90 dB(A)	85 dB(A)
Concrete Pump	74 to 84 dB(A)	82 dB(A)
Crane, Moveable: 50 HP, 200 HP, 400 HP	75 to 95 dB(A)	76, 80, 83 dB(A)
Derrick	86 to 89 dB(A)	88 dB(A)
Forklift, 40 HP	68 to 82 dB(A)	80 dB(A)
Side Boom, 200 HP	80 to 90 dB(A)	85 dB(A)
Water Truck, 500 HP	79 to 88 dB(A)	84 dB(A)
Stationary Equipment		
Boiler, 1600 HP	79 to 85 dB(A)	82 dB(A)
Compressors: 100 HP, 200 HP	68 to 87 dB(A)	78, 81 dB(A)
Generators: 20 HP, 400 HP, 1300 HP	69 to 81 dB(A)	74, 81, 84 dB(A)
Pumps: 25 HP, 200 HP, 350 HP	60 to 80 dB(A)	73, 76, 80 dB(A)
Impact Equipment		
Compactor, 20 HP	84 to 90 dB(A)	86 dB(A)
Jack Hammers	75 to 104 dB(A)	88 dB(A)
Pile Drivers (Peak Level)	90 to 104 dB(A)	101 dB(A)
Pneumatic Tools	82 to 88 dB(A)	86 dB(A)
Rock Drills	90 to 105 dB(A)	98 dB(A)
Steam Boiler (Pile Driver)	83 to 92 dB(A)	88 dB(A)
Other Equipment		
Saws	67 to 92 dB(A)	78 dB(A)
Vibrators	69 to 80 dB(A)	76 dB(A)
Welding Machines: 50 HP, 80 HP	76 to 85 dB(A)	80, 82 dB(A)

Source: Wieland Associates, 1999.

TABLE 4.4-7
Future Noise Levels (CNEL)

Segments	Future With Project (50 feet from Near Lane Centerline)	Change Due to Project
Friars Road		
I-15 Northbound ramps to Rancho Mission Road	76.5	+1.5
Rancho Mission Road to Santo Road	75.5	+1.5
Fairmount Avenue		
I-8 Eastbound ramp to Camino Del Rio North	76.5	+2.5
Mission Gorge Road		
Mission Gorge Place to Twain Avenue	70.5	+3.5
Twain Avenue to Vandever Avenue	70.0	+3.5
Friars Road to Zion Avenue	74.5	+1.5
West of Princess View Drive	72.0	+2.0
West of Jackson Drive	73.5	+2.5
Waring Road		
Zion Avenue to Orcutt Avenue	66.5	No change
South of Orcutt Avenue	67.0	+0.5

Source: Wieland Associates, 2004

to comply with applicable City regulations at the time projects are proposed, Title 24-Noise Insulation Standards, and implementation of site-specific building techniques to attenuate noise. The site-specific building techniques include using pedestrian oriented planning techniques, incorporating architectural design strategies which reduce the exposure of noise-sensitive receptors to vehicular noise, incorporating noise barriers or walls into development adjacent to noise sources, and modification of construction building elements as necessary to provide sound attenuation.

4.4.3.3 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. As described in the Existing Conditions section, there are many potential sources of stationary noise including, but not limited to, truck deliveries, parking lot activity, mechanical equipment, and street or parking lot cleaning. Noise compatibility of redevelopment activities will be addressed on a case-by-case basis as specific redevelopment activities are proposed. This review includes an assessment of compatibility with surrounding uses. Since redevelopment activities may include noise-generating land uses located in vicinity of noise-sensitive uses, this impact is considered significant. All redevelopment activities will need to comply with the City of San Diego sound level limits as identified in Table 4.4-1. Implementation of Mitigation Measure N2 will reduce the impact to a level less than significant.

4.4.4 Significance of Impact

4.4.4.1 Construction Noise

The potential noise generated during demolition and construction of future redevelopment activities is considered a significant, short-term impact.

4.4.4.2 *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.

4.4.4.3 *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.

4.4.5 Mitigation Measures

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.

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, to the extent feasible under a pedestrian oriented concept, 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 (i.e., placing bedrooms or balconies on the side of the house facing away from 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.

4.4.6 Conclusion

Implementation of Mitigation Measure N1 will reduce the short-term construction noise impact to a level less than significant.

Implementation of Mitigation Measure N2 will reduce the traffic noise exposure and stationary noise impacts to a level less than significant.

4.5 Cultural Resources

Information contained in this section is summarized from the cultural resources report, *A Cultural and Historical Resources Study for the Grantville Redevelopment Study and Project Area*, prepared by ASM Affiliates, Inc. (ASM, 2004). This document is located in Volume II Appendix E of this EIR.

4.5.1 Existing Conditions

Records Search and Literature Review

A records search to identify cultural research studies previously completed and cultural sites recorded within the Project Area and within a one-mile radius of the Project Area was completed at the South Coastal Information Center, San Diego State University. The results of this records search indicates that a total of 55 cultural resource studies have been completed within a one-mile radius of the Project Area. The majority of these studies were corridor surveys for Caltrans expansion projects on Interstates 15 and 8. A number of historic building assessments have also been completed within a one-mile radius of the Project Area. The remaining projects were completed for private development. Most of the previous studies have not included the Grantville Redevelopment Project Area. The only projects that have overlapped with the Project Area are Cupples' survey along Mission Gorge Road (1974), the East Mission Gorge Trunk Sewer Project (Kyle and Gallegos, 1995a) and a survey for the Mission Valley Water Reclamation project (Carrico 1990). Native American consultation was also conducted as an additional source of information regarding traditional cultural properties, areas of cultural sensitivity or any other issues of concern regarding the project area.

Based on the records search, no historic or prehistoric resources have been recorded within the Grantville Project Area. However, prehistoric and historic sites (not including historic structures) have been recorded within one mile of the Project Area (Table 4.5-1). These previously recorded sites are located outside of the Project Area and are concentrated in Mission Valley and Mission Gorge. The most prominent among these is the Mission San Diego de Alcalá and the site of the ethnohistoric village of Nipaquay (CA-SDI-35/202), located on the west side of the San Diego river, across from the Grantville Project Area. Associated with this important site is the Mission dam and flume (CA-SDI-6660H). Other sites include: four prehistoric habitation sites (SDI-239, -11,723, -12,088, and -13,708); five lithic scatters (SDI-8667, -11,081, -11,613, -12,089, and -13,905); four historic trash scatters (SDI-35, -11,270, -13,923, and -14,017); three shell scatters (SDI-9899, -14,015, and -14,016); two prehistoric quarries (SDI-8349, -11,611); one bedrock milling site (SDI-11,077); one pictograph site, possibly of historic date, with lithic scatter (SDI-4505H); one artifact scatter (SDI-11,612); and one isolate (P-37-015082).

The Geofinder database has records for 102 historic buildings and structures within one mile of the Project Area. Twenty-seven buildings on the San Diego State University Campus (well outside of the Project Area) are listed on the National Register. The remaining buildings are concentrated in the Normal Heights and Kensington Heights communities. No historic buildings or structures are recorded within the Project Area.

TABLE 4.5-1
Previously Recorded Prehistoric and Historic Sites
Within One Mile of the Project Area

Site/Isolate #	Resource Description	Status
SDI-35/202	Mission San Diego de Alcalá/Kumeyaay village of Nipaguay	Significant
SDI-4505H	Pictographs and lithic scatter	Unknown
SDI-6660H	San Diego Mission dam and flume	Significant
SDI-8349	Prehistoric quarry	Unknown
SDI-8667	Sparse lithic scatter	Unknown
SDI-9899	Shell scatter and mutata	Unknown
SDI-11,077	Bedrock milling	Unknown
SDI-11,081	Lithic scatter	Not Significant
SDI-11,611	Prehistoric quarry	Unknown
SDI-11,612	Artifact scatter	Unknown
SDI-12,089	Lithic scatter	Unknown
SDI-13,905	Lithic scatter	Unknown
SDI-13,923	Historic trash dump	Not Significant
SDI-14,015	Shell scatter	Unknown
SDI-14,016	Shell scatter	Unknown
SDI-14,017	Historic trash scatter	Unknown
SDI-14,152	Heron site discovered under three meters of alluvial sands below water table on the banks of the lower San Diego River	Significant
P-37-015082	Isolate	Not Significant

Note: No previously recorded cultural resource sites have been identified within the Project Area.
Source: ASM Affiliates, Inc., 2004.

Historic Building Survey

ASM Affiliates, Inc. (ASM) reviewed SANGIS data regarding land parcels and building records within the Project Area. Buildings constructed prior to 1959 (45 years of age or older), meet the basic criterion for eligibility to the City Historical Resources Register. However, in order to allow for assessment of impacts to potentially eligible historic resources over the next five years, each of the buildings constructed prior to 1964 was visited during a field survey. Additionally, ASM conducted a street-by-street survey in an effort to identify other buildings constructed prior to 1964 for which construction dates are not available in the SANGIS data.

4.5.1.1 Archaeological Resources

The records search, literature review and Native American Consultation did not identify any previously recorded prehistoric or historic archaeological sites within the Project Area. However, a number of important sites are located in close proximity to the Project Area. These include the site of the ethnohistoric Kumeyaay village of Nipaguay and the Mission San Diego de Alcalá (CA-SDI-35/202), located on the west side of the San Diego River. Cultural resources sites associated with these historic properties, such as the Mission flume and dam, are known to be located along the San Diego River drainage. Because of the historical use of this area and the identification of previously recorded cultural resource sites, there remains

a high potential for previously undiscovered prehistoric and historic sites to be located along and adjacent to the San Diego River. For example, several previously unrecorded, but significant prehistoric sites have already been discovered, deeply buried in alluvium with the San Diego River Valley. These sites include the Heron site (SDI-14,152), discovered under three meters of alluvial sands below the water table on the banks of the lower San Diego River (ASM, 2004).

4.5.1.2 Historic Buildings and Structures

There are only 21 buildings located within the Project Area that have recorded construction dates prior to 1960: one from the 1910's, two from the 1930's, three from the 1940's and fifteen from the 1950's. An additional thirteen buildings of known or estimated date were recorded during the field survey conducted by ASM. In total, 28 buildings constructed prior to 1960, and an additional 13 buildings constructed between 1960 and 1964 were included in the inventory. Table 2 of the cultural resources report (see Volume II, Appendix E) provides a summary of buildings in the Project Area constructed prior to 1964; Table 3 summarizes buildings in the Project Area constructed prior to 1959; and, Table 4 summarizes buildings in the Project Area constructed between 1960 and 1964 (see Volume II, Appendix E). Of the 28 buildings dated to 1960 or earlier, recorded as a result of this study, almost all lack attributes that would qualify them for the City or State Register. Possible exceptions include 6980 Mission Gorge Road, 6974 Mission Gorge Road, 4385 Twain Avenue, and the Ascension Lutheran Church at 5106 Zion Avenue (Table 4.5-2).

TABLE 4.5-2
Potentially Historic Structures Located In Project Area

Structures	Resource Description	Status
6980 Mission Gorge Road	Constructed in 1930. <i>Ericson Pacific</i> . Warehouse/light industrial building. Concrete block construction with concrete foundation.	Unknown
6974 Mission Gorge Road	Constructed 1910. Residential unit. Side gabled wood framed house with a compound linear plan.	Unknown
4385 Twain Avenue	Constructed 1930. Small wood and stucco bungalow.	Unknown
5106 Zion Avenue	Ascension Lutheran Church	Unknown

Note: No previously recorded cultural resource sites have been identified within the Project Area.

Source: ASM Affiliates, Inc., 2004.

4.5.2 Impact Threshold

For purposes of this EIR a significant impact will occur if the proposed project would:

- Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the CEQA Guidelines.
- Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the CEQA Guidelines.
- Disturb any human remains, including those interred outside of formal cemeteries.

4.5.3 Impact

4.5.3.1 Archeological Resources

There are no previously recorded archaeological sites located within the Project Area. However, there is a high potential for subsurface prehistoric and Spanish Colonial period archaeological sites to be located within the alluvial plain of the San Diego River. This would apply to those portions of the Project Area located west of Fairmont Avenue, and the undeveloped areas located north of Friars Road and north of Mission Gorge Road. Future redevelopment activities within these portions of the Project Area have the potential to result in a significant impact to previously unrecorded archaeological resources. A site-specific cultural resources survey would be required in order to identify presence or absence of cultural resources. Additionally, archaeological monitoring would be required within these areas during site development. Any newly discovered sites would need to be tested to determine significance, and site-specific impacts mitigated through avoidance and preservation, or completion of a data recovery program. Implementation of Mitigation Measure CR1 would reduce this potential impact to archaeological resources to a level less than significant.

4.5.3.2 Historic Buildings and Structures

Buildings greater than 45 years in age are potentially eligible to the City of San Diego Historic resources Register. Specifically, within the City of San Diego, properties that are 45 years old or greater and which have "integrity of setting, location, design, materials, feeling and association" may qualify for inclusion in the City's Historical Resources Register (City of San Diego 2000:10). There are no previously recorded buildings or structures within the Project Area and there are no historical properties listed on the City, State, or Federal registers within the Project Area. Of the 28 buildings dated to 1960 or earlier, recorded as a result of ASM's study, almost all lack attributes that would qualify the structures for the City or State Register. Possible exceptions include 6980 Mission Gorge Road, 6974 Mission Gorge Road, 4385 Twain Avenue, and the Ascension Lutheran Church at 5106 Zion Avenue. The following provides a description of each of these structures:

6974 Mission Gorge Road. This warehouse/light industrial building was constructed in 1930. It consists of a concrete block construction with concrete foundation. The front gable has a centrally placed opening and stepped false front. Two small wide wood framed windows are located high on the gable end and red brick inlaid in the gable forms an arrow shape.

6980 Mission Gorge Road. This side gabled wood frame house was constructed in 1910. The building consists of a one and one-half story building with a single story extension and an attached garage to the east. There is also a detached garage to the west. The roof is wooden shingles.

4385 Twain Avenue. This small wood and stucco bungalow was constructed in 1930. The front façade has a centrally placed door with picture windows on either side. There is a small front porch with shed roof supported on plain posts.

5106 Zion Avenue (Ascension Lutheran Church). The Ascension Lutheran Church was built between 1957 and 1960 and was designed by Des Lauriers & Sigurson, Architects. The structure was originally located to the rear of the Baptist church on Greenbrier Street and was moved to its present location in 1960 (the structure was designed to be moveable). The church has a dramatic, steeply pitched roof extending almost to the ground.

Formal evaluation to the City and State registers is specifically recommended for these buildings if any future redevelopment activities are anticipated to result in an impact to these structures. There are thirteen additional buildings dating between 1960 and 1965 that will reach the 45-year age threshold for potential eligibility to the City register over the next few years. However, none of these buildings appear eligible to the State or City register. The redevelopment plan will have a lifespan of 30-years. It is possible that future redevelopment activities would result in an impact to structures that are currently not considered historic, but would meet the age eligibility criteria in the future (e.g. 10-15 years in the future). As such, future redevelopment activities have the potential result in a significant impact to historic structures. Implementation of Mitigation Measure CR2 will reduce potential impact to historic buildings and structures to a level less than significant.

4.5.4 Significance of Impact

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.

4.5.5 Mitigation Measures

4.5.5.1 *Historic Resources*

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.

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.
- 3) 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.

4.5.6 Conclusion

Implementation of the proposed Redevelopment Project has the potential to impact previously unrecorded, significant prehistoric and historic archaeological resources as a result of future development within the Project Area. Implementation of Mitigation Measure CR1 will reduce the impact to a level less than significant.

Implementation of the proposed Redevelopment Project has the potential to impact significant historical buildings and structures. Implementation of Mitigation Measure CR2 will reduce the impact to a level less than significant.

4.6 Biological Resources

Information contained in this section is summarized from the *Grantville Redevelopment EIR – Biological Opportunities and Constraints Analysis* (Rocks Biological Consulting, Inc., 2004). This document is provided in Volume II Appendix F of this EIR.

4.6.1 Existing Conditions

The Grantville Redevelopment Project Area and surrounding lands primarily consists of urban development (682.5 acres); however, native habitat is present in the Project Area, a majority of which is located in or near the San Diego River.

4.6.1.1 Botanical Resources-Flora

A. Vegetation Communities

A total of 11 vegetation communities/land uses as described by Holland (1986) and/or Oberbauer (1996) have been delineated within the Project Area and are presented in Figures 4.6-1, 4.6-2, 4.6-3, and 4.6-4. The following are brief descriptions of the 11 vegetation communities, for a detailed description please refer to the Biological Opportunities and Constraints Analysis (Volume II, Appendix F of this EIR).

Native Upland Communities

Diegan Coastal Sage Scrub (Holland Code 32500; Tier II habitat type) occupies approximately 109.4 acres throughout the Project Area, of which, 9.0 acres occur in Subarea A, 100.0 acres in Subarea B, and 0.4 acres in Subarea C (Table 4.6-1). This habitat is comprised primarily of low, soft-woody subshrubs of approximately one meter (3 ft) in height, many of which are facultatively drought-deciduous.

Large patches of Diegan Coastal Sage Scrub within the Project Area have been disturbed because of mechanical clearing and grading and support a high abundance of non-native, weedy grasses and forbs amongst the native shrubs.

Wetland Communities

Riparian Forest (Holland Code 61000) occupies approximately 65.0 acres within the Project Area including 26.0 acres in Subarea A and 39.0 acres in Subarea B. There is no Riparian Forest in Subarea C (Table 4.6-1). This habitat is an open or closed canopy forest that is generally greater than 6 m (20 ft) high and occupies relatively broad drainages and floodplains supporting perennially wet streams.

Southern Riparian Scrub (Holland Code 63300) occupies approximately 18.0 acres within the Project Area, of which, 1.9 acres occur in Subarea A and 16.1 acres in Subarea B (Table 4.6-1). There is no Southern Riparian Scrub in Subarea C. This habitat varies from a dense, broad-leaved, winter-deciduous association dominated by several species of willow to an herbaceous scrub dominated by mulefat.

Freshwater Marsh (Holland Code 52400) occupies approximately 1.8 acres within the Project Area, of which, 1.4 acres in Subarea A and 0.4 acres are in Subarea B (Table 4.6-1). There is no Freshwater Marsh in Subarea C. Freshwater Marsh occurs in wetlands that are permanently flooded or saturated with fresh water (Rocks Biological Consulting, 2004).

Open Water (Oberbauer Code 13140) occupies approximately 37.0 acres within the Project Area, of which, 11.0 acres occur in Subarea A and 26.0 acres are in Subarea B (Table 4.6-1). There is no Open Water in Subarea C. There are large ponds within the San Diego River that reduce water flow velocity of the River and contain water throughout the year. The Open Water areas often support Freshwater Marsh or Southern Riparian Scrub along its margins and in some instances are being invaded by the weedy Uruguay Marsh Purslane.

Non-Native Vegetation

Non-native Grassland (Holland Code 42200, Tier IIIB habitat type) occupies approximately 5.9 acres within the Project Area, of which, 0.3 acres occur in Subarea A and 5.6 acres occur in Subarea B (Table 4.6-1). There is no Non-native Grassland in Subarea C. Non-native Grassland is characterized by a dense to sparse cover of annual grasses, often with native and non-native annual forbs (Rocks Biological Consulting, 2004).

Eucalyptus Woodland (Oberbauer Code 11100; Tier IV habitat type) occupies approximately 1.8 acres of land only within Subarea B (Table 4.6-1). There are scattered Eucalyptus trees throughout the Project Area. Eucalyptus Woodland is characterized by dense stands of gum trees.

Disturbed habitat (Oberbauer Code 11300; Tier IV habitat type) occupies approximately 34.0 acres within the Project Area, of which, 1.0 acre occurs within Subarea A and 33.0 acres within Subarea B (Table 4.6-1). Disturbed habitat is any land on which the native vegetation has been significantly altered by agriculture, construction, or other land-clearing activities, and the species composition and site conditions are not characteristic of the disturbed phase of a plant association (e.g. disturbed Diegan Coastal Sage Scrub).

Giant Reed occupies approximately 1.6 acres in Subarea A (Table 4.6-1). Giant Reed is a robust, perennial grass that can grow from 9 to 30 feet in height and spreads rapidly from horizontal rootstocks in the soil (Rocks Biological Consulting, 2004). Giant Reed is a California Department of Fish and Game (CDFG)-listed noxious weed and is listed by the California Invasive Plant Council (Cal-IPC) as a List A-1 "Most Invasive Wildland Pest Plant." Within Subareas A and B, this species has invaded areas along the San Diego River and Alvarado Creek degrading Southern Riparian Scrub and Riparian Forest habitats.

Ornamental (Oberbauer Code 11000) vegetation occupies approximately 13.0 acres within the Project Area including 8.0 acres in Subarea A, 30.0 acres in Subarea B, and 2.0 acres in Subarea C and typically consists of non-native landscape and/or garden plantings that have been planted in association with buildings, roads, or other development (Table 4.6-1).

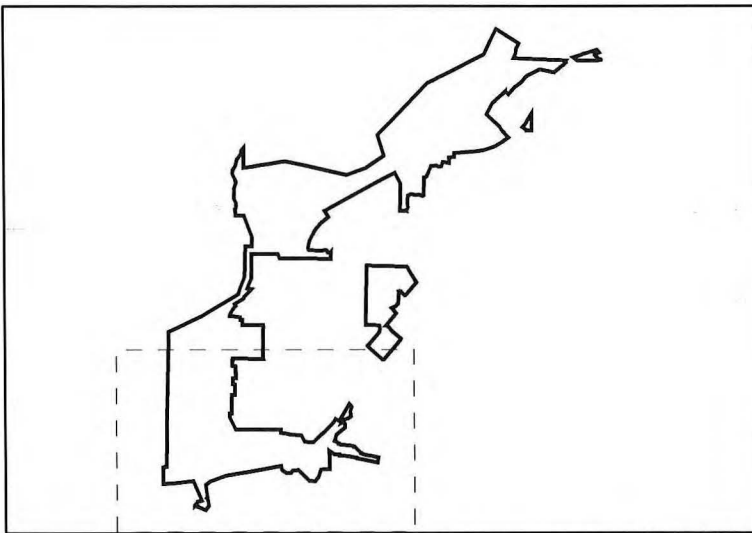
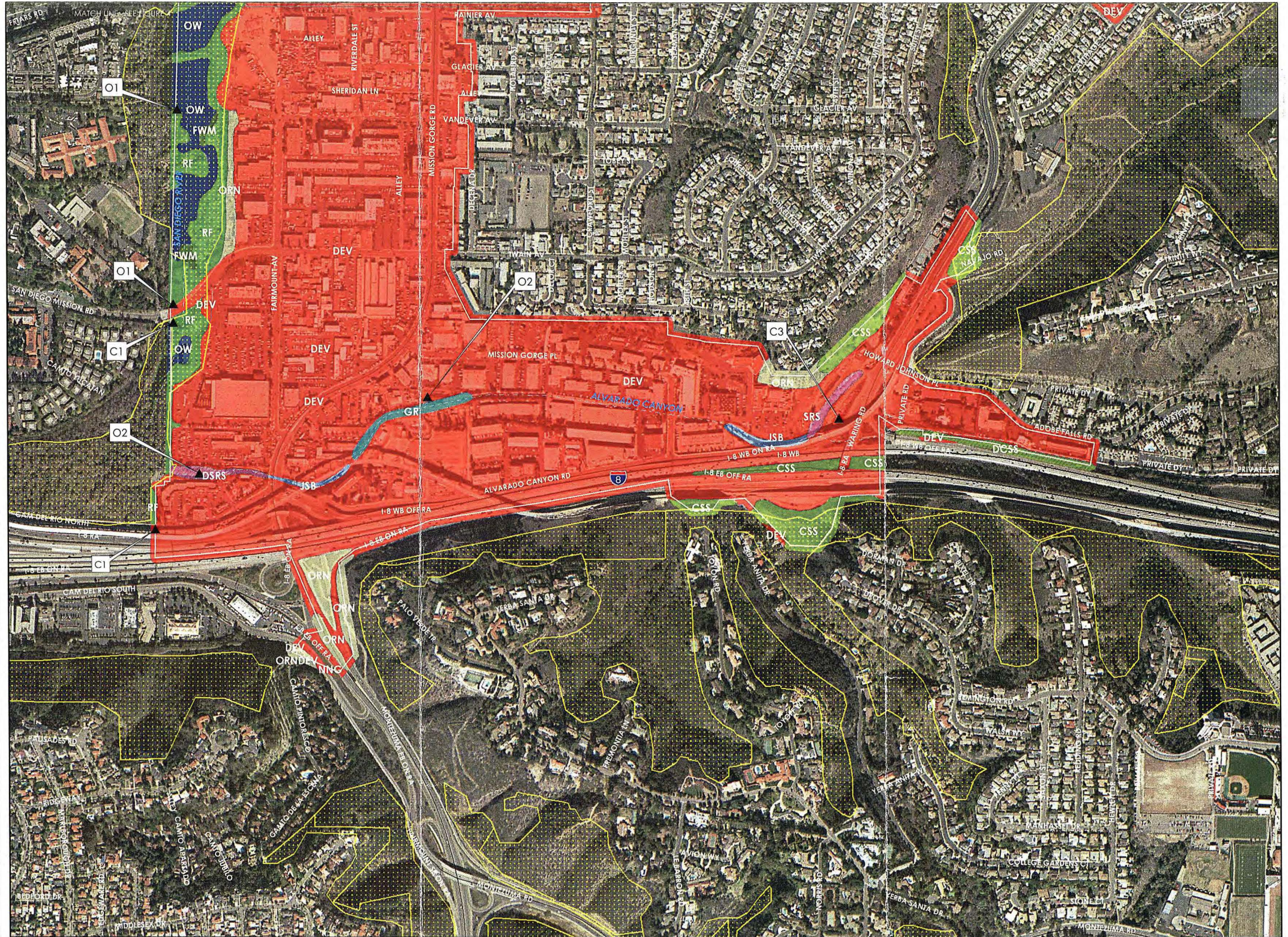
Legend

- Redevelopment Project Area
- Creeks and Rivers
- Freeways
- Major Roads
- Roads
- Multiple Habitat Planning Area

C1-C9 Potential Biological Constraints to Redevelopment
O1-O5 Mitigation Opportunities of Potential Redevelopment Impacts

Vegetation Communities

	Riparian Forest	RF
	Southern Riparian Scrub	SRS
	Disturbed Southern Riparian Scrub (Giant Reed Dominated)	DSRS
	Freshwater Marsh	FM
	Jurisdictional Streambed	JSB
	Open Water	OW
	Giant Reed (<i>Arundo donax</i>)	GR
	Diegan Coastal Sage Scrub	CSS
	Disturbed Diegan Coastal Sage Scrub	DCSS
	Non-native Grassland	NNG
	Disturbed Habitat	DH
	Eucalyptus	EUC
	Ornamental	ORN
	Urban/Developed	DEV



SOURCE: Rocks Biological Consulting, Landiscor (1/14/04), SANDAG, SanGIS and BRG Consulting, Inc., 2004

9/30/04

BRG CONSULTING, INC.

0 400 800 1,600 Feet
1" = 800'

Grantville EIR
Vegetation Communities and Opportunities and Constraints - Subarea A

FIGURE
4.6-1

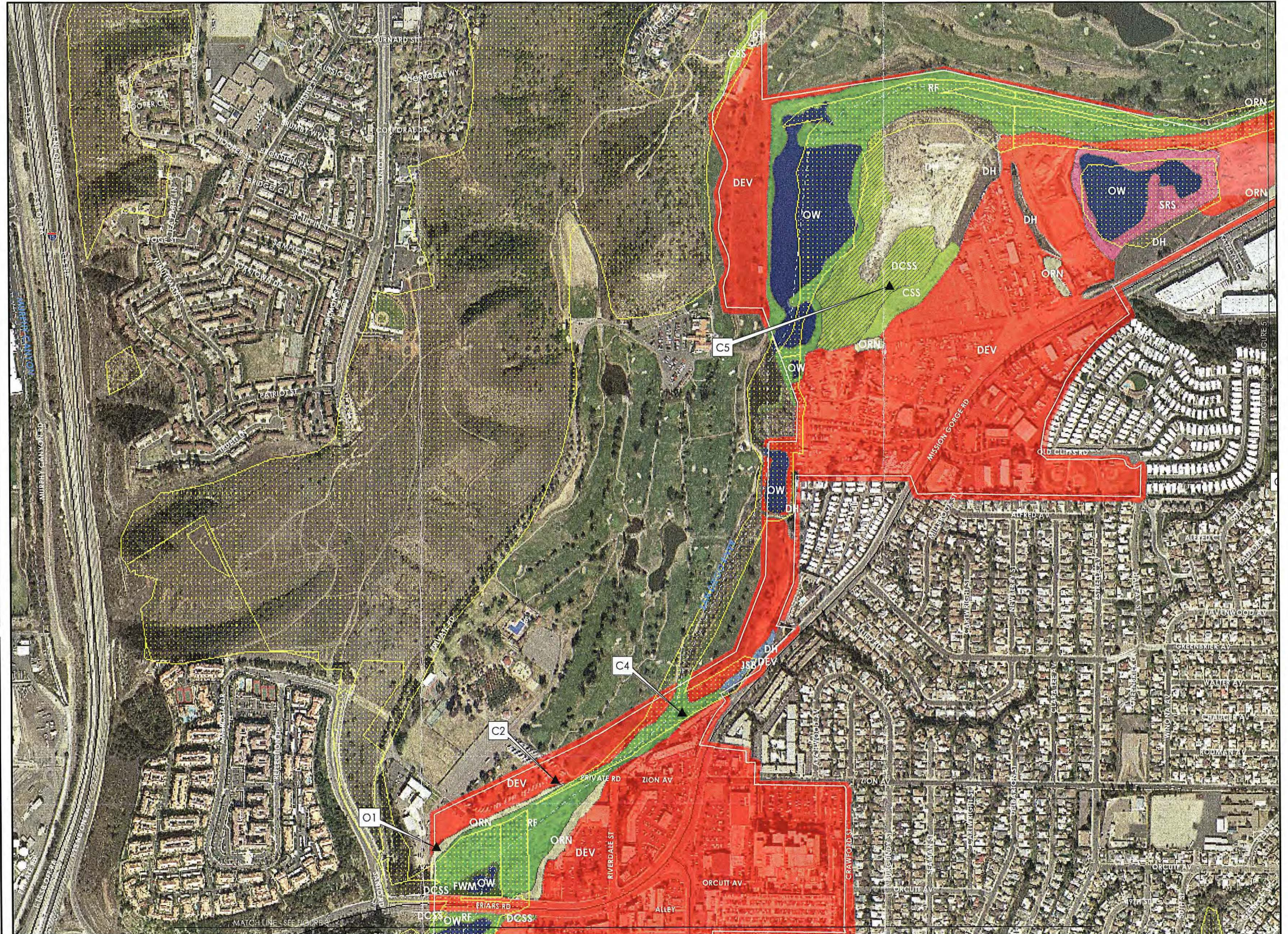
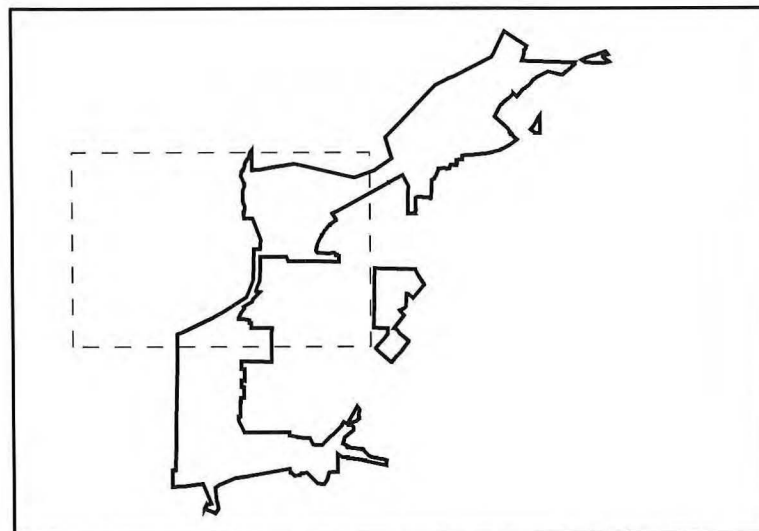
Legend

- Redevelopment Project Area
- Creeks and Rivers
- Freeways
- Major Roads
- Roads
- Multiple Habitat Planning Area

C1-C9 Potential Biological Constraints to Redevelopment
 O1-O5 Mitigation Opportunities of Potential Redevelopment Impacts

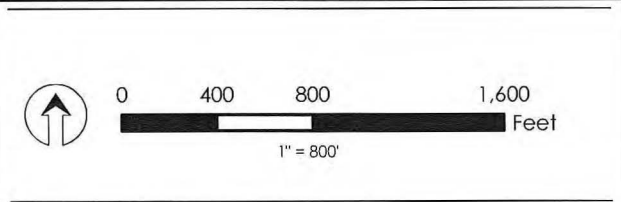
Vegetation Communities

	Riparian Forest	RF
	Southern Riparian Scrub	SRS
	Disturbed Southern Riparian Scrub (Giant Reed Dominated)	DSRS
	Freshwater Marsh	FM
	Jurisdictional Streambed	JSB
	Open Water	OW
	Giant Reed (<i>Arundo donax</i>)	GR
	Diegan Coastal Sage Scrub	CSS
	Disturbed Diegan Coastal Sage Scrub	DCSS
	Non-native Grassland	NNG
	Disturbed Habitat	DH
	Eucalyptus	EUC
	Ornamental	ORN
	Urban/Developed	DEV



SOURCE: Rocks Biological Consulting, LandisCor (1/14/04), SANDAG, SanGIS and BRG Consulting, Inc., 2004

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Grantville EIR

Vegetation Communities and Opportunities and Constraints - Subareas A and B

FIGURE
4.6-2

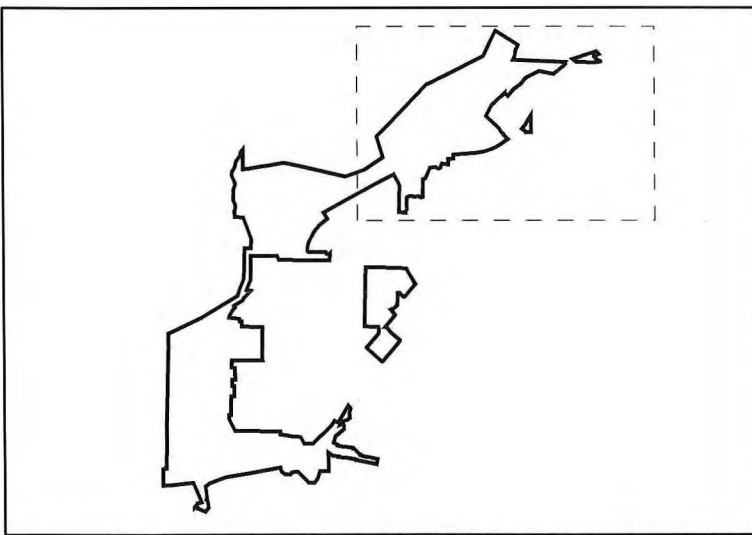
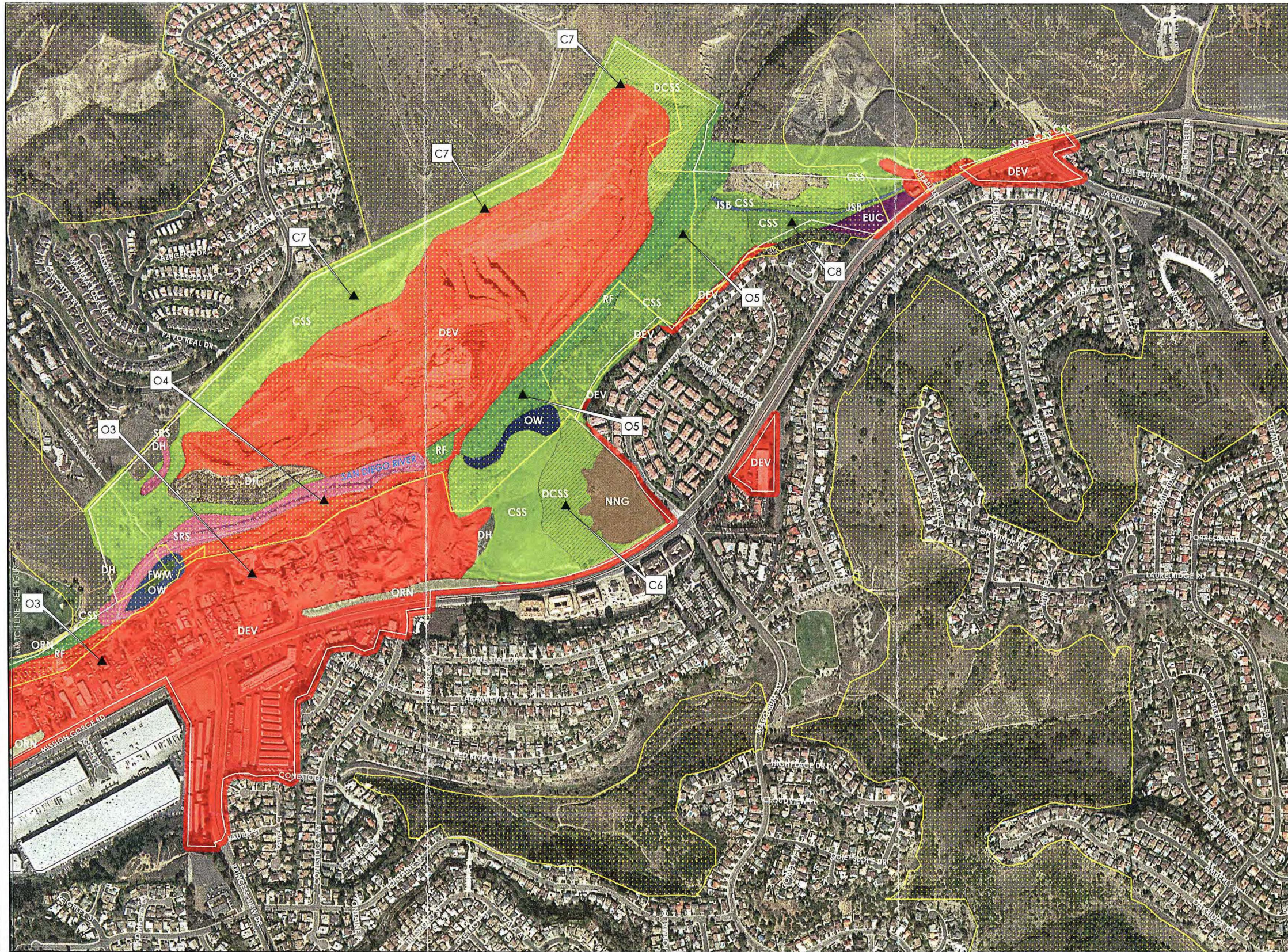
Legend

- Redevelopment Project Area
- Creeks and Rivers
- Freeways
- Major Roads
- Roads
- Multiple Habitat Planning Area

C1-C9 Potential Biological Constraints to Redevelopment
 O1-O5 Mitigation Opportunities of Potential Redevelopment Impacts

Vegetation Communities

	Riparian Forest	RF
	Southern Riparian Scrub	SRS
	Disturbed Southern Riparian Scrub (Giant Reed Dominated)	DSRS
	Freshwater Marsh	FM
	Jurisdictional Streambed	JSB
	Open Water	OW
	Giant Reed (<i>Arundo donax</i>)	GR
	Diegan Coastal Sage Scrub	CSS
	Disturbed Diegan Coastal Sage Scrub	DCSS
	Non-native Grassland	NNG
	Disturbed Habitat	DH
	Eucalyptus	EUC
	Ornamental	ORN
	Urban/Developed	DEV



SOURCE: Rocks Biological Consulting, Landiscor (1/14/04), SANDAG, SanGIS and BRG Consulting, Inc., 2004

9/30/04

BRG CONSULTING, INC.

0 400 800 1,600 Feet
 1" = 800'

Grantville EIR

Vegetation Communities and Opportunities and Constraints - Subarea B

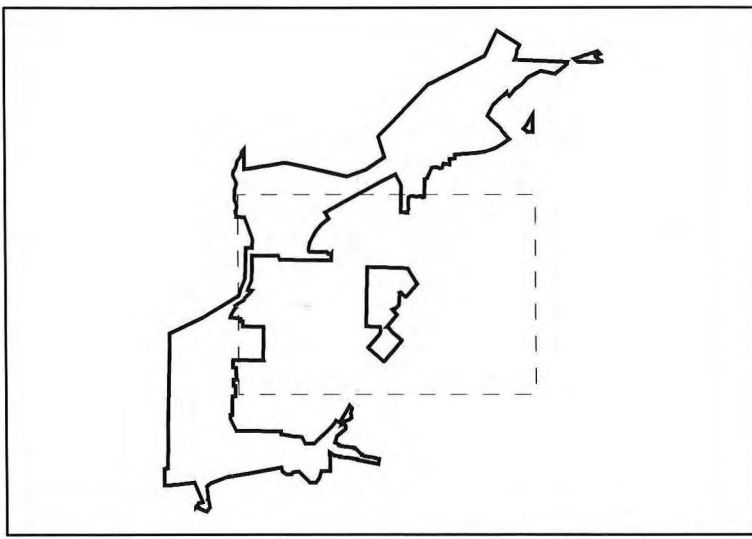
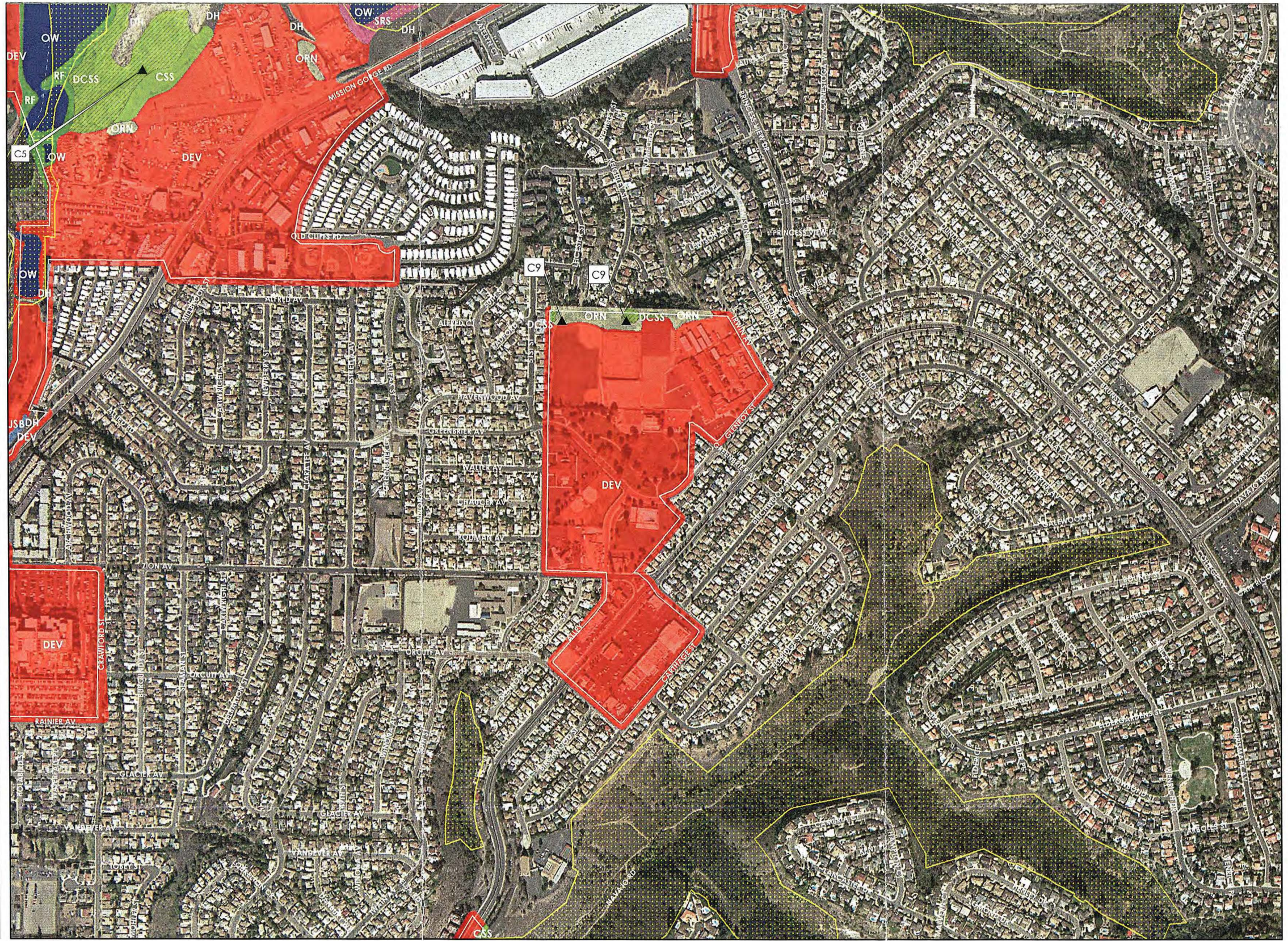
FIGURE
 4.6-3

Legend

- Redevelopment Project Area
- Creeks and Rivers
- Freeways
- Major Roads
- Roads
- Multiple Habitat Planning Area
- C1-C9 Potential Biological Constraints to Redevelopment
- O1-O5 Mitigation Opportunities of Potential Redevelopment Impacts

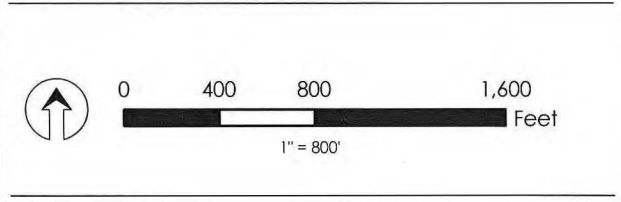
Vegetation Communities

 Riparian Forest	RF
 Southern Riparian Scrub	SRS
 Disturbed Southern Riparian Scrub (Giant Reed Dominated)	DSRS
 Freshwater Marsh	FM
 Jurisdictional Streambed	JSB
 Open Water	OW
 Giant Reed (<i>Arundo donax</i>)	GR
 Diegan Coastal Sage Scrub	CSS
 Disturbed Diegan Coastal Sage Scrub	DCSS
 Non-native Grassland	NNG
 Disturbed Habitat	DH
 Eucalyptus	EUC
 Ornamental	ORN
 Urban/Developed	DEV



SOURCE: Rocks Biological Consulting, LandisCor (1/14/04), SANDAG, SanGIS and BRG Consulting, Inc., 2004

9/30/04



Grantville EIR
Vegetation Communities and Opportunities and Constraints - Subarea C

FIGURE
4.6-4

TABLE 4.6-1
Vegetation Communities Subarea Acreages

Habitat	Subarea A	Subarea B	Subarea C	Total
Diegan Coastal Sage Scrub	9.0	100.0	0.4	109.4
Riparian Forest	26.0	39.0	0.0	65.0
Southern Riparian Scrub	1.9	16.1	0.0	18.0
Freshwater Marsh	1.4	0.4	0.0	1.8
Open Water	11.0	26.0	0.0	37.0
Non-native Grassland	0.3	5.6	0.0	5.9
Eucalyptus Woodland	0.0	1.8	0.0	1.8
Disturbed	1.0	33.0	0.0	34.0
Giant Reed	1.6	0.0	0.0	1.6
Ornamental	8.0	3.0	2.0	13.0
Urban/Developed	339.8	280.1	62.6	682.5
Total Site				970

Source: Rocks Biological Consulting, 2004.

Urban/Developed (Oberbauer Code 12000; Tier IV habitat type) areas occupy the majority of the Project Area (approximately 682.5 acres or 70 %) including 339.8 acres in Subarea A, 280.1 acres in Subarea B, and 62.6 acres in Subarea C (Table 4.6-1). Urban/Developed areas support no native vegetation because of the presence of buildings or roads.

B. Plants

The Project Area supports limited native floral diversity throughout much of the area because the majority of the Project Area is Urban/Developed. The Diegan Coastal Sage Scrub within the Project Area is mostly of moderate to low species diversity because many of these patches have been disturbed or degraded to some degree or are adjacent to Disturbed Habitat or Urban/Developed areas. The areas of highest native species diversity occur within and adjacent to the habitat along the San Diego River. The Riparian and Freshwater Marsh habitats in Subareas A and B support a moderate to high level of native species diversity and the Diegan Coastal Sage Scrub that buffers the San Diego River from adjacent Urban/Developed areas are of higher quality than isolated patches that occur away from the River.

Rare, Threatened, Endangered, Narrow Endemic and/or Sensitive Species or MSCP Covered Species

Regulatory authority over sensitive species listed as threatened or endangered is issued under the Federal Endangered Species Act (FESA) and/or the California Endangered Species Act (CESA). The City of San Diego has several regulations governing biological resources within the City. These include the Multiple Species Conservation Program (MSCP) Subarea Plan, the Environmentally Sensitive Lands regulations, and the Biology Guidelines.

Tables 4.6-2 and 4.6-3 summarize the Narrow Endemic Species and Non-Narrow Endemic Sensitive flora that are expected or have potential to occur within the Project Area. Narrow endemic species are those with a very restricted habitat and occur only in the San Diego region. Specific protections apply to Narrow Endemic species pursuant to the MSCP.

TABLE 4.6-2
Potential for Narrow Endemic Plant Species to Occur Within the Grantville Redevelopment Project Area

Species	Potential to Occur/Comments
San Diego Thornmint	Moderate. An MSCP monitored population of this species occurs in the western portion of Mission Trails Park near the community of Tierrasanta.
San Diego Ambrosia	Moderate. Species have been reported along the San Diego River within Mission Trails Regional Park.
Encinitas baccharis	Very low. Species occur in southern maritime and southern mixed chaparrals on sandstone soils, typically in north San Diego County.
Short-leave Live-Forever	Very low. Soil formation and habitat of species do not occur within the Project Area.
Variegated Dudleya	Low-moderate. There is very little suitable habitat for this species within the Project Area.

Source: Rocks Biological Consulting, 2004.

TABLE 4.6-3
Potential for Non-Narrow Endemic Sensitive Plant Species to Occur Within the Grantville Redevelopment Project Area

Common Name	Habitat	ESA Status	CESA Status	CNPS Status	MSCP Status	Project Area Potential
California adolphia	Chprl, CoScr	None	None	2	Not Covered	Potentially Present
Orcutt's Brodiaea	Chrpl, CmWld, Medws, VFGrs, VnPla/clay	None	None	1B	Covered	Potentially Present
Slender-pod Jewel Flower	Chprl, CoScr	None	SR	None	Covered	Potentially Present
Water-stemmed Ceanothus	Chprl	None	None	2	Covered	Low Potential to Occur Due to Lack of Suitable Habitat
Summer Holly	Chpri	None	None	1B	Not Covered	Low Potential to Occur Due to Lack of Suitable Habitat
Western Dichondra	Chprl, CoScr	None	None	4	Not Covered	Potentially Present
Palmer's Ericameria	RpWld	None	None	2	Covered	Low Potential to Occur Due to Lack of Suitable Habitat
Coast Barrel Cactus	CoScr, Chprl	None	None	2	Covered	Expected
Palmer's Grappling	CoScr, Chprl	None	None	4	Not Covered	Expected
Graceful Tarplant	VFGrs	None	None	4	Not Covered	Low Potential to Occur Due to Lack of Suitable Habitat

TABLE 4.6-3
Potential for Non-Narrow Endemic Sensitive Plant Species to Occur
Within the Grantville Redevelopment Project Area
 (cont'd.)

Common Name	Habitat	ESA Status	CESA Status	CNPS Status	MSCP Status	Project Area Potential
San Diego Marsh Elder	RpWld, intermittent creeks, streambeds	None	None	2	Not Covered	Potentially Present
Southwestern Spiny Rush	RpMarsh, Meadows (Alkali)	None	None	4	Not Covered	Potentially Present
Small-flowered Microseris	VFGrS/clay	None	None	4	Not Covered	Potentially Present
Willowy Monardella	RpScr, sandy floodplains	FE	SE	1B	Covered	Low Potential to Occur Due to lack of Suitable Habitat
San Diego Goldenstar	Chprl, CoScr (openings)	None	None	1B	Covered	Potentially Present
Torrey Pines	Chprl, CCFrs	None	None	1B	Covered	Not Present as Native
Nuttall's Scrub Oak	Chprl	None	None	1B	Not Covered	Low Potential to Occur Due to lack of Suitable Habitat
Engelmann Oak	Chprl, CmWld, RpWld, VFGrS	None	None	4	Not Covered	Low Potential to Occur Lack of Suitable Habitat
San Diego Viguiera	CoScr	None	None	4	Not Covered	Observed in Project Area

Notes: **Habitat Codes:** CCFrs = Closed-cone Conifer Forest, Chprl = Chaparral, CoScr = Coastal Scrub, CmWld = Cismontane Woodland, Medws = Meadows, RpWld = Riparian Woodland, VFGrS = Valley and Foothill Grassland, VnPlas = Vernal Pools
FE = Federally Endangered, **FT** = Federally Threatened, **SE** = California ESA, **SR** = State Rare, Endangered.
CNPS Status: List 1B – Plants rare, threatened, or endangered in California or Elsewhere; List 2 – Plants rare or endangered in California, but more common elsewhere; List 3 – Plants about which more information is needed; List 4 – Plants of limited distribution.

Source: Rocks Biological Consulting, 2004.

4.6.1.3 Zoological Resources - Fauna

A. Wildlife Habitats

Wildlife habitat refers to the land and water that provide the food, shelter and opportunities for reproduction that wild animals need to survive. The following section summarizes the characteristics of the vegetation communities within the Project Area and lists some of the common or sensitive wildlife species that often use these habitats.

Diegan Coastal Sage Scrub

Within the Project Area, this vegetation community is likely to support several locally common species of birds, mammals, reptiles, and butterflies as well as sensitive wildlife species. The Diegan Coastal Sage Scrub

within the Project Area is disturbed or fragmented in many areas, but large patches exist that are connected or adjacent to Mission Trails Regional Park and would be expected to support a moderately diverse collection of wildlife species. The Diegan Coastal Sage Scrub is of high enough quality that the federally listed threatened California Gnatcatcher, a sage scrub obligate species, has been observed in several locations within the Project Area (Rocks Biological Consulting, 2004) (Table 4.6-4). Please refer to the Biological Opportunities and Constraints Analysis (Volume II, Appendix F of this EIR) for a detailed discussion on specific species found in the Diegan Coastal Sage habitat.

Riparian Habitat

Riparian habitat refers to the trees, other vegetation and physical features normally found on the banks and floodplains of rivers, streams, and other bodies of freshwater (Rocks Biological Consulting, 2004). Riparian habitat occupies a small amount of total land area, but supports a disproportionately large number of fish and wildlife species. Several locally common wildlife species are expected to use the riparian areas along the San Diego River. Please refer to the Biological Opportunities and Constraints Analysis (Volume II, Appendix F of this EIR) for a detailed discussion on specific species found in the Riparian Habitat.

The Riparian Habitat within the Project Area has been disturbed and reduced in size from its historic extent because of residential, commercial, and industrial development and alteration of its hydrologic regime. However, extensive, high quality Riparian Habitat exists along many stretches of the San Diego River within the Project Area. Within the City of San Diego, Riparian Habitat of the River extends from Mission Bay Park near the Pacific Ocean to Mission Trails Regional Park and provides a regional habitat linkage between these two City parks.

Freshwater Marsh

Freshwater Marshes are among the most productive wildlife habitats. They provide food, cover, and water for more than 160 species of birds, and numerous mammals, reptiles, and amphibians (Rocks Biological Consulting, 2004). Many species rely on Freshwater Marsh for their entire life cycle. Many of the species listed as occurring in riparian habitats are likely to use Freshwater Marshes in some capacity for foraging, cover, or breeding. There are large areas of Freshwater Marsh and open water in the San Diego River because of alteration of landform and hydrologic regime that has created large ponds within the River's channel.

Non-Native Vegetation

The Non-native Grassland, Eucalyptus Woodland, and Disturbed Habitat within the Project Area provide some biological value to native wildlife species, but the value is far below that of native vegetation communities. Non-native Grassland provides foraging opportunities for raptors such as red-tailed hawk, red-shouldered hawk, and owl species because it is an open, low growing community that typically supports an abundance of small mammals such as deer mice, gophers, and rats. Locally common species of birds and butterflies will also use Non-native Grassland and Disturbed Habitat for foraging and cover.

TABLE 4.6-4
Sensitive Species Expected or With a Potential to Occur in the
Redevelopment Project Area

Common Name	Habitat	ESA Status	CESA Status	MSCP Status	Project Area
Quino Checkerspot Butterfly	Open Grassland and openings of Coastal Scrub and Chaparral that support Dotseed Plantain	FE	SA	Not Covered	Low Potential to occur due to lack of suitable habitat, historical occurrences in Project Area have been extirpated. Not reported since 1960.
Hermes Copper	Openings in Chaparral, associated with the larval host plant Spiny Redberry, adults feed on nectar from California Buckwheat	FSC	SA	Not Covered	Low Potential to occur due to lack of suitable habitat. Known from Mission Trails Regional Park.
Western Spadefoot Toad	Sandy or gravelly soil in grasslands, Coastal Scrub, open Chaparral, and pine-oak woodlands. Openings with shallow, temporary pools are optimal.	FSC	CSC Protected	Not Covered	Potentially Present
Southwestern Pond Turtle	Quiet, permanent stream pools and ponds	FSC	CSC	Covered	Expected
San Diego Horned Lizard	Friable soils in Chaparral, Coastal Scrub, Oak Woodlands, and old dirt roads with native ant species	FSC	CSC Protected	Covered	Potentially Present
Coronado Shink	Various habitats including grasslands, Coastal Scrub, and woodlands	FSC	CSC	Not Covered	Expected
Orangethroat Whiptail	Coastal Scrub, Chaparral, sandy floodplains with patches of brush and rock	FSC	CSC Protected	Covered	Expected
Silvery Legless Lizard	Leaf litter and sandy substrates	FSC	CSC	Not Covered	Potentially Present
Coastal Western Whiptail	Coastal Scrub, Chaparral, and grasslands	FSCC	SA	Not Covered	Potentially Present
Coast Patchnosed Snake	Chaparral and Coastal Scrub; may require mammal burrows or woodrat nests for overwintering	FSC	CSC Protected	Not Covered	Potentially Present
San Diego Ringneck Snake	Chaparral, forest and grasslands	None	SA	Not Covered	Potentially Present
Coastal Rosy Boa	Rocky outcrops within Chaparral and Coastal Scrub	FSC	SA	Not Covered	Low Potential to occur due to lack of suitable habitat
Two-striped Garter Snake	Semi-permanent and permanent bodies of water in variety of habitats. Requires riparian border	None	CSC Protected	Not Covered	Expected
Northern Red Diamondback Rattlesnake	Rocky outcrops and areas of heavy brush or rugged terrain on slopes of chaparral, sage scrub, and desert scrub, usually below 400 feet	FSC	CSC	Not Covered	Expected
Turkey Vulture	Open Habitats with large trees	FSC	CSC	Not Covered	Observed in Project Area
Golden Eagle	Nests in cliffs or trees in mountainous or hilly terrain	None	CSC Fully Protected	Covered	Low Potential to occur due to lack of suitable habitat

TABLE 4.6-4
Sensitive Species Expected or With a Potential to Occur in the
Redevelopment Project Area
 (cont'd.)

Common Name	Habitat	ESA Status	CESA Status	MSCP Status	Project Area
American Peregrine Falcon	Coastal areas	FE	CE	Covered	Low potential to occur due to lack of suitable habitat
Sharp-shinned Hawk	Mixed woodlands near open areas, riparian habitats	None	CSC	Not Covered	Potentially Present
Cooper's Hawk	Oak, riparian deciduous or other woodland habitats, often near water	None	CSC	Covered	Observed in Project Area
Northern Harrier	Marsh and open terrain	None	CSC	Covered	Expected
Ferruginous Hawk	Dry, open terrain	FSC	CSC	Covered	Potentially Present
Osprey	Near lagoons, bays, and lakes	None	CSC	Not Covered	Potentially Present
Loggerhead Shrike	Grassland or open habitats with bare ground and spar shrub and/or tree cover	FSC	CSC	Not Covered	Potentially Present
Tricolored Blackbird	Near ponds	None	CSC	Covered	Expected
Least Bell's Vireo	Riparian woodlands, typically nests in immature Salix spp. (willow) stands	FE	SA SE	Covered	Expected. This species has been covered in the Project Area
California Horned Lark	Grasslands, disturbed habitat and open areas with sparse, low vegetation	None	CSC	Not Covered	Expected
Burrowing Owl	Grasslands, generally those occupied by other burrowing animals	None	CSC	Covered	Low potential to occur due to lack of suitable habitat
California Gnatcatcher	Coastal Scrub	FT	CSC	Covered	Observed in Project Area in several locations
Western Bluebird	Open woodlands, farmlands and orchards	None	None	Covered	Potentially Present
Yellow Warbler	Riparian woodlands with Salix spp. (willow) component	None	CSC	Not Covered	Expected
Yellow-breasted Chat	Riparian woodland/scrub with dense undergrowth	None	CSC	Not Covered	Expected
Coastal Cactus Wren	Coastal Scrub with patches of <i>Cylindropuntia prolifer</i> (coastal cholla) and other cacti	None	CSC	Covered	Low potential to occur due to lack of suitable habitat
Southern California Rufous-crowned Sparrow	Rocky hillsides with sparse, low Coastal Scrub or Chaparral, sometimes mixed with grassland	FSC	CSC	Covered	Expected
Grasshopper Sparrow	Grasslands and pastures	None	SA	Not Covered	Potentially Present
Southern Willow Flycatcher	Summer resident; riparian woodland with Salix spp. (willow) component	FE	CSC	Covered	Low-moderate potential to occur
American Badger	Open grasslands near native habitat	None	None	Covered	Very low potential to occur due to lack of habitat
San Diego Black-tailed Jackrabbit	Open Chaparral, Coastal Scrub and grasslands	FSC	CSC	Not Covered	Expected

TABLE 4.6-4
Sensitive Species Expected or With a Potential to Occur in the
Redevelopment Project Area
 (cont'd.)

Common Name	Habitat	ESA Status	CESA Status	MSCP Status	Project Area
Dulzura California Pocket Mouse	Coastal Scrub with fine sandy soils	FSC	CSC	Not Covered	Expected
Northwestern San Diego Pocket Mouse	Coastal Scrub	FSC	CSC	Not Covered	Expected
San Diego Woodrat	Chaparral, often in rock outcrop areas	FSC	CSC	Not Covered	Potentially Present
Yuma Myotis	Primarily woodlands and forests; forages over water	FSC	CSC	Not Covered	Potentially Present
Long-eared Myotis	Multiple habitats; forages in oak/coniferous forests	FSC	None	Not Covered	Potentially Present
Fringed Myotis	Multiple habitats; forage in coniferous forests	FSC	None	Not Covered	Potentially Present
Long-legged Myotis	Multiple habitats; forages in coniferous forests	FSC	None	Not Covered	Potentially Present
Small-footed Myotis	Multiple habitats; strongly associated with openings in woodlands, brush and riparian habitats	FSC	None	Not Covered	Potentially Present
Spotted Bat	High rocky cliffs; forages in riparian and edge habitats	FSC	CSC	Not Covered	Potentially Present
Pallid Bat	Multiple habitats; forages in open forest and grasslands	None	CSC	Not Covered	Potentially Present
Pocketed Free-tailed Bat	Cliffs	None	CSC	Not Covered	Potentially Present – Known From San Diego River in Mission Gorge (CNDDDB 2004)
Big Free-tailed Bat	Cliffs; strong association with rugged, rocky canyons	None	CSC	Not Covered	Potentially Present

Source: Rocks Biological Consulting, 2004.

The abundance of Urban/Developed areas within the Project Area has eliminated habitat connectivity and fragmented habitats to a great degree. This results in a reduction in the diversity and abundance of wildlife species in the Project Area.

B. Rare, Threatened, Endangered, Narrow Endemic and/or Sensitive Species or MSCP Covered Species

Table 4.6-4 summarizes the sensitive fauna expected or with potential to occur within the Project Area.

C. Sensitive Biological Resources

The Project Area supports sensitive habitats including wetland habitats, Riparian and Freshwater Marsh and the upland communities Diegan Coastal Sage Scrub and Non-native Grassland. Several sensitive species use Riparian Habitat and are known from the Project Area including the federally listed endangered Least Bell's Vireo and CDFG sensitive Cooper's Hawk (Rocks Biological Consulting, 2004). Riparian habitats have extremely high wildlife value because of the availability of water and cover and the abundance of forage in the form of vegetation and other animals.

Several sensitive species also inhabit Diegan Coastal Sage Scrub including the threatened California Gnatcatcher and CDFG sensitive rufous-crowned sparrow that are known from the Project Area. Both Riparian and Diegan Coastal Sage Scrub habitats are naturally limited in distribution and have been depleted substantially in Southern California by development and other disturbance activities. See Table 4.6-4 for a listing of sensitive species and their potential for occurrence in the Project Area.

D. Wildlife Corridors

A wildlife corridor, or linkage, is often defined as a landscape feature that allows animal movement between two patches of habitat or between habitat and other important habitat features such as water (Rocks Biological Consulting, 2004).

The MSCP preserve was designed to maintain connections between core habitat areas, including linkages between coastal lagoons and more inland habitats, and linkages between different watersheds. In addition to allowing for demographic and genetic exchange by all species between core preserve areas, linkages are intended to allow larger predators (mountain lions, coyotes, and bobcats) to move among conserved habitat blocks and reach coastal habitats.

The Project Area is located within the City of San Diego's MSCP with much of the Riparian Habitat and adjacent, undeveloped upland vegetation communities contained within the City's Multi-Habitat Planning Area (MHPA). The MSCP identifies the San Diego River corridor as a Core Biological Habitat Linkage between the Pacific Ocean and Mission Trails Regional Park. The San Diego River corridor is important because it provides a linkage between habitats that allows wildlife to disperse to larger areas of native habitat in the region and help increase or maintain biological diversity. The MHPA boundary is depicted on Figures 4.6-1 through 4.6-4.

4.6.1.4 Regulatory Background

The project is subject to the biological regulations of the City San Diego as well as state and federal agencies.

A. City of San Diego

The City of San Diego has several regulations governing biological resources within the City. These include the MSCP, the Environmentally Sensitive Lands regulations, and the Biology Guidelines.

The MSCP is a comprehensive habitat conservation-planning program for southwestern San Diego County. The program targets areas for preservation (labeled MHPA in the City of San Diego) in exchange for local agency 'take' authority over covered federal and state-listed species. The City's MSCP Subarea Plan, Biology Guidelines, and Environmentally Sensitive Lands Regulations are the implementing regulations of the City's MSCP pursuant to its implementing agreement with the USFWS and CDFG.

The MSCP identifies the MHPA, or preserve of the MSCP, and is intended to link all core biological areas into a regional wildlife preserve. Any development project in the City of San Diego that proposes impacts to native habitat must provide mitigation for such impacts pursuant to the Biology Guidelines. For projects

located outside the MHPA, habitat must either be acquired as mitigation or monies must be paid into a habitat acquisition fund. For developments located wholly within the MHPA, a 25 percent development area is allowed for each parcel, and the remainder of the site is preserved as mitigation. For developments located partially within the MHPA, all lands outside the MHPA may be developed; if lands outside the MHPA total less than 25 percent of the parcel, development within the MHPA is allowed in order to achieve 25 percent development of the parcel. Any development within the MHPA must be located in the least biologically sensitive portion of the site.

Within the City of San Diego, wetlands are regulated under the Municipal Code's Environmentally Sensitive Lands Ordinance (ESL) and Biology Guidelines. According to the City of San Diego Municipal Code, wetlands are defined as areas characterized by naturally occurring hydrophytic, or wetland vegetation, including but not limited to salt marsh, brackish marsh, freshwater marsh, riparian forest, oak riparian forest, riparian woodlands, riparian scrub, and vernal pools. The city also takes jurisdiction over areas that have hydric soils or wetland hydrology but lack naturally occurring wetland vegetation due to human activities or because of catastrophic or recurring natural events, such as flooding or fire.

Pursuant to the ESL, impacts to wetlands should be avoided. Unavoidable impacts must be minimized to the maximum extent practicable. Whether or not an impact is unavoidable is determined on a case-by-case basis. Only impacts necessary to allow reasonable use of a parcel are allowed under the ESL. Examples of such cases include properties entirely constrained by wetlands, roads where the only access to the developable portion of the site results in impacts to wetlands, and essential public facilities (essential roads, sewer, water lines, etc.) where no feasible alternative exists. The city also requires that a wetland buffer adequate to protect the functions and values of the wetland be maintained.

B. California Department of Fish and Game

Wetlands within the state of California are also subject to California Department of Fish and Game (CDFG) jurisdiction pursuant to Section 1600 of the California Fish and Game Code. State regulations define the CDFG jurisdiction for the purpose of administering Sections 1601 and 1603 of the Fish and Game Code as within the bed, bank, and channel of stream, including intermittent streams.

The State also regulates impacts on rare plant and animal species through the California Endangered Species Act. State listed species with potential to occur in the Project Area are listed in Tables 4.6-2, through 4.6-4. However, the City of San Diego has take authority over many of the areas' State-listed species through the MSCP. Impacts to MSCP-covered listed species outside the MHPA are allowed through permits issued by the City of San Diego. Take of MSCP covered species within the MHPA is not allowed. Any impacts to non-covered listed species would require a permit from CDFG (Rocks Biological Consulting, 2004).

C. U.S. Fish and Wildlife Service

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 ~~are~~ may also be 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).

D. U.S. Army Corps of Engineers

Waters of the U.S., including wetlands, are subject to U.S. Army Corps of Engineers (ACOE) jurisdiction pursuant to Section 404 of the federal Clean Water Act. Non-wetland waters of the U.S. are defined by the ACOE based on the presence of an ordinary high water mark (OHWM) as defined at 33 CFR 328.3(e).

In addition to wetlands, ACOE has jurisdiction over other Waters of the U.S. that include non-wetland areas such as unvegetated channels that exhibit a clear OHWM and are considered to be, or are directly connected to, a navigable waterway. Impacts on ACOE jurisdictional wetlands or other Waters of the U.S. would require a Section 404 permit.

4.6.2 Impact Threshold

For purposes of this EIR, a significant biological resources impact would occur, according to the City of San Diego Significance Determination Guidelines under CEQA, if implementation of the project would result in:

- *Direct impacts greater than 0.10 acre to Diegan Coastal Sage Scrub (Tier II upland community) would be considered significant.*
- *Direct impacts greater than 0.01 acre to Riparian Habitat or Freshwater Marsh (Tier I wetland communities) would be considered significant.*
- *Direct impacts to all federal and state listed species and narrow endemic species would be considered significant.*
- *Direct impacts to individual sensitive species may be considered significant, based on the species rarity and extent of the impacts.*
- *Indirect impacts may be considered significant depending upon the sensitivity of the biological resource impacted and anticipated magnitude of the impact.*
- *Indirect impacts to lands included within the MHPA would be considered significant.*

4.6.3 Impact

4.6.3.1 Development Constraints

Future redevelopment activities carried out within the Project Area would need to be in conformance with City of San Diego regulations and would also need to conform to state and federal regulations if wetlands impacts or impacts on non-MSCP covered species would result.

For projects that would not impact any City of San Diego Tier I-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 habits 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.

A majority of redevelopment would occur within areas containing no sensitive biological resources. However, redevelopment activities within the portion of the Project Area in, or in proximity to the San Diego River have the potential to result in a significant impact to biological resources.

For parcels located outside of the MHPA, there is no limit on encroachment into sensitive biological resources, with the exception of wetlands, narrow endemics, and federally or state listed species that are not covered by the MSCP. However, impacts to sensitive biological resources must be assessed, and mitigation, where necessary, must be provided as described in Table 4.6-5. Impacts to Tier II or III communities may be achieved through preservation within the equivalent tier or higher. Land with the appropriate habitat may be preserved in perpetuity, or payment into the City's habitat acquisition fund may be made to satisfy the mitigation requirements. Currently, an acre of habitat acquisition fund mitigation land costs \$25,000.

Impacts to wetlands must be avoided to the maximum extent practicable both within and outside of the MHPA. Impacts on Narrow Endemic species must be avoided to the maximum extent practicable outside the MHPA. If impacts cannot be avoided, then management, enhancement, or transplantation would be required. Within the MHPA, impacts on Narrow Endemic species must be avoided.

For parcels located within or partially within the MHPA, limits on encroachments in to MHPA lands are set forth in the City's ESL and Biology Guidelines. For parcels located entirely within the MHPA, up to 25 percent of the parcel may be developed and development must be sited within the least biologically sensitive portions of the parcel.

For parcels located partially within the MHPA, the portion of the site outside of the MHPA may be developed, and encroachment into the MHPA is allowed if necessary in order to achieve a 25 percent development area on the entire parcel. For projects developed in conformance with the MSCP, impacts on biological resources on properties entirely constrained by the MHPA is achieved through preservation of the undeveloped portion of the parcel through: 1) Granting the land to the City; 2) A conservation easement; or 3) A covenant of easement.

For parcels partially constrained by the MHPA, biological impacts would require mitigation at the ratios set forth in Table 4.6-5. Note that undeveloped portions of any specific project site may be used toward any required mitigation.

TABLE 4.6-5
City of San Diego Mitigation Requirements for Habitat Impacts
Outside and Inside of the MHPA

TIER	HABITAT TYPE	REQUIRED MITIGATION RATIOS
TIER I: (rare uplands)	Southern Foredunes Torrey Pines Forest Coastal Bluff Scrub Maritime Succulent Scrub Maritime Chaparral Scrub Oak Chaparral Native Grassland Oak Woodlands	Impact Outside of MHPA Preservation Inside MHPA: 1:1 Preservation Outside MHPA: 2:1 Impact Inside of MHPA Preservation Inside MHPA: 2:1 Preservation Outside MHPA: 3:1
TIER II: (uncommon uplands)	Coastal Sage Scrub (CSS) CSS/Chaparral	Impact Outside of MHPA Preservation Inside MHPA: 1:1 Preservation Outside MHPA: 1.5:1 Impact Inside of MHPA Preservation Inside MHPA: 1:1 Preservation Outside MHPA: 2:1
TIER III A: (common uplands)	Mixed Chaparral Chamise Chaparral	Impact Outside of MHPA Preservation Inside MHPA: 0.5:1 Preservation Outside MHPA: 1:1 Impact Inside of MHPA Preservation Inside MHPA: 1:1 Preservation Outside MHPA: 1.5:1
TIER III B: (common uplands)	Non-native Grasslands	Impact Outside of MHPA Preservation Inside MHPA: 0.5:1 Preservation Outside MHPA: 1:1 Impact Inside of MHPA Preservation Inside MHPA: 1:1 Preservation Outside MHPA: 1.5:1
TIER IV: (other uplands)	Disturbed Land Agriculture Eucalyptus Woodland Ornamental Plantings	Impacts to these areas are less than significant; no mitigation required.

Source: City of San Diego, 1997.

4.6.3.2 Direct Impacts

A. Vegetation Community Impacts

Implementation of future redevelopment activities could result in direct impacts to the vegetation communities/land uses that occur within the Project Area. It is not currently possible to quantify the extent of habitat that may be affected by redevelopment activities because these activities will vary and are not presently defined. To better understand where impacts on biological resources may occur within the Project Area, the following sections assess areas within each Subarea where future development pursuant

to the Community Plan Land Uses may have an impact on existing sensitive biological resources if new development is proposed. Impacts on Diegan Coastal Sage Scrub, Diegan Coastal Sage Scrub/Chaparral, Riparian Habitat, Freshwater Marsh, and Non-native Grassland would be considered significant. These potential impacts could be constraints to proposed redevelopment activities. In the following sections, specific areas of interest have been labeled C1-C9 with the "C" denoting a potential "Constraint." Implementation of Mitigation Measures BR1 through BR8 will reduce impacts to these vegetation communities to a level less than significant on a project specific basis.

Subarea A

Subarea A, at the southern end of the Project Area, is comprised primarily of Urban/Developed land uses (339.8 acres), but also includes significant areas of Riparian (26.0 acres) and Freshwater Marsh Habitat (1.4 acres) along the San Diego River in the western portion of the Subarea.

FIGURE 4.6-1 – C1

Within the area labeled 'C1' in Subarea A (Figure 4.6-1), the Community Plan Land Use allows for Industrial use. These parcels consist primarily of Urban/Developed land and would not be impacted by redevelopment of this area with future industrial uses; however, there is also Riparian and Freshwater Marsh habitat associated with the San Diego River that is within the MHPA. Before specific redevelopment activities could be implemented that may affect these sensitive vegetation communities, a site-specific biological resources report including a wetland delineation would be required by the City of San Diego. Direct impacts on Riparian or Freshwater habitat would be considered significant.

FIGURE 4.6-2 – C2

Within the area labeled 'C2' in Subarea A (Figure 4.6-2), the Community Plan Land Use allows for commercial use. This parcel consists of Urban/Developed land and would not be impacted by redevelopment of this area with commercial use, but this parcel also includes Riparian Habitat, some of which is within the MHPA. Before specific redevelopment activities could be implemented that may affect this sensitive vegetation community, a site-specific biological resources report including a wetland delineation would be required by the City of San Diego. In addition, wetland impacts would be subject to the jurisdiction of the ACOE, CDFG, RWQCB, and the City. Direct impacts on Riparian Habitat or encroachment into the MHPA beyond that allowed by the City of San Diego regulations would be considered significant.

FIGURE 4.6-1 – C3

In the eastern portion of Subarea A near Alvarado Canyon and Adobe Falls Road, there are small patches of Diegan Coastal Sage Scrub immediately south of Interstate 8 and adjacent to Waring Road, both of which are designated as MHPA land. Also, there is a portion of Alvarado Creek and an unnamed tributary within Subarea A at 'C3' (Figure 4.6-1). Alvarado Creek conveys water west, roughly parallel to Interstate 8 from Lake Murray and into the Project Area. The streambed is sparsely vegetated at the east end of the Project Area and has been directed underground into a culvert near commercial businesses and parking lots. The creek then "daylights" into a concrete lined channel with dense patches of the invasive Giant

Reed before flowing under Mission Gorge Road and into the San Diego River. This portion of Alvarado Creek and its tributary are designated for office, commercial, and multi-family residential use in the Community Plan Land Use and are not within the MHPA. Impacts on the streambed or wetland vegetation may be subject to the jurisdiction of the ACOE, CDFG, RWQCB, and the City. Before specific redevelopment activities could be implemented that may affect Alvarado Creek, its tributary or the Diegan Coastal Sage Scrub, a site-specific biological resources report including a wetland delineation would be required by the City of San Diego. Direct impacts on jurisdictional drainages, wetland vegetation or Diegan Coastal Sage Scrub or encroachment into the MHPA beyond that allowed by the City of San Diego regulations would be considered significant.

Other vegetation communities or land uses that occur within Subarea A include landscape plantings of horticultural specimens along roads and interchanges and Disturbed Habitat that lacks vegetation or supports only non-native vegetation. Impacts on these vegetation communities/land uses would not be considered significant.

Within Subarea A, there are also significant opportunities for creation, restoration, or preservation of sensitive vegetation communities. Such measures could serve as mitigation measures to reduce potential future redevelopment project impacts to less than significant. These opportunities are discussed in the Mitigation Measures section.

Subarea B

Subarea B is located in the central to northern portion of the proposed Grantville Redevelopment Project Area, primarily along the San Diego River to Mission Trails Regional Park (Figures 4.6-2 and 4.6-3). Subarea B supports large areas of Disturbed Habitat because of sand and gravel extraction operations. There are also patches of well-developed Riparian Habitat and highly disturbed, Giant Reed infested portions of the San Diego River. On the slopes above the River are large patches of Diegan Coastal Sage Scrub that are connected with the large open space area of Mission Trails Regional Park.

FIGURE 4.6-2 – C4

Along the San Diego River, Subarea B includes a large Urban/Developed area and extensive habitat within the River and adjacent uplands. Riparian and Freshwater Marsh habitats and large open water ponds are present within the River's influence and patches of Diegan Coastal Sage Scrub are present on slopes on both sides of the River. These habitats are within the City of San Diego's MHPA except for a patch of disturbed Diegan Coastal Sage Scrub along the east side of the River. Specifically, within the area labeled 'C4' in Subarea B, the Community Plan Land Use allows for Commercial use. This parcel consists of Urban/Developed land and a small area of Riparian Habitat that appears to be within the MHPA. Before specific redevelopment activities could be implemented that may affect this sensitive vegetation community, a site-specific biological resources report including a wetland delineation would be required by the City of San Diego. In addition, wetland impacts would be subject to the jurisdiction of the Corps, CDFG, RWQCB, and the City. With any change in site usage, the area would be required to come into

conformance with MSCP regulations. No development beyond that allowed pursuant to MSCP regulations would be allowed. Direct impacts on Riparian Habitat would be considered significant.

FIGURE 4.6-2 AND 4.6-4 – C5

Also, within the area labeled 'C5' in Subarea B (Figure 4.6-2), the Community Plan Land Use allows for Industrial use. This parcel consists of disturbed Diegan Coastal Sage Scrub and Disturbed habitat that is not within the MHPA. Before specific redevelopment activities could be implemented that may affect Diegan Coastal Sage Scrub, a site-specific biological resources report would be required by the City of San Diego. Direct impacts on Diegan Coastal Sage Scrub would be considered significant. Direct impacts on Disturbed Habitat would not be a significant impact on biological resources.

FIGURE 4.6-3 – C6

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. This lot supports a large slope with Diegan Coastal Sage Scrub that is within the MHPA and Non-native Grassland that is outside the MHPA. Before specific redevelopment activities could be implemented that may affect these vegetation communities, a site-specific biological resources report would be required by the City of San Diego. No development beyond that allowed pursuant to MSCP regulations would be allowed. Direct impacts on Diegan Coastal Sage Scrub and/or Non-native Grassland would be considered significant.

FIGURE 4.6-3 – C7

The area labeled 'C7' (Figure 4.6-3) is currently being used for Sand and Gravel extraction and is designated as such in the Community Plan Land Use. Most of this area is Disturbed Habitat because of mining activities, but extensive patches of Diegan Coastal Sage Scrub within the MHPA are still present. The redevelopment of the currently disturbed mining areas would not result in a significant impact on biological resources. However, before specific redevelopment activities could be implemented that may affect Diegan Coastal Sage Scrub, a site-specific biological resources report would be required by the City of San Diego and, as with constraint area 'C4', with any change in site usage, the area would be required to come into conformance with MSCP regulations. No development beyond that allowed pursuant to MSCP regulations would be allowed. Direct impacts on Diegan Coastal Sage Scrub would be considered significant.

FIGURE 4.6-3 – C8

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. Before specific redevelopment activities could be implemented that may affect Diegan Coastal Sage Scrub/Chaparral, a site-specific biological resources report would be required by the City of San Diego. Direct impacts on Diegan Coastal Sage Scrub/Chaparral would be considered significant, and development beyond that allowed within the MHPA would be precluded.

Other vegetation communities or land uses that occur within Subarea B include landscape plantings of horticultural specimens along roads and interchanges and Disturbed Habitat that lacks vegetation or supports only non-native vegetation. Impacts on these vegetation communities/land uses would not be considered significant.

Within Subarea B, there are also opportunities for creation, restoration, or preservation of sensitive vegetation communities. These opportunities are discussed under Mitigation Measures.

Subarea C

FIGURE 4.6-4 – C9

Subarea C occurs in the eastern portion of the Project Area and is not contiguous with the rest of the Project Area (Figure 4.6-4). Subarea C is almost all Urban/Developed and includes a shopping center; retail uses and community facilities; and the Allied Gardens Community Park. The biological resources in this Subarea are limited to two small patches of disturbed Diegan Coastal Sage Scrub and Ornamental vegetation ('C9') that are not within the MHPA.

The Community Plan Land Use designates the areas that currently support disturbed Diegan Coastal Sage Scrub as Schools, Colleges, and Universities. If further improvements to this area were proposed that might impact disturbed Diegan Coastal Sage Scrub, a site-specific biological resources report would be required by the City of San Diego. Direct impacts on Diegan Coastal Sage Scrub would be considered significant and mitigation pursuant to Table 4.6-5 would be required for any impacts to Tier I-III habitats.

Table 4.6-6 provides a summary of potential direct impacts to vegetation communities/land uses for the Proposed Redevelopment Project.

B. Wildlife Corridor Impacts

The San Diego River and associated Riparian and upland vegetation communities within the valley and on the slopes provides a regional wildlife corridor that links Mission Trails Regional Park with Mission Bay Park. Impacts to sensitive vegetation communities in the Project Area such as Riparian, Freshwater Marsh, Diegan Coastal Sage Scrub, or Non-native Grassland would also be considered an impact on the regional wildlife corridor. Direct impacts on native vegetation communities within this corridor would be considered significant. However, consistency with the MSCP and City wetland regulations would also generally avoid impacts to wildlife corridors.

C. Sensitive Species Impacts

Future redevelopment activities have the potential to result in temporary and/or direct impacts to sensitive flora and fauna species within the Project Area. Temporary impacts could result from construction activities that occur in close proximity to potential nesting habitat of sensitive species. Impacts could include adversely affecting individuals during the breeding season causing them to abandon nests thereby increasing the potential for nest predation or neglect and reducing fecundity (potential reproductive capacity) of the species.

TABLE 4.6-6
Summary of Potential Impacts to Vegetation Communities

Vegetation Community (MSCP Tier Habitat Type)	Project Area Acreage	Potential Impacts	Biological Significance Determination
Diegan Coastal Sage Scrub (Tier II) or Diegan Coastal Sage Scrub/Chaparral (Tier II)		<p>Subarea A – Potential direct impacts from redevelopment of the area into Office land use.</p> <p>Subarea B – Potential direct impacts from redevelopment of area into Single Family Housing or Sand and Gravel mine or other Industrial use.</p> <p>Subarea C – Potential direct impacts from redevelopment of area for Schools, Colleges, and University use.</p>	Significant
Riparian Habitat (Tier I Wetland)		<p>Subarea A – Potential direct impacts from redevelopment of the area into Office land use.</p> <p>Subarea B – Potential direct impacts from redevelopment into Commercial land use.</p>	Significant
Freshwater Marsh (Tier I Wetland)		Subarea A – Potential direct impacts from redevelopment of the area into Industrial land use.	Significant
Non-native Grassland (Tier IIIB)		Subarea B – Potential direct impacts from redevelopment of area into Sand and Gravel mine land use.	Significant
Disturbed Habitat (Tier IV)		<p>Subarea A – Potential direct impacts from redevelopment of the area into Office land use.</p> <p>Subarea B – Potential direct impacts from redevelopment of the area into Industrial land use.</p>	Not Significant
Ornamental		Subareas A-C Potential direct impacts from redevelopment of the area into numerous land uses including conversion to open space.	Not Significant
Urban/Developed (Tier IV)		Subareas A-C Potential direct impacts from redevelopment of the area into numerous land uses including conversion to open space.	Not Significant

Source: City of San Diego, 1997.

Redevelopment activities could also result in permanent direct impacts through destruction of sensitive plants and animals including sensitive birds and their nests and eggs, aestivation sites for sensitive amphibians, and eggs and larvae of sensitive butterfly species occurring within these habitat areas. It is not possible to determine that significant impacts to sensitive species would occur from proposed redevelopment activities; however, direct impacts on non-MSCP covered federal and state listed sensitive species or narrow endemics outside the MHPA would be considered significant. Impacts to covered or non-covered listed species or to narrow endemic species within the MHPA would be considered significant.

Implementation of Mitigation Measures BR1 through BR-8 would reduce the potential impact to less than significant for impacts outside the MHPA. Impacts within the MHPA should be avoided.

4.6.3.3 *Indirect Impacts*

Indirect Impacts are defined in the CEQA Guidelines as "effects which are caused by the project and are later in time or farther removed in distance, but are still reasonably foreseeable." Indirect impacts can result in a temporary or permanent impact that causes a biologically significant change in the environment (California Resources Agency 2001: §15358)

A. Vegetation Community Impacts

There is the potential for the following indirect impacts to occur on vegetation communities from redevelopment activities:

- Noise, dust and associated construction activity could affect animals during construction.
- The introduction of invasive exotic plant species into native habitats from disturbance or removal of native vegetation communities.
- Excessive irrigation of landscaping adjacent to native vegetation communities could alter the localized natural moisture regime and increase weediness and susceptibility of plants to disease, pests, and fungus.
- Increased urban runoff and pollution into native vegetation communities through use of herbicides, pesticides, and fertilizers.
- Increase of human disturbance of native vegetation through trampling and introduction of non-native, weedy species.

These potential permanent indirect impacts would be considered significant. However, implementation of Mitigation Measures BR1 through BR8 would reduce the potential impact to less than significant.

B. Wildlife Corridor Impacts and Sensitive Species Impacts

The San Diego River and adjacent upland habitats serve as a regional habitat linkage or wildlife corridor throughout its length within the Project Area. Permanent indirect impacts could occur from an increase in the amount of edge habitat, night illumination of vegetation communities, and an increase in human intrusion into the corridor. An increase in the amount of edge habitat can increase opportunities for invasive species to spread and colonize new areas and degrade the quality of habitat for plant and

wildlife species. The introduction of additional lighting into the wildlife corridor could cause physiological and behavioral changes in wildlife species and disproportionately increase opportunities for predation on vulnerable species. Increases in human disturbance to the corridor could occur from an increase in human intrusion in areas adjacent to redevelopment. Human disturbance could include trampling, harassing of wildlife, introduction of domestic animals such as cats and dogs, and an increase in litter. Domestic cats and dogs are known to prey on reptiles, passerine birds, and small mammals. These potential indirect impacts on the wildlife corridor in the MHPA would be considered significant. Implementation of Mitigation Measures BR1 through BR8 would reduce potential indirect impacts to less than significant.

C. MSCP Consistency Issues

Redevelopment actions that are consistent with the City's MSCP would provide for the long-term viability of wildlife and sensitive habitats. Portions of the project lie within or adjacent to the MHPA and these areas could incur indirect impacts from redevelopment activities. These indirect impacts include allowable compatible uses within the MHPA, such as passive recreation, utility line and road maintenance, and essential public facility improvement. Since redevelopment activities are not well defined, it is not currently possible to address required compliance with detailed MSCP planning and MHPA land use adjacency guidelines. Implementation of Mitigation Measures BR1 through BR9 would reduce the potential impact to less than significant.

4.6.4 Significance of Impact

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.

4.6.5 Mitigation Measures

In addition to biological constraints, the Project Area includes several opportunities for habitat restoration, creation, or conservation. The following are redevelopment project mitigation requirements as well as a discussion of potential biological restoration and enhancement opportunities.

4.6.5.1 Project Mitigation Requirements

The following measures would provide mitigation for impacts on biological resources within the Project Area. All future redevelopment activities will be required to be in compliance with City of San Diego MSCP Subarea Plan and its implementing regulations.

- 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.

- 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 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 above.
- 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.
- 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.

4.6.5.2 *Biological Mitigation Opportunities and the San Diego River Park Master Plan*

The Draft San Diego River Park Master Plan is a comprehensive planning document. As specific redevelopment actions are implemented and impacts on biological resources occur, mitigation within the San Diego River Park and adjacent habitats will likely be necessary. There appear 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. Potential mitigation opportunities within each Subarea are presented below and are identified as 'O1-O5' with 'O' denoting a potential 'Opportunity.'

A. Subarea A

The San Diego River Park Master Plan has identified areas along the River at 'O1' (Figure 4.6-1) that are recommended for addition to the adjacent open space areas. These parcels abut the River and are currently Urban/Developed, but are classified as Open Space in the Community Land Use Plan. An opportunity may be available along the River in these areas to mitigation impacts from redevelopment projects through creation of wetland habitats and wetland buffer habitats within these Urban/Developed areas.

Another potential opportunity for mitigation of redevelopment impacts and identified as a “Key Site” in the San Diego River Park Master Plan is at the confluence of Alvarado Creek and the San Diego River ('O2')(Figure 4.6-1). Mitigation opportunities include day lighting, or uncovering, and dechannelizing Alvarado Creek and removing large areas of Giant Reed to enhance existing Riparian Habitat. These areas are not within the MHPA, but provide significant biological opportunities and, if restored, may be candidates for inclusion in the MHPA.

Within Subarea A generally, opportunities for mitigation exist such as removal of Ornamental vegetation along development parcels that abut the River.

B. Subarea B

The San Diego River Park Master Plan identifies several opportunities for enhancement, restoration, creation, or protection of native habitats along the River within Subarea B that could be used to mitigate impacts from redevelopment activities or could be pursued by the City of San Diego for enhancement of the River Park.

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. These parcels are immediately adjacent to the San Diego River and, if necessary, there may be opportunities for mitigation of redevelopment impacts through creation or restoration of Riparian, Freshwater and/or Diegan Coastal Sage Scrub habitats in areas that are currently under Industrial land use.

There is a long stretch of the River that is infested with the invasive Giant Reed within the Superior Mine ('O4')(Figure 4.6-3). Mitigation could include removal of Giant Reed and re-planting with native riparian species. This area is within the MHPA.

Several of the Open Water areas of the River are also infested with the invasive Uruguay Marsh Purslane. Mitigation could include removal of this species.

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.

There is also an opportunity to enhance disturbed Diegan Coastal Sage Scrub and Riparian Habitat in areas currently designated as Open Space at the point where the River turns sharply south along the Admiral Baker Golf Course (Figure 4.6-2). This area is not within the MHPA, but is adjacent and may be a candidate for inclusion in the preserve if restored.

C. Subarea C

There are limited opportunities for mitigation of redevelopment impacts in Subarea C. There are two small patches of disturbed Diegan Coastal Sage Scrub that could be enhanced or enlarged, but these areas are not classified as Open Space and are low quality patches that are not worthy of extensive mitigation efforts. These patches are not within the MHPA.

4.6.5.3 Protection and Notice Element

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.

4.6.6 Conclusion

Future redevelopment activities have the potential to result in direct and indirect impacts to sensitive species, depending on the type, size, and location of proposed activities. Implementation of Mitigation Measures BR1 through BR9 will reduce the significant biological resources impacts to a level less than significant.

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4.7 Geology/Soils

The following summarizes the results of the *Limited Geotechnical Evaluation Grantville Redevelopment Project Environmental Impact Report (EIR)*, San Diego, California (Ninyo & Moore, September 17, 2004). The complete report is provided in Volume II, Appendix G of this EIR.

4.7.1 Existing Conditions

The Project Area is located in the western portion of the Peninsular Ranges Geomorphic Province of Southern California. The Peninsular Ranges are traversed by several major active faults including the Whittier-Elsinore, and San Jacinto faults located northeast of the Project Area and the Rose Canyon, Agua Blanca-Coronado Bank and San Clemente faults located west of the Project Area.

4.7.1.1 Geology

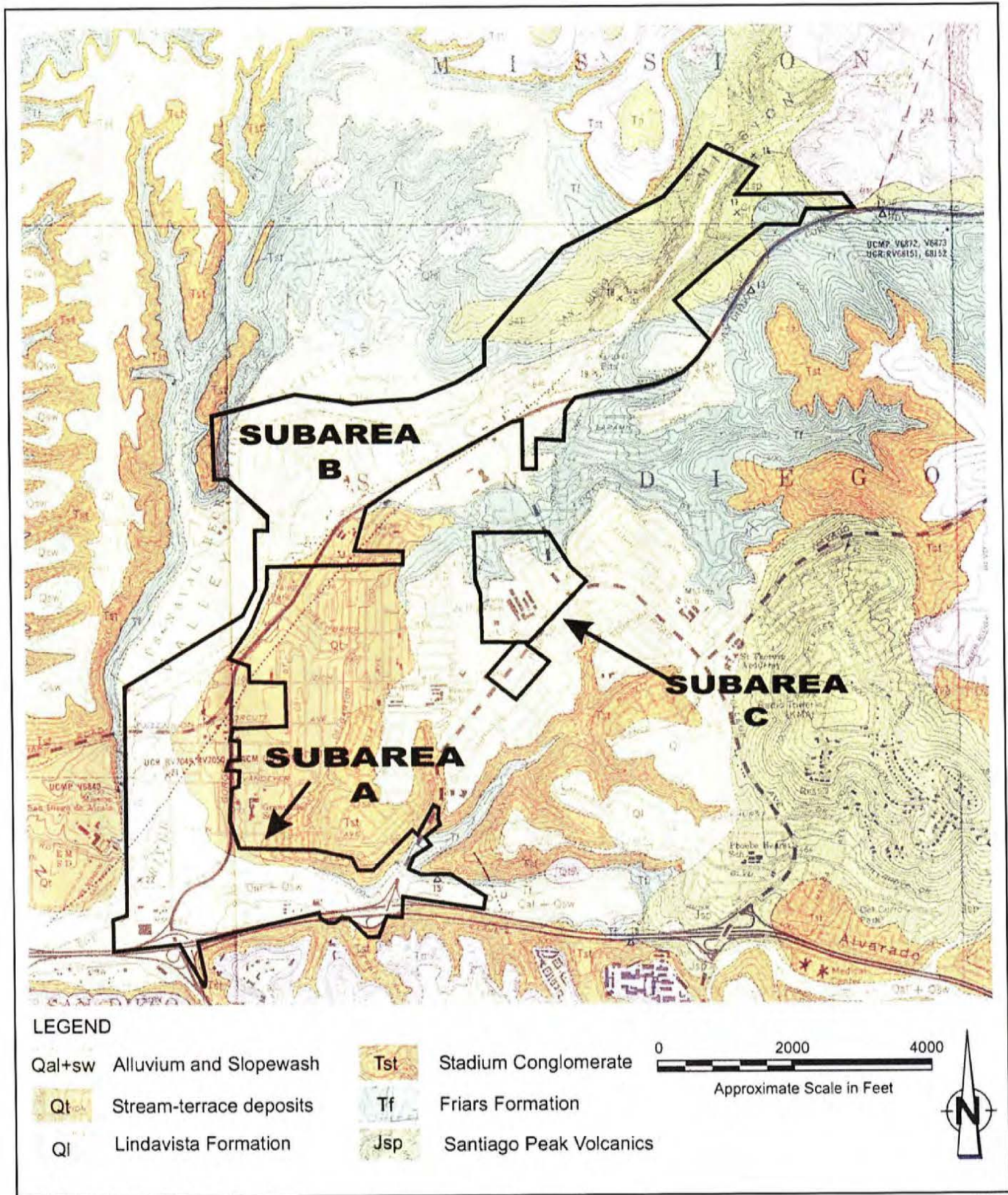
The Project Area is generally underlain by fill associated with the development of individual parcels, alluvium (along the San Diego River and Alvarado Canyon north of I-8), terrace deposits (along the eastern side of Subarea A), Lindavista Formation (Subarea C), Stadium Conglomerate (Subarea A, northside of Alvarado Canyon), Friars Formation (the eastern end of Subarea B and north central portion of Subarea C), and the Santiago Peak Volcanics (eastern end of Subarea B). Figure 4.7-1 depicts the soils and geologic units in the Project Area. The units are described below:

Fill (not mapped): Fill soils in the Project Area are generally derived from nearby formational units and are similar in composition. Fill soils can vary from clay to sand, depending on the parent material. The compaction of the fills can vary considerably, ranging from loose to dense. Fill soils are located in Subareas A, B, and C.

Alluvium and Slopewash (map symbol Qal + sw): Holocene alluvium is present in the bottom of the San Diego River Valley and Alvarado Canyon north of I-8 (Subareas A and B). The alluvium generally consists of silty sand and clayey sand with some clay and silt. Scattered layers of gravel and cobbles are also likely to be present within the alluvium. The alluvium is generally in a loose condition and much of it would be subject to liquefaction below the water table. In developed parts of the western portion of Subarea A, alluvium is likely to be present below existing fill soils.

Terrace Deposits (map symbol Qt): Pleistocene age terrace deposits have been mapped on portions of Subarea A. In general, the terrace deposits consist of medium dense, coarse silty to poorly graded sand.

Lindavista Formation (map symbol Ql): The Pleistocene Lindavista Formation has been mapped on Subarea C. In general, materials of the Lindavista Formation consist of brown to reddish brown, weakly to moderately cemented, clayey and silty sandstone. Strongly cemented concentrations are also commonly found within the Lindavista Formation.



SOURCE: Ninyo & Moore, 2004



Grantville EIR
Geologic Map

FIGURE
4.7-1

Stadium Conglomerate (map symbol Tst): The late Eocene-age Stadium Conglomerate has been mapped in the eastern portion of Subarea A on the north side of Alvarado Canyon. In general, the Stadium Conglomerate consists of cobbles with a moderately cemented, coarse-grained sandstone matrix.

Friars Formation (map symbol Tf): The middle Eocene-age Friars Formation has been mapped in the eastern portion of Subarea A on the north side of Alvarado Canyon and in Subarea B on the south side of Mission Gorge. In general, the Friars Formation consists of massive, medium-grained sandstone with interbeds of strongly indurated claystone. The claystone is generally moderately to highly expansive. Cobble conglomerate lenses are also common within the Friars Formation.

Santiago Peak Volcanics (map symbol Jsp): The Jurassic, Santiago Peak Volcanics are present in the eastern portion of Subarea B on the northeastern and southern sides of Mission Gorge. In general, the Santiago Peak Volcanics consist of metamorphosed volcanic, volcanoclastic, and sedimentary rocks. In the Project Area, materials of the Santiago Peak Volcanics are being mined for aggregate.

4.7.1.2 Mineral Resources

The majority of the Project Area is located within urban areas where no significant mineral deposits are present, or are considered likely to exist. Therefore, the potential for loss of mineral deposits due to further development in these portions of the Project Area is considered low.

4.7.1.3 Groundwater

Based on the project location, groundwater is likely to be at or near the surface in the bottom of the San Diego River Valley. Groundwater is expected to be at depths of 20 to 40 feet below the majority of Subarea A and lower portions of Subarea B. In the higher elevations of the Project Area (portions of Subarea B and C) depths to groundwater are expected to be more than 50 feet. Groundwater levels can fluctuate due to seasonal variations, irrigation, and other factors. The majority of the Project Area is not expected to be affected by shallow groundwater.

4.7.1.4 Geotechnical Hazards

A. Slope Stability

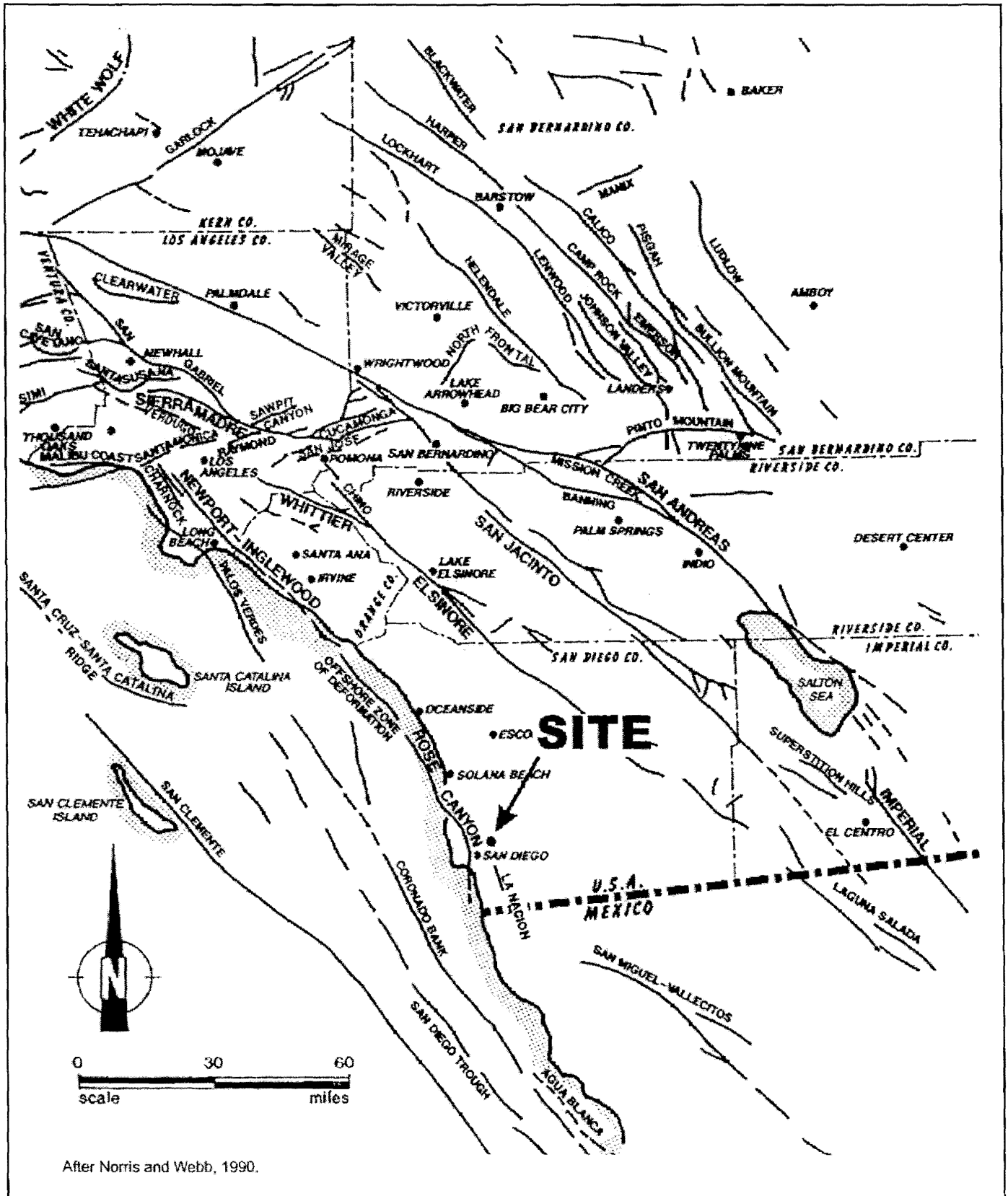
No landslides or indications of deep-seated landslides were mapped or observed in the Project Area.

B. Faulting and Seismicity

The Project Area is located in a seismically active area, as is most of Southern California. The Project Area is not underlain by known active faults (i.e., faults that exhibit evidence of ground displacement during the last 11,000 years).

Active Faults

No faults currently classified as "active" by the State of California are known to traverse the Project Area. The Rose Canyon fault is the closest "active" fault located approximately five miles west of the Project Area. The fault lies within an Earthquake Fault Zone (Figure 4.7-2).



SOURCE: Ninyo & Moore, 2004

10/19/04

	<p>Grantville EIR</p> <p>Fault Location Map</p>	<p>FIGURE</p> <p>4.7-2</p>
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Strong Ground Motion and Ground Surface Rupture

The seismic hazard most likely to impact the Project Area is ground shaking resulting from an earthquake on a major active fault. Due to the relatively close proximity of the Rose Canyon Fault Zone to the Project Area, the most significant ground shaking from one of the regional faults will most likely occur on the Rose Canyon Fault Zone. The Project Area is located in a zone where the horizontal peak ground acceleration having a 10 percent probability of exceedance in 50 years is 0.25g (25 percent of the acceleration of gravity). A maximum credible earthquake of magnitude 6.9 on the Rose Canyon Fault Zone could produce a peak horizontal ground acceleration of 0.31g to 0.36g (site acceleration), and a maximum probable event may be on the order of 0.17g to 0.19g. This is the level of risk assumed by the Uniform Building Code (UBC, 1997) minimum design requirements.

4.7.2 Impact Threshold

For the purposes of this EIR, a significant impact would occur if the proposed project would:

- *Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:*
 - i. *Rupture of a known earthquake fault as delineated on the most recent Alquist-Priolo Earthquake Fault Zone Map;*
 - ii. *Strong seismic ground shaking;*
 - iii. *Seismic-related ground failure, including liquefaction; or*
 - iv. *Landslides.*
- *Result in substantial soil erosion or loss of topsoil;*
- *Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse;*
- *Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code; or,*
- *Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewer are not available for the disposal of waste water.*

4.7.3 Impact

4.7.3.1 Groundwater

Perched water conditions due to irrigation and runoff may be encountered in portions of the Project Area. The majority of the Project Area is not expected to be affected by shallow groundwater. However, groundwater is likely to be at or near the surface in the bottom of the San Diego River Valley. Any future redevelopment activities in or near the River Valley would need to account for the potential for groundwater. The potential presence of groundwater is considered a significant impact.

4.7.3.2 Geotechnical Hazards

A. Slope Stability

There are no landslides or deep-seated landslides located within the Project Area and no impact associated with this issue is anticipated.

B. Faulting and Seismicity

The Project Area is located in a seismically active area, as is most of Southern California. No active faults traverse the Project Area. The closest active fault to the Project Area is the Rose Canyon Fault, which is assigned a maximum earthquake magnitude of 6.9. The impact associated with faulting and seismicity is considered significant as implementation of future redevelopment activities has the potential to expose people or structures to potential substantial adverse effects due to strong ground shaking or seismic related ground failure. Implementation of Mitigation Measure GS1 will reduce the impact to a level less than significant.

Ground surface rupture due to active faulting is not considered likely due to the absence of known active faults underlying the Project Area. Lurching and cracking of the ground as a result of nearby or distant seismic events is also considered unlikely.

Liquefaction, Seismically Induced Settlement and Lateral Spread

Liquefaction of cohesionless soils can be caused by strong vibratory motion due to earthquakes. Loose granular soils and non-plastic silts that are saturated by a relatively shallow groundwater table are most susceptible to liquefaction. The Project Area contains some areas that may be subject to liquefaction in the event of a nearby seismic event. These areas include the lower portions of Subareas A and B. The impact associated with liquefaction, induce settlement and lateral spread is considered significant. Implementation of Mitigation Measure GS1 will reduce the impact to a level less than significant.

Soil Erosion

Implementation of future redevelopment activities is not anticipated to result in substantial soil erosion. The Project Area is primarily developed, and redevelopment activities will need to comply with storm water regulations that require implementation of erosion control measures during construction of a project. While the Project Area is large, redevelopment of the area will occur over a 20 to 30 year period. Any active construction activity in the Redevelopment Project Area at any one time would not be significant in terms of the amount of soils exposed to erosion forces such as wind and rain.

Septic Systems

The Project Area is served by a municipal sewer system and does not rely on septic systems for disposal. As such, no impact associated with soils incapable of adequately supporting the use of septic tanks will result.

4.7.4 Significance of Impact

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.

4.7.5 Mitigation Measures

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.

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.

4.7.6 Conclusion

Implementation of Mitigation Measure GS1 will reduce the impact to geology and soils to a level of less than significant.

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4.8 Hazards and Hazardous Materials

The following summarizes the results of the *Hazardous Materials Technical Study Grantville Redevelopment Project and Study Area, San Diego, California* (Ninyo & Moore, September 17, 2004). The complete report is provided in Volume II, Appendix H of this EIR.

4.8.1 Existing Conditions

Developed properties within the Project Area are primarily commercial and industrial facilities. The surrounding area consists of primarily residential properties interspersed with commercial and industrial buildings.

4.8.1.1 Aerial Photograph Review

Historical aerial photographs were reviewed to obtain information regarding the history and activities within the Project Area. Based on the review of aerial photographs, the Project Area appears to have been occupied with undeveloped land, agricultural land, and scattered development from at least as early as 1928 until sometime between 1953 and 1966. From that time until the late 1980s, residential and commercial development progressively replaced agricultural land and undeveloped land. By 1989, the Project Area appeared similar to its current configuration.

4.8.1.2 Site Reconnaissance

A limited hazardous materials site reconnaissance was conducted of the Project Area. This reconnaissance involved a visual survey by vehicle of properties of potential environmental concern. Access to properties in the Project Area was limited to observations made from public rights-of-way, such as streets, alleys and sidewalks and the exterior of the properties.

4.8.1.3 Environmental Database Search

An environmental information database search of federal, state, and local databases was performed. The review was conducted to evaluate whether properties within approximately 1,000 feet of the boundaries of the Project Area have been identified as having experienced significant unauthorized releases of hazardous substances or other events with potentially adverse environmental effects. Table 3 of the HMTS (see Volume II Appendix H) provides a summary of the Environmental Database review sites of potential environmental concern. Approximately 36 sites of potential environmental concern within the Project Area and surrounding area were identified as a result of the environmental information database search.

Properties located within the boundaries of the Project Area were listed in the Underground Storage Tank (UST) and Aboveground Storage Tank (AST), Leaking Underground Storage Tank (LUST), Resource Conservation and Recovery Act (RCRA), Department of Environmental Health (DEH) HE17 (permits), and Solid Waste Landfill (SWL) databases. In addition to the properties located within the boundaries of the Project Area, the database search identified several surrounding properties of potential environmental concern. Forty-five unmapped (non-geocoded) facilities were also noted in the database reports as being located within the same zip code as the Project Area. One of these unmapped facilities is a duplicate listing on the LUST database, located at Mission Gorge and Twain Avenue. Eighteen open LUST cases,

located at 14 facilities, were identified in the Project Area. Thirteen RCRA Generator facilities were identified in the Project Area. Three of the unmapped facilities are listed on the SWL database; however, one is a duplicate listing and the second, identified as the North Chollas Burn Site (located several miles south of the Project Area), has been given a status of "clean close." These facilities are discussed in further detail below. Based on the locations of the 40 remaining unmapped facilities, their distances from the site, and the database on which they were listed, there is a low likelihood of these facilities have negatively impacted the environmental integrity of the Project Area.

4.8.1.4 Environmental Regulatory Agency Inquiries and Document Review

Information regarding properties of potential environmental concern within the boundaries of the Project Area was requested from the Department of Environmental Health (DEH). Sixteen facilities were selected based on information provided in the environmental database search. Figure 4.8-1 depicts the location of these facilities within the Project Area. Table 4.8-1 describes the facilities.

4.8.2 Impact Threshold

For the purpose of this EIR, a significant impact would occur if the proposed Redevelopment project would:

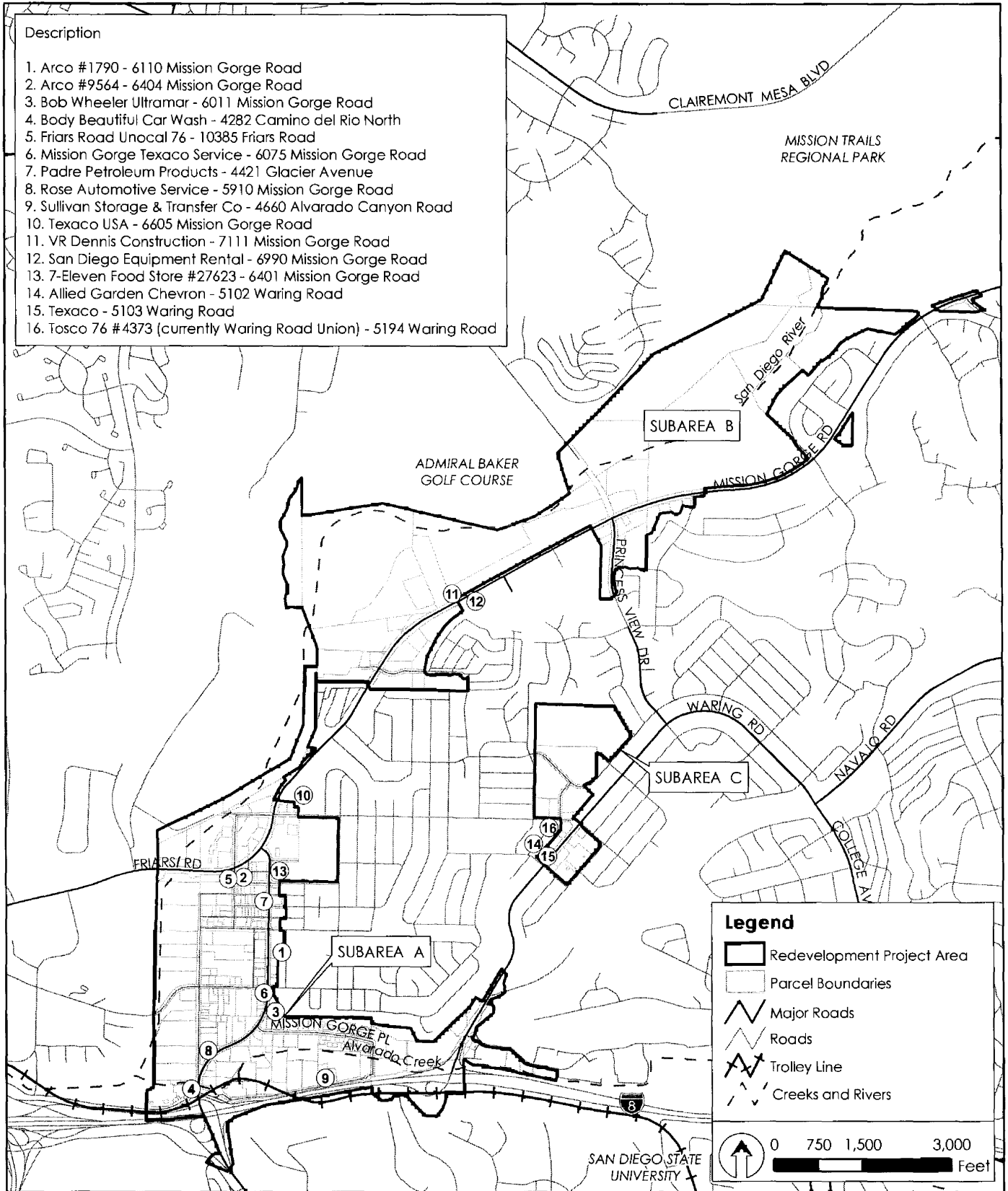
- *Routinely transport, use or dispose of hazardous materials;*
- *Release hazardous materials into the environment;*
- *Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;*
- *Is included on a list of hazardous materials; and,*
- *Impairs implementation of, or physically interferes with an adopted emergency response plan or emergency evacuation plan.*

4.8.3 Impact

The proposed project will result in the redevelopment of existing land uses in the Project Area. The degree of potential impact will range from not significant, to significant requiring mitigation, depending on the location and type of use proposed of any future redevelopment projects in the Project Area. In general, redevelopment activities provide an opportunity to remediate (or clean up) existing sites of environmental concern, as any existing sites of contamination would need to be cleaned prior to new development. The new development would be required to comply with applicable regulations regarding the use, storage, and transport of hazardous materials.

Potential hazards and hazardous impacts include:

- Uses that would involve the handling, storage, and treatment of hazardous materials;
- Uses that would release hazardous materials into the environment;
- Uses that would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.



SOURCE: Ninyo & Moore, SanGIS and BRG Consulting, Inc., 2005

3/10/05

	<p>Grantville EIR</p> <p>Sites of Potential Environmental Concern</p>	<p>FIGURE</p> <p>4.8-1</p>
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TABLE 4.8-1
 Summary of Sites of Potential Environmental Concern in the Project Area

Facility	Map ID	Location (Subarea)			Potential Environmental Concern (Y/N) ²	Comments
		A	B	C		
Arco #1790 – 6110 Mission Gorge Road	1	X			Y	The database search indicated that a release of gasoline occurred, and the aquifer was affected. The DEH file review indicates that remedial action has occurred at the facility. The most recent groundwater report recommends that the DEH consider the site for closure. Because the facility has not yet been granted regulatory closure, there is a moderate to high likelihood that this facility has adversely affected the environmental integrity of the Project Area. The database search indicates that this facility is a permitted site. A violation cited in June 1999 indicated the facility did not properly report, investigate, or respond to an unauthorized release. Open LUST case and RCRA Generator facility.
Arco #9564 – 6404 Mission Gorge Road	2	X	X		Y	During the site reconnaissance, it was observed that the property is now occupied by a Thrifty Oil gasoline station. The database search indicates that a tank release from this gasoline service station property was discovered on August 8, 1986. According to the DEH file review, remedial action is underway; however, analytical data indicates the presence of hydrocarbons in the groundwater. Based on this information, there is a moderate to high likelihood that this facility has adversely affected the environmental integrity of the subject site. The database search indicates that this facility is a permitted site. Violations of concern were not noted in the database report. However, the facility is associated with an unauthorized release case. Open LUST Case and RCRA Generator facility.

TABLE 4.8-1
Summary of Sites of Potential Environmental Concern in the Project Area

Facility	Map ID	Location (Subarea)			Potential Environmental Concern (Y/N)?	Comments
		A	B	C		
Bob Wheeler Ultramar	3	X			Y	During the site reconnaissance, it was observed that the facility is occupied by Valero. The database search indicates that a tank release for this property was discovered in January 1999. According to the DEH file review, soil and groundwater were affected by a release of waste oil during UST closure. The soil contamination has been delineated; however, quarterly groundwater monitoring continues. Based on this information, there is a moderate to high likelihood that this facility has adversely affected the environmental integrity of the Project Area. A violation in August 1998 indicates the facility has not entered into a written contract with the tank owner and notified the Hazardous Materials Management Division (HHMD). This facility is an open LUST case.
Body Beautiful Car Wash – 4282 Camino del Rio North	4	X			Y	The database search report indicated that a release at this property was discovered in November 2002. Gasoline was released and, reportedly, a remediation plan has been implemented. According to the DEH file review, site closure has been recommended based on the reduced levels of MTBE and TPH. Because site closure has not been granted, there is moderate to high likelihood that this facility has adversely affected the environmental integrity of the subject site.

TABLE 4.8-1
Summary of Sites of Potential Environmental Concern in the Project Area

Facility	Map ID	Location (Subarea ¹)			Potential Environmental Concern (Y/N) ²	Comments
		A	B	C		
Friars Road Unocal 76 – 10385 Friars Road	5	X			Y	During the site reconnaissance, it was observed that the facility is now occupied by Rose Auto Sales and Car Wash. The database search indicated that a tank release at this property was discovered in May 1994. The file review at the DEH indicated that semi-annual monitoring and recovery of free product continue to be recommended. Based on this information, there is a moderate to high likelihood that this facility has adversely affected the environmental integrity of the Project Area. In addition, a second tank release was reported for this facility in February 1996. However, this release is listed as "case closed," and is, therefore, not considered to present an environmental concern to the Project Area at the present time. The database search indicates that the facility is a permitted site. A violation cited in August 1998 indicated the facility has not entered into a written contract with the tank owner and notified the Hazardous Material Management Division (HMMD). This facility is an open LUST case.
Mission Gorge Texaco Service – 6705 Mission Gorge Road	6	X			Y	During the site reconnaissance, it was observed that the facility is now occupied by Auto Port Limited. The database search indicates that a tank release at this property was discovered in July 1992. The DEH file review indicated that quarterly groundwater monitoring will continue and additional wells may be installed to delineate the contaminant plume. Based on this information, there is a moderate to high likelihood that this facility has adversely affected the environmental integrity of the subject site. The database search indicated that the facility is a permitted site. Violations of concern were not noted in the database report. However, the facility is associated with an unauthorized release case and is an open LUST case and RCRA Generator facility.

TABLE 4.8-1
Summary of Sites of Potential Environmental Concern in the Project Area

Facility	Map ID	Location (Subarea ¹)			Potential Environmental Concern (Y/N) ²	Comments
		A	B	C		
Padre Petroleum Products – 4421 Glacier Avenue	7	X			Y	During the reconnaissance, the property buildings appeared to be unoccupied. The database search indicates that a tank release at this property was discovered in December 1992. Diesel fuel was released, and the aquifer was affected. Reportedly, a preliminary site assessment is underway and further action has been recommended, including extraction of free product and delineation of groundwater contamination. The database search indicates that this facility is a permitted site. Violations of concern were noted in the database report. However, the facility is associated with an unauthorized release case and is an open LUST case and RCRA Generator facility.
Rose Automotive Service and Rose Toyota – 5910 Mission Gorge Road and 5921 Fairmount Avenue	8	X			Y	During the site reconnaissance, this property was observed to be occupied by Toyota San Diego. A Phase I Environmental Assessment of the facility was conducted in 1998, and recommended soil and groundwater sampling due to former LUST case on site. Groundwater was found to be contaminated. The contaminant plume has migrated to approximately 75 feet west of Fairmount Avenue, and is confined to the site at the present time. Documentation regarding the release at this facility was not on file.
Sullivan Storage and Transfer Company – 4660 Alvarado Canyon Road	9	X			Y	During the site reconnaissance, this property was observed to be occupied by Qualtech Auto Center. The database search indicated that a tank release at this property was discovered in December 1996. Gasoline was released, and the aquifer was affected. MTBE was found at a maximum concentration of 13,600 parts per million (ppm). Reportedly, a preliminary site assessment is underway. Based on this information, there is a moderate to high likelihood that this facility had adversely affected the environmental integrity of the Project Area. The database search indicated that this facility is a permitted site. No violations were noted in the search. However the facility is associated with an unauthorized release and is an open LUST case and RCRA Generator site.

TABLE 4.8-1
Summary of Sites of Potential Environmental Concern in the Project Area

Facility	Map ID	Location (Subarea!)			Potential Environmental Concern (Y/N)?	Comments
		A	B	C		
Texaco USA – 6605 Mission Gorge Road	10	X	X		Y	During the site reconnaissance, this property was observed to be occupied by a Kentucky Fried Chicken fast food restaurant. The database search indicated that a tank release at this property was discovered in October 1993. Gasoline was released to the groundwater. According to documents reviewed at the DEH, quarterly groundwater monitoring events are being performed at the facility. Based on this information, there is a moderate to high likelihood that this facility has adversely affected the environmental integrity of the Project Area. In addition, one other tank release was reported for this facility. However, this release is listed as "case closed," and is, therefore, not considered an environmental concern to the site at the present time. The database search indicates that this facility is a permitted site. Violations associated with improper tank testing and failure to report results to regulatory agencies are noted in the database report. The facility is an open LUST case.
Texaco – 6075 Mission Gorge Road (not mapped)		X	X			The database search indicates that this facility is a permitted site. Violations of concern were not noted in the database report. However, the facility is associated with an unauthorized release case and is an open LUST case and RCRA Generator site.
Mission Gorge and Twain Mission Gorge Road (not mapped)		X			Y	The database search indicates that this facility is a permitted site. Violations of concern were not noted in the database report. However, the facility is associated with an unauthorized release case and is an open LUST case and RCRA Generator site.

TABLE 4.8-1
Summary of Sites of Potential Environmental Concern in the Project Area

Facility	Map ID	Location (Subarea)			Potential Environmental Concern (Y/N) ¹	Comments
		A	B	C		
City of San Diego Sewer Project/VR Dennis Construction	11		X		Y	During the site reconnaissance, this property was observed to be occupied by ABC Supply Company. The database search indicated that a tank release at this property was discovered in April 1992. Gasoline was released; however, the medium affected is not indicated. Documents reviewed at the DEH indicated that the responsible party has yet to be determined. Based on this information there is a moderate to high likelihood that this facility has adversely impacted the environmental integrity of the Project Area.
San Diego Equipment Rental – 6990 Mission Gorge Road	12		X		Y	During the reconnaissance, this property was observed to be occupied by World RV. The database search indicated that a tank release at this property was discovered in January 1995. Gasoline was released into the groundwater. According to the file review, a remedial action plan has not yet been implemented. Based on this information, there is a moderate to high likelihood that this facility has adversely impacted the environmental integrity of the subject site. The database search indicates that this facility is a permitted site. Violations of concern were not noted in the database report. However, the facility is associated with an unauthorized release case and is an open LUST case and RCRA Generator site.

TABLE 4.8-1
Summary of Sites of Potential Environmental Concern in the Project Area

Facility	Map ID	Location (Subarea)			Potential Environmental Concern (Y/N) ²	Comments
		A	B	C		
Allied Garden Chevron – 5102 Waring Road	13			X	Y	<p>During the site reconnaissance, this property was observed to be a vacant lot. The database search report indicated that a tank release at this property was discovered in August 1993. Waste oil was released, and reportedly, remedial action is underway. Another release involving gasoline was discovered in March 2000. Documents reviewed at the DEH indicated semi-annual groundwater monitoring will continue at the facility. Also, additional wells may be installed off site to facilitate delineation of the contaminant plume. Based on this information, there is a moderate to high likelihood that this facility has adversely impacted the environmental integrity of the Project Area. In addition, one other tank release was reported for this facility. However, this release is listed as "case closed," and is, therefore, not considered to present an environmental concern to the site at the present time.</p> <p>The database search also indicated that this facility is a permitted site. Violations of concern were not noted in the database report. However, the facility is associated with unauthorized release case and is an open LUST case and RCRA Generator site.</p>

TABLE 4.8-1
Summary of Sites of Potential Environmental Concern in the Project Area

Facility	Map ID	Location (Subarea ¹)			Potential Environmental Concern (Y/N) ²	Comments
		A	B	C		
Texaco – 5103 Waring Road	14			X	Y	During the site reconnaissance, this property was observed to be occupied by a Shell station. The database search indicated that a tank release at this property was discovered in January 1992. Gasoline was released to the groundwater. The most recent report on file at the DEH indicated there is still free product in one well, and significant hydrocarbon concentrations present in other wells. Based on this information, there is a moderate to high likelihood that this facility has adversely impacted the environmental integrity of the Project Area. In addition, one other tank release was reported for this facility. However, this release is listed as “case closed,” and is, therefore, not considered to present an environmental concern to the site at the present time. The database search indicates that the facility is a permitted site. Violations of concern were not noted in the database report. However, the facility is associated with an unauthorized release case and is an open LUST case and RCRA Generator site.
Tosco 76 #4373 – 5194 Waring Road	15			X	Y	The database search indicates that a tank release for this property was discovered in July 1988. Gasoline was released into the groundwater. Quarterly groundwater monitoring is being performed at the site, according to documents reviewed at the DEH. Based on this information, there is a moderate to high likelihood that this facility has adversely impacted the environmental integrity of the Project Area. The database search indicated that this facility is a permitted site. A violation cited February 1998 indicated the facility has not entered into a written contract with the tank owner and notified the Hazardous Materials Management Division (HHMD). This facility is an open LUST case.

Source: Ninoyo and Moore, 2004.

- Development on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment.

Eighteen open LUST cases, located at 14 facilities, were identified in the Project Area. Based on the information obtained from the environmental database search and DEH documents reviewed, there is a moderate to high likelihood that these facilities have adversely impacted the environmental integrity of the Project Area. Figure 4.8-1 indicates the location of the 14 facilities and Table 4.8-1 describes each of these facilities.

Thirteen RCRA Generator facilities were identified in the Project Area. Three of the facilities are associated with LUST cases; therefore, there is a moderate to high likelihood that these three facilities have adversely impacted the environmental integrity of the Project Area. Based on the nature of the remaining ten facilities and the fact that they are not associated with unauthorized releases, there is a low likelihood that these facilities have adversely impacts the environmental integrity of the site to date. Figure 4.8-1 indicates the location of these facilities and Table 4.8-1 describes each of these facilities.

The horizon of the redevelopment plan is 20-30 years. During this timeframe, changes are likely to occur that will alter the status of the various potential hazardous materials sites identified in the Project Area. For each subsequent development project or improvement that occurs within the Project Area, the status of any particular site or sites affected by a specific project action (e.g., new commercial development or right-of-way improvements) will need to be evaluated through a Phase I Hazardous Materials Environmental Site Assessment, and in some instances, additional assessment (Phase II) and site remediation. Therefore, implementation of Mitigation Measures HM1, HM2 and HM3 would reduce potential impacts from these facilities to a level less than significant.

The relative security of a particular hazardous waste site, or other site of environmental concern, depends on the proposed development proposal for the specific parcels. Documented soil and groundwater contamination located at facilities within the Project Area is being addressed by the individual responsible parties. Remediation goals are based on cleanup levels designed to protect water quality. However, residual contamination may present non-water quality risks to the environment, such as human health, or create a condition of pollution or nuisance not addressed by the regulatory agency cleanup requirement. Residual contamination may be of particular concern during subsurface construction activities, when the contaminant pathway is often the most direct and shortest. Therefore, implementation of Mitigation Measure HM1 at the time a specific development proposal is proposed, will allow the potential impact to be evaluated and, if necessary, a specific mitigation (or remediation) plan be devised. The implementation of Mitigation Measure HM4 would reduce the potential impact as a result of residual contamination, if found to be present, to less than a level of significance.

In general, sites containing contaminated soil and groundwater are known to regulatory agencies. Such sites are in programs to remedy these sites, and many of the sites within the Project Area are anticipated to advance toward, or achieve acceptable remedies during the life of the redevelopment plan. However,

the potential exposure of people or property to unremediated soils, groundwater, or surface water, or any other sources of existing contamination within the Project Area as properties are redeveloped is considered a significant impact. Implementation of Mitigation Measures HM1, HM5 and HM6 will reduce the impact to a level less than significant.

Surveys to test for asbestos-containing building materials and lead based paint are also required by the City of San Diego to be performed at sites with existing buildings. Buildings that contain asbestos will need to be remediated during demolition. Implementation of Mitigation Measure HM1 would ensure proper asbestos removal is conducted within the Project Area.

No impact associated with impairing the implementation of, or physical interference with an adopted emergency response plan or emergency evacuation plan is anticipated. Subsequent redevelopment activity in the Project Area will be consistent with the Community Plans in which the project is located. As such, the project would not involve the closure of evacuation routes or interfere with an emergency response plan.

4.8.4 Significance of Impact

The potential presence of hazardous materials and existing areas of contamination in the Project Area is considered a significant impact.

4.8.5 Mitigation Measures

- 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.

- 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.

4.8.6 Conclusion

Implementation of Mitigation Measures HM1, HM2, HM3, HM4, HM5 and HM6 will reduce the potential impact related to hazardous materials and hazards to a level less than significant.

4.9 Paleontological Resources

4.9.1 Existing Conditions

Paleontological resources represent a limited, nonrenewable, and impact-sensitive scientific and educational resource. As defined in this section, "paleontological resources" (i.e., fossils) are the remains and/or traces of prehistoric plant and animal life exclusive of man. Fossil remains such as bones, teeth, shells, and leaves are found in the geologic deposits (rock formations) where they were originally buried. Paleontological resources include not only the actual fossil remains, but also the collecting localities, and the geologic formations containing those localities.

Paleontological resource sensitivities are rated for individual formations and recognize the important relationship between fossils and the geologic formations within which they are entombed. A high sensitivity is assigned to geologic formations known to produce vertebrate fossil remains or are considered to have the potential to produce such remains. A moderate sensitivity is assigned to geologic formations that are judged to have a strong, but unproven potential for producing important fossil remains. A marginal sensitivity is assigned to geologic formations that are composed either of pyroclastic volcanic or meta sedimentary rocks, but which nevertheless have a limited probability of producing fossil remains from certain sedimentary lithologies at localized outcrops.

The Project Area is underlain by fill associated with the development of individual parcels, alluvium and slope wash, terrace deposits, Lindavista Formation, Stadium Conglomerate, Friars Formation, and the Santiago Peak Volcanics. Imported fill used for development sites is required to be screened for paleontological resources prior to the use for development, therefore, there is no paleontological resource sensitivity associated with this fill material. Alluvium and slope wash are not consolidated, and do not contain important paleontological resources. Table 4.9-1 identifies the paleontological resource sensitivity of the geologic formations discussed above.

TABLE 4.9-1
Paleontological Resource Sensitivity

Geologic Formation	Marginal Sensitivity	Moderate Sensitivity	High Sensitivity
Terrace Deposits		X	
Lindavista Formation		X	
Stadium Conglomerate		X	
Friars Formation			X
Santiago Peak Volcanics	X		

Source: Deméré, Thomas and Walsh, Stephen, 1993.

There are two types of terrace deposits, river and marine. Marine terrace deposits have a high paleontological sensitivity; whereas river terrace deposits have a moderate sensitivity. Since the San Diego

River is located within, and adjacent to the Redevelopment Project Area, river terrace deposits underlain portions of the Redevelopment Project Area. River terrace deposits include coarse-grained, gravelly sandstones, pebble and cobble conglomerates, and claystone.

Santiago peak volcanic areas contain either metasedimentary rocks or metavolcanic rocks and the paleontological sensitivity of Santiago Peak Volcanics varies depending on which type of rock is contained in the formation. The metavolcanic portion makes up a bulk of this formation in San Diego County. A portion of the Redevelopment Project Area is underlain with the metavolcanic portion of the Santiago Peak Volcanics, and is considered to be of marginal sensitivity.

4.9.2 Impact Threshold

For purposes of this EIR a significant impact will occur if the proposed project would:

- *Directly or indirectly destroy a unique paleontological resource or site, or unique geologic feature.*

Because paleontological resources are largely a buried resource, there is no way to accurately predict what fossils are present within a site or their individual significance to the scientific community before they are discovered. For the purposes of this EIR, impacts to paleontological resources are considered significant if future redevelopment activities involve grading in areas underlain by geologic formations that exhibit a moderate to high paleontological resource potential.

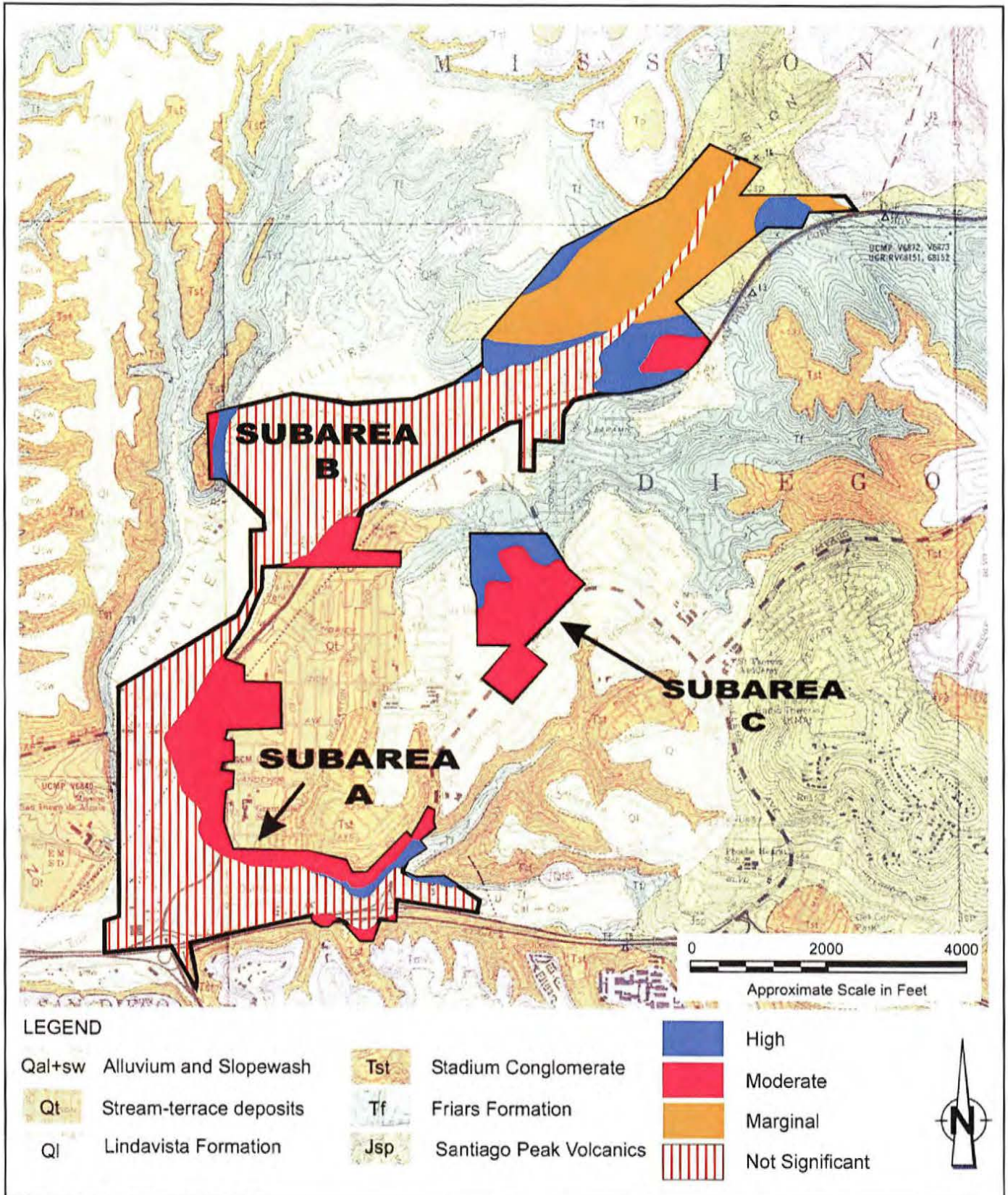
4.9.3 Impact

Paleontological resources are typically impacted when earthwork activities such as mass excavation projects cut into geological deposits (formations) within which fossils are buried. These impacts are in the form of physical destruction of fossil remains. Since fossils are the remains of prehistoric animal and plant life, they are considered to be non-renewable. Such impacts are significant, and under CEQA Guidelines, require mitigation.

As identified in Table 4.9-1, the Friars Formation has a high potential for producing significant paleontological resources; the Terrace Deposits, Lindavista Formation and Stadium Conglomerate have a moderate potential for producing significant paleontological resources; and the Santiago Peak Volcanics have a marginal potential for producing significant paleontological resources.

As shown in Figure 4.9-1, the majority of the Redevelopment Project Area does not have a significant potential to yield paleontological resources. However, the eastern portion of Subarea A has a moderate and high paleontological resource sensitivity, several portions of Subarea B have moderate and high paleontological resource sensitivity, and Subarea C has a moderate and high paleontological resource sensitivity.

The specific location and nature of future redevelopment projects ~~is~~are currently unknown. However, it is anticipated that redevelopment activities will involve grading and earthwork with excavations into these formations. Any future earthwork involving disturbance to the Terrace Deposits, Lindavista Formation,



SOURCE: Ninyo & Moore, 2004

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Grantville EIR

Paleontological Resources Sensitivity Map

FIGURE
4.9-1

Stadium Conglomerate, and Friars Formation within the Project Area has the potential to impact paleontological resources. This is considered a significant impact. Implementation of Mitigation Measure PR1 will reduce the impact to paleontological resources to a level less than significant. Mitigation Measure PR1 requires monitoring of project site grading, and recovery and proper curation of fossils should significant fossils be encountered during site grading.

4.9.4 Significance of Impact

Future redevelopment activities have the potential to result in the substantial excavation of potential fossil-bearing geologic formations and the impact is considered significant.

4.9.5 Mitigation Measures

The following measures have been developed by the City of San Diego to reduce the project-related Paleontological impact to below a level of significance. These measures encompass a comprehensive program to protect paleontological resources should they be found at a construction site. The mitigation program is consistent with standard programs employed at other sites within the City of San Diego. Implementation of these measures would allow preservation and future scientific study of any important Paleontological resources encountered, thereby reducing the potential impact to below a level of significance. This mitigation measure applies to projects located within the Terrace Deposits, Linda Vista Formation, stadium conglomerate and friars formation only.

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.

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.

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.

(2) 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.

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.

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.

4.9.6 Conclusion

Implementation of Mitigation Measure PR1 will reduce the impact to paleontological resources to a level less than significant.

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4.10 Aesthetics

4.10.1 Existing Conditions

4.10.1.1 *Project Area Aesthetics*

The Project Area is situated in the eastern portion of the City of San Diego, primarily in the Navajo Community Plan area but also includes portions in the Tierrasanta Community and the College Area Community Plan areas. The City of San Diego has adopted Community Plans for each of these areas that provide guidelines related to land use and development. New development needs to be consistent with the appropriate Community Plan guidelines and policies related to aesthetics. The portion of the Project Area located within the College Area Community Plan Area is not an area identified in the Community Plan as an area requiring special consideration for aesthetics.

The Project Area is generally urban in character. The open space areas included within the Project Area include the San Diego River and the surrounding native habitat. Portions of the Project Area have public views to the San Diego River and Mission Trails Regional Park. Neighborhoods within the community planning areas are walkable and residential uses are generally within walking distance to schools or shopping areas. The existing development within the Project Area includes commercial office, industrial-related structures, public and institutional facilities, parks, open space, and vacant land.

The Project Area is located in a valley, generally bounded to the east, west and south by relatively flat developed land and to the north and portions of the east by hillsides and canyons that help to frame the community area and define the pattern of development within the neighborhoods. The San Diego River has historically shaped the overall nature of the area's topography. The river currently traverses Mission Trails Regional Park and Mission Gorge, and runs along Mission Gorge Road in the northern portion of the Project Area, flowing from northeast to southwest. The portion of the river located in the northeast section of the Navajo community has been significantly altered as a result of an ongoing sand and gravel extraction operation. Much of the area in and around the river has already been mined and is currently being used for industrial and contractor storage and operation uses. A mix of retail, industrial and industrial office park uses have been developed along the portion of the river that forms portions of the northern and western boundary of the Project Area.

A. Navajo Community Plan

The Navajo community is characterized by a wide variety of natural features including flat mesas, steep canyons, and rolling hills. The most prominent feature in the Project Area is the San Diego River and Mission Trails Regional Park. Elevations within the community range from a low of around 100 feet above sea level at the westerly edge of Mission Gorge to 1,591 feet at the peak of Cowles Mountain, the highest point in the City of San Diego. Several streets and other public areas offer framed public views of panoramic aesthetic features such as the open space areas to the north of the community or to Lake Murray and its surrounding native habitats.

The Navajo Community contains a diverse land use development pattern with a majority of the area maintaining low to medium residential densities, while the commercial and industrial uses are focused along the main traffic corridors of Mission Gorge Road and Navajo Road.

The Navajo Community Plan's goals and recommendations, which directly apply to the aesthetics of the Project Area, include the following:

- Grading and landscaping standards should be improved. Hillside cuts, in particular, must be better controlled to preserve the natural topography;
- Enhance and maintain the aesthetic qualities of the San Diego River corridor as part of the open space system;
- 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 150 feet from the river to avoid glare and shading impacts to the habitat;
- Continue the ongoing efforts to revitalize the commercial areas along Mission Gorge Road, establish one or more Business Improvement District;
- 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;
- 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;
- The removal of off-premise signs and the consolidation of multiple on-premise signs should be pursued during project reviews in an effort to reduce sign clutter and enhance the visual appearance of Mission Gorge Road;
- 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; and,
- Development along Mission Gorge Road shall comply with the regulations included in the Community Plan Implementation Overlay Zone (CPIOZ).

B. Tierrasanta Community Plan

The Tierrasanta Community is generally a low density residential community. The presence of commercial areas are designated only where necessary to support the residential community, and the presence of industrial activity is limited to a small, isolated site. The plan seeks to capitalize on the open spaces of the cayonlands interspersed throughout the community as well as the expansive open space resource of the

nearby Mission Trails Regional Park. The San Diego River runs along the majority of the Tierrasanta Community Plan's southern planning boundary and is primarily considered in two ways: flood control and recreation.

The Tierrasanta Community plan's goals and recommendations, which directly apply to the aesthetics of the Project Area, include the following:

- Future development of areas that abut the Mission Trails Regional Park should be sensitive to it, as proposed within the Urban Design Element of the Tierrasanta Community Plan; and,
- To protect assets of Mission Trails Regional Park from degradation by surrounding development.

4.10.1.2 Light and Glare

The Project Area is urbanized and substantial light and glare is produced by existing development. The Project Area currently consists of commercial, office, industrial development, public institutions, vacant land, and open space. Existing levels of light and glare are that of an urban, developed community and neighborhoods with daytime glare from building windows, automobile windshields, and paved surfaces. Nighttime light from billboards, commercial signage, buildings, automobile headlights and parking lot/security lighting also exist throughout the Project Area.

4.10.2 Impact Threshold

For the purposes of this EIR, the proposed project will have a significant aesthetic impact if it will:

- *Block a view through a designated view corridor as shown in an adopted community plan, or the General Plan;*
- *Cause a substantial view blockage of a public resource (such as ocean) that is considered significant by the applicable community plan;*
- *Exceed the allowed height or bulk regulations, and this excess causes unnecessary view blockage;*
- *Have a cumulative effect by opening up a new area for development, which will ultimately cause "extensive" view blockage;*
- *Significantly alter natural landform features;*
- *Introduce development that is incompatible with surrounding land uses and community character;*
or
- *Substantially increase light and glare affecting surrounding properties.*

4.10.3 Impact

4.10.3.1 Project Area Aesthetics

Implementation of the proposed Redevelopment Project will result in redevelopment of existing parcels and new development within the Project Area. Future redevelopment activities will need to be consistent

with the applicable Community Plans and the approval process for activities covered by the pertinent Community Plan.

Specific development proposals for the Project Area are unknown; however, any future development activities within the Project Area could potentially impact public views or scenic vistas from public areas, primarily with respect to the San Diego River.

As redevelopment activities proceed within the Project Area, each individual development proposal will need to comply with the development standards of the City of San Diego Land Development Code and the adopted design guidelines of the community or neighborhood in which it is located. Development activities that occur in the Project Area will be reviewed by the City for compliance with the Navajo and Tierrasanta Community Plan goals and objectives regarding aesthetics. Implementation of mitigation measure A1 would reduce the potential impact to a level less than significant.

Implementation of the proposed project is anticipated to result in the replacement of older undesirable development with new development that would be in compliance with the goals, objectives, and recommendations contained in the applicable Community Plans. This is anticipated to protect the existing desirable aesthetics within the Project Area and eliminate the undesirable conditions of the buildings and landscape in the Project Area.

The existing topography of the Project Area is relatively flat. There are no significant natural landforms located within the Project Area, although significant natural landforms are located adjacent to the Project Area including Mission Trails Regional Park. Because future redevelopment will be required to comply with the City's development standards related to landform including design, preservation of public views, and compatibility with surrounding land uses, the project will not significantly alter natural landform features and no significant impact associated with landform will occur.

4.10.3.2 *Light and Glare*

As redevelopment occurs in the Project Area, the potential for light and glare will increase on a localized basis. Additional lighting sources may be introduced into new areas, and redevelopment has the potential to increase the overall affect of nighttime lighting within and adjacent to the Project Area. Additionally, glare from building surfaces would increase if future redevelopment proposals within the Project Area include the construction of buildings with greater reflective surfaces.

Because the Project Area is generally urban, proposed redevelopment activities are not anticipated to result in a significant increase in light and glare in the area. The future redevelopment is required to comply with current City development standards, which address lighting standards and compatibility of lighting with surrounding land uses. The impact associated with an increase in light and glare is considered less than significant.

4.10.4 Significance of Impact

Future redevelopment activities within the Project Area may result in significant aesthetic impacts.

4.10.5 Mitigation Measures

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 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 Trails regional Park should be sensitive to it, as proposed within the Urban Design Element of the Tierrasanta Community Plan.

4.10.6 Conclusion

Implementation of Mitigation Measure A1 will reduce the potential aesthetic impact as a result of future redevelopment activities within the Project Area to a level less than significant.

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4.11 Water Quality/Hydrology

4.11.1 Existing Conditions

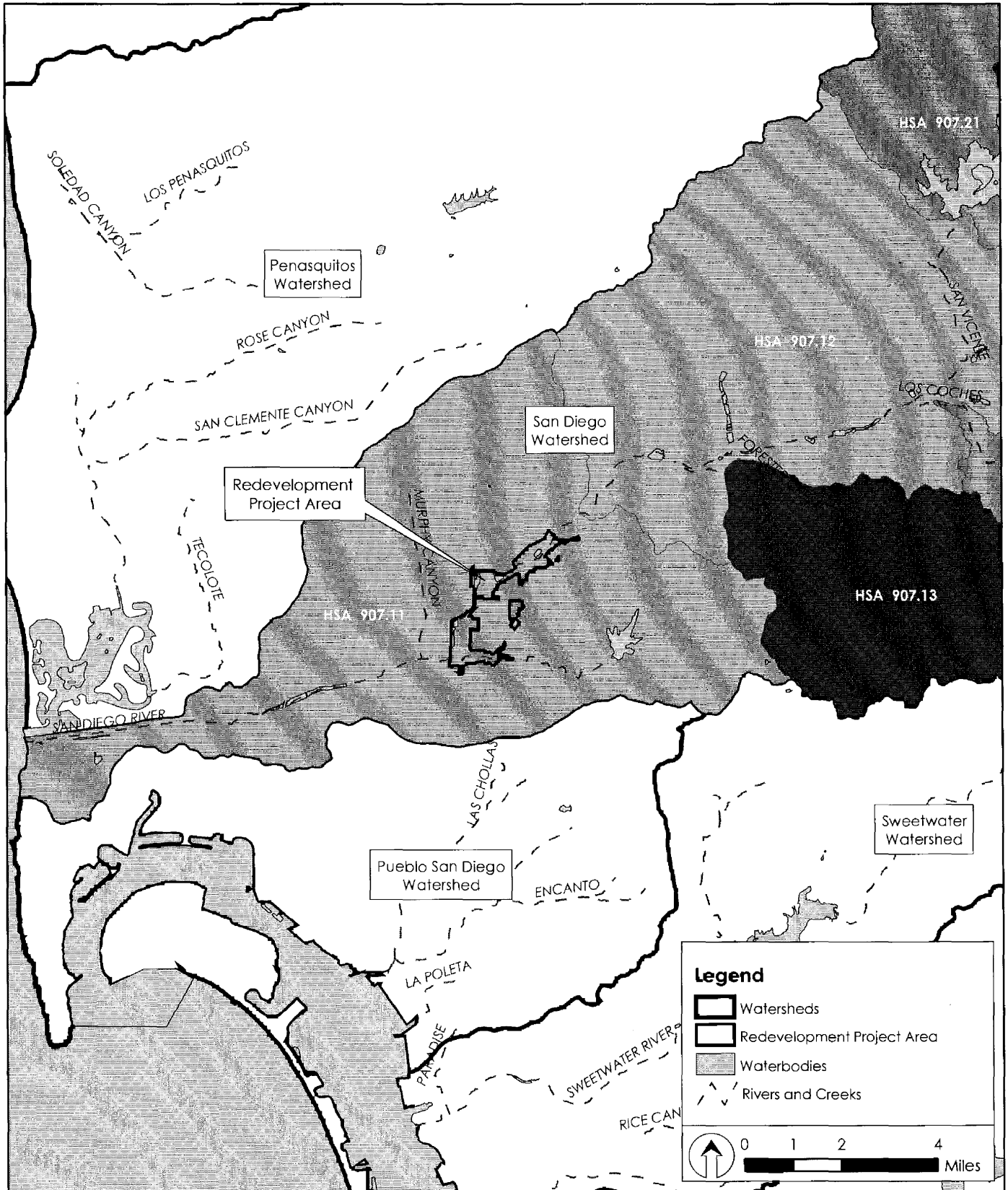
4.11.1.1 *Hydrologic Setting*

The Project Area is located with the San Diego Regional Water Quality Control Board (RWQCB) Basin. The Basin contains 11 major drainage basins which encompass most of San Diego County, parts of southwestern Riverside County and southwestern Orange County. The San Diego Hydrologic Region is over three million acres in size and generally drains westerly toward the Pacific Ocean. The Project Area is located in the Mission San Diego Hydrologic Subarea of the Lower San Diego Hydrologic Area, within the San Diego River Hydrologic Unit (HU). With a land area of approximately 440 square miles, the San Diego River HU is the second largest HU in San Diego County. It also has the highest population (~475,000) of the County's watersheds and contains portions of the cities of San Diego, El Cajon, La Mesa, Poway, and Santee and several unincorporated communities (Figure 4.11-1).

The Project Area generally drains to the west, toward the San Diego River, the primary hydrologic feature within the Project Area. The San Diego River bisects the northwestern portion of Subarea B and generally defines the western boundary of Subareas A and B of the Project Area as it flows from southwest through the western portion of the Navajo Community to Mission Valley. The San Diego River originated 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. Through most of the Project Area, the San Diego River is channelized. Primary tributaries to the San Diego River include Boulder Creek, Cedar Creek, Conejos Creek, Chocolate Creek, Los Coches Creek, San Vicente Creek, and Forester Creek.

Another significant drainage feature of the Project Area is Alvarado Canyon Creek, which begins at the outfall of Lake Murray. Alvarado Canyon Creek generally parallels Interstate 8 as it flows westward to its confluence with the San Diego River. Alvarado Canyon Creek traverses through the southern portion of Subarea A. Navajo Canyon also drains to Alvarado Canyon Creek. Navajo Canyon is southeast of Subarea C. Currently, the majority of Alvarado Canyon Creek is channelized and the confluence with Navajo Canyon is tenuous due to the highway infrastructure and urban development. Alvarado Canyon Creek drains into the San Diego River in the southwestern portion of Subarea A.

Hydrology within the San Diego River Watershed is currently monitored on a continuous basis through the long-term flow monitoring stations maintained by the United States Geologic Service (USGS), the ALERT system operated by the County Department of Public Works, and a group of other hydrologic and meteorological monitoring stations administered by various local and federal agencies (Baseline Assessment, San Diego River Watershed Management Plan, August 2004). Approximately 85 percent of the total surface water flow occurs from December to May, in response to winter storms that originate in the



SOURCE: SANDAG, SanGIS and BRG Consulting, Inc., 2004

10/20/04

	<p>Grantville EIR</p> <p>San Diego River Watershed and Hydrological Sub-Areas</p>	<p>FIGURE 4.11-1</p>
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Pacific Northwest. Annual rainfall within the San Diego River HU ranges from about 10 inches (25 cm) at the coast to approximately 40 inches (102 cm) in the Cuyamaca Mountains.

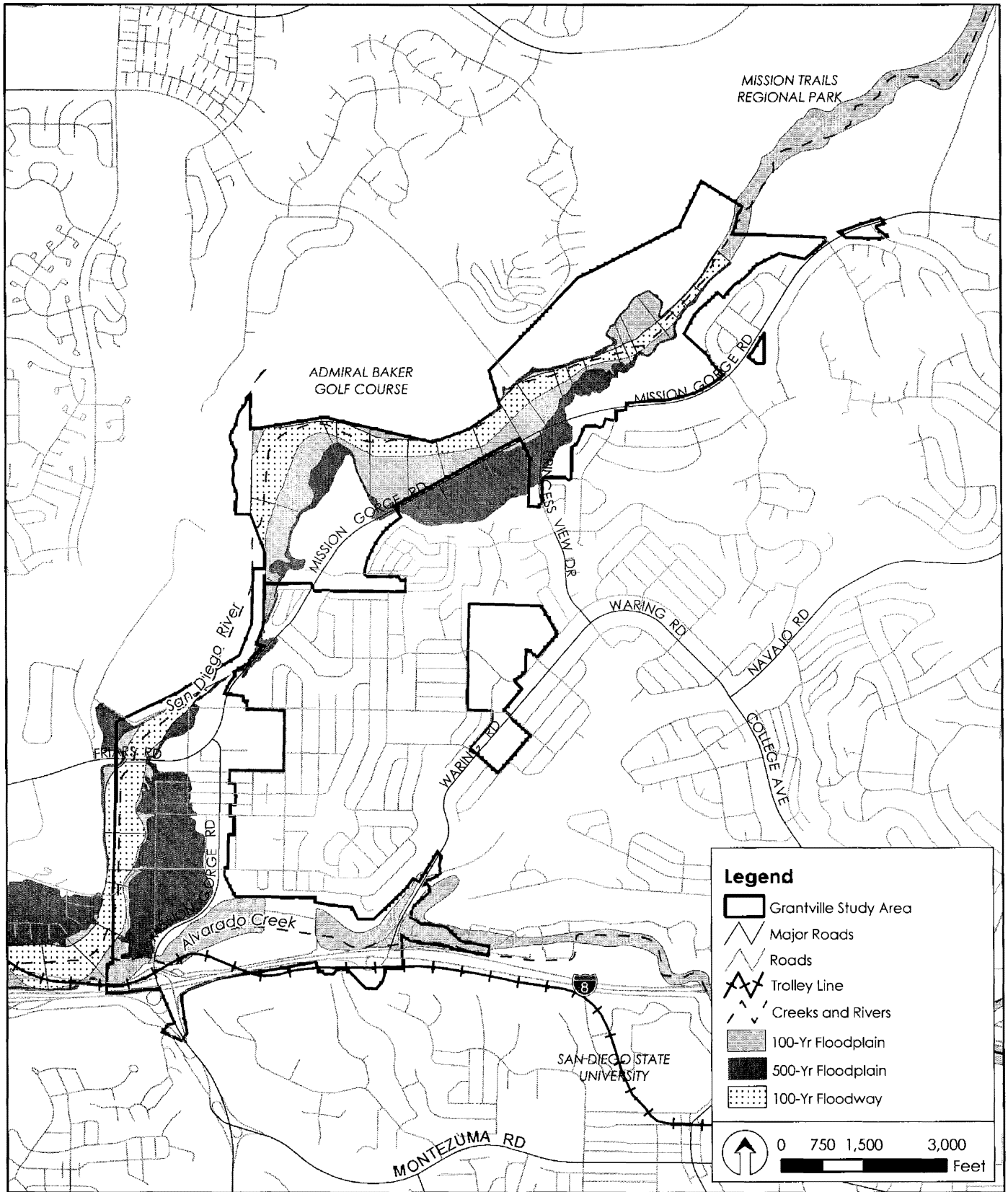
4.11.1.2 *Flooding*

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. Portions of the western side of Subarea A are within the 100-year floodplain and floodway of the San Diego River. The northwestern and northern portions of Subarea B are within the 100-year floodplain and floodway of the San Diego River.

The primary flood control measures serving the SDRW include El Capitan Reservoir, San Vicente Reservoir, and the channelized sections of the San Diego River at the estuary, Mission Valley, and Lakeside. The reservoirs have historically functioned effectively in reducing peak flood flows along the lower San Diego River. For example, during the 1980 flood, El Capitan Reservoir absorbed the entire peak flow, while San Vicente Reservoir reduced the peak flow by approximately 50 percent. However, the existing levels of protection afforded by the flood control channel sections may be inadequate in the intensively urbanized Mission Valley area under a 100-year flood. The flood-carrying capacity of the channel at this section may become even less adequate under burned conditions after wildfires such as the 2003 Cedar Fire (Baseline Assessment, San Diego River Watershed Management Plan, August 2004).

The Baseline Assessment, San Diego River Watershed Management Plan, provides the following recommendations to improve short-term flood protection:

- Restore, improve, and maintain drainage system capacities through vegetation clearing and sediment removal;
- Improve flood early warning systems;
- Install, restore, improve, and maintain erosion control and water retention structures, particularly in areas determined to be at high risk of flooding;
- Provide public information (e.g., signage and mailings) on flood hazards, particularly in areas determined to be at high risk to flooding; and
- Adopt guidelines to encourage the "daylighting" of underground culverts as well as the removal of concrete/riprap channel lining as appropriate to improve water quality while maintaining and/or improving the existing level of flood protection.



SOURCE: SanGIS and BRG Consulting, Inc., 2005

3/10/05



Grantville EIR
Floodplain Map

FIGURE
4.11-2

4.11.1.3 Existing Water Quality

A. San Diego Regional Water Quality Control Board Basin Plan

Each of the nine regional boards in California is required to adopt a Basin Plan. Basin Plans designate the beneficial uses for all surface and groundwaters in the San Diego Region.

B. Beneficial Uses

Beneficial uses of groundwater and surface water have been established for each water body within the San Diego Basin. According to the RWQCB Basin Plan:

Beneficial uses are defined as the uses of water necessary for the survival or well being of man, plants and wildlife. The uses of water serve to promote the tangible and intangible economic, social and environmental goals of mankind.

Examples include the drinking, swimming, industrial, and agricultural water supply, and the support of fresh and saline aquatic habitats. According to the Basin Plan, beneficial uses have been designated for specific coastal water bodies, inland surface waters, and groundwater.

In 1972, the State Water Quality Control Board (SWQCB) adopted a uniform list and description of beneficial uses to be applied throughout all hydrological basins of the State. Water bodies that have beneficial uses that may be affected by activity in the Project Area are the San Diego River and Alvarado Canyon Creek. Designated beneficial uses for the San Diego River and Alvarado Canyon Creek, include:

- Agricultural supply (AGR);
- Industrial service supply (IND);
- Contact and non-contact water recreation (REC1 and REC2);
- Warm freshwater habitat (WARM);
- Cold freshwater habitat (COLD);
- Wildlife habitat (WILD); and
- Rare, threatened, or endangered species (RARE).

Alvarado Canyon Creek is not assigned the beneficial use of RARE. Designated beneficial uses for the mouth of the San Diego River include REC1, REC2, commercial and sport fishing (COMM), estuarine habitat (EST), WILD, RARE, marine habitat (MAR), and migration of aquatic organisms (MIGR).

The following are definitions of the applicable beneficial uses.

Agricultural Supply (AGR) – Includes uses of water for farming, horticulture, or ranching including, but not limited to, irrigation, stock watering, or support of vegetation for range grazing.

Industrial Service Supply (IND) – Includes uses of water for industrial activities that do not depend primarily on water quality including, but not limited to, mining, cooling water supply, hydraulic conveyance, gravel washing, fire protection, or oil well re-pressurization.

Industrial Process Supply (PROC) – Includes uses of water for industrial activities that depend primarily on water quality.

Municipal and Domestic Supply (MUN) – Includes uses of water for community, military, or individual water supply systems including, but not limited to, drinking water supply.

Contact Water Recreation (REC 1) – Includes uses of water for recreational activities involving body contact with water, where ingestion of water is reasonably possible. These uses include, but are not limited to, swimming, wading, water-skiing, skin and SCUBA diving, surfing, white water activities, fishing, or use of natural springs.

Non-contact Water Recreation (REC 2) – Includes the uses of water for recreational activities involving proximity to water, but not normally involving body contact with water, where ingestion of water is reasonably possible. These uses include, but are not limited to, picnicking, sunbathing, hiking, beachcombing, camping, boating, tidepool and marine life study, hunting, sightseeing, or aesthetic enjoyment in conjunction with the above activities.

Warm Freshwater Habitat (WARM) – Includes uses of water that support warm water ecosystems including, but not limited to, preservation or enhancement of aquatic habitats, vegetation, wildlife (e.g., mammals, birds, reptiles, amphibians, invertebrates), or wildlife water and food sources.

Wildlife Habitat (WILD) – Includes uses of water that support terrestrial ecosystems including, but not limited to, preservation and enhancement of terrestrial habitats, vegetation, wildlife (e.g., mammals, birds, reptiles, amphibians, invertebrates), or wildlife water and food sources.

Commercial and Sport Fishing (COMM) – Includes the uses of water for commercial or recreational collection of fish, shellfish, or other organisms including, but not limited to, uses involving organisms intended for human consumption or bait purposes.

Estuarine Habitat (EST) – Includes uses of water that support estuarine ecosystems including, but not limited to, preservation or enhancement of estuarine habitats, vegetation, fish, shellfish, or wildlife (e.g., estuarine mammals, waterfowl, shorebirds).

Rare, Threatened, or Endangered Species (RARE) – Includes uses of water that support habitats necessary, at least in part, for the survival and successful maintenance of plant or animal species established under state or federal law as rare, threatened or endangered.

Marine Habitat (MAR) – Includes uses of water that support marine ecosystems including, but not limited to, preservation or enhancement of marine habitats, vegetation such as kelp, fish, shellfish, or wildlife (e.g., marine mammals, shorebirds).

Migration of Aquatic Organisms (MIGR) – Includes uses of water that support habitats necessary for migration, acclimatization between fresh and salt water, or other temporary activities by aquatic organisms, such as anadromous fish.

Cold Freshwater Habitat (COLD) – Includes uses of water that support cold water ecosystems including, but not limited to, preservation or enhancement of aquatic habitats, vegetation, fish or wildlife, including invertebrates.

C. Water Quality Objectives

Like the designation of beneficial uses, the designation of water quality objectives must satisfy all of the applicable requirements of the California Water Code, Division 7 (Porter-Cologne Act) and the Clean Water Act. California Water Code, Section 13241 provides that each Regional Water Quality Control Board shall establish water quality objectives for the waters of the state (i.e., ground and surface waters) which, in the Regional Board's judgment, are necessary for the reasonable protection of beneficial uses and for the prevention of nuisance. The Clean Water Act Section 303 requires that the State adopt water quality objectives (called water quality criteria) for surface waters. The Water Quality Control Plan for the San Diego Basin identifies a wide range of water quality objectives.

D. 303(d) List of Impaired Water Bodies

The RWQCBs identify water quality objectives in order to protect the designated beneficial uses of the water bodies. Section 303(d) of the federal Clean Water Act (CWA, 33 USC 1250, *et seq.*, at 1313(d)), requires States to identify waters that do not meet water quality standards after applying certain required technology-based effluent limits. Waters that do not meet the water quality standards are referred to as "impaired" water bodies. States are required to compile this information in a list and submit the list to the United States Environmental Protection Agency (USEPA) for review and approval. This list is known as the Section 303(d) list of impaired waters. As part of the listing process, states are required to prioritize water/watersheds for future development of total maximum daily load (TMDL). The TMDL establishes the allowable pollutant loadings or other quantifiable parameters for a water body and provides the basis for the State to establish water quality based controls. The purpose of TMDLs is to ensure that beneficial uses of the water body are restored and that the water quality objectives are achieved.

On July 25, 2003 USEPA gave final approval to California's 2002 Section 303(d) List of Water Quality Limited Segments. The lower portion of the San Diego River (12 miles) is currently identified on the Section 303(d) list for fecal coliform (6 miles), low dissolved oxygen, phosphorus, and total dissolved solids. The RWQCB has determined that developing TMDLs for these contaminants is a lower priority for this watershed than in other watersheds.

E. City of San Diego Draft River Park Master Plan

Origins of the River Park Master Plan date back to 1975 and Kevin Lynch's *Temporary Paradise, A look at the Special Landscape of the San Diego Region*. More recently, The San Diego River Park Foundation was formed in 2001 to coordinate the efforts of the many community groups and other organizations dedicated to the San Diego River, and to working towards developing the River Park Master Plan. The next step was to develop the San Diego River Park Conceptual Plan, which outlines the broad goals and objectives for the San Diego River Park. The six organizations with the most involvement in the Plan are: San Diego River Park Foundation, San Diego River Coalition, San Diego River Park Alliance, San Diego River Conservancy, Select Committee on Parks and River Restoration, and the San Diego Watershed Workgroup.

Over the last fifty years, commercial, residential and industrial uses have expanded around the San Diego River. Mining operations and urban development have changed the character and physical course of the San Diego River. The Draft San Diego River Master Plan seeks to change this condition and enhance the relationship between the river and nearby land uses.

The Plan identifies the following seven principles as the vision and guiding ideas for future design and implementation of the Plan.

- Reclaim the valley as a Common
- Reorient development toward the river
- Improve hydrologic function
- Unify fragmented lands
- Emphasize a continuum of experience
- Reveal the valley history
- Balance people, water and wildlife

The following recommendations from the Plan are specific to hydrology and water quality.

- Augment flows to the river
- Remove/circumvent obstacles that impede flow
- Remove invasive vegetation species
- Encourage the growth of appropriate riparian vegetation
- Re-contour the channel to encourage meander and braiding
- Expand the floodplain
- Adopt programs to reduce/remove non-point source loads of pollutants

The Plan identifies segments of the San Diego River (i.e., Plateau, the Gorge, Upper Mission Valley, the Confluence, Lower Mission Valley, and the Estuary). The San Diego River traverses the two community planning areas (Navajo and Tierrasanta) that are included in the Project Area. In terms of the Plan, the segments of the San Diego River that fall within the Project Area are the Upper Mission Valley and the Confluence.

The Upper Mission Valley segment extends from the Friars Road Bridge to the west boundary of Mission Trails Regional Park. The Upper Mission Valley is characterized by three hydrologic conditions: 1) the gravel extraction mine bordering Mission Trails Regional Park has channelized the river and disrupted habitat continuity through and across the mine site; 2) the river corridor through the mine site is infested with exotic plant species; and, 3) the river channel is interrupted by a series of ponds that obstruct the natural

sediment transport processes of the stream. The Plan provides the following recommendations for the Upper Mission Valley:

- Establish a 500-foot minimum open space corridor through the Superior Mine redevelopment area.
- Acquire land for park and open space.
- Improve interface between Admiral Baker Golf Course and the river.
- Explore opportunities to improve water quality and river pattern.
- Create sites at waystations to interpret the history of the valley settlement and the Old Mission Dam flume.

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 Alcalá. 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.

F. Baseline Assessment, San Diego River Watershed Management Plan

The lower San Diego River Watershed, which encompasses the Project Area has generally poor surface water quality. Typical contaminants include elevated levels of biological indicators, total dissolved solids, pH, pesticides, metals, petroleum, and trash. These contaminants are often the result of:

- Increased impervious surfaces causing increased runoff and pollutant loading and poor natural pollutant assimilation.
- Alteration of river morphology and natural pollutant assimilation and buffering zones.
- Increased input of nutrients and pesticides from landscaped areas.
- Increased input of trash and other floatables.
- Local groundwater contamination from spills and leaks of hazardous materials.
- Accidental discharges of raw sewage.

- Increased erosion and siltation as a result of construction and other activities/practices.
- Increased TDS as a result of poor irrigation practices and imported water use.
- Stream modifications by aggregate mining with associated adverse changes in hydrology and habitat loss.

As contained in this Management Plan, the RWQCB recommended management measures include the following:

- Increased oversight of section 401 Water Quality applications by the RWQCB to minimize hydromodification of the streams that lead to decreased water quality and the loss of beneficial uses.
- Removal of existing hydromodifications where feasible.
- The RWQCB should encourage continued improved compliance with all stormwater permits.
- Development of alternative site use design and construction techniques.
- Increase the number of stationary, permanent monitoring stations in the San Diego Management Area.
- Pursue acquisition of technology that provides real-time data collection.

G. Ground Water Quality

Soils along the San Diego River are porous, and surface water moves freely between ground and surface water. As a result, the water surface of standing water within the San Diego River channel represents the groundwater table. The largest aquifer near the Project Area is in Mission Valley. The Mission Valley aquifer covers approximately 11 square miles along the San Diego River and storage capacity is estimated at 40,000 acre feet of water. Within the San Diego River Watershed, groundwater quality is good. Due to the porous nature of the aquifer, recharge through streamflow infiltration is rapid, and significant interchange between surface flows and groundwater flow occurs. Designated beneficial uses for ground waters within the SDRW include MUN, AGR, IND, and PROC. Within the Lower San Diego HA, groundwater beneficial uses do not apply west of the easterly boundary of the I-5 right-of-way.

4.11.1.4 Water Quality Regulations

A. City of San Diego Municipal Code

Within the City of San Diego, existing land uses, new development, and redevelopment are required to comply with the City of San Diego Municipal Code. Related to hydrology and water quality, the following codes are applicable:

Chapter 4, Article 3, Division 3 – Stormwater Management and Discharge Control. The purposes of this Division are to further ensure the health, safety and general welfare of the citizens of the City of San Diego by controlling Non-Storm Water Discharges to the Storm Water Conveyance System by

eliminating discharges to the Storm Water Conveyance System from spills, dumping, or disposal of materials other than Storm Water and by reducing Pollutants in urban Storm Water discharges to the maximum extent practicable.

Chapter 14, Article 2, Division 1 – Grading Regulations. The purpose of these regulations is to address slope stability, protection of property, erosion control, water quality, and landform preservation and to protect the public health, safety, and welfare of persons, property, and the environment.

Chapter 14, Article 2, Division 2 – Storm Water Runoff and Drainage Regulations. The purpose of this division is to regulate the development of, and impacts to, drainage facilities, to limit water quality impacts from development, to minimize hazards due to flooding while minimizing the need for construction of flood control facilities, to minimize the impacts to environmentally sensitive lands, to implement the provisions of federal and state regulations, and to protect the public health, safety, and welfare.

Chapter 14, Article 2, Division 4 – Landscape Regulations. The purpose of these regulations is to minimize the erosion of slopes and disturbed lands through revegetation; to conserve energy by the provision of shade trees over streets, sidewalks, parking areas, and other paving; to conserve water through low-water-using plantings and irrigation design; to reduce the risk of fire through site design and the management of flammable vegetation; and to improve the appearance of the built environment by increasing the quality and quantity of landscaping visible from public rights-of-way, private streets, and adjacent properties, with emphasis on landscaping as viewed from public rights-of-way.

Chapter 14, Article 3, Division 1 – Environmentally Sensitive Lands Regulations. The purpose of these regulations is to protect, preserve and, where damaged, restore the environmentally sensitive lands of San Diego and the viability of the species supported by those lands. These regulations are intended to assure that development, including, but not limited to coastal development in the Coastal Overlay Zone, occurs in a manner that protects the overall quality of the resources and the natural and topographic character of the area, encourages a sensitive form of development, retains biodiversity and interconnected habitats, maximizes physical and visual public access to and along the shoreline, and reduces hazards due to flooding in specific areas while minimizing the need for construction of flood control facilities.

B. Regulation/Legal Basis for Authority

The principal federal and state laws pertaining to the regulation of water quality are known respectively, as the 1972 Federal Water Pollution Control Act (also known as the Clean Water Act and Division 7 of the 1969 California Water Code (also known as the Porter-Cologne Water Quality Control Act). The laws are similar in many ways. The fundamental purpose of both laws is to protect the beneficial uses of water. An important distinction between the two is that the Porter-Cologne Water Quality Control addresses both ground and surface waters while the Clean Water Act addresses surface water only. The San Diego Regional Water Quality Control Board (RWQCB) has developed policies, rules, and procedures, and has been granted the authority to implement and enforce the laws and regulations requiring the control of water quality.

The Clean Water Act (CWA) also established the National Pollutant Discharge Elimination System (NPDES), which requires permits for discharges of pollutants from certain point sources into waters of the United States. The CWA allows the EPA to delegate NPDES permitting authority to states with approved environmental regulatory programs. California is one of the delegated states. The NPDES permits relative to this project are the General Construction Stormwater Permit and the regional General Municipal Stormwater Permit.

C. General Municipal Stormwater Permit

The RWQCB has adopted an area-wide Municipal Stormwater Permit, Order No. 2001-01, NPDES No. CAS0108758, "Waste Discharge Requirements for Discharges of Urban Runoff from the Municipal Separate Stormwater Sewer Systems (MS4s) Draining the Watersheds of the County of San Diego, the Incorporated Cities of San Diego County and the San Diego Unified Port District." Under an area-wide Municipal Stormwater Permit, municipalities are ultimately held responsible for everything in their stormwater conveyance systems, including industrial and construction stormwater runoff. Order No. 2001-01 presents guideline requirements for the control of pollutants resulting from stormwater and urban runoff from all areas named in NPDES Permit No. CAS0108758. RWQCB specifically requires Co-permittees to:

Inventory existing stormwater pollution control programs, illicit discharge detection programs, monitoring programs and data, stormwater conveyance system maps, land use maps, and existing laws, ordinances, and codes giving the dischargers the authority to implement and enforce stormwater management programs in their areas of jurisdiction and where necessary, promulgate the authority to carry out all functions of the stormwater management programs.

The municipal stormwater permit requires Co-permittees to utilize planning procedures including a master plan to develop, implement, and enforce controls to reduce the discharge of pollutants from municipal separate storm sewers which receive discharges from areas of new development and significant redevelopment. This new permit addresses controls to reduce pollutants in discharges from municipal separate storm sewers after construction is completed. With respect to land use planning for new development and redevelopment, at a minimum, each Co-permittee shall assess its general plan, modify development project approval processes, revise environmental review processes, and conduct education efforts focused on new development and redevelopment to minimize the short and long-term impacts on receiving water quality.

D. General Construction Stormwater Permit

Pursuant to Section 402(p)(4), EPA promulgated regulations for NPDES permit applications for stormwater discharges. On November 16, 1990, the EPA published final regulations that establish stormwater to waters of the United States from construction projects that encompass one (1) or more acres of soil disturbance are effectively prohibited unless the discharge is in compliance with an NPDES Permit. State Water Resources Control Board (SWRCB) Order No. 99-08, NPDES General Permit No. CAS2000002, "General Permit for Stormwater Discharges Associated with Construction Activity", is the active General stormwater construction activity permit for the State of California and RWQCB.

This permit was modified and reissued on August 19, 1999 based on a court challenge the San Francisco, Santa Monica, San Diego, and Orange Coast BayKeepers groups. The Court issued a judgment and directed the SWRCB to modify the provisions of the General Permit to, among others, require permittees to implement specific sampling and analytical procedures to determine whether Best Management Practices (BMPs) implemented on the construction site are: 1) preventing further impairment by sediment in storm waters discharged directly into waters listed as impaired for sediment or silt; and 2) preventing other pollutants, that are known or should be known by permittees to occur on construction sites and that are not visually detectable in stormwater discharges, from causing or contributing to exceedences for water quality objectives. Based on the Court's direction, the two areas of the permit that were modified were the Stormwater Pollution Prevention Plan (SWPPP) and the Monitoring Program and Reporting Requirements portions of the permit.

Specific conditions of the NPDES permit that may directly affect the planning and design requirements of future redevelopment projects are:

- Development and implementation of stormwater and receiving water-monitoring programs to evaluate discharges of pollutants from stormwater conveyance systems to waters of the United States.
- Development and implementation of an illicit connection/illegal discharge detection program to identify and eliminate non-stormwater discharges to stormwater conveyance systems.
- To maximum extent practicable, develop and implement BMPs to control discharges of pollutants to Waters of the United States.
- Implementation of an annual analysis of the effectiveness of the overall stormwater pollution control management program.

In order to be in compliance with the Permit, all projects involving one acre or more of soil disturbance will require a General Construction Stormwater Permit, which must include the following:

- Notices of Intent (NOIs) – Certification to be signed by owner of the construction site.
- Stormwater Pollution Prevention Plans (SWPPPs). Required elements of SWPPP include: 1) Site description addressing the elements and characteristics specific to the site; 2) Description of BMPs for erosion and sediment controls; 3) BMPs for construction waste handling and disposal; (4) Implementation of approved local plans; (5) Proposed post-construction controls, including description of local post-construction erosion and sediment control requirements; (6) Non-storm water management; (7) 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 8) 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.

- Monitoring Program and Reporting Requirements – Including inspection of prevention measures record keeping and annual certification of compliance, due July 1, 1993, and each July 1st thereafter. Dischargers of stormwater associated with construction activity that directly enters a water body listed on the 303 (d) list of impaired water bodies shall conduct a sampling and analysis program for the pollutants (sedimentation/siltation or turbidity) causing the impairment. Discharges that flow through tributaries that are not listed on the 303(d) list of impaired water bodies or that flow into Municipal Separate Storm Sewer Systems (MS4) are not subject to these sampling and analysis requirements.

Industrial land uses are required to comply with the General Industrial Stormwater Permit. The permit lists the general descriptions of industrial facilities that would need to obtain a permit. The permit also identifies three categories of dischargers that would not need a permit if the facility type meets certain criteria identified in the permit. For example, facilities that fall into "category 10" (light industrial uses) are not subject to the general industrial permit if the facility can meet certain minimum conditions.

Stormwater dischargers associated with industrial activity must comply with Sections 301 and 402 CWA. The U.S. EPA published (November 16, 1990) final regulations that establish application requirements for stormwater permits. The regulation requires that stormwater associated with industrial activity that discharges either directly to surface waters or indirectly through municipal stormwater sewers must be regulated by an NPDES permit. The regulations authorize States to issue general permits or individual permits to regulate stormwater discharges. The SWRCB issued a statewide General Industrial Stormwater permit, Water Quality Order No. 97-03-DWQ, NPDES, General Permit No. CAS000001 "Waste Discharge Requirements for Discharges Associated with Industrial Activities Excluding Construction Activities", on November 19, 1991. The monitoring requirements of the permit were amended September 17, 1992. Generally, the permit requires facility operators to:

- Eliminate unauthorized non-stormwater discharges;
- Develop and implement a stormwater pollution prevention plan (SWPPP); and,
- Perform monitoring of stormwater discharges and authorize non-stormwater discharges.

4.11.2 Impact Threshold

For the purposes of this EIR, a significant impact would occur if the proposed project would:

- *Cause a substantial increase in impervious surfaces and associated increased runoff;*
- *Cause a substantial alteration to on- and off-site drainage patterns due to changes in runoff flow rates or volumes;*
- *Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map;*
- *Place within a 100-year flood hazard area structures which would impede or redirect flood flows.*
- *Conflict with the City of San Diego's Stormwater Standards;*

4.11.3 Impact

4.11.3.1 Hydrology/Drainage

Redevelopment activities will occur over a 20-30 year period, and will be consistent with the land uses allowed in the Navajo and Tierrasanta Community Plans. Redevelopment within the Project Area has the potential to increase the rate or amount of surface runoff. There are many factors that can affect whether development of a project would result in a significant impact to hydrology/drainage including the location of a specific activity, the type of use proposed, and whether or not the proposed uses would result in changes to existing drainage patterns and conditions.

On a broad perspective, redevelopment activities are not expected to significantly alter the existing drainage pattern of the Project Area or surrounding area. This is because most of the Project Area is developed, and projects are not anticipated to require extraordinary amounts of grading or alternation of topography that could affect the hydrologic function of the San Diego River and Alvarado Canyon Creek. The Project Area will drain in essentially the same manner as it currently drains (i.e., east to west via the San Diego River and Alvarado Canyon Creek and then to San Diego Bay). In some cases, redevelopment activities are expected to improve deficient or adverse drainage conditions associated with the San Diego River and Alvarado Canyon Creek, as guided by the San Diego River Park Master Plan and San Diego River Watershed Management Plan.

However, on a more localized basis, there is the potential that specific redevelopment activities may require grading or alteration of the topography that could affect the hydrologic function of the parcel in which the project is located, altering localized drainage patterns and runoff. This issue is considered a significant impact. Mitigation Measure HD1 will reduce this impact to a level less than significant. Mitigation Measure HD1 requires that prior to approval of a specific development plan within the Project Area, 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 to the maximum extent practicable.

4.11.3.2 Flooding

As identified on Figure 4.11-2, portions of Subareas A and B are located within the 100-year floodplain and floodway as identified by the Federal Emergency Management Agency (FEMA) maps. 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. Implementation of Mitigation Measure HD1 will reduce this significant impact to a level less than significant.

As identified in Mitigation Measure HD1, for development projects located within or adjacent to the 100-year floodplain, additional consideration in the hydrology study and site specific drainage plan shall be given to the design of the project so as not to place structures within the 100-year floodplain that may redirect flood flows. In addition, the hydrology and drainage studies shall incorporate the recommendations of the San Diego River Park Master Plan and the San Diego River Watershed Management Plan relative to flooding to the maximum extent practicable.

4.11.3.3 *Water Quality – Short-Term*

The proposed project will result in the redevelopment of existing land uses over a 20 to 30 year period. Redevelopment would be required to comply with current (and/or future) water quality regulations regarding on-site construction related runoff.

Grading requirements of future projects could potentially alter existing drainage patterns, causing erosion or siltation on a particular site or in the area on a short-term basis during construction. This issue is magnified for development projects located near the San Diego River and Alvarado Canyon Creek. As such, 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. Implementation of Mitigation Measure WQ1 will reduce this impact to a level less than significant. Mitigation Measure WQ1 requires that erosion, siltation, and emission of construction related pollutants shall be controlled through compliance 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). 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 discharges into water bodies listed on the 303 (d) list of impaired water bodies; and

- 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
- Storm drain inlet protection
- Stabilized construction entrance/exit
- Vehicle and equipment maintenance, cleaning, and fueling
- Hydroseed, soil binders, or straw mulch

4.11.3.4 *Water Quality – Long Term Impacts*

The majority of existing land uses within the Project Area were developed prior to the current surface and groundwater quality regulations and non-compliance with the current regulations may have contributed to the San Diego River's listing on the 303(d) list of impaired waters.

Future point and non-point source runoff associated with redevelopment activity will be controlled through compliance 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). Redevelopment activity compliance with the NPDES permits and City of San Diego Municipal Code requirements are anticipated to reduce the level of fecal coliform, low dissolved oxygen, phosphorus, and total dissolved solids in the River. In addition, implementation of the recommendations contained in the San Diego River Park Master Plan and San Diego River Watershed Management Plan will serve to reduce the level of pollutants in the San Diego River. Also, per federal, state and local regulations, future development activity will be required to remove/clean-up existing hazards/hazardous materials (e.g., underground storage tanks) prior to development. Removing/cleaning-up hazards/hazardous materials from the Project Area will also reduce the amount of pollutant runoff that enters the San Diego River Watershed.

Over the next 20 to 30 years, future redevelopment activity (including new infrastructure such as roadways) will replace existing land uses that do not comply with water quality control requirements with land uses that should include all water quality measures identified in current and future applicable water quality control programs. However, 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. Implementation of Mitigation Measure WQ2 will reduce this impact to a

level less than significant. Mitigation Measure WQ2 requires all future redevelopment projects to 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 projects should 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 shall include, but are not limited to:

- Infiltrations basins
- Retention/detention basins
- Biofilters
- Structural controls

4.11.4 Significance Of Impact

4.11.4.1 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.

4.11.4.2 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.

4.11.4.3 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.

4.11.4.4 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.

4.11.5 Mitigation Measures

4.11.5.1 Hydrology/Drainage/Flooding

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 the San Diego River Watershed Management Plan relative to hydrology/drainage and flooding to the maximum extent practicable.

4.11.5.2 Water Quality

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,
- 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
- Storm drain inlet protection
- Stabilized construction entrance/exit
- Vehicle and equipment maintenance, cleaning, and fueling
- Hydroseed, soil binders, or straw mulch

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:

- Infiltrations basins
- Retention/detention basins
- Biofilters
- Structural controls

4.11.6 Conclusion

Implementation of Mitigation Measure HD1 will reduce the hydrology/drainage and flooding impacts to a level less than significant. Implementation of Mitigation Measure WQ1 will reduce the short-term water quality impact to a level less than significant. Implementation of Mitigation Measure WQ2 will reduce the long-term water quality impact to a level less than significant.

4.12 Population and Housing

4.12.1 Existing Conditions

4.12.1.1 Population

A. San Diego County

San Diego County had an estimated 1990 population of 2,498,016. The population grew approximately 12.6 percent from 1990 to 2000. Table 4.12-1 depicts the population growth that occurred between 1990 and 2000 throughout San Diego County.

As depicted in Table 4.12-1, the Central Major Statistical Area (MSA), which includes the Grantville Redevelopment Area, had the highest population in the County in 1990 and the second highest population in 2000. However, the Central MSA experienced only a 3.8 percent increase in population between 1990 and 2000. This represents the lowest percent increase in population during the ten-year period among the seven MSAs. According to the San Diego Association of Governments (SANDAG), the current (2004) population in San Diego County is 3,017,204, that is a seven percent population increase between 2000 and 2004.

TABLE 4.12-1
San Diego County 1990 and 2000 Population

Major Statistical Area (MSA)	1990	2000	Numeric Change 1990-2000	Percent Change 1990-2000
Central	595,720	619,133	23,413	3.8
North City	569,992	658,877	88,885	13.5
South Suburban	261,694	307,469	45,775	14.12
East Suburban	429,291	462,663	33,372	7.2
North County West	310,194	364,157	53,963	14.8
North County East	312,477	380,430	65,953	17.3
East County	18,648	21,104	2,456	11.6
Region	2,498,016	2,813,833	315,817	11.2

U.S. Census Bureau. 1990 and 2000.

B. City of San Diego

According to the U.S. Census Bureau, in 1990 the total population for the City of San Diego was 1,110,549. In 2000, the City's population was estimated to be 1,223,400. During the ten-year period, the City's population grew by approximately 112,851 persons, which represents a ten percent increase in total population within the City. According to SANDAG, the current (2004) population in the City is 1,294,032, that is a six percent population increase between 2000 and 2004.

C. Community Plan Areas

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. In 2000, the Navajo Community Plan area had an existing population of approximately 47,335, while the population of the Tierrasanta Community Plan Area was 30,430. According to SANDAG, the 2004 population estimate for the Navajo Community Plan area is 49,260 and the 2004 population estimate for the Tierrasanta Community Plan Area is 31,933. This represents a four percent population increase between 2000 and 2004 in the Navajo Community Plan area and a five percent population increase between 2000 and 2004 in the Tierrasanta Community Plan area.

D. Redevelopment Project Area

Within the Navajo and Tierrasanta Community Plan portions of the Project Area, no population is present because there are no housing units located within the Project Area. The Project Area does not contribute to the total population within the City.

5.12.1.2 Housing

A. San Diego County

San Diego County had an estimated number of housing units of 946,240 in 1990. Between 1990 and 2000 the number of housing units increased by 8.9 percent to an estimated 1,039,149 housing units. Table 4.12-2 depicts the increase in the number of housing units between 1990 and 2000 throughout San Diego County. As depicted in Table 4.12-2, the Central MSA had the second highest number of housing units in both 1990 and 2000; however, the Central MSA experienced an increase of only 2.6 percent between those years. This represents the lowest percent increase in the number of housing units during the ten-year period among the seven MSAs within the region. According to SANDAG, the current (2004) housing estimate is 1,045,812 housing units, which is a five percent increase in the number of housing from 2000 to 2004.

TABLE 4.12-2
San Diego County 1990 and 2000 Housing Units

Major Statistical Area (MSA)	1990	2000	Numeric Change 1990-2000	Percent Change 1990-2000
Central	219,389	225,305	5,916	2.6
North City	234,167	269,099	34,932	13.0
South Suburban	86,251	97,098	10,847	11.2
East Suburban	160,533	170,370	9,837	5.8
North County West	116,942	134,488	17,546	13.0
North County East	118,951	131,101	12,150	9.3
East County	10,007	11,688	1,681	14.4
Total	946,240	1,039,149	92,909	8.9

Source: SANDAG, Info, San Diego Region Population and Housing Estimates, January 1, 2000.

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.

4.13 Public Services and Utilities

4.13.1 Schools

4.13.1.1 Existing Conditions

The San Diego Unified School District (SDUSD) provides public educational facilities to the Project Area. Schools serving the Project Area and surrounding community consist of one high school, one middle school, and three elementary schools. Table 4.13-1 depicts the current enrollment, capacity, and enrollment trend at each of the five schools. The enrollment level of the five schools is currently below their current enrollment capacity. Currently, there are no residential dwelling units located within the Project Area and no school services are being used by the Project Area.

TABLE 4.13-1
Current School Enrollment and Capacity

School	Current Enrollment	Current Capacity	Future Enrollment (trend)
Foster (K-5)	518	575	Falling
Marvin (K-5)	383	471	Falling
Dailard (K-5)	516	529	Stable/slight drop
Lewis (6-8)	1153	1200	Stable/rising
Henry (9-12)	2477	2506	Stable/rising

Source: San Diego Unified School District, 2004.

4.13.1.2 Impact Threshold

For the purposes of this EIR, a significant impact would occur if the proposed project:

- Generates more students than the SDUSD Schools identified above could accommodate, necessitating the development of new schools, or physically altered facilities, the construction of which may cause significant environmental impacts.

4.13.1.3 Impact

The proposed project is the adoption and implementation of a Redevelopment Plan. At this time there is no specific development proposed. Implementation of the Redevelopment Plan will involve development of projects throughout the Project Area over the life of the Redevelopment Plan (20 to 30 years). Consistent with the Community Plan land use designations, most redevelopment in the Project Area is anticipated to be commercial, and industrial. The Community Plan does allow a small amount of single family (48 dwelling units) and multi-family (86 dwelling units) residential development within the Project Area; however, the existing uses of these parcels would have to be redeveloped with residential in order for this to occur. Table 4.13-2 estimates the number of students that would be generated by redevelopment consistent with the Community Plan land uses, (134 dwelling units). Based on student generation factors, 65 school aged children would be generated. As indicated in Table 4.13-1, the five existing schools serving the Project Area have additional enrollment capacity for 158 elementary, 47 middle school and 29 high school students. Based on the current and future enrollment capacity of the existing schools and given

that only 65 school aged children would be generated once all of the dwelling units are developed, approval of the Redevelopment Plan and redevelopment of the existing parcels currently designated for residential uses would not generate enough students to necessitate the development of new schools or the physical alteration of existing schools that could result in significant environmental impacts. The additional students generated could be accommodated by existing school facilities. This issue is not considered significant.

TABLE 4.13-2
Educational Facilities Demand

Residential Dwelling Unit Type	Number of New Units	Student Generation Factor	Students Generated by the Project
Single Family	48	0.78	37
Multi-Family	86	0.32	28
Total			65

Source: San Diego City Schools, 2004.

4.13.1.4 *Significance of Impact*

No impact associated with schools is anticipated.

4.13.1.5 *Mitigation Measures*

No mitigation measure is proposed, as no significant schools impact has been identified.

4.13.1.6 *Conclusion*

No significant schools impact is anticipated.

4.13.2 *Gas and Electric*

4.13.2.1 *Existing Conditions*

San Diego Gas and Electric Company (SDG&E) provides gas and electricity service to the Project Area. Energy that is provided throughout California, including to the Project Area is generated by numerous power plants that are located within and outside the State. Electricity and natural gas is supplied via the electric grid and transmission lines. Table 4.13-3 identifies monthly instantaneous peak demand for electricity in the State between 2000 and 2003, based on various assumptions of weather conditions and economic and demographic growth in a California Independent System Operator (CAISO) Control Area, which comprises the bulk of California's transmission system. The State of California has experienced energy shortages during the past years, with peak demand approaching or reaching daily load supply. During a power outage, rolling, or rotating blackouts may be ordered that affect entire grids.

To promote the safe and reliable maintenance and operation of utility facilities, the California Public Utilities Commission (CPUC) has mandated specific clearance requirements between utility facilities and surrounding objects or construction activities.

TABLE 4.13-3
Historical Monthly Instantaneous Peak Demand (MW)
CAISO Control Area

Year	Jan.	Feb.	March	April	May	June	July	Aug.	Sept.	Oct.	Nov.	Dec.
2000	32,744	32,394	32,552	33,911	39,808	43,630	45,245	45,2494	43,740	35,712	33,338	34,115
2001	32,623	30,683	29,778	31,770	37,808	39,762	41,192	41,419	37,993	38,805	32,138	33,347
2002	33,488	31,854	31,033	31,460	38,165	38,750	42,441	40,803	41,358	35,269	31,770	32,307
2003	30,549	29,872	31,194	31,583	39,577	40,187	42,689	42,560	41,467	36,522	31,659	33,140

Source: CAISO, 2004 Summer Assessment, California Independent Operating System, April 16, 2004.

A 69 kilovolt (kV) Substation serves the Project Area. Electricity is distributed from this substation throughout the Project Area via overhead and underground distribution lines. According to SDG&E, existing services are adequate to meet the existing needs of the Project Area.

Natural gas is distributed throughout the Project Area via underground lines, typically located within public right-of-ways, functioning as a backbone system to service individual parcels. According to SDG&E, the system is considered adequate to meet the existing needs of the Project Area.

4.13.2.2 *Impact Threshold*

For the purposes of this EIR, a significant impact would occur if the proposed project would:

- Result in substantial adverse physical impacts associated with the provision of new or physically altered transmission facilities, the need for new or physically altered transmission facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable levels of service;
- Result in a substantial increase in demand upon existing sources of energy; or,
- Require the development of new energy sources.

4.13.2.3 *Impact*

Table 4.13-4 depicts the seasonal instantaneous peak load forecast for years 2004 through 2008 for the CAISO control area. The table shows that in 2008, seasonal peak electrical loads are anticipated to range from a low of 35,000 megawatts (MW) in late winter to a high of 47,978 MW in the summer.

Redevelopment consistent with the Community Plan land uses is anticipated to result in an increase in development intensity that may increase energy usage within the Project Area. The level of increase is dependent on the type of uses that are being replaced, their intensity of development, and whether or not those uses are replaced with modern, state of the art building materials and energy efficient heating and cooling systems. As energy conservation technology becomes more cost efficient and other incentives, such as expedited permit review is offered by local jurisdictions, developers are more likely to design and develop energy efficient projects. The City of San Diego has adopted a Sustainable Building Policy (900-14)

TABLE 4.13-4
Seasonal Instantaneous Peak Electrical Load Forecast (MW)
ISO Control Area Capacity Forecast, 2004 – 2008

	Summer 2004	Winter 2004-2005	Summer 2005	Winter 2005-2006	Summer 2006	Winter 2006- 2007	Summer 2007	Winter 2007- 2008	Summer 2008	Winter 2008- 2009
Forecasted Peak Demand	44,380	33,179	45,253	33,906	46,144	34,649	47,052	35,408	47,978	36,184

Source: CAISO, Five Year Assessment (2004-2008), California Independent Operating System, October 10, 2003.

that provides an expedited ministerial and discretionary permitting process for private development projects that meet certain criteria associated with the U.S. Green Building Council, Leadership in Energy and Environmental Design (LEED). Future redevelopment projects are likely to design their commercial and industrial (which constitute the majority of redevelopment) projects according to LEED criteria in order to qualify for expedited ministerial and discretionary permit approval. Commercial and industrial redevelopment projects would need to design their project to provide 30% of its projected total energy use utilizing renewable energy resources (e.g., photovoltaic, wind and fuel cells), City of San Diego Council Policy, 900-14, May 20, 2003. Projected usage of electricity and natural gas usage based on redevelopment of the Project Area consistent with Community Plan land uses is provided in Tables 4.13-5 and 4.13-6, respectively.

Without definition of specific redevelopment projects, it is not possible to anticipate the exact level and location (i.e., which electrical circuits increase in load would occur on) of electrical power usage. As depicted in Table 4.13-5, the net increase in electrical power usage based on redevelopment of the Project Area is 673,814 kilowatt hours per month. As depicted in Table 4.13-6, the net increase in natural gas usage based on redevelopment of the Project Area is estimated to be 686,069.5 cubic feet per month.

According to SDG&E, existing gas and electric infrastructure (i.e., electric and gas distribution and transmission lines, substations, and power plants) located within or adjacent to the Project Area would provide adequate service to proposed redevelopment activities. As such, the project would not result in substantial adverse physical impacts associated with the provision of new or physically altered transmission facilities. Any increases in electrical load would require only routine adjustments to the network of distribution lines, such as adding new lines or upgrading existing distribution lines. These system changes/improvements will occur as redevelopment activities are proposed within the Project Area. The physical impact to the environment would be in the form of short-term noise and air quality, and potentially hydrological/water quality, geotechnical, cultural, biological, and paleontological resources. Implementation of mitigation measures described in other sections of this document with respect to these issues would mitigate the potential impact of these minor improvements to a level less than significant.

TABLE 4.13-5
Projected Monthly Electrical Power Usage

Land Use Type	Usage Factor (kw/h month/ du/ksf)	Increase (du/ksf)	Projected Increase in Electrical Power Usage (kwh/month)
Redevelopment Plan Area			
Single Family Residential	5,700 du	48 du	273,600
Multi-Family Residential	3,940 du	86 du	338,840
Commercial	20 ksf	303 ksf	6,060
Industrial	9 ksf	6,146 ksf	55,314
Office	N/A	N/A	N/A
Schools	N/A	N/A	N/A
Parks	N/A	N/A	N/A
Open Space	N/A	N/A	N/A
Recreation	N/A	N/A	N/A
Public Services*	N/A	N/A	N/A
Hospitals	N/A	N/A	N/A
Sand and Gravel	N/A	N/A	N/A
Transportation	N/A	N/A	N/A
GRAND TOTAL		134 du/6,449 ksf	673,814

Notes: du = dwelling units, sf = square feet, ksf = thousand square feet

* Libraries are included under the public services.

N/A: Redevelopment consistent with the Community Plan is not anticipated to increase the intensity of this land use type.

Source: South Coast Air Quality Management District and BRG Consulting, Inc.

TABLE 4.13-6
Projected Daily Natural Gas Usage

Land Use Type	Usage Factor (cf month/ du or ksf)	Increase (du/ksf)	Projected Increase in Natural Gas Usage (cf/month)
Redevelopment Plan Area			
Single Family Residential	6,665.0 du	48 du	319,920
Multi-Family Residential	4,011.5 du	86 du	344,989
Commercial	2.9 ksf	303 ksf	878.7
Industrial	3.3 ksf	6,146 ksf	20,281.8
Office	N/A	N/A	N/A
Schools	N/A	N/A	N/A
Parks	N/A	N/A	N/A
Open Space	N/A	N/A	N/A
Recreation	N/A	N/A	N/A
Public Services*	N/A	N/A	N/A
Hospitals	N/A	N/A	N/A
Sand and Gravel	N/A	N/A	N/A
Transportation	N/A	N/A	N/A
GRAND TOTAL			686,069.5

Notes: cf = cubic feet, du = dwelling units, sf = square feet, ksf = thousand square feet

* Libraries are included under the public services.

N/A: Redevelopment consistent with the Community Plan is not anticipated to increase the intensity of this land use type.

Source: South Coast Air Quality Management District and BRG Consulting, Inc.

The proposed redevelopment activities will not result in the use of a substantial amount of fuel, a substantial increase in demand upon existing sources of energy, or the development of new energy sources. The proposed redevelopment activities will result in redevelopment activities occurring over a 20 to 30-year period and demand increase will occur incrementally over that period of time. Redevelopment activities will create energy demands typical of urban development. The impact to gas and electric services resulting from implementation of the proposed redevelopment activities will be less than significant.

4.13.2.4 *Significance of Impact*

No impact associated with gas and electricity is anticipated.

4.13.2.5 *Mitigation Measures*

No mitigation measure is proposed, as no significant gas or electric impact has been identified.

4.13.2.6 *Conclusion*

No significant gas and electric impact is anticipated.

4.13.3 *Water*

4.13.3.1 *Existing Conditions*

San Diego's primary water resources include the Colorado River and the California Aqueduct system. Water supply from these sources is imported by the San Diego County Water Authority (SDCWA). Four major aqueducts channel water from the north into a series of reservoirs and local treatment plants in the San Diego area. Water is distributed locally by various public and private agencies.

According to the City of San Diego Water and Sewer Design Guidelines, standard water demand rates for residential uses are 150 gallons per capita/day; 5,000 gallons/day per net acre for commercial, office, schools, public services and hospitals; 6,250 gallons/day per net acre for industrial uses; and 4,000 gallons/day per net acre for parks, open space and recreation. Table 4.13-7 depicts existing and projected water demand for the Project Area based on SANGIS existing and planned land use data. As depicted in Table 4.13-7, water demand within the Project Area will increase by approximately 254.1 thousand gallons per day from the existing demand.

4.13.3.2 *Impact Threshold*

For the purposes of this EIR, a significant impact would occur if the proposed project would:

- *Result in the need for the physical alteration or expansion of existing water facilities or the need for new water facilities, in which the alteration, expansion, or construction could cause a significant environmental impact; or*
- *Require new or expanded water entitlements.*

TABLE 4.13-7
Existing and Projected Daily Water Use

Land Use	Water Use Factor	Population/Acreage		Water Demand (1000s gal/day)		
		Existing	Projected	Existing Use	Projected Use	Change From Existing
Redevelopment Plan Area						
Single Family Residential	150 (gcd)	0	117 pop.	0	17.55	+17.55
Multi-Family Residential	150 (gcd)	0	210 pop.	0	31.5	+31.5
Industrial	6,250 (gad)	258.6 ac.	399.6 ac.	1,616.25	2,497.5	+881.25
Commercial	5,000 (gad)	125.68 ac.	132.6 ac.	628.4	663	+34.6
Office	5,000 (gad)	21.26 ac.	17.38 ac.	106.3	86.9	-19.4
Schools	5,000 (gad)	24.90 ac.	24.90 ac.	124.5	124.5	0
Parks	4,000 (gad)	68.92 ac.	49.92 ac.	275.68	199.68	-76.0
Open Space	4,000 (gad)	69.02 ac.	69.02 ac.	276.08	276.08	0
Recreation	4,000 (gad)	18.89 ac.	20.89 ac.	75.56	83.56	+8.0
Public Services*	5,000 (gad)	13.31 ac.	14.89 ac.	66.55	74.45	+7.9
Hospitals	5,000 (gad)	32.98 ac.	32.98 ac.	164.9	164.9	0
Sand and Gravel	6,250 (gad)	200.38 ac.	99.38 ac.	1,252.4	621.1	-631.3
Transportation	N/A	N/A	N/A	N/A	N/A	N/A
GRAND TOTAL				4,586.62	4,840.72	+254.1

Notes: gcd = gallons/capita/day; gad = gallons/net acre/day; pop = population; ac = acres

* Libraries are included under Public Services.

N/A: Redevelopment consistent with the Community Plan is not anticipated to increase this land use type.

Source: Generation Factors obtained from City of San Diego Water Utilities Department Water and Sewer Design Guidelines.

4.13.3.3 Impact

Implementation of the proposed redevelopment project is anticipated to intensify the level of development within the Project Area. With projected redevelopment consistent with Community Plan land uses, the population could increase by approximately 327 people and non-residential square footage within the Project Area will increase by approximately 27.62 acres. Therefore, as depicted in Table 4.13-7, water demand within the Project Area will increase to approximately 4,840.72 thousand gallons per day, an increase of 254.1 thousand gallons per day. The proposed project will result in an increase in water demand, but the change in water demand is not considered a significant impact as the increase in water demand will occur over an extended period of time (20 to 30 years) and the demand created by this project will not result in the need for the physical alteration of extension of water facilities which could cause a significant environmental impact. The Project Area can be served by existing and planned water infrastructure. However, some system changes/improvements may be necessary as redevelopment activities are proposed within the Project Area. The physical impact to the environment would be in the form of short-term noise and air quality, and potentially hydrological/water quality, geotechnical, cultural, biological, and paleontological resources. Implementation of mitigation measures described in other sections of this document with respect to these issues would mitigate the potential impact of these more minor water infrastructure improvements to a level less than significant.

4.13.3.4 *Significance of Impact*

No impact associated with water is anticipated.

4.13.3.5 *Mitigation Measures*

No mitigation measure is proposed, as no significant water impact has been identified.

4.13.3.6 *Conclusion*

No significant water impact is anticipated.

4.13.4 *Sewer Facilities*

4.13.4.1 *Existing Conditions*

Wastewater generated within the Project Area is collected by sewer lines owned and operated by the City of San Diego Metropolitan Wastewater Department. Wastewater from the Project Area is diverted to the Point Loma Wastewater Treatment Plant (PLWTP) via the San Diego Metropolitan Sewer System. The PLWTP provides advanced primary treatment for the City of San Diego and the treated water is discharged into the Pacific Ocean through a 4.5-mile long pipeline outfall. The plant processes an average of 180 million gallons per day (mgpd) of wastewater generated by approximately 2.2 million San Diego residents in a 450 square mile service area. The plant has a treatment capacity of 240 mgpd.

The City of San Diego received a waiver from requirements by the Clean Water Act (CWA) in 1995 to upgrade the level of treatment to Secondary Treatment. The Environmental Protection Agency (EPA) and the Regional Water Quality Control Board (RWQCB) granted this waiver when they agreed through the combination of industrial source control, Advanced Primary Treatment of wastewater, a deep ocean outfall and comprehensive monitoring, that the PLWTP fully protects the ocean. The City of San Diego received a renewal of the CWA Permit in September 2002.

Residential dwelling units are generally considered the primary wastewater generators. Currently, there are no residential dwelling units located within the Project Area; therefore, the standard method of analyzing wastewater generation is not applicable. Although the existing non-residential land uses in the Project Area do generate wastewater during the normal course of business operation.

4.13.4.2 *Impact Thresholds*

For the purposes of this EIR, a significant impact would occur if the proposed project would:

- *Result in the need for the physical alteration or expansion of existing sewer facilities or the need for new sewer facilities, in which the alteration, expansion, or construction could cause a significant environmental impact.*

4.13.4.3 *Impact*

Redevelopment consistent with the Community Plan land uses will result in an increase in development intensity that may generate higher demands on the existing sewer facilities. Based on projected

redevelopment, sewer flows within the Project Area have the potential to increase by approximately 26,160 gallons per day (gpd) associated with residential land uses. The quantity is based on standard effluent generation rate of 80 gallons/capita/day. In addition, non-residential wastewater generation will increase. The increase in generation of wastewater associated with residential (26,160 gpd) and non-residential land use increases would occur over a 20 to 30-year period, and could be met through the provision of public improvements to the sewer facilities within the Project Area. Some improvements to sewer facilities within the Project Area may be needed as redevelopment activities are proposed within the Project Area. The physical impact to the environment would be in the form of short-term noise and air quality, and potentially hydrological/water quality, geotechnical, cultural, biological, and paleontological resources. Implementation of mitigation measures described in other sections of this document with respect to these issues would mitigate the potential impact of these more minor sewer infrastructure improvements to a level less than significant.

4.13.4.4 *Significance of Impact*

No impact associated with sewer facilities is anticipated.

4.13.4.5 *Mitigation Measures*

No mitigation measure is proposed, as no significant sewer facilities impact has been identified.

4.13.4.6 *Conclusion*

No significant sewer facilities impact is anticipated.

4.13.5 *Police Services*

4.13.5.1 *Existing Conditions*

Police services for the Project Area are provided by the Eastern Division Police Substation located at 9225 Aero Drive, in the Serra Mesa community of the City of San Diego. The Serra Mesa community is located northwest in relationship to the Project Area. This station houses approximately 127 patrol officers, 15 sergeants, nine detectives, two lieutenants, and one Captain. Additional resources (such as SWAT, canine units, etc.) respond to the Eastern Division, as they are needed. Additional police services for the Project Area are provided by the Police Community Relations Office (also known as the Navajo Storefront) located at 7381 Jackson Drive. This facility is a community outreach facility. This office houses one police officer and one community service officer to provide crime prevention education and information services.

The San Diego Police Department's Operation Support division is responsible for determining the allocation of officers to each Police Division. The number of officers is based on the total number of calls and the type of calls for each division. Current staff allocations assign a minimum of one officer for each of the communities assigned to the Eastern Division, on each watch in a given 24-hour period. On at least one day each week, there is an overlapping squad on each watch, which translates to two squads of officers working during that particular shift. In an emergency situation (or if the Division falls below the minimum

staffing levels), officers from other commands can respond to assist. Officers from other agencies respond to emergencies under existing mutual aid agreements.

The San Diego Police Department has personnel on duty and available to respond to calls for service seven days a week, 24 hours a day. Calls for service are prioritized, with emergency calls getting the highest priority. Calls for service range from level "1 priority," meaning life-threatening/suspicious activity, to a level "4 priority" call related to non life-threatening/suspicious activity. The Citywide average response time is 7 minutes and 3 seconds. The average response time for emergency calls for Eastern Division to the Project Area is 6 minutes and 7 seconds.

According to the police department, currently, there are no plans to construct new police facilities or expand existing facilities within the Project Area or that serve the Project Area. Since no new facilities or expansions are planned within the Project Area, no revenue has been identified for any major police facility expansions or additions. Generally, most new police facilities are funded through Development Impact Fees (DIF) along with other funding, depending upon the project.

4.13.5.2 *Impact Threshold*

For the purposes of this EIR, a significant impact would occur if the proposed project would:

- *Result in the need for the physical alteration or expansion of existing police facilities or the need for new police facilities, in which the alteration, expansion, or construction could cause a significant environmental impact.*

4.13.5.3 *Impact*

The Project Area is expected to experience an increase in population resulting from a net increase of approximately 134 dwelling units, and an associated population increase of approximately 327 within the 20 to 30 year Redevelopment Plan timeframe. The Police Department strives to meet a two officer per thousand resident ratio. Therefore, the addition of 1,000 residents to the Grantville/Allied Gardens communities would require personnel and possible additional police vehicles. The proposed project will only result in an increase population by 327 people over a 20 to 30 year timeframe. Since this incremental increase is below the police threshold of 1,000 residents, no additional officers or police facilities would be required to meet the police protection needs of the Project Area. Furthermore, the proposed project does not propose to change any land use designations for the Project Area and according to the Police Department, it is not anticipated that the proposed project will create a need for the physical alteration or expansion of existing police facilities, in which the alteration, expansion, or construction could cause a significant environmental impact. Therefore, no impact associated with police services is anticipated to occur.

4.13.5.4 *Significance of Impact*

No impact associated with police services is anticipated.

4.13.5.5 Mitigation Measures

No mitigation measure is proposed, as no significant police services impact has been identified.

4.13.5.6 Conclusion

No significant police services impact is anticipated.

4.13.6 Fire Protection

4.13.6.1 Existing Conditions

The City of San Diego Fire-Rescue Department, Station 34, provides primary fire protection and emergency medical services to the Project Area. Station 34 is located at 6565 Cowles Mountain Boulevard at the cross street of Navajo Road. Station 34 has four firefighters on duty each shift, with a total of twelve firefighters over three divisions. Apparatus consists of one triple combination pumper (Engine 34) and one brush apparatus (Brush Rig 34). Under first alarm conditions or when Station 34 is not available to respond to a fire or medical emergency, there are five Stations that act as secondary stations to provide fire protection and emergency medical services to the Project Area based on their current availability. These five Stations include:

- Station 5, located at 3902 9th Avenue, 92103. Apparatus consists of the Battalion 5, Engine 5, and Truck 5;
- Station 10, located at 4605 62nd Street, 92115. Apparatus consists Battalion 10, Engine 10, Truck 10, Brush Rig 10, and Utility Rig 10;
- Station 17, located at 4206 Chamoune Avenue, 92115. Apparatus consists of Engine 17;
- Station 18, located at 4676 Felton Street, 92116. Apparatus consists of Engine 18 and Brush Rig 18; and,
- Station 31, located at 6002 Camino Rico, 92120. Apparatus consists of Engine 31 and Paramedic Unit 31.

Table 4.13-8 identifies the response times of each Station to a specific intersection within the Project Area. These two intersections were selected by the City Fire-Rescue Department to illustrate the overall response times for the Project Area.

4.13.6.2 Impact Threshold

For the purposes of this EIR, a significant impact would occur if the proposed project would:

- *Result in the need for the physical alteration or expansion of existing Fire Department facilities or the need for new Fire Department facilities, in which the alteration, expansion, or construction could cause a significant environmental impact.*

TABLE 4.13-8
Fire Station Response Times

Subarea A		Subarea B	
Mission Gorge/Twain Avenue Intersection		Mission Gorge/Old Cliffs Roads Intersection	
Fire Station	Response Time In minutes	Responding Company	Response Time In minutes
Station 17	5.0	Station 31	5.0
Station 31	5.6	Station 17	7.1
Station 18	5.1	Station 34	9.2
Station 10	7.1	Station 10	9.1
Station 5	8.3	Station 5	10.3

Source: City of San Diego Fire-Rescue Department, 2004.

4.13.6.3 *Impact*

Implementation of the proposed project will result in an increase in demand for fire protection services within the Project Area over the 20 to 30 year redevelopment timeframe. The increase in demand is attributable to redevelopment activities and associated demand for fire prevention inspections, and applicable code enforcement activities.

Proposed new development within the Project Area will be required to meet current Fire Code requirements, which are generally more rigorous than those under which existing development was approved/constructed. As new development occurs, overall safety of buildings within the Project Area is expected to improve.

In terms of fire department response to fire calls, the National Fire Protection Association 1710 Standard, requires that the initial arrival of the fire department's fire suppression resources should occur within six minutes and/or the initial full alarm assignment within ten minutes. According to the City Fire-Rescue Department, if these guidelines were to be exceeded, there could be the need for a new fire station and equipment. As indicated in Table 4.13-8, Station 5 currently exceeds the National Fire Protection Association 1710 Standard for response to the Mission Gorge/Old Cliffs Roads intersection with a response time of 10.3 minutes. However, with the implementation of the proposed project, response times will stay the same for each of the six stations, and the project does not propose any use that would alter the response time or require new Fire Department facilities.

4.13.6.4 *Significance of Impact*

No impact associated with fire protection is anticipated.

4.13.6.5 *Mitigation Measures*

No mitigation measure is proposed, as no significant fire protection impact has been identified.

4.13.6.6 *Conclusion*

No significant fire protection impact is anticipated.

4.13.7 Solid Waste

4.13.7.1 Existing Conditions

The City of San Diego Environmental Services Department (ESD) provides the following services to the Redevelopment Project Area: resource management, environmental programs, environmental protection, energy conservation, collection services, and refuse disposal. The ESD pursues waste management strategies that emphasize waste reduction and recycling, composting, and environmentally-sound landfill management to meet the City's long-term disposal needs. ESD also ensures that all federal, state, and local mandates relating to waste management are met in an efficient and financially sound manner. In 1989, the State of California mandated (AB 939) that all cities reduce waste disposed in landfills by 25% by 1995 and 50% by the year 2000. To meet this mandate, the ESD has devised a working plan called Plan 2000. Currently, the 25% diversion goal has been met and surpassed; however, ESD has not reached the 50% reduction level.

The ESD is organized into three divisions: Refuse Collection, Refuse Disposal, and Environmental Programs. Refuse Collection provides weekly service to approximately 305,000 homes and businesses throughout the City; Refuse Disposal ensures the safe and efficient disposal of over 1.4 million tons of waste generated annually in the City; and Environmental Programs implements comprehensive recycling, hazardous materials management, code enforcement and support programs.

Relative to development and redevelopment activities, the ESD's policy is that prior to the issuance of any permit, including but not limited to any discretionary action, demolition, grading, or any other construction permit, the City of San Diego Environmental Review Manager (ERM) shall verify that all requirements of a waste management plan have been shown and/or noted on the demolition and/or grading plans. The following are elements that the waste management plan is required to address include:

1. Prior to issuance of a demolition permit, the permittee shall be responsible to arrange a pre-construction meeting. This meeting shall be coordinated with Mitigation Monitoring Coordination (MMC) to verify that implementation of the waste management plan shall be performed in compliance with the plan approved by Land Development review (LDR) and ESD, to ensure that impacts to solid waste facilities are mitigated to below a level of significance.
2. The plan (construction documents) shall include the following elements for demolition, construction, and occupancy phases of the project as applicable:
 - (a) Tons of waste anticipated to be generated,
 - (b) Material type of waste to be generated,
 - (c) Source separation techniques for waste generated,
 - (d) How material will be reused on-site,
 - (e) Name and location of recycling, reuse, or landfill facilities where waste will be taken if not reused on-site,

- (f) A "buy recycled" program,
 - (g) How the project will aim to reduce the generation of construction/demolition debris,
 - (h) A plan of how waste reduction and recycling goals will be communicated to subcontractors, and
 - (i) A time line for each of the three main phases of the project as stated above.
3. The plan shall strive for a goal of 50% waste reduction.
 4. The plan shall include specific performance measures to be assessed upon the completion of the project to measure success in achieving waste minimization goals. The Permittee shall notify MMC and ESD when:
 - (a) A demolition permit is issued,
 - (b) When demolition begins,
 - (c) The permittee shall arrange for progress inspections, and a final inspection, as specified in the plan and shall contact both MMC and ESD to perform these periodic site visits during demolition and construction to inspect the progress of the project's waste diversion efforts, and
 - (d) When demolition ends.
 5. Prior to the issuance of a grading permit, the applicant shall receive approval from the ERM that the waste management plan has been prepared, approved, and implemented. Also, prior to the issuance of the grading permit, the applicant shall submit evidence to the ERM that the final Demolition/Construction report has been approved by MMC and ESD. This report shall summarize the results of implementing the above Waste Management Plan elements, including: the actual waste generated and diverted from the project, the waste reduction percentage achieved, and how that goal was achieved, etc.

There are seven active landfills located within the County of San Diego: West Miramar, Sycamore, Otay Annex, Ramona, Borrego Springs, Las Pulgas, and San Onofre. Only the first five accept municipal solid waste. The latter are military owned and operated and only accept military waste. Thus, solid waste from the proposed Project Area would be disposed of within the remaining five landfills. The following information is from the Integrated Waste Management Plan, Draft 2004 Countywide Siting Element.

The West Miramar Landfill, located in the City of San Diego, has a remaining capacity of approximately 13.8 million tons with an estimated closure date of 2011. Additional capacity is contingent upon a possible vertical expansion of the landfill. If pursued, the landfill may extend its capacity to accept waste for an additional three to ten years.

Sycamore Landfill, located in the City of San Diego, has a remaining capacity of approximately 17.2 million tons with an estimated closure date of 2017. The landfill operator is currently seeking an expansion of the landfill that would provide additional capacity extending the closure date to approximately 2035.

Otay Annex Landfill, located in the City of Chula Vista, has a remaining capacity of approximately 31.3 million tons with an estimated closure date of 2027.

Ramona Landfill, located in the unincorporated community of Ramona, has a remaining capacity of approximately 294,550 tons with an estimated closure date of 2006.

Borrego Springs Landfill, located in the unincorporated community of Borrego Springs, has a remaining capacity of approximately 117,600 tons with an estimated closure date of 2040.

Estimated remaining capacities are based on design limits specific to each landfill site. Estimated closure dates are determined by site capacity and the maximum daily permitted rate of disposal specific to each site.

4.13.7.2 *Impact Threshold*

For the purposes of this EIR, a significant impact would occur if the proposed project would:

- *Result in the need for the physical alteration or expansion of existing solid waste facilities or the need for new solid waste facilities, in which the alteration, expansion, or construction could cause a significant environmental impact.*

4.13.7.3 *Impact*

No specific development is proposed as part of the proposed Redevelopment Plan adoption. Future redevelopment will be required to comply with the City's requirement for preparation of a waste management plan, which will achieve the City's waste minimization goals.

4.13.7.4 *Significance of Impact*

No impact associated with solid waste is anticipated.

4.13.7.5 *Mitigation Measures*

No mitigation measure is proposed, as no significant solid waste impact has been identified.

4.13.7.6 *Conclusion*

No significant solid waste impact is anticipated.

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4.14 Mineral Resources

For the purpose of CEQA analysis, "mineral resources" refers to aggregate resources. Aggregate consists of sand, gravel, and crushed rock.

4.14.1 Existing Conditions

Many valuable minerals are found in the San Diego region, ranging from gold to crushed rock. Production of metals and gemstones and other more glamorous minerals has been limited for many years because of high extraction costs. In terms of both quantity and economic value, sand and gravel and crushed rock are the most valuable mineral resources extracted and processed in the San Diego region.

4.14.1.1 *Surface Mining and Reclamation Act (SMARA)*

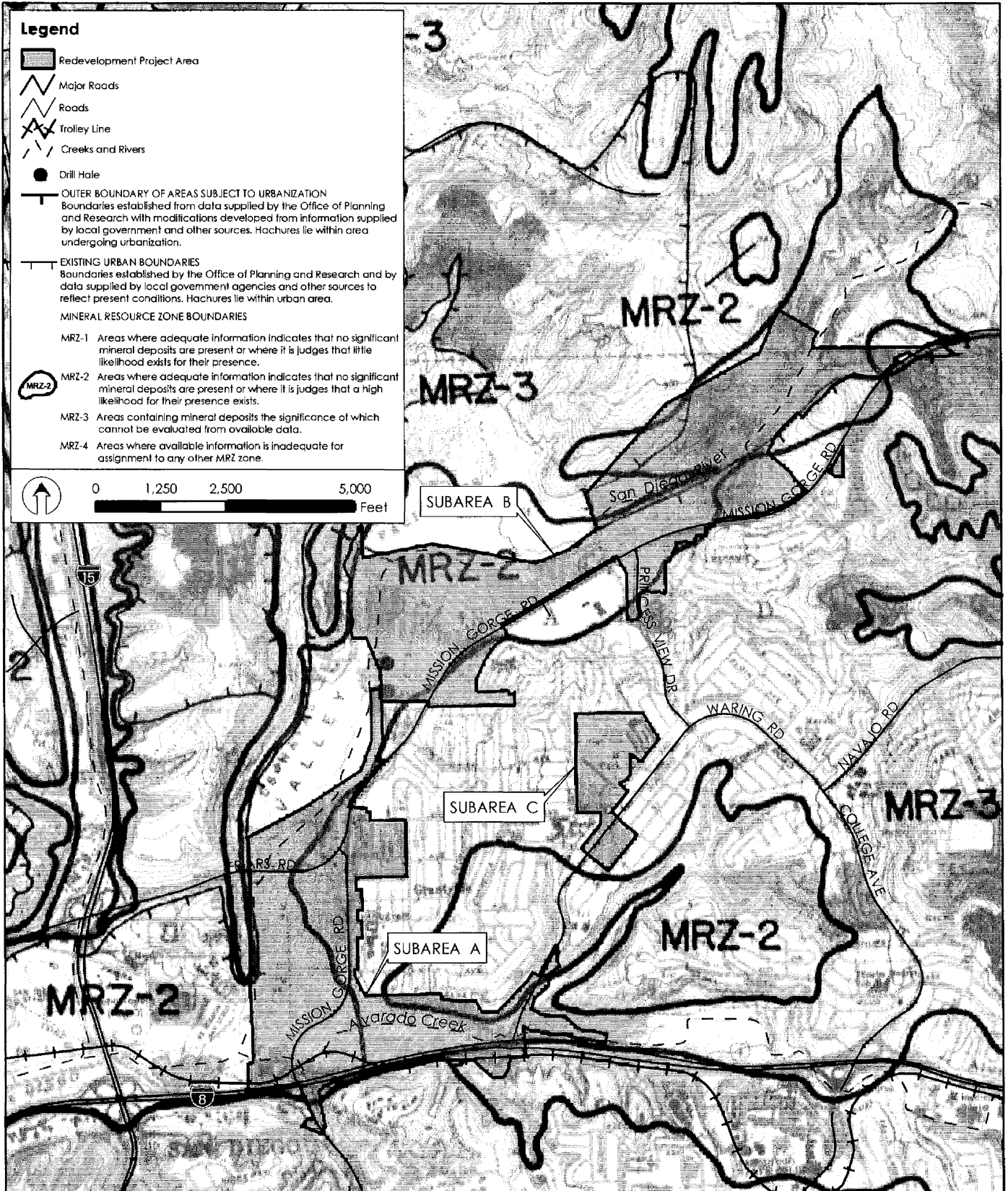
SMARA (1975) mandated that aggregate resources throughout the state be mapped so that local governments could make land use decisions in light of the presence of aggregate resources and the need to preserve access to those resources. One of the primary objectives of SMARA is to protect mineral resources of regional and statewide significance. The California Department of Conservation, Division of Mines and Geology is the state agency responsible for identifying and protecting Mineral Resource Zones (MRZs) per SMARA. The Division of Mines and Geology has prepared Mineral Land Classification Maps for aggregate resources. The Mineral Land Classification Maps designate four different types of resource sensitivities. The four sensitivity types are:

- MRZ-1:** Areas where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence.
- MRZ-2:** Areas where adequate information indicates that significant mineral deposits are present or where it is judged that a high likelihood for their presence exists.
- MRZ-3:** Areas containing mineral deposits the significance of which cannot be evaluated from available data.
- MRZ-4:** Areas where available information is inadequate for assignment of any other MRZ zone.

4.14.1.2 *Sand and Gravel Extraction*

Within and adjacent to the Project Area, two MRZ-2 boundaries have been mapped by the California Division of Mines and Geology. Figure 4.14-1 depicts the MRZ-2 locations within and adjacent to Subareas A, B, and C. The first MRZ-2 area encompasses portions of Subareas A and C. This area is currently not being used for aggregate extraction. The land use types in this area consist of public services, commercial, industrial, residential, and open space.

The second MRZ-2 area encompasses portions of Subareas A and B and contains a 250-acre sand and gravel-processing facility. The facility operates on both sides of the San Diego River along the northern boundary of the Project Area, generally between Princess View Drive and Margerum Avenue (Figure 4.14-1). The Project Area encompasses approximately 200 acres of the total 250-acre sand and gravel-processing center. The quarry has been in operation since 1927 and is currently operating under a



SOURCE: CA Division of Mines and Geology, 1983, SanGIS and BRG Consulting, Inc., 2005

3/10/05

	<p>Grantville EIR</p> <p>Mineral Resource Zone Boundaries</p>	<p>FIGURE</p> <p>4.14-1</p>
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Conditional Use Permit (CUP). The CUP expires in 2033 and regulates the mining, processing, storage, and sale of natural resource materials. The California Department of Conservation, Division of Mines and Geology also regulates the sand and gravel processing facility. A master reclamation plan for the 250 acres covered within the CUP establishes goals and general guidelines for the reclamation of the project area upon completion of the mining activity. Final reclamation is to be accomplished in phases with the approval of precise reclamation plans (City of San Diego, Navajo Community Plan, 1982).

The remaining portions of the Project Area not within the MRZ-2 boundaries are within the MRZ-3 boundary (see Figure 4.14-1). The MRZ-3 boundary is defined as "Areas containing mineral deposits the significance of which cannot be evaluated from available data."

A. City of San Diego

The City of San Diego Progress Guide and General Plan establishes goals and standards to address future planning decisions related to the extraction and processing of mineral resources. Goals applicable to the existing sand and gravel operations in the Project Area include:

- Protection of major mineral deposits against encroachment by land uses that would make their extraction undesirable or impossible.
- Production of sand and gravel with minimal harm and disturbance to adjacent properties.
- Planned rehabilitation of depleted mineral areas to facilitate desirable reuses compatible with local development objectives.
- Conservation of construction material resources to provide for City's growth and development needs now and in the near and distant future.

B. Navajo Community Plan

The Industrial Element of the Navajo Community Plan addresses objectives and proposals to guide and encourage future policy and development decisions related to the sand and gravel facility located within the Project Area. The following proposal was established to encourage industrial development that is compatible with the residential character of the Navajo community:

Future development of the remaining sand and gravel operation and the previously mined 170 acres should be accomplished under a master planned industrial development (PID) permit process. A master PID will provide an opportunity for comprehensive review of the relationship between proposed development and the ultimate reclamation plan for the San Diego River, coordination of open space and pathways with Mission Trails Regional Park, traffic impacts to Mission Gorge Road and the proposed State Highway 52 interchanges.

C. Tierrasanta Community Plan

The northern half of the existing sand and gravel processing facility, within Subarea B is located in the community of Tierrasanta. The Community Plan contains a discussion of the sand and gravel operation and some goals, objectives and proposals applicable to the sand and gravel operation. In the discussion

section, the Community Plan identifies the existing sand and gravel area as a major mineral resource in the San Diego area. In addition, the Plan states that “While the extraction of these minerals is of economic value, certain characteristics that accompany mineral extraction are often found objectionable. These include noise, dust, and the unattractive appearance of the quarry sites.” The goal of the Open Space section is to “Establish an open space system which protects the natural resources, provides for the managed production of resources...” An objective contained in the Community Plan that is applicable to the sand and gravel operation the Community Plan states, “minimize the effect of natural resource extraction on surrounding land uses.” Also, related to the sand and gravel operation, the Community Plan states: “Upon termination of the sand and gravel operations, the excavated areas should be rehabilitated 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.”

D. San Diego River Park Master Plan

In general, the San Diego River Park Master Plan seeks to provide a direction to restore the relationship between the San Diego River and nearby land uses. Relative to the existing sand and gravel extraction operation located within Subarea B of the Project Area, the Plan identifies several key points; 1) ongoing discussions with Superior Mine land owners and developers is essential to finding an appropriate balance between development and open space; 2) potential for the site to redevelop for more intensive use makes time critical to taking action at the planning level. While mining operations are scheduled to continue for another 20 years, potential redevelopment value may reduce this time frame; 3) minimum 500 feet Open Space Corridor is recommended in addition to trail corridor/buffer; and 4) acquisition of 15-20 acre site is recommended for development as a naturalized park with access to the river from Mission Gorge Road.

4.14.2 Impact Threshold

For the purposes of this EIR, a significant impact would occur if the proposed project would:

- *Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state; or,*
- *Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.*

4.14.3 Impact

As described in the Environmental Setting, two MRZ-2 boundaries have been mapped by the California Division of Mines and Geology within and adjacent to the Project Area.

The first MRZ-2 area encompasses portions of Subareas A and C; however, this area is not currently used for aggregate extraction and future use of this area for aggregate extraction is unlikely as the area is currently developed with urban uses and is surrounded by uses that constrain the future use of this area due to potential land use compatibility issues. The land use types that currently exist within this portion of the Project Area and the MRZ-2 are public service, commercial, industrial, residential, and open space. Redevelopment of this area consistent with Community Plan land use designations will not result in a loss of availability of known mineral resources that would be considered valuable to the region and residents of

the state, or loss of availability of a locally-important mineral resource recovery site as the resources are not currently being mined and the area is currently developed with various land use types.

The second area designated MRZ-2 is an operational 250-acre sand and gravel-processing facility located within Subarea B of the Project Area (see Figure 4.14-1). The Project Area encompasses approximately 200 acres of the total 250-acre sand and gravel-processing center. Future redevelopment of this area consistent with the Community Plan land use designations will reduce the total land area of the sand and gravel extraction area by approximately 92 acres (50%). Because the sand and gravel extraction area (200 acres within the Project Area) is currently operating under a CUP that does not expire until 2033, it is assumed that the sand and gravel extraction facility will continue to operate under its CUP and through oversight by the California Division of Mines and Geology until completion of mining activity, which would occur either through exhaustion of the resource or at the time of marginal economic return. Sand and gravel operations may also cease due to an accelerated transition created by redevelopment opportunities. Cessation of mining activity is the prerogative of the mining operator and the California Division of Mines and Geology cannot mandate ongoing mining activity at a particular location. At the time in the future when sand and gravel operations are discontinued, as stated above, a master reclamation plan, final reclamation plan, and precise reclamation plans for the mining area will be developed. Future reuse of the sand and gravel area will be consistent with the Navajo and Tierrasanta Community Plan goals, objectives, and proposals.

No significant impact will occur relative to loss of available known mineral resources that would be considered valuable to the region and residents of the state. Redevelopment of this area is consistent with the Navajo and Tierrasanta Community Plans and will not result in a loss of availability of a locally-important mineral resource recovery site delineated on the local general plan.

4.14.4 Significance Of Impact

No significant impact will occur relative to loss of available known mineral resources that would be considered valuable to the region and residents of the state. Redevelopment of this area is consistent with the Navajo and Tierrasanta Community Plans and will not result in a loss of availability of a locally-important mineral resource recovery site delineated on the local general plan.

4.14.5 Mitigation Measures

No mitigation measure is proposed as no significant mineral resources impact has been identified.

4.14.6 Conclusion

No significant mineral resources impact has been identified.

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5.0 ANALYSIS OF LONG-TERM EFFECTS

5.1 Cumulative Impacts

CEQA Guidelines Section 15355 define cumulative effects as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." The CEQA Guidelines further state that the individual effects may be changes resulting from a single project or a number of separate projects; or the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Section 15130 of the CEQA Guidelines allows for the use of two alternative methods to determine the scope of projects for the cumulative impact analysis:

List Method – A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency.

General Plan Projection Method – A summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative impact.

This cumulative impact analysis utilizes the regional growth projections method, which assumes buildout of both local and regional general plans as well as population forecasts for the County and region as a whole. General growth expected to occur in the Navajo Community Plan Area, Tierrasanta Community Plan Area, College Area Community Plan Area and adjacent Mission Valley and Mid-City Community Plan Area is accounted for in terms of regional growth projections by the San Diego Association of Governments (SANDAG).

SANDAG estimates regional growth for the San Diego County area for the purposes of planning and public policy development. The most recent growth projections available at the time of the Notice of Preparation (NOP) was published for the EIR is the 2030 Forecast, demographic conditions. SANDAG provides estimates and forecasts of employment, population, and housing for the period ranging from 2000 to 2030. These forecasts serve as a basis for growth forecasts made by SANDAG.

SANDAG projections are available by Countywide, City, Major Statistical Areas, Subregional Areas, and Community Planning Areas. Table 5-1 shows the current estimates and future projections for population, housing, and employment for the City of San Diego. The population of San Diego is expected to increase approximately 35 percent between 2000 and 2030 to approximately 1,656,820 persons, compared to the entire County's population, which is expected to increase by approximately 54 percent. The County as a whole is expected to experience a slightly higher increase (55 percent) in housing units between 2000 and 2030 compared to the City of San Diego (29 percent). The County is also expected to experience a greater increase (51 percent) in employment growth than the City of San Diego (26 percent) from 2000 to 2030.

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 project):

- 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

segments and intersections. Traffic improvements are identified with the Navajo and Tierrasanta Community Plans, and also as discussed in Section 4.2, that when implemented, would help to reduce the cumulative traffic impact. However, the timing of these improvements are unknown, and the cumulative impact would remain significant and unavoidable.

5.1.3 Air Quality

The geographic scope for air quality comprises the San Diego Air Basin (Basin) and the traffic study area defined in Section 4.2-Transportation/Circulation. The San Diego Air Basin is depicted in Figure 4.3-1 in Section 4.3-Air Quality. The Basin is in transitional-attainment for ozone (smog) and is either in attainment or unclassified for federal standards of carbon monoxide (CO), sulfur dioxide (SO₂), nitrogen dioxide (NO₂), fine particulate matter (PM₁₀), and lead. Development forecasted for the region will generate increased emission levels from transportation and stationary sources. Potential cumulative air quality impacts will be partially reduced through implementation and achievement of emission levels identified in the Regional Air Quality Strategies (RAQS) and General Plan air quality elements of local jurisdictions. Based on the expected reductions in emissions due to implementation of these plans, vehicle emissions from redevelopment activities are anticipated to gradually decrease dependent on the type of pollutant. However, 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 cumulative impact to air quality is significant and unavoidable.

5.1.4 Noise

The geographic scope for noise includes growth projections for the City of San Diego and the traffic study area defined in Section 4.2-Transportation/Circulation. The proposed project will contribute to an increase in vehicular-generated noise along roadways in the Project Area and surrounding areas. As indicated in Table 4.4-7 (provided in Section 4.4-Noise of this EIR) land uses adjacent to major roadways will be exposed to roadway noise levels that exceed City noise standards. However, the project's contribution is less than significant, accounting to an increase ranging between 1 to 3.5 dBA on the study area roadways. Mitigation Measures proposed in Section 4.4 will reduce the impact as a result of cumulative traffic noise within the Project Area to a level less than significant.

5.1.5 Cultural Resources

The geographic scope for cultural resources includes the Project Area and San Diego River Valley. Implementation of the proposed project would not result in a significant impact to known cultural resources. No significant archaeological and historical resources have been identified in the Project Area. However, there is the potential that buried resources exist in the Project Area, and certain structures may be deemed historic during the life of implementation of the redevelopment plan. The project's compliance with the mitigation measures identified in Section 4.5 Cultural Resources of this EIR will ensure that no significant impact to significant cultural resources occurs within the Redevelopment Project Area. On a broader scope, archaeological and cultural resources are protected through Section 15064.5 of the CEQA Guidelines, other federal and state laws, and local ordinances. Future cumulative development within the region would be subject to review under CEQA and compliance with federal, state, and local

regulations protecting cultural resources. Impacts to cultural resources as a result of development in the region would be reduced to a level less than significant through implementation of mitigation measures on a project-by-project basis.

5.1.6 Biological Resources

The Redevelopment Project Area is located in the Navajo, Tierrasanta, and College Area Community Plan Areas. These areas are primarily urban; however, tracts of open space land with sensitive resources remain in the San Diego River and Mission Trails area. Portions of the Project Area as well as the Navajo and Tierrasanta Community Plan Areas are located within the City of San Diego Multiple Species Conservation Plan (MSCP) and the MHPA. The MSCP is designed to mitigate the loss of biological resources throughout the region by providing a comprehensive framework of interconnecting habitat and ensuring species diversity. Therefore, the cumulative impact would be less than significant as future projects will be required to conform with the MSCP as specified by the City of San Diego MSCP Subarea Plan and implementing ordinances.

5.1.7 Geology/Soils

Redevelopment activities and other development in the City of San Diego will result in an increase in population and development that would be exposed to hazardous geological conditions. Geologic and soils conditions are typically site specific and can be addressed through appropriate engineering practices. Cumulative impacts to geologic resources would be considered significant if future redevelopment activities would be impacted by geologic hazards(s) and if the impact could combine with offsite geologic hazards to be cumulatively considerable. However, there are no unique geological characteristics in the Project Area that would pose this type of hazard. Geologic and soils conditions in the Project Area will result in a significant, but mitigable geology/soils impacts including strong ground shaking, surface failures, faulting and seismicity, and liquefaction, induce settlement, and lateral separation. As part of future redevelopment activities, these conditions will be site-specific and mitigable by site-specific grading, construction and design methods. The proposed project's incremental effects are not cumulatively considerable. Geologic conditions in the Southern California region will essentially be the same regardless of the amount of development and the cumulative geologic impact is considered less than significant.

5.1.8 Hazards and Hazardous Materials

The geographic scope for hazards and hazardous materials includes growth projections for the City of San Diego with emphasis on the Redevelopment Project Area and the area immediately adjacent to the Project Area. Certain potentially significant hazardous conditions currently exist in the Project Area, primarily as a result of previous use of certain properties for operations that involved the use and storage of hazardous materials. Future redevelopment activities within the Project Area will be evaluated through preparation of Phase I Environmental Site Assessments, and if necessary, additional assessment (Phase II) and site remediation. It is expected that redevelopment activities will provide a benefit in that as properties within the Project Area redevelop, any existing potentially hazardous site conditions will be remediated. This is also typically the case for any new development that occurs in the region. The sale and transfer of property involves assessment of hazardous materials and compliance with federal, state, and local

regulations for the use, disposal, transfer, and clean-up of these materials. As such, the proposed project is not anticipated to contribute to a significant cumulative impact related to hazards and hazardous materials.

5.1.9 Paleontological Resources

As identified in Section 4.9 - *Paleontological Resources*, geologic formations within the Project Area have the potential to contain paleontological resources. Redevelopment activities may require grading and involve earthwork that will cut into these formations. Any earthwork involving these formations has the potential to impact paleontological resources. Mitigation will reduce the impact to paleontological resources to a level less than significant. Additionally, the City of San Diego requires paleontological monitoring during grading activities for project's involving grading over ten feet in depth, or 2,000 cubic yards. Continued implementation of these measures will ensure that the cumulative impact to paleontological resources is less than significant.

5.10.1 Aesthetics

The geographic scope for aesthetics include growth projections for the Navajo, Tierrasanta, and College Area Community Plan areas. The physical blighting conditions of the properties within the Redevelopment Project Area include deterioration and dilapidation, inadequate parking and loading, and obsolescence. The presence of these conditions reflect a lack of investment by property owners to maintain their properties in good condition. Aesthetically, physical blight is seen as very undesirable.

Because future redevelopment will be required to comply within the City's development standards related to aesthetics including design, preservation of public views, and compatibility within surrounding land uses, the project will not significantly alter natural landform features and no significant impact associates with aesthetics will occur.

Future redevelopment of the Project Area will not result in a significant aesthetic or urban design impact as the redevelopment is expected to enhance the visual character of the area. Cumulatively, since individual development proposals will conform with the goals, policies, and recommendations of the General Plan, the relevant community plans, and the Land Development Code, the cumulative impact is also considered less than significant. Individual development proposals will be assessed by the City to determine consistency with the applicable development regulations and design guidelines in the community plans. No significant cumulative impact to aesthetics of the area will occur.

5.1.11 Hydrology/Water Quality

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 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 Measures HD1 identified in Section 4.11 – Hydrology/Water Quality will reduce the potential impact as a result of specific redevelopment activities this 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.

The Project Area is located in the San Diego River Hydrologic Unit. Water Quality issues associated with the San Diego River Watershed include: water quality degradation by toxic chemicals, bacteria and toxic dissolved solids (TDS); excessive extraction of groundwater; proliferation of invasive species; runoff containing excessive levels of nutrients and sediments flooding; and habitat loss and modification. The San Diego River is currently identified on the 2002 Clean Water Act Section 303(d) list of impaired water for coliform, low dissolved oxygen, phosphorus, and total dissolved solids.

The majority of existing land uses within the Redevelopment Project Area were developed prior to the current water quality regulations. Future point and non-point source runoff associated with redevelopment activity will be controlled through compliance with the City of San Diego Municipal Code (as identified in the Environmental Setting portion of this section), General Municipal Stormwater Permit (Order No. 2001-01, NPDES NO. CAS0108758), and the General Industrial Stormwater permit (Order No. 97-03-DWQ, NPDES NO. CAS000001) requirements. Future development activity will replace existing land uses that do not comply with current water quality control requirements with land uses that include water quality measures identified in applicable water quality control programs. This upgrading process will occur throughout the 20 to 30 year redevelopment process. Redevelopment activity is required to comply with the water quality permits/programs identified above which is expected to improve water quality in the San Diego River Watershed. Also, pursuant to federal, state and local regulations, future redevelopment activity will be required to remove/clean-up existing hazards/hazardous materials (e.g., underground storage tanks) prior to development. These actions will reduce the amount of pollutant runoff that enters the San Diego River Watershed. Over time, compliance by redevelopment with the NPDES permits identified above, implementation of the TMDL for the San Diego River and the San Diego River Enhancement Program will substantially improve water quality within the San Diego River Watershed. Future point and non-point runoff to the San Diego River Watershed associated with redevelopment activities is considered less than significant and the cumulative impact of future redevelopment activities and other development within

the City of San Diego will not result in a cumulatively considerable water quality impact based on implementation of the water quality permits and programs identified above.

5.1.12 Population and Housing

As identified in Section 4.12-*Population and Housing*, the project will not induce substantial population and/or housing growth in the Navajo, Tierrasanta, and College Area Community Plan areas. The Redevelopment Plan does not propose to increase residential densities from the level that is currently allowed by the adopted Navajo, Tierrasanta, and College Area Community Plans. The project would not induce substantial population growth.

The proposed Redevelopment Project would not displace people as a result of removing residential units nor will the project add people as a result of the development of new residential units. Therefore, the redevelopment activities will not contribute towards a cumulatively significant population and housing impact.

5.1.13 Public Services and Utilities

The Redevelopment Project Area is contained within the Navajo, Tierrasanta, and College Area Community Plan areas. These communities are essentially builtout and public services and utilities are currently provided to all land uses within those areas. Redevelopment pursuant to existing community plan land uses would slightly increase the number of dwelling units and number of residents within the Project Area; however, there would not be a significant increase in a residential-based demand. Implementation of the proposed redevelopment project would provide a beneficial impact to public facilities, in that there would be additional financing available to contribute to public facility improvements in the Project Area. As properties are redeveloped, improvements to existing public facilities would be required. Because the Project Area is primarily developed and served by public service and utility providers, redevelopment of existing land uses is not anticipated to contribute to a significant cumulative impact on public services and utilities.

5.1.14 Mineral Resources

As identified in Section 4.14 – *Mineral Resources of this EIR*, a sand and gravel processing facility is located within Subarea B of the Redevelopment Project Area. It is anticipated that this area will eventually be redeveloped with an industrial use. However, this conversion is expected as a function of the viability of the remaining aggregate resources on-site and market demand. The eventual conversion of this area from a sand and gravel operation is not considered significant in the context of cumulative aggregate resources available in the region.

5.2 Significant Irreversible Environmental Changes

The proposed project is a redevelopment of an area and irreversible environmental changes will be minimal. The project is the redevelopment of an area primarily developed with urban uses. However, development of the proposed project will result in the consumption of non-renewable energy resources

including, but not limited to, the following: lumber and other forest products; sand, gravel, and concrete; asphalt; petrochemical construction materials; steel, copper, lead and other metals; and water consumption.

5.3 Unavoidable Significant Environmental Impacts

Analysis of environmental impacts caused by the proposed project has been performed, and is contained in Section 4.0. Unavoidable significant environmental impacts were identified for the following impact areas and were analyzed as part of this EIR:

- Transportation/Circulation – With the addition of project traffic, several roadway segments and intersections within the Project Area would experience a LOS of E or F. The traffic/circulation impact will remain significant and unavoidable.
- Air Quality – The addition of project traffic will increase air quality emissions within the Project Area. The long-term air quality impact is considered significant and unavoidable, as no available technologies exist to reduce the future operations and vehicular related air pollutant emissions to a level less than significant.

Mitigated to a level less than significant:

- Air Quality
- Noise
- Cultural Resources
- Biological Resources
- Geology/Soils
- Hazards and Hazardous Materials
- Paleontological Resources
- Aesthetics
- Water Quality/Hydrology
- Public Services

6.0 GROWTH INDUCEMENT

This section of the EIR considers the ways implementation of the proposed Redevelopment Project could directly or indirectly encourage economic or population growth in the region. CEQA refers to growth inducement as ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment [CEQA Section 15126(d)]. Induced growth is any growth which exceeds planned growth and results from new development (i.e., extension of infrastructure) which would not have taken place in the absence of the proposed project.

The project will foster economic growth in the area. The proposed Redevelopment Project is intended to act as a catalyst to reverse the physical and economic blight in the area by promoting an arrangement of land use, circulation, and services which will eliminate blight and encourage and contribute to the economic, social, physical health, safety, and welfare of the community.

The Redevelopment Project improvements may include, but not be limited to, the removal and rehabilitation of physically obsolete or substandard structures; combining properties and parcels or acquiring real property where necessary to provide for open space, parking, and other needed uses; improvements to streets, drainage, and other public facilities; and façade improvements and general design improvements and structural repairs to buildings and structures.

While the project will foster economic growth in the area, the growth-inducing impact of the project is not considered to be significant. The Grantville Redevelopment Area is located in an area of the City of San Diego that has been designated urbanized by the City's General Plan and Progress Guide. The proposed Redevelopment Project is consistent with the City's requirements for the development "tier." The Navajo, Tierrasanta, and College Area Community Plan Areas are generally urbanized and are supported by existing urban infrastructure. The project will result in the extension of new infrastructure, however, no new areas will open up for development as a result of this extension. Furthermore, all development would occur within the Redevelopment Project Area.

For these reasons, the proposed project would not encourage or facilitate activities that could significantly affect the environment, individually or cumulatively.

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7.0 EFFECTS FOUND NOT TO BE SIGNIFICANT

CEQA Guidelines §15128 requires that an EIR contain a brief statement disclosing the reasons why various possible significant effects of a proposed project were found not to be significant and, therefore, would not be discussed in detail in the EIR. The environmental issues not expected to have a significant impact as a result of the proposed project are Agricultural Resources and Parks/Recreation.

7.1 Agricultural Resources

The project site is located in an urbanized area and does not contain prime farmland, unique farmland or farmland of statewide importance. The project site is not under Williamson Act contract and is not designated for agricultural use. Therefore, implementation of the proposed project would not result in significant impact to agricultural resources.

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 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.

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8.0 PROJECT ALTERNATIVES

CEQA requires the consideration of alternative development scenarios and the analysis of impacts associated with the alternatives. Through comparison of these alternatives to the proposed project, the advantages of each can be weighed and analyzed. Section 15126.6(a) of the CEQA Guidelines requires that an EIR, "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." (Section 15126.6).

Additionally, Sections 15126.6 (e)(f) of the CEQA Guidelines state:

- The specific alternative of "no project" shall also be evaluated along with its impact. If the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.
- The range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making.

Pursuant to the CEQA Guidelines stated above, a range of alternatives to the proposed project is considered and evaluated in this EIR. The discussion in the section provides:

1. A description of alternatives considered;
2. An analysis of whether the alternatives meet most of the objectives of the project (described in Section 3.0 of this EIR); and
3. A comparative analysis of the alternatives under consideration and the proposed project. The focus of this analysis is to determine if alternatives are capable of eliminating or reducing the significant environmental effects of the project to a less than significant level. Table 8-1 provides a summary of this analysis. The alternatives considered in the EIR include: 1) No Project/No Redevelopment Plan; 2) No Additional Development; 3) General Plan Opportunity Areas Map Concept; and, 4) Transit-Oriented Development (TOD) Principals Alternative.

8.1 No Project/No Redevelopment Plan

The State CEQA Guidelines require analysis of the No Project Alternative (Public Resources Code Section 15126). According to Section 15126.6(e), "the specific alternative of 'no project' shall also be evaluated along with its impacts. The 'no project' analysis shall discuss the existing conditions at the time the notice of preparation is published, at the time environmental analysis is commenced, as well as what would be

TABLE 8-1
Comparison of Project Alternatives Impacts
To Proposed Project Impacts

Impact Category	No Project/No Redevelopment Plan	No Additional Development	General Plan Opportunity Areas Map	TOD Principals Alternative
Land Use	Greater	Similar	Similar	Similar
Transportation/Circulation	Greater	Less	Greater	Less
Air Quality	Greater	Less	Greater	Less
Noise	Similar	Similar	Greater	Less
Cultural Resources	Similar	Less	Similar	Similar
Biological Resources	Similar	Less	Similar	Similar
Geology/Soils	Similar	Similar	Similar	Similar
Hazards/Hazardous Materials	Greater	Greater	Similar	Similar
Paleontological Resources	Similar	Less	Similar	Similar
Aesthetics	Greater	Greater	Similar	Similar
Water Quality/Hydrology	Greater	Greater	Similar	Less
Population/Housing	Similar	Similar	Greater	Greater
Public Services	Greater	Similar	Greater	Greater
Mineral Resources	Similar	Similar	Similar	Similar
Environmentally Superior	No	Yes	No	Yes

Source: BRG Consulting, Inc., 2004.

reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services."

8.1.1 Description of Alternative

The No Project/No Redevelopment Plan Alternative assumes that the proposed redevelopment plan would not be implemented. However, as with the proposed project, under the No Project/No Redevelopment Plan, 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.

8.1.1.1 *Land Use*

No land use impact has been identified associated with the proposed project. However, the Project Area currently contains a large amount of underutilized land and buildings, existing incompatible land uses, parcels of irregular form and shape, and insufficient parking and vehicle access. Under this alternative, the beneficial effects of redevelopment activities, such as providing a mechanism to allow consolidation of parcels and implementing a more cohesive development pattern, continuity of land use patterns and parcelization, and general public infrastructure and landscaping improvements, may not be achieved. Development within the Project Area is likely to continue in a similar fashion as has historically occurred in the Project Area. Overall, the land use impact would be greater than under the proposed project, as land use goals identified within applicable community plans for the Project Area would not be achieved.

8.1.1.2 *Transportation/Circulation*

Assuming that the Project Area is developed according to existing community plan land use designations and zoning, the level of development expected by the horizon year (year 2030) would be similar to the proposed project, as such, the level of traffic generated with this alternative would also be similar. However, the beneficial effects of implementing a redevelopment plan for the Project Area would not be implemented. These include private property access improvements and financing for public infrastructure improvements, including those identified in applicable community plans. 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.

8.1.1.3 *Air Quality*

Implementation of this alternative would result in the generation of a similar level of air emissions as the proposed project because a similar level of development would occur, although at a slower rate than under the proposed project. 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. Overall, the air quality impact would be greater than the proposed project.

8.1.1.4 *Noise*

Roadway noise levels would be similar to the project because a similar level of development would occur within the Project Area. As with the project, future development fronting major roadways would be exposed to noise levels exceeding acceptable standards. Project area roadways carry a high volume of traffic that currently expose various land uses to noise levels that exceed community noise standards. In general, the older structures within the Project Area have not been constructed so as to attenuate noise from adjacent major roadways. Any new development within the Project Area will need to be constructed in compliance with applicable building code requirements to ensure exterior and interior noise standards are met. The noise impact associated with this alternative would be similar to the proposed project.

8.1.1.5 *Cultural Resources*

Implementation of this alternative would result in a similar impact to cultural resources as the proposed project. This alternative assumes that a similar level of development could occur, including the footprint of development. Therefore, the impact would be expected to be similar to the project.

8.1.1.6 *Biological Resources*

Implementation of this alternative would result in a similar impact to biological resources as the proposed project. A similar level of development, including the footprint of development, would occur under this alternative as would occur under the proposed project; therefore, the impact would be expected to be similar to the project. Implementation of this alternative would not provide a catalyst for enhancement of certain areas of the San Diego River, as identified in the San Diego River Park Master Plan.

8.1.1.7 *Geology/Soils*

Implementation of this alternative would result in a similar geology/soils impact as the proposed project. Development within the Project Area will need to conform to the applicable building code provisions and seismic standards at the time of development. However, because a redevelopment plan would not be implemented, conformance of existing substandard structures would occur at a slower rate. Under this alternative, the beneficial effects of redevelopment activities, such as facilitating new development in the Project Area and replacing older substandard structures would not be achieved.

8.1.1.8 *Hazards/Hazardous Materials*

Implementation of this alternative would result in a greater impact associated with hazardous materials. New future development within the Project Area would need to comply with all applicable local, state, and federal regulations governing the use, storage, and transport of hazardous materials, regardless of whether or not the project is implemented. However, the proposed project will provide economic incentive to remediate existing sites, and under this alternative remaining sites containing hazardous materials, including structures that contain lead-based paint and/or asbestos containing building materials would likely remain for the near future.

8.1.1.9 *Paleontological Resources*

The overall rate of development would be slower than under the proposed project; however, the footprint of development would be similar to the proposed project. Therefore, the impact to paleontological resources would be similar.

8.1.1.10 *Aesthetics*

Under this alternative, the existing visual appearance of the Project Area would be expected to remain. The beneficial effects of the redevelopment plan that address the aesthetics of the Project Area would likely not be implemented. These include rehabilitating structures and improvements, providing incentives to property owners to participate in improving conditions in the Project Area, and adopting specific design guidelines for projects to ensure a consistent design theme that will guide future redevelopment activities. Landform alterations would be similar under this alternative as the Project Area is generally flat terrain and

builtout with urban uses. Future development activities are not expected to significantly alter landform conditions. The aesthetics impact is expected to be greater than the proposed project.

8.1.1.11 Water Quality/Hydrology

Implementation of this alternative would result in a greater impact to water quality and hydrology. The proposed project would redevelop properties that currently do not have structural controls to clean storm water runoff. The redevelopment project would provide a catalyst to improve substandard properties and bring these properties into compliance with current Regional Water Quality Control Board regulations governing runoff. Without a redevelopment plan, improvements to the San Diego River under the San Diego River Watershed Management Plan and the San Diego River Park Master Plan within the Project Area may not be achieved. Additionally, without a redevelopment plan, there would be less economic incentive to remediate existing hazardous materials sites and properties that contribute to degradation of water quality. Overall, the impacts to water quality and hydrology would be greater than the proposed project.

8.1.1.12 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. As with the project, under this alternative, construction of 134 housing units could occur, although at a slower rate. This amount of housing is consistent with the level identified in the community plan for the Project Area, and is not considered significant. This alternative would result in a similar impact to population and housing.

8.1.1.13 Public Services and Utilities

Implementation of this alternative would result in growth occurring within the Project Area at a slower pace than is anticipated to occur with implementation of a redevelopment project. Ultimately the same level of development would be expected by the horizon year (year 2030); however, the benefits of implementing a redevelopment plan would not occur, including the provision of better public services and facilities. This alternative would result in a greater impact to public services and utilities than the proposed project.

8.1.1.14 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. Under the proposed project, there is a possibility that redevelopment opportunities may accelerate the transition of the sand and gravel-processing facility to a different use. However, the proposed project is consistent with the applicable community plans and transition of the sand and gravel-processing facility to a different use is expected to occur regardless of whether the redevelopment plan is implemented. Therefore, this alternative would result in a similar mineral resources impact to the proposed project.

8.1.1.15 Conclusion – No Project/No Redevelopment Plan

This alternative is environmentally inferior to the proposed project. It would result in greater impacts associated with land use, transportation/circulation, air quality, hazards/hazardous materials, aesthetics,

water quality/hydrology and public services. Impacts associated with noise, cultural resources, biological resources, geology/soils, paleontological resources, population/housing, and mineral resources would be similar to the proposed project. This alternative would not reduce any significant impacts associated with the proposed project. Additionally, this alternative would not meet most of the basic objectives of the proposed project.

8.2 No Additional Development

8.2.1 Description of Alternative

The No Additional Development Alternative considers the environmental impacts associated with no additional development beyond that which currently exists within the Project Area. The level of development will remain at its existing condition within the Project Area under this alternative.

8.2.1.1 *Land Use*

No land use impact has been identified associated with the proposed project. However, incompatible land uses currently exist throughout the Project Area. Under this alternative, the beneficial effects of redevelopment activities, such as creating more compatible land uses, and continuity of land use patterns and parcelization, may not be achieved. The land use impact would be similar to the proposed project.

8.2.1.2 *Transportation/Circulation*

Implementation of this alternative would result in the generation of less traffic within the Project Area than the proposed project as this alternative assumes no new development would occur. Because less traffic would be generated under this alternative, the traffic impact would be less than the proposed project. However, in the horizon year, traffic operations at study area segments and intersections are anticipated to be unacceptable with and without the proposed project. Under this alternative, the project's incremental impact to study area roadway segments and intersections would be avoided. The beneficial effects of redevelopment activities, such as private property access improvements and public infrastructure improvements may not be implemented.

8.2.1.3 *Air Quality*

Implementation of this alternative would result in the generation of less traffic and therefore the amount of air emissions would be less than the proposed project. However, the beneficial air quality effects of redevelopment activities, including public infrastructure improvements would not be implemented. Overall the air quality impact would be less than the proposed project.

8.2.1.4 *Noise*

Roadway noise levels would be less than the proposed project because less traffic would be generated in the Project Area. The project generated traffic noise ranges between .5 and 3.5 dBA, and higher noise levels are generated by cumulative traffic conditions. In general, the older structures within the Project Area have not been constructed so as to attenuate noise from major roadways and these structures would

remain under this alternative. Overall, the noise impact associated with this alternative would be similar to the proposed project.

8.2.1.5 *Cultural Resources*

Implementation of this alternative would result in less of an impact to cultural resources than the proposed project. Because this alternative assumes that no development could occur, potential impacts to cultural resources would be avoided.

8.2.1.6 *Biological Resources*

Implementation of this alternative would result in less of an impact to biological resources than the proposed project. Because no development would occur under this alternative, potential impacts to biological resources within and adjacent to the Project Area would be avoided. Implementation of this alternative would not provide a catalyst for enhancement of certain areas of the San Diego River, as identified in the San Diego River Park Master Plan.

8.2.1.7 *Geology/Soils*

Implementation of this alternative would result in a similar geology/soils impact as the proposed project. However, assuming no new development occurs within the Project Area, conformance of existing substandard structures to applicable building codes would not occur. Under this alternative, the beneficial effects of redevelopment activities, such as facilitating new development in the Project Area and replacing older substandard structures would not be achieved.

8.2.1.8 *Hazards/Hazardous Materials*

Implementation of this alternative will result in a greater impact associated with hazardous materials than the proposed project. Structures that contain lead-based paints and/or structures with asbestos containing materials presumably would not be rehabilitated or remediated and existing sites would likely not be remediated.

8.2.1.9 *Paleontological Resources*

This alternative will result in less of an impact to paleontological resources than the proposed project. No additional grading or development would occur under this alternative; therefore, potential impacts to paleontological resources would be avoided.

8.2.1.10 *Aesthetics*

Under this alternative, the existing visual character of the Project Area would not be expected to change. The beneficial effects of the redevelopment plan that address the aesthetics of the area would likely not be implemented. These include rehabilitation of structures, landscaping, reconfiguration and consolidation of parcels, etc. Landform alternative impacts would be similar, as the Project Area is generally developed, and the topography is relatively flat; therefore, significant changes in existing landform or topography are not anticipated. Overall, the impact to the aesthetic character of the Project Area is expected to be greater than the proposed project as specific community plan goals related to improvement of the visual quality of the area could not be achieved.

8.2.1.11 *Water Quality/Hydrology*

Implementation of this alternative would likely result in a greater impact to hydrology and water quality than the proposed project. The proposed project would redevelop properties that currently do not have structural controls to clean storm water runoff. Without a redevelopment plan and with no new development, the economic incentive to remediate existing hazardous materials sites and properties that contribute to the degradation of water quality would not be achieved. Also, public infrastructure improvements, including drainage improvements would not be implemented which is more likely to occur with implementation of the redevelopment plan. The redevelopment project would provide a catalyst to improve substandard properties and bring them into compliance with current regional Water Quality Control Board standards. Overall, the impacts to water quality/hydrology will be greater than the proposed project.

8.2.1.12 *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, land use conditions would remain the same and no additional housing would be developed in the Project Area. Overall, this alternative would result in a similar population and housing impact as the proposed project.

8.2.1.13 *Public Services and Utilities*

The impact to public services and utilities would be similar to the proposed project. This alternative would not create an additional demand on public services. However, the benefits of the redevelopment project, including the provision of improved public facilities, would not be provided.

8.2.1.14 *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. The proposed project is consistent with the General Plan, including transition of the sand and gravel-processing facility to an urban use. This alternative would result in a similar mineral resources impact as the proposed project.

8.2.1.15 *Conclusion – No Additional Development Alternative*

This 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. Impacts associated with noise, geology/soils, biological resources, and population/housing would be similar to the proposed project. However, it would result in greater impacts associated with hazards/hazardous materials, aesthetics, and water quality/hydrology. This alternative would not meet most of the basic objectives of the proposed project.

8.3 General Plan Opportunity Areas Map Concept

8.3.1 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 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. Figure 8-1 depicts the land use configuration assumed for the General Plan Opportunity Areas Map Concept alternative. This alternative is being evaluated in response to comments on the Notice of Preparation and scoping for the EIR. The alternative introduces a mixed-use land use pattern in proximity to mass public transit (e.g., the San Diego Trolley) and major transportation corridors. The overall objective of the land use pattern would be to encourage the use of alternative modes of transportation and implementing pedestrian friendly concepts. This alternative also recognizes recent trends in development within the Mission Valley and I-8 corridor.

The alternative would result in an increase in commercial development by approximately 410,000 square feet, industrial development by approximately 4,818,000 square feet, office development by approximately 321,000 square feet, single-family residential units by 28 units, and multi-family dwelling units by 2,982 units. Institutional facilities would be reduced by approximately 66,700 square feet, religious facilities by approximately 117,000 square feet, quarry extraction by 208 acres, agriculture (commercial) by 1 acre, hospital development by approximately 91,000 square feet, and commercial recreation by approximately 31 acres.

8.3.1.1 Land Use

No land use impact has been identified associated with the proposed project. However, the Project Area currently contains underutilized land and buildings, existing incompatible land uses, parcels of irregular form and shape, and insufficient parking and vehicle access. Under this alternative, the beneficial effects of redevelopment activities, such as creating more compatible land uses, and continuity of land use patterns and parcelization, would also be achieved. Redevelopment would occur essentially in a similar fashion with the exception that more housing and less commercial and industrial development would occur. Overall, the land use impact would be similar to the proposed project.

8.3.1.2 Transportation/Circulation

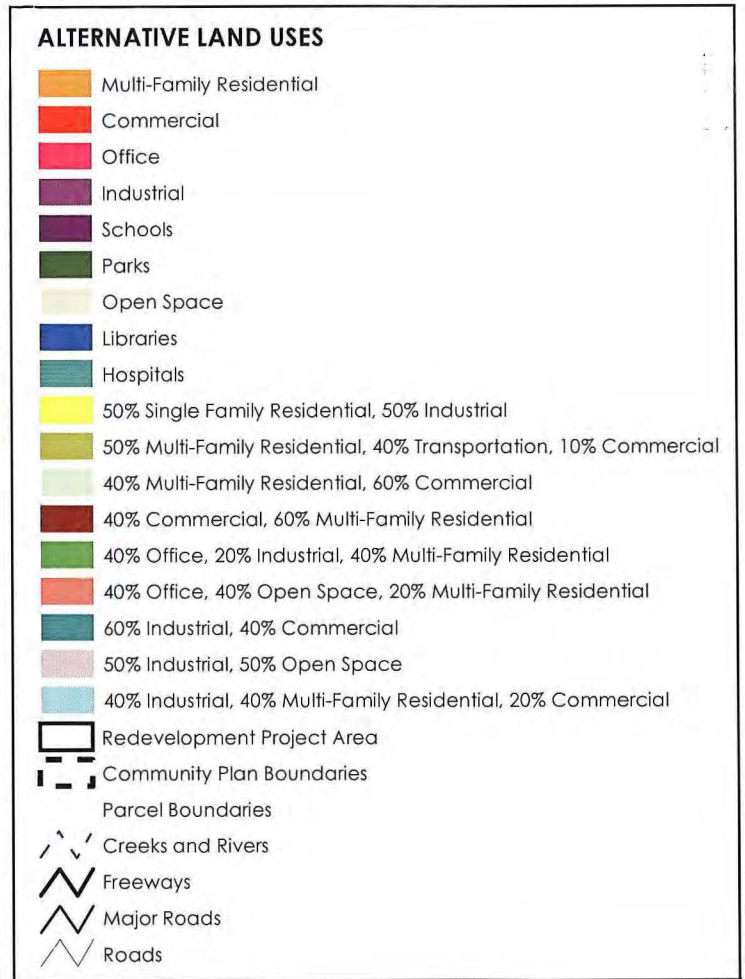
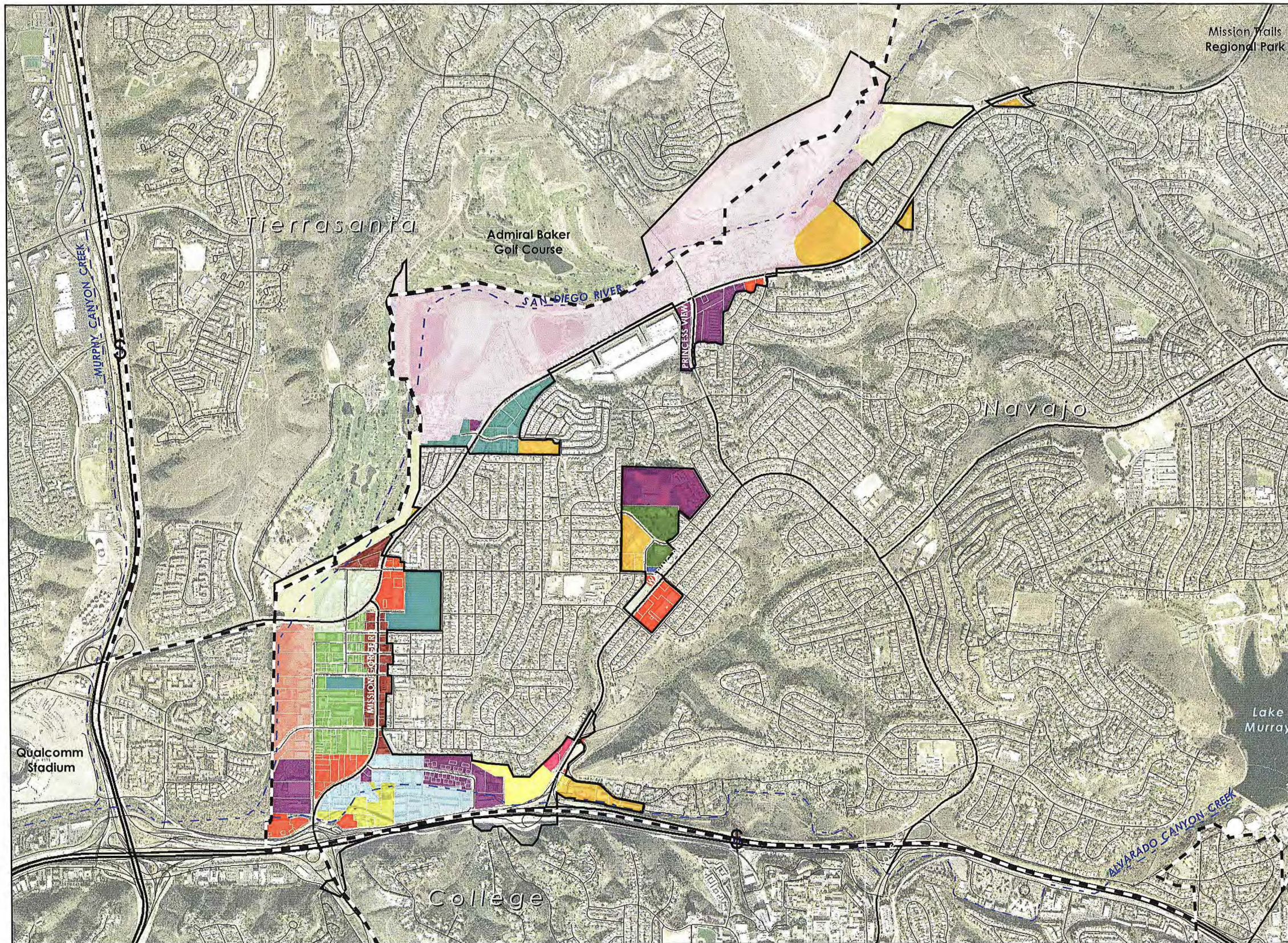
Redevelopment of the Project Area according to the General Plan Opportunity Areas Map Alternative would generate a net increase of 50,359 daily trips (see Table 8-2), the proposed project is estimated to generate approximately 31,606 daily trips (see Table 4.2-4). The increase in vehicular trips generated under this alternative is largely attributed to the increase of residential and commercial uses which are higher trip generators than the industrial uses. Table 8-2 depicts the estimated trip generation pursuant to the General Plan Opportunities Area Map Alternative. Figure 8-2 depicts the daily and peak hour trip assignment under this alternative.

TABLE 8-2
Trip Generation for the General Plan Opportunities Area Map Alternative

Land Use	Intensity	Trip Rate	Per	Daily Trips	AM Trips	AM In	Out	PM Trips	In	Out
Alternative Land Use Intensities										
Neighborhood Commercial	268 KSF	72	KSF	19,295	772	463	309	2,122	1,061	1,061
Community Shopping Center	167 KSF	49	KSF	8,163	245	147	98	816	408	408
Specialty Retail/ Strip Commercial	-24 KSF	36	KSF	-862	-26	-16	-10	-78	-39	-39
Industrial (Manufacturing/ Assembly)	4,325 KSF	4	KSF	17,298	3,460	3,114	346	3,460	692	2,768
Industrial (Business Park)	173 KSF	16	KSF	2,762	331	109	222	331	66	265
Industrial (Small Industrial Park)	-277 KSF	15	KSF	-4,158	-457	-412	-46	-499	-100	-399
Industrial (Large Industrial Park)	599 KSF	8	KSF	4,790	527	474	53	575	115	460
Commercial Office	321 KSF	20	KSF	3,903	507	457	51	546	109	437
Institutional (Library)	-67 KSF	20	KSF	-1,334	-27	-19	-8	-133	-67	-67
Residential Single Family	28 DU	10	DU	277	22	4	18	28	19	8
Residential Multi-Family	2,982 DU	8	DU	23,854	1,908	382	1,527	2,385	1,670	716
Religious Facility	-117 KSF	9	KSF	-1,054	-42	-34	-8	-84	-42	-42
Park (Development)	7 AC	50	AC	336	13	0	0	27	0	0
Industrial Extraction (Quarry)	-208 AC	100	AC	-20,830	-3,125	-2,187	-937	-3,333	-1,333	-2,000
Agriculture	-1 AC	2	AC	-1	0	0	0	0	0	0
Hospital	-92 KSF	20	KSF	-1,831	-165	-115	-49	-183	-55	-128
Commercial Recreation (Golf)	-31 AC	8	AC	-247	-15	-12	-3	-22	-7	-16
Total Alternative Project Trips				50,359	3,930	2,356	1,560	5,958	2,499	3,433

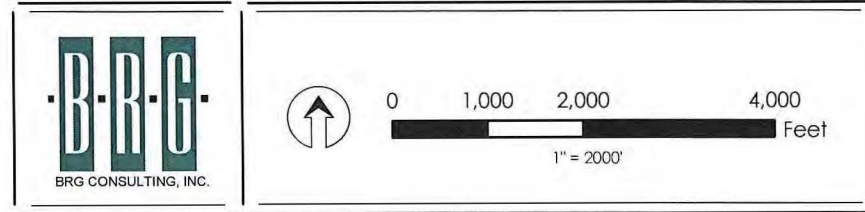
Notes: KSF = thousand square feet, DU = dwelling units, AC = acres.

Source: City of San Diego Trip Generation Manual, September 1998.



SOURCE: LandisCor (1/14/04), SanGIS and BRG Consulting, Inc., 2004

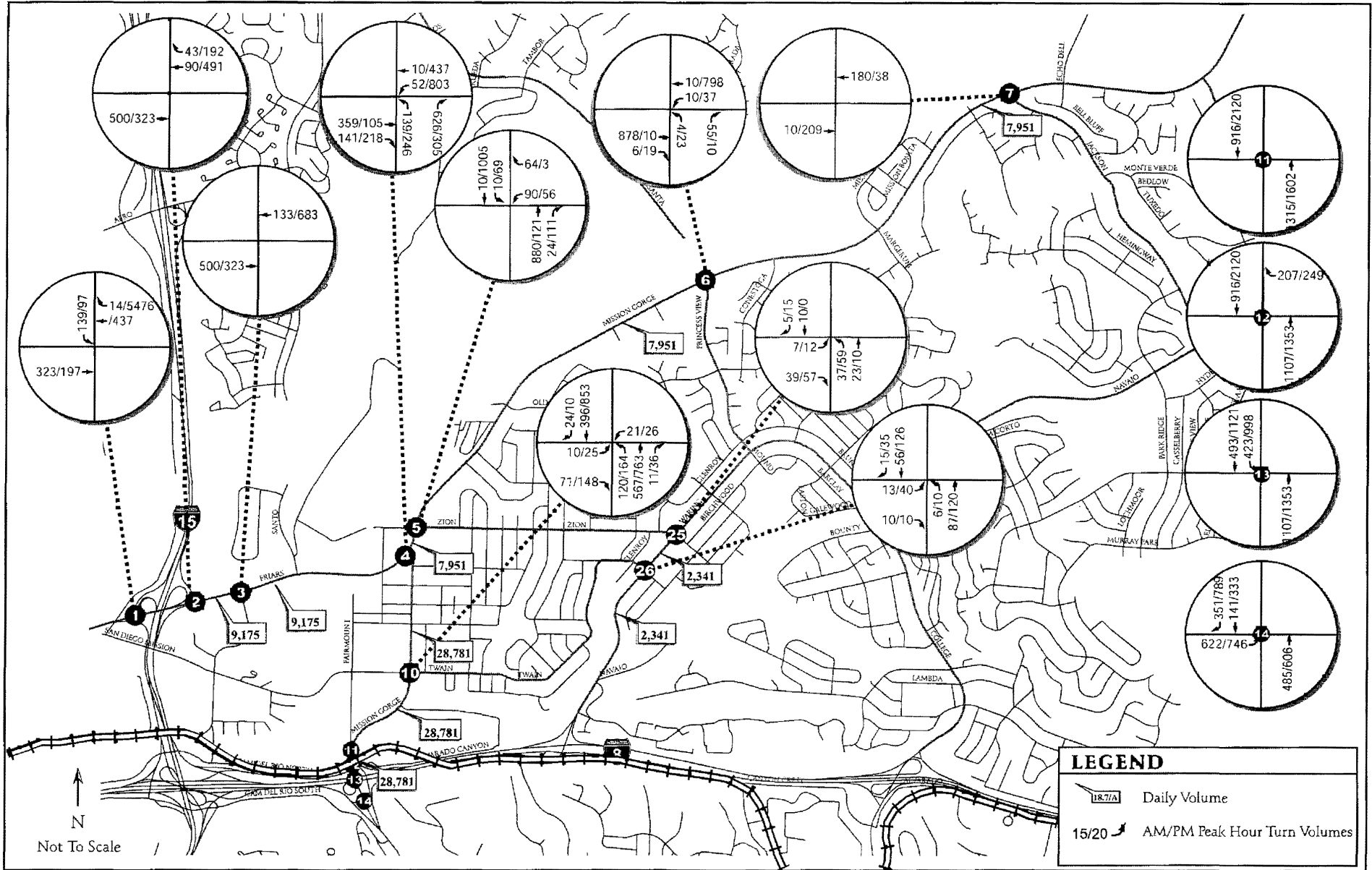
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Grantville EIR

General Plan Opportunities Area Map Alternative Land Uses

FIGURE
8-1



SOURCE: Katz, Okitsu & Associates, 2004

3/10/05

Grantville EIR

General Plan Opportunities Alternative Daily and Peak Hour Trip Assignment

FIGURE

8-2



Table 8-3 summarizes the horizon year (Year 2030) roadway segment conditions both with and without the project. As shown in Table 8-3, in the horizon year, without the alternative land uses, all roadway segments operate at LOS D or better except:

- 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)
- Mission Gorge Road from Mission Gorge Place to Twain Avenue (LOS E)

With the addition of alternative plan traffic, the following segments are significantly impacted:

- Friars Road from I-15 northbound ramps to Rancho Mission Road (LOS F)
- Friars Road from Rancho Mission Road to Santo Road (LOS F)
- Fairmount Avenue from I-8 eastbound 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)
- Mission Gorge Road from Friars Road to Zion Avenue (LOS F)

Implementation of this alternative would result in a greater impact than the proposed project as this alternative would: degrade Friars Road from Rancho Mission Road to Santa Road to LOS F (as compared to LOS E under the proposed project). Also, this alternative would significantly impact two additional roadway segments that are not impacted by the proposed project: Mission Gorge Road from Twain Avenue to Vandever Avenue (LOS F) and Mission Gorge Road from Friars Road to Zion Avenue (LOS F).

Table 8-4 summarizes the results of the peak hour intersection performance analysis and the significance of project impacts. Figures 8-3 and 8-4 depict the horizon year AM and PM peak hour intersection turning movements for this alternative.

As shown in Table 8-4, under this alternative, the following intersections would be significantly impacted:

- Zion & Mission Gorge Road (AM and PM Peak hour)
- Friars Road & I-15 southbound ramps (PM peak hour)
- Friars Road & Mission Gorge Road (PM peak hour)
- Twain & Mission Gorge Road (AM and PM peak hour)
- Fairmount Avenue & Mission Gorge Road (AM and PM peak hour)
- Camino Del Rio & I-8 westbound off ramp & Fairmount Avenue (AM and PM Peak hours)
- I-8 eastbound on- and off-ramps & Fairmont Avenue (AM and PM Peak hours)

TABLE 8-3
Horizon Year 2030
Daily Roadway Segment Conditions with the Alternative Plan Project

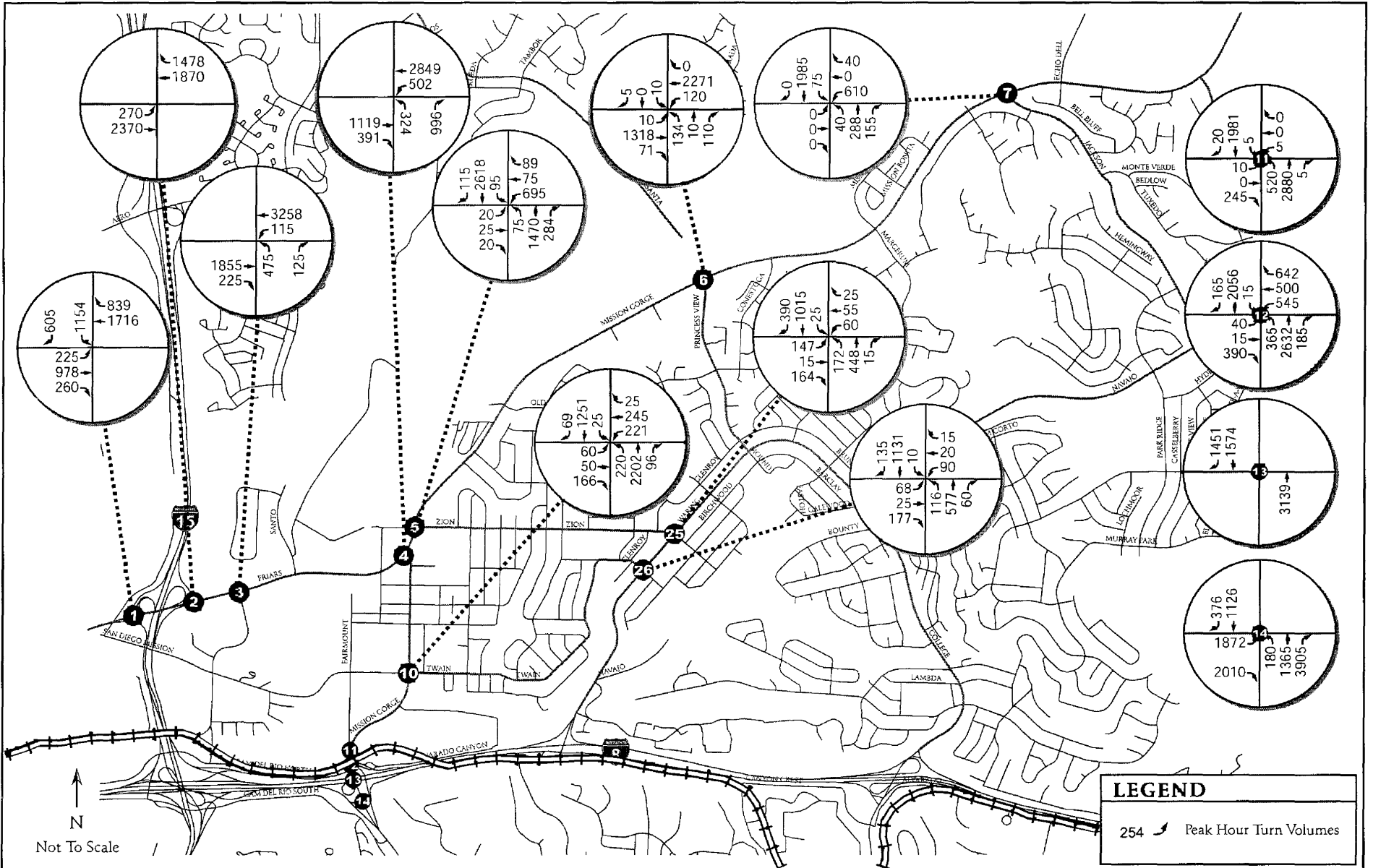
Street Segment	Lanes / Class	Horizon without Project			Project Added	Horizon with Project			Comparison	
		ADT	V/C	LOS		ADT	V/C	LOS	Increase V/C	Sig?
Friars Road										
I-15 NB Ramps to Rancho Mission Road	6 / Prime	69,900	1.165	F	9,108	79,008	1.317	F	0.152	Yes
Rancho Mission Road to Sanfo Road	6 / Prime	56,500	0.942	E	9,108	65,608	1.093	F	0.152	Yes
Fairmount Avenue										
I-8 EB Off Ramp to Camino Del Rio North	4 / Major	59,500	1.488	F	28,695	88,195	2.205	F	0.717	Yes
Mission Gorge Road										
Mission Gorge Place to Twain Avenue	4 / Major	37,200	0.930	E	28,695	65,895	1.647	F	0.717	Yes
Twain Avenue to Vandever Avenue	4 / Major	33,900	0.848	D	28,695	62,595	1.565	F	0.717	Yes
Friars Road to Zion Avenue	6 / Prime	52,400	0.873	D	7,991	60,391	1.007	F	0.133	Yes
West of Princess View Drive	5 / Prime	33,200	0.664	C	7,991	41,191	0.824	C	0.160	No
West of Jackson Drive	6 / Major	28,200	0.564	C	7,991	36,191	0.724	C	0.160	No
Waring Road										
Zion Avenue to Twain Avenue	4 / Major	16,100	0.403	B	1,899	17,999	0.450	B	0.047	No
South of Twain Avenue	4 / Major	18,000	0.450	B	1,899	19,899	0.497	B	0.047	No

Notes: NB = North Bound, SB = South Bound, EB = East Bound, WB = West Bound, ADT = Average Daily Traffic, V/C = Volume/Capacity Ratio, LOS = Level of Service, Sig = Significant
Source: Katz, Okitsu & Associates, 2004

TABLE 8-4
Year 2030 Peak Hour Intersection Conditions with the Alternative Plan Project

Intersection	2030 Without		2030 With		Increase Delay (sec.)	Significant?
	Delay (sec.)	LOS	Delay (sec.)	LOS		
AM Peak Hour						
1. Friars & I-15 SB Ramps	42.5	D	48.1	D	5.6	No
2. Friars & I-15 NB Ramps	8.3	A	8.7	A	0.4	No
3. Friars & Rancho Mission Rd	25.1	C	30.6	C	5.5	No
4. Friars & Mission Gorge Rd	17.6	B	29.9	C	12.3	No
5. Zion & Mission Gorge Rd	42.4	D	67.1	E	24.7	Yes
6. Princess View & Mission Gorge Rd	22.9	C	33.4	C	10.5	No
7. Jackson & Mission Gorge Rd	15.0	B	15.3	B	0.3	No
10. Twain & Mission Gorge Rd	48.5	D	117.5	F	69.0	Yes
11. Fairmont Ave & Mission Gorge Rd	18.6	B	93.0	F	74.4	Yes
12. Cam. Del Rio/ I-8 WB Off & Fairmount Ave	138.0	F	309.3	F	171.3	Yes
13. Fairmont Ave & I-8 WB On Ramp*	0.0	A	0.0	A	0.0	No
14. I-8 EB On and Off Ramps & Fairmount Ave	25.0	C	81.4	F	56.2	Yes
25. Zion & Waring Rd	26.5	C	35.0	C	8.5	No
26. Twain & Waring Rd	15.6	B	15.8	B	0.2	No
PM Peak Hour						
1. Friars & I-15 SB Ramps	67.2	E	111.9	F	44.7	Yes
2. Friars & I-15 NB Ramps	16.5	B	30.1	C	13.6	No
3. Friars & Rancho Mission Rd	24.5	C	43.1	D	18.6	No
4. Friars & Mission Gorge Rd	50.9	D	194.9	F	144.0	Yes
5. Zion & Mission Gorge Rd	40.3	D	86.0	F	45.7	Yes
6. Princess View & Mission Gorge Rd	24.1	C	17.8	B	3.0	No
7. Jackson & Mission Gorge Rd	13.3	B	13.9	B	0.6	No
10. Twain & Mission Gorge Rd	70.0	E	291.0	F	221.0	Yes
11. Fairmont Ave & Mission Gorge Rd	25.1	C	241.6	F	216.5	Yes
12. Cam. Del Rio/ I-8 WB Off & Fairmount Ave	222.1	F	509.0	F	286.9	Yes
13. Fairmont Ave & I-8 WB On Ramp*	0.0	A	0.0	A	0.0	No
14. I-8 EB On and Off Ramps & Fairmount Ave	19.8	B	93.7	F	73.9	Yes
25. Zion & Waring Rd	26.6	C	31.0	C	4.4	No
26. Twain & Waring Rd	13.3	B	14.2	B	0.9	No

Notes: NB = North Bound, SB = South Bound, EB = East Bound, WB = West Bound, ADT = Average Daily Traffic, V/C = Volume/Capacity Ratio, LOS = Level of Service, Sig = Significant
Source: Katz, Okitsu & Associates, 2004



SOURCE: Katz, Okitsu & Associates, 2004

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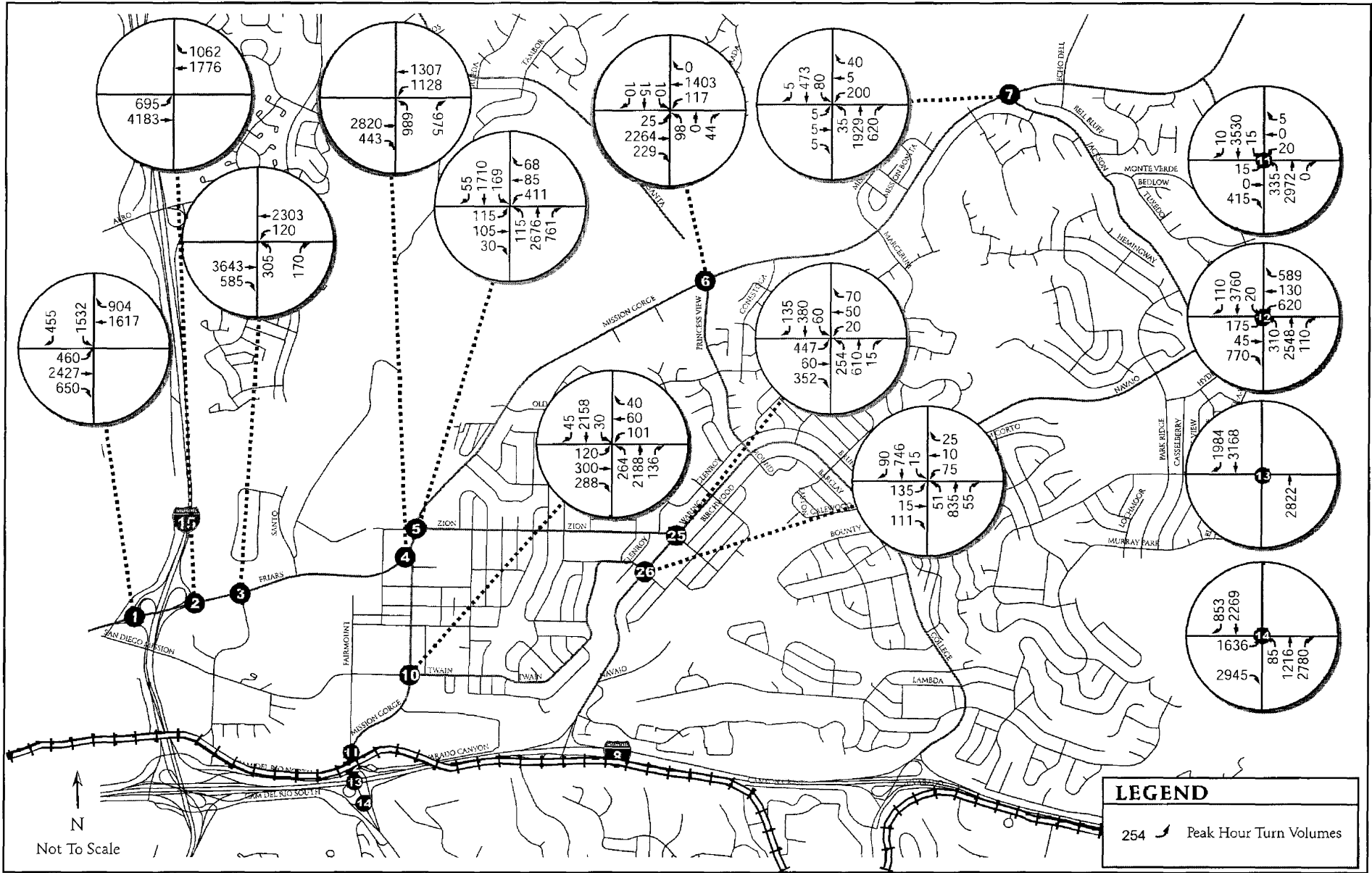


Grantville EIR

Horizon Year AM Peak Hour Turning Movements
with General Plan Opportunities Alternative

FIGURE

8-3



SOURCE: Katz, Okitsu & Associates, 2004

3/10/05

Grantville EIR

Horizon Year PM Peak Hour Turning Movements with General Plan Opportunities Alternative

FIGURE

8-4



Ramp meter locations that would be significantly impacted by this alternative include:

- Friars Road to I-15 North (AM Peak hour);
- Friars Road to I-15 South (loop) (PM Peak Hour); and,
- Friars Road (HOV) to I-15 North (PM Peak Hour).

This alternative would impact the same intersections and ramp meter locations as compared to the proposed project; as well as additional impacts to the Zion and Mission Gorge Road intersection and the I-8 eastbound on- and off-ramps & Fairmount Avenue.

8.3.1.3 *Air Quality*

Implementation of this alternative would result in generation of more mobile and stationary air pollutant emissions than the proposed project. This is based on the traffic generation estimates provided in Table 8-2, and is attributed to the increase in residential land uses. The trip generation estimates are considered conservative, and do not factor in the use of public transit systems. As with the proposed project, as commercial and industrial land uses redevelop, the beneficial air quality effects of redevelopment activities, including public infrastructure improvements and upgraded stationary air pollution control equipment will be implemented. Because residential mixed use would be located near the transit corridor, mass transit options, such as the San Diego Trolley could be utilized. Overall, the air quality impact would be greater than the proposed project.

8.3.1.4 *Noise*

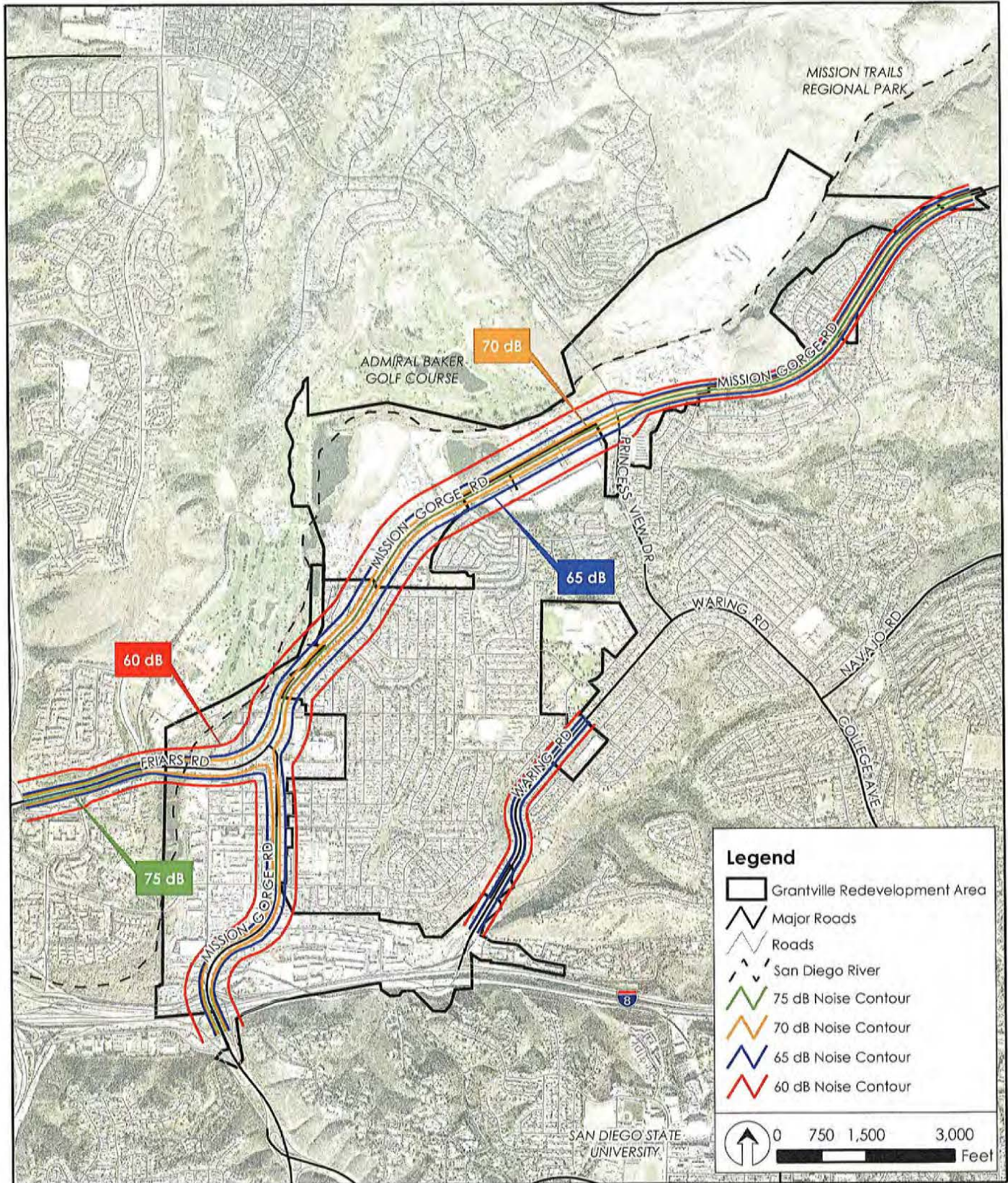
Roadway noise levels would be greater than the proposed project because significantly more vehicles would be using the Project Area roadways due to the additional trips generated by residential land uses. Any new development within the Project Area will need to be constructed in compliance with the applicable building codes to ensure exterior and interior noise standards are met regardless of whether this alternative or the proposed project is implemented. Figure 8-5 depicts the roadway noise contours associated with implementation of this alternative.

8.3.1.5 *Cultural Resources*

Implementation of this alternative would result in a similar impact to cultural resources as the proposed project. This alternative assumes future redevelopment activities would occur in the same area as the proposed project; therefore, there would be a similar potential to impact sensitive cultural resources.

8.3.1.6 *Biological Resources*

Implementation of this alternative would result in a similar impact to biological resources as the proposed project. Future redevelopment activities are assumed to occur within the same land area as the project; therefore, there would be a similar potential to impact sensitive biological resources within and adjacent to the Project Area.



SOURCE: Landiscor (1/14/04), Wieland Associates, SanGIS and BRG Consulting, Inc., 2004

12/7/04



Grantville EIR
 General Plan Opportunities Alternative
 Roadway Noise Contours

FIGURE
 8-5

8.3.1.7 *Geology/Soils*

Implementation of this alternative would result in a similar geology/soils impact as the proposed project. Future development within the Project Area will need to conform to the applicable building codes and standards at the time development occurs. Under this alternative as with the proposed project, the beneficial effects of redevelopment activities, such as facilitating new development in the Project Area and replacing older substandard structures would be achieved.

8.3.1.8 *Hazards/Hazardous Materials*

Implementation of this alternative would result in a similar hazards/hazardous materials impact as the proposed project. Future development within the Project Area will need to conform to the applicable building codes and standards at the time development occurs. Under this alternative, the beneficial effects of redevelopment activities, such as rehabilitating or remediating existing land uses that contain lead-based paints and/or structures with asbestos containing materials would occur.

8.3.1.9 *Paleontological Resources*

Implementation of this alternative would result in a similar impact to paleontological resources as the proposed project. This alternative would result in development of the same land area, and therefore, have a similar chance of impacting sensitive paleontological resources.

8.3.1.10 *Aesthetics*

Under this alternative, the visual character of the Project Area would be expected to improve as redevelopment activities occur. The beneficial effects of a redevelopment plan that address the aesthetics of the Project Area would be implemented under this alternative. These improvements include rehabilitating structures and improvements, providing incentives to property owners to participate in improving conditions in the Project Area, and adopting specific design guidelines for projects to ensure a consistent design theme that will guide future redevelopment activities. Landform alterations would be similar under this alternative as the Project Area is builtout and located on relatively flat terrain. Future development activities are not anticipated to significantly alter landform conditions. Overall, the aesthetics impact is expected to be similar to the proposed project.

8.3.1.11 *Water Quality/Hydrology*

Implementation of this alternative would likely result in a similar impact to water quality and hydrology. As with the proposed project, this alternative would redevelop properties that currently do not have structural controls to clean storm water runoff. This alternative would implement mixed uses near the San Diego River and Alvarado Canyon Creek instead of commercial and industrial uses that are identified in the community plan. Under either scenario, all new development would be required to comply with the Regional Water Quality Control Board requirements. As with the proposed project, this alternative would provide a catalyst to improve substandard properties and bring them into compliance with current Regional Water Quality Control Board beneficial uses, implement improvements to the San Diego River under the San Diego River Watershed management Plan and the San Diego River Park Master Plan, and provide an economic incentive to remediate existing hazardous materials sites and properties that contribute to degradation of water quality would not be achieved.

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

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

the existing commercial and industrial areas located east of Fairmount Avenue, south of Twain Avenue, north of I-8, and west of Waring Road. This 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 within this area. A total of 2,500 multi-family residential dwelling units is assumed.

8.4.1.1 *Land Use*

No land use impact has been identified associated with the proposed project. However, the Project Area currently contains underutilized land and buildings, existing incompatible land uses, parcels of irregular form and shape, and insufficient parking and vehicle access. Under this alternative, the beneficial effects of redevelopment activities, such as creating more compatible land uses, and continuity of land use patterns and parcelization, would be achieved. Redevelopment would occur essentially in a similar fashion with the exception that more housing and less commercial and industrial development would occur. This alternative would also serve to meet regional goals of locating higher density residential uses in proximity to mass transit systems (i.e., the trolley station). Overall, the land use impact would be similar to the proposed project.

8.4.1.2 *Transportation/Circulation*

This alternative would generate approximately 7,200 average daily trips less than the proposed project. Additionally, residential uses would be located near the transit corridor and there would be viable mass transit options to area residents, including the San Diego Trolley. This would encourage alternative forms of transportation other than the automobile. The impact to transportation/circulation would be less than the project.

8.4.1.3 *Air Quality*

Implementation of this alternative would result in generation of less mobile and stationary air pollutant emissions because less traffic would be generated, and residential uses would be located near the transit corridor and mass transit options, such as the San Diego Trolley. The air quality impact would be less than the proposed project.

8.4.1.4 *Noise*

Roadway noise levels would be less than under the proposed project because fewer vehicles would be using the Project Area roadways. As with the proposed project, any new development within the Project Area will need to be constructed in compliance with the applicable building codes to ensure exterior and interior noise standards are met.

8.4.1.5 *Cultural Resources*

Implementation of this alternative would result in a similar impact to cultural resources as the proposed project. This alternative assumes the same development footprint as the proposed project, with a similar potential impact to currently undiscovered cultural resources.

8.4.1.6 *Biological Resources*

Implementation of this alternative would result in a similar impact to biological resources as the proposed project. This alternative assumes the same development footprint as the proposed project; therefore, future redevelopment activities will develop the same land area and have a similar impact on sensitive biological resources.

8.4.1.7 *Geology/Soils*

Implementation of this alternative would result in a similar geology/soils impact as the proposed project. Future development within the Project Area, will need to conform to the applicable building codes and standards at the time development occurs. Under this alternative, the beneficial effects of redevelopment activities, such as facilitating new development in the Project Area and replacing older substandard structures would also be achieved.

8.4.1.8 *Hazards/Hazardous Materials*

Implementation of this alternative would result in a similar hazards/hazardous materials impact as the proposed project. Future development within the Project Area, regardless of whether the project is implemented will need to conform to the applicable building codes and standards at the time development occurs. Under this alternative, the beneficial effects of redevelopment activities, such as rehabilitating or remediating existing land uses that contain lead-based paints and/or structures with asbestos containing materials would occur.

8.4.1.9 *Paleontological Resources*

Implementation of this alternative would result in a similar impact to paleontological resources as the proposed project. This alternative assumes the same development footprint as the proposed project; therefore, future redevelopment activities will develop the same land area and will have a similar potential of impacting sensitive paleontological resources.

8.4.1.10 *Aesthetics*

Under this alternative, the visual appearance of the Project Area is anticipated to improve as redevelopment activities occur. The beneficial effects of a redevelopment plan that address the aesthetics of the Project Area would be implemented under this alternative. These improvements include rehabilitating structures and improvements, providing incentives to property owners to participate in improving conditions in the Project Area, and adopting specific design guidelines for projects to ensure a consistent design theme that will guide future redevelopment activities. Landform alterations would be similar under this alternative as the Project Area is located on level terrain, is built out, and future development activities will not significantly alter landform conditions. The aesthetics impact is expected to be similar to the proposed project.

8.4.1.11 *Water Quality/Hydrology*

Implementation of this alternative would likely result in less of an impact to water quality and hydrology. As with the proposed project, this alternative would redevelop properties that currently do not have structural controls to clean storm water runoff but under this alternative, redevelopment intensity would be less and

associated pollutant emissions in stormwater runoff would be less. This alternative would provide a catalyst to improve substandard properties and bring them into compliance with current Regional Water Quality Control Board beneficial uses, implement improvements to the San Diego River under the San Diego River Watershed Management Plan and the San Diego River Park Master Plan, and provide an economic incentive to remediate existing hazardous materials sites and properties that contribute to degradation of water quality would not be achieved.

8.4.1.12 *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 2,500 dwelling units could be constructed) would occur, which would result in an 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.

8.4.1.13 *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 800 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 21 acres of population-based parkland.

8.4.1.14 *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. Because the proposed project is consistent with the General Plan and transition of the sand and gravel-processing facility to a different use will eventually occur, this alternative would result in a similar mineral resources impact as the proposed project.

8.4.1.15 *Conclusion – Transit Oriented Development Principals Alternative*

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

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10.0 GLOSSARY

ACOE	Army Core of Engineers
ADT	Average Daily Traffic
AST	Aboveground Storage Tank
AQIA	Air Quality Impact Assessment
BACT	Best Available Control Technology
CAAQS	California Ambient Air Quality Standards
CALTRANS	California Department of Transportation
CARB	California Air Resources Board
CESA	California Endangered Species Act
CCRL	California Community Redevelopment Law
CDFG	California Department of Fish and Game
CEAPER	College and Easter Area Planning and Economic Review
CEQA	California Environmental Quality Act
CNEL	Community Equivalent Noise Level
CO	Carbon Monoxide
CUP	Conditional Use Permit
dB	decibel
dba	A-weighted sound level
DDAs	Disposition and Development Agreements
DEH	Department of Environmental Health
ESA	Environmental Site Assessment
ESL	Environmental Sensitive Land Ordinance
F	Fahrenheit
FESA	Federal Endangered Species Act
HHMD	Hazardous Materials Management Division
HMTS	Hazardous Materials Technical Study
HU	Hydrologic Unit
LEED	Leadership in Energy and Environmental Design
LUST	Leaking Underground Storage Tank
MBTA	Migratory Bird Treaty Act
MHPA	Multiple Habitat Planning Area
MMRP	Mitigation, Monitoring and Reporting Program
MSA	Major Statistical Area
MSCP	Multiple Species Conservation Program
NAAQS	National Ambient Air Quality Standards
NO ₂	Nitrogen Dioxide
NOP	Notice of Preparation
O ₃	Ozone
OHWM	Ordinary High Water Mark
OPAs	Owner Participation Agreements

PID	Planned Industrial Development
RAQS	Regional Air Quality Strategies
RCRA	Resource Conservation and Recovery Act
ROC	Reactive Organic Compounds
RWQCB	Regional Water Quality Control Board
SANDAG	San Diego Association of Governments
SanGIS	San Diego Geographic Information Source
SDAB	San Diego Air Basin
SDAPCD	San Diego Air Pollution Control District
SDG&E	San Diego Gas and Electric
SDRW	San Diego River Watershed
SDRWQCB	San Diego Regional Water Quality Control Board
SIP	State Implementation Plan
SMARA	Surface Mining and Reclamation Act
SMGB	State Mining and Geology Board
SO ₂	Sulfur Dioxide
SWL	Solid Waste Landfill
SWQCB	State Water Quality Control Board
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
UST	<u>Underground Storage Tank</u>
VOC	Volatile Organic Compounds

11.0 INDIVIDUALS AND AGENCIES CONSULTED

The following persons and organizations were contacted in preparation of this Environmental Impact Report:

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BRG Consulting, Inc.

304 Ivy Street

San Diego, CA 92101

(619) 298-7127

Tim Gnibus, AICP, Senior Project Manager

Patrick O'Neill, Project Manager

Patrick Zabrocki, Environmental Planner

Kathie Washington, Environmental Planner

Mary Brady, Production Manager

Mettja Kuna, GIS Analysis and Graphics

Subconsultants

Katz, Okitsu & Associates

2251 San Diego Avenue, Suite A-270

San Diego, CA 92110-2926

(619) 683-2933

Responsibility: Preparation of Traffic Impact Analysis (November 2004).

BRG Consulting, Inc.

304 Ivy Street

San Diego, CA 92101

(619) 298-7127

Responsibility: Preparation of Air Quality Worksheets (November 2004).

Wieland Associates

233276 South Pointe Drive, Suite 114

Laguna Hills, CA 92653

Responsibility: Preparation of Noise Modeling Worksheets (November 2004).

ASM Affiliates

543 Encinitas Blvd., Suite 114

Encinitas, CA 92024

(760) 632-1094

Responsibility: Preparation of Cultural Resources Report (September 2004).

Rocks Biological Consulting

3242 Falcon Street

San Diego, CA 92103

(619) 843-6640

Responsibility: Preparation of Biological Resources Report (October 2004).

Ninyo & Moore

5710 Ruffin Road

San Diego, CA 92123

(858) 576-1000

Responsibility: Preparation of Geology Reconnaissance Report (September 2004) and Hazardous Materials Technical Study (September 2004).

FOREWORD

The Grantville Redevelopment Project Draft EIR was circulated for public review for a period of 64 days extending from December 13, 2004 to February 14, 2005. The Draft EIR was distributed to a variety of public agencies and individuals.

In accordance with CEQA Guidelines Section 15088, the City of San Diego Redevelopment Agency has evaluated the comments on environmental issues received from those agencies/parties and has prepared written responses to each pertinent comment relating to the adequacy of the environmental analysis contained in the Draft EIR. There has been good faith, reasoned analysis in response to comments, rather than conclusionary statements unsupported by factual information.

The agencies, organizations, and interested persons listed on the Response to Comments Index submitted comment on the Draft EIR during the public review period. Each comment submitted in writing is included, along with a written response where determined necessary. The individual comments have been given reference numbers, which appear to the left of the corresponding comment. For example, the first letter, from the State of California, Governor's Office of Planning and Research, State Clearinghouse has comment number OPR1, with additional comments to a letter, numbered consecutively.

In response to comments received, certain revisions have been made in the EIR. These revisions to the EIR are generally minor text changes that do not constitute significant additional information that changes the outcome of the environmental analysis or require recirculation of the document (Guidelines Section 15088.5). All such changes are noted in the responses to comments.

The comment letters and responses are provided on the following pages.

Index of Comments on Draft EIR & Responses

Commentor	Date	Response Series
Federal Agencies		
U.S. Fish and Wildlife Service (joint letter w/DFG)	February 14, 2005	DFG1 – DFG19
State Agencies		
Governor's Office of Planning and Research (OPR) – State Clearinghouse and Planning Unit	January 27, 2005	OPR1
Department of Conservation	January 12, 2005	DOC1
Native American Heritage Commission	January 26, 2005	NAHC1 – NAHC3
Department of Transportation	January 25, 2005	DOT1 – DOT6
San Diego County Office of Education	February 2, 2005	DFG1 – DFG19
Department of Fish and Game (joint letter w/USFWS)	February 14, 2005	COE1 – COE2
Local Agencies		
San Diego Association of Governments (SANDAG)	February 14, 2005	SNDG1 – SNDG4
City of San Diego – Development Services Department (Ann French Gonsalves- Traffic)	February 14, 2005	AG1 – AG6
City of San Diego – Park Planning and Development, Park and Recreation Department	January 26, 2005	PRD1 – PRD23
Organizations		
Tierrasanta Community Council	February 14, 2005	TCC1 – TCC13
Individuals		
Daniel Dallenbach – Valley View Properties	January 19, 2005	DD1 – DD13
Richard McCarter – California Neon Products	January 31, 2005	RM1 – RM6
Brian R. Caster – Caster Properties, Inc.	February 9, 2005	BC1 – BC8
Daniel R. Smith - El Dorado Properties	January 25, 2005	DRS1 – DRS29
Charles Little – Letter A	January 24, 2005	CLA1 – CLA9
Charles Little – Letter B	February 1, 2005	CLB1 – CLB8
Lynn Murray	February 8, 2006	LM1 – LM7
Jennifer Nickles	February 2, 2005	JN1 – JN14
Holly Simonette – Letter A	February 14, 2005	HSA1 – HSA32
Holly Simonette – Letter B	January 25, 2005	HSB1 – HSB7
Holly Simonette/Lynn Murray	January 2005	HSLM1 – HSLM8
Don Stillwell – Letter A	January 31, 2005	DSA1
Don Stillwell – Letter B	February 8, 2005	DSB1
Helen R. Hunter	February 14, 2005	HH1 – HH6
Marilyn Reed	February 13, 2005	MR1 – MR9
Lee Campbell	February 14, 2005	LC1 – LC77
Betty Torre	February 14, 2005	BT1 – BT5
Public Meetings		
Redevelopment Agency Hearing Transcript	January 25, 2005	RB1 – RB3, JR1 HS1 – HS6, DS1, JS1 – JS2, DF1 – DF4
Grantville Redevelopment Area Committee Minutes	January 31, 2005	
Petition		
San Diego River Conservancy	March 13, 2005	SDRC1 – SDRC40

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Arnold
Schwarzenegger
Governor

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



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(e) of the California Public Resources Code states that:

"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
Director, State Clearinghouse

Enclosures
cc: Resources Agency

**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.

OPR1

**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 500 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

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.



DEPARTMENT OF CONSERVATION
STATE OF CALIFORNIA

DIVISION OF OIL,
GAS, & GEOTHERMAL
RESOURCES

5816 CORPORATE AVE.
SUITE 200
CYPRESS
CALIFORNIA
90630-4731

PHONE
714/816-6847

FAX
714/816-6853

INTERNET
cdnsrv.ca.gov

ARNOLD
SCHWARZENEGGER
GOVERNOR

DOC1

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:

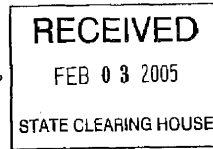
Comment noted. The Draft Program EIR addresses the adoption of a redevelopment project area; no specific development is proposed at this time. Future redevelopment activities would comply with federal, state, and local agency disclosure requirements in the event a previously unrecorded well is encountered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

NATIVE AMERICAN HERITAGE COMMISSION
915 CAPITOL MALL, ROOM 354
SACRAMENTO, CA 95814
(916) 653-4082
(916) 657-5390 - Fax



January 26, 2005

clear
1/26/05
late



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# ~~2664061122~~ 2004071121

Dear Mr. Reed:

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:

NAHC1

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

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.

NAHC2

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.

NAHC3

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

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

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

Kumeyaay Cultural Historic Committee
Ron Christman
56 Viejas Grade Road Diegueno/Kumeyaay
Alpine , CA 92001
(619) 443-0385

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

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

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

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

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

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
El Cajon, CA 92021

619 445-2613

619 445-1927 Fax

Diegueno/Kumeyaay

Viejas Band of Mission Indians

Anthony Pico, Chairperson

PO Box 908
Alpine, CA 91903

(619) 445-3810

(619) 445-5337 Fax

Diegueno/Kumeyaay

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# 20040/1122, San Diego County.

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.
- 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).

DOT2

DOT3

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

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:

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.

DFG1

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.

DFG2

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)

DFG3



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.

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DFG3
(cont'd.)

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.

DFG4

- 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.

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 [Section 143.0141(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].*

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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.

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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 effects¹ 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

DFG6

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 (Anderson 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 (Soule 1991).

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 Molenaar 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.

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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 corridor². 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 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.

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.purrfence.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 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."
- 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.

DFG7
(cont'd.)

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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)

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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).

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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.

DFG11

- 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.

DFG12

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.

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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 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.

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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.

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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 complete description of the proposed project.
 - A range of practicable alternatives that have been considered to reduce project impacts to biological resources, including the MHPA.
 - 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).
 - Verification that all requirements and conditions of the MSCP Subarea Plan and Implementing Agreement are met.
 - 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.
 - 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
 - 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.

DFG18

⁴ In particular, section 143.0145(e)(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.

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 DFG18:

Comment noted.

Mr. Reed (FWS-SDG-1185.1)

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- 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.
- 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.

DFG18
(cont'd.)

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.

Mr. Reed (FWS-SDG-4185.1)

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- 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.
 - 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)

DFG18
(cont'd.)

Mr. Reed (FWS-SDG-1185.1)

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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).
- 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 effect⁶ 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.

DFG18
(cont'd.)

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

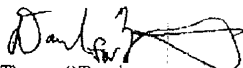
Mr. Reed (FWS-SDG-4135.1)

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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 Jayna)
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.
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- 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 für 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 Molenaar, 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.

Mr. Reed (FWS-SDG-4185.1)

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United States Army Corps of Engineers (USACE). 1991. Hydraulic design of flood control channels. USACE Headquarters, EM11102-0-1601, 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. Costruta, 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 Hartley Robert J. Workins 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.

**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.

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



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:

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

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.
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.
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.

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.

SNDG1

SNDG2

SNDG3

SNDG4

MEMBER AGENCIES

City of San Diego

City of Vista

Coronado

Del Mar

Escondido

Escondido

Imperial Beach

La Mesa

Lebanon, Calif.

National City

Oceanside

Poway

San Diego

San Marcos

Santee

Soldado Beach

Vista

and

County of San Diego

GOVT 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

San Antonio/Alamo

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.

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

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.

AG4

5. Page 8-10, Section 8.3 General Plan Opportunity Areas Map Alternative.

Transportation/Circulation:

- 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.

AG5

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.

AG6

Ann French Gonsalves

Ann French Gonsalves, P.E.
Senior Traffic Engineer

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
M E M O R A N D U M

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

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.

PRD2

Specific Comments

1) Page 2-5

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.

PRD3

2) Page 3-9

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.

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

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.
- RD8 6) Page 4.1-4
Table 4.1-1 - Please refer to comment #2.
- RD9 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.
- RD10 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.
- RD11 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.
- RD12 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), All 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 4.13-1 Public 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

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).

PRD14

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 rezoning, 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
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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:

- 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".

TCC1

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.

§ 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.

TCC2

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.

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."

TCC3

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 rehabilitated 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)~~

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 commentator 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 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.
- 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.

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."

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."

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."

TCC4

TCC5

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.

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.

TCC6

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:

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).

TCC7

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):

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)

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?

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

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

TCC8

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.

TCC9

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 PM₁₀ (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 PM₁₀ 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.

TCC10

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. OEHA 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.

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

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.

TCC11

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).

TCC12

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.

TCC13

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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**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.

1/19/05

RE: GRANVILLE REDEVELOPMENT.

Dear Mr Reed,

*I have made copies of various pages
of the EIR with my comments for your
review.*

*Respectfully,
Daniel Dalenbach*

DANIEL J. DALLENBACH 6136 Mission Gorge Rd., #230
Broker San Diego, CA 92120

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DD1

Exec

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.

DD2

DO ROAD & UTILITIES (SEE ATTACH) THIS IS FOR ONLY PART OF THE PROJECT?

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
<p>Section 4.2 - Transportation/Circulation</p> <p>Proposed redevelopment activities based on existing community plan land uses are anticipated to add 31,406 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:</p> <ul style="list-style-type: none"> • Friars Road from I-15 North Bound Ramps to Rancho Mission Road (LOS F); • Friars Road from Rancho Mission Road to Santa 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). <p>The following interconnections would be significantly impacted by the proposed redevelopment:</p> <ul style="list-style-type: none"> • 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). <p>Ramp meter analysis was also conducted for the proposed project. This analysis indicates impacts would occur in 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).</p>	<p>T1</p> <p>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:</p> <ul style="list-style-type: none"> • 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. <p><i>WHAT IS DIFFERENCE?</i></p> <p><i>WHAT HAPPENS BETWEEN FAIRMOUNT & ZION ?</i></p>	<p>Significant and Unavoidable</p>

DD3

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 Fairmount Avenue and Zion Road. No further improvement is recommended for this specific segment as it current is improved to a 6-lane primary arterial.

December 13, 2004

Impact(s)	Recommended Mitigation Measure(s)
Section 4.9-- Paleontological Resources (cont'd.)	<p>4. Final Results Report</p> <p>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.</p> <p>b. MMC shall notify the RE or BI, as appropriate, of receipt of the Final Results Report.</p>
<p>Section 4.10 - Aesthetics</p> <p>Future redevelopment activities within the Project Area may result in significant aesthetic impacts.</p> <p>DD4 SHOULDNT THIS INCLUDE OR AS AMENDED?</p>	<p>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 Navajo and Tierrasanta Community Plans, including:</p> <ul style="list-style-type: none"> 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 aestriably 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 Trails Regional Park should be sensitive to it, as proposed within the Urban Design Element of the Tierrasanta Community Plan. <p>Less Than Significant</p>

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.

ological resources sensitivity. The Friars Formation has a high resources sensitivity and the Santiago geology, 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 jetted 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:

- 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?

DD6

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:

- Rehabilitating, altering, remodeling, improving, modernizing, clearing or reconstructing buildings, structures and improvements;
- Rehabilitating, preserving, developing, or constructing affordable housing in compliance with State Law;
- 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;
- Providing relocation assistance to displaced residential and nonresidential occupants, if necessary;
- Facilitating the development or redevelopment of land for purposes and uses consistent with the Redevelopment Plan;
- Providing incentives for property owners, tenants, businesses, and residents to participate in improving conditions throughout the Redevelopment Project Area;
- 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 of 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.

DD7

WHAT ABOUT FLOODING?

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 of 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 on 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.

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).

DD8

WHAT ABOUT TWAIN?

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.

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 31,006 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.

DD9

OR AS AMENDED

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.

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

DD10

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 project):

WHAT ABOUT FAIRMOUNT EXTENSION 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.

DD11

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.

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 of 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

DD12

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

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

SCH #

Rev:

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

Project Location:
County: San Diego City/Nearest Community: San Diego
Cross Streets: Friars Road, Mission Gorge Road Zip Code:
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 [] 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:
[X] Aesthetic/Visual [X] Flood Plain/Flooding [X] Schools/Universities [X] Water Quality
[X] Agricultural Land [] Forest Land/Fire Hazard [] Septic Systems [X] Water Supply/Groundwater
[X] Air Quality [X] Geologic/Seismic [X] Sewer Capacity [X] Wetland/Riparian
[X] Archeological/Historical [X] Minerals [X] Soil Erosion/Compaction/Grading [X] Wildlife
[] Coastal Zone [X] Noise [X] Solid Waste [X] Growth Inducing
[X] Drainage/Absorption [X] Population/Housing Balance [X] Toxic/Hazardous [X] Landuse
[X] Economic/Jobs [X] Public Services/Facilities [X] Traffic/Circulation [X] Cumulative Effects
[] Fiscal [X] Recreation/Parks [X] Vegetation [] 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.

REVISION 3-31-99

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.

DD13

FOR THE NEXT GRANTVILLE DEVELOPMENT.



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

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).

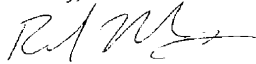
RM5

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.

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 B-1 show their property to be designated as an alternative 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 paragraphs 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@castergroup.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 address 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?
- JRS11** **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.
- JRS18** **Question 4:** Is the flood channel, also known as Alvarado Canyon Creek an infrastructure project?
- JRS19** **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?
- JRS20** **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 DR58:

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 DR59:

Comment noted. Please also refer to responses to comments BC3, DR56, DD2, DD5, and DD7.

Response to Comment DR510:

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 DR511:

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 DR512:

Comment noted.

Response to Comment DR513:

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 DR514:

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 DR515:

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 DR516:

Comment noted. See also response to comment PRD11.

Response to Comment DR517:

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 DR518:

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 DR519:

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 DR520:

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.

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

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.

Sincerely,

DRS29



Daniel R. Smith
Member
Grantville Redevelopment Project Advisory Committee

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.

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 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

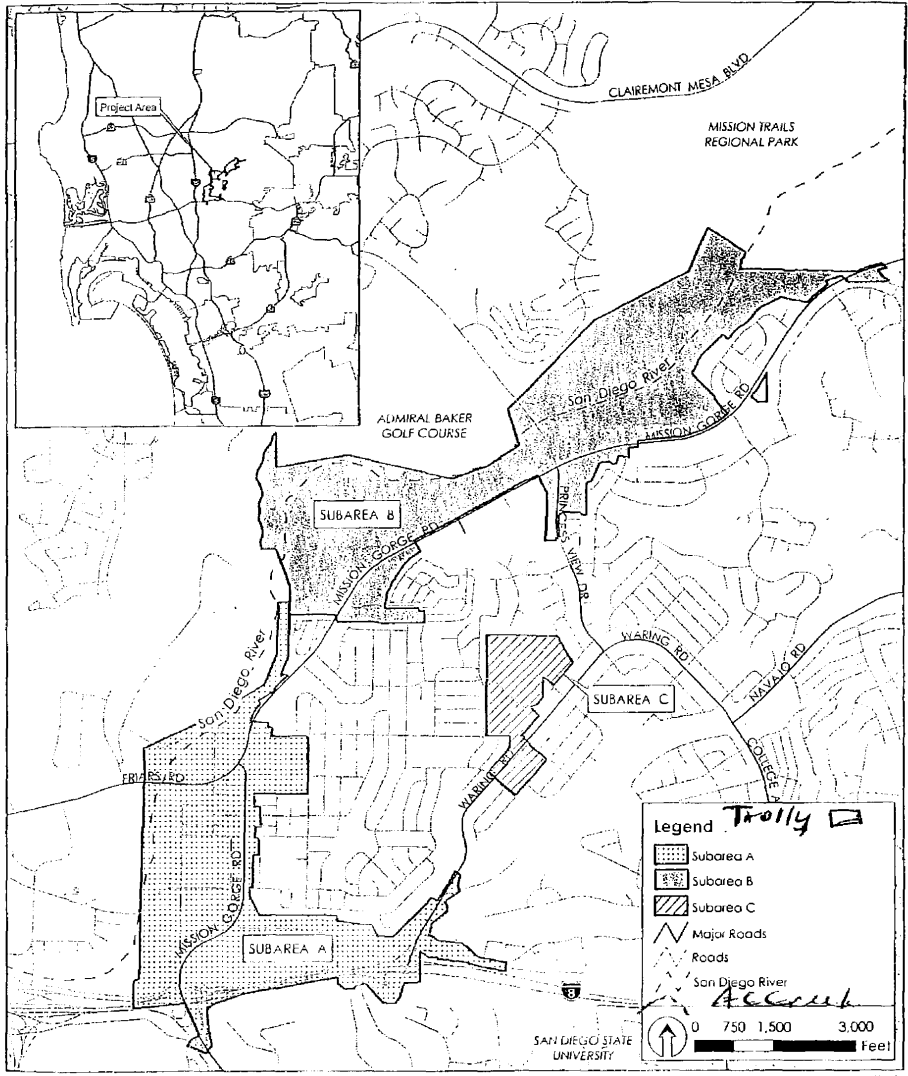
The proposed Grantville Redevelopment Project Area is located in San Diego County, in the eastern portion of the City of San Diego north of Interstate 8 and east of Interstate 15. A majority of the Project Area is located within the Navajo Community Planning Area, and generally includes the existing 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-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 Calina Dorado 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., 2004

10/19/04



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
<p>Section 4.2 – Transportation/Circulation</p> <p>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:</p> <ul style="list-style-type: none"> • 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). <p>The following intersections would be significantly impacted by the proposed redevelopment:</p> <ul style="list-style-type: none"> • 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). <p>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)</p>	<p>T1</p> <p>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:</p> <ul style="list-style-type: none"> • 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 <u>six-lane</u> major street between Fairmount Avenue and Interstate 8. • Improve Mission Gorge Road to a <u>six-lane</u> major street between Fairmount Avenue and Interstate 8. <p><i>Flooding at Mission Gorge Place and Mission Gorge Rd Bridge</i></p>	<p>Significant and Unavoidable</p>

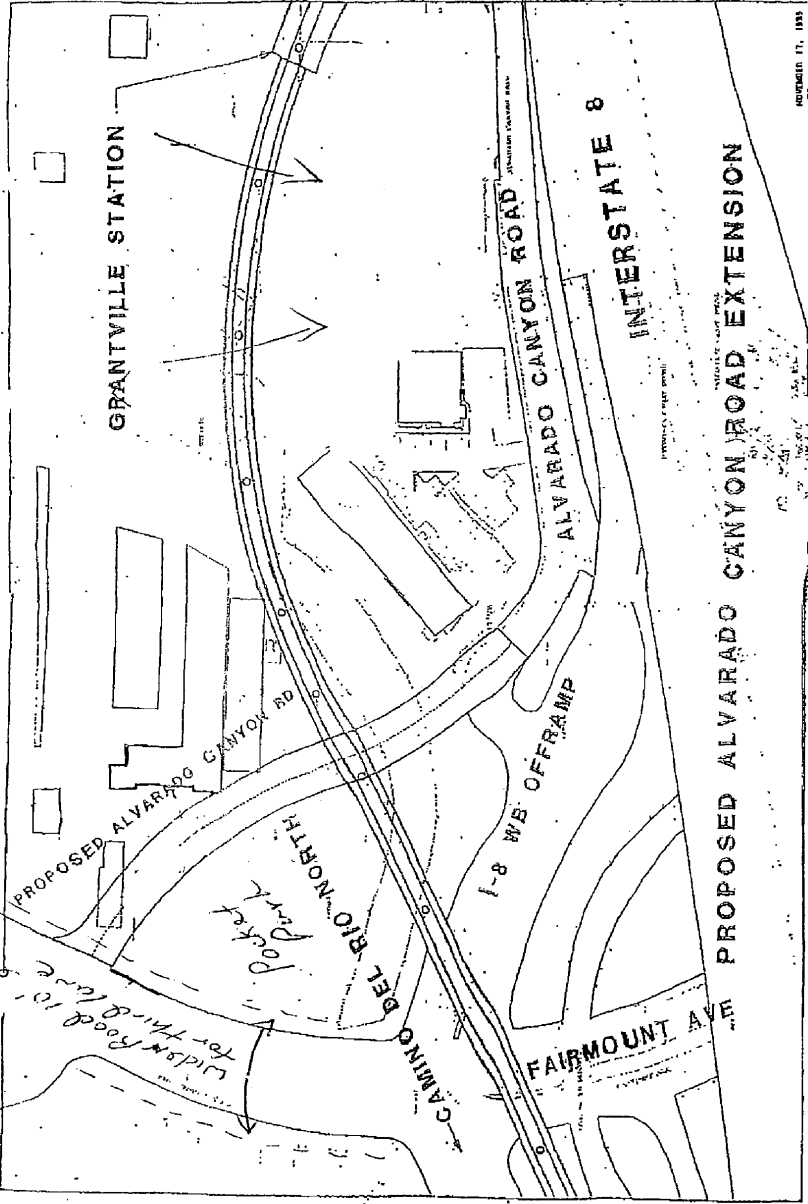


Exhibit B

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:

- 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 defer 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 banking 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

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

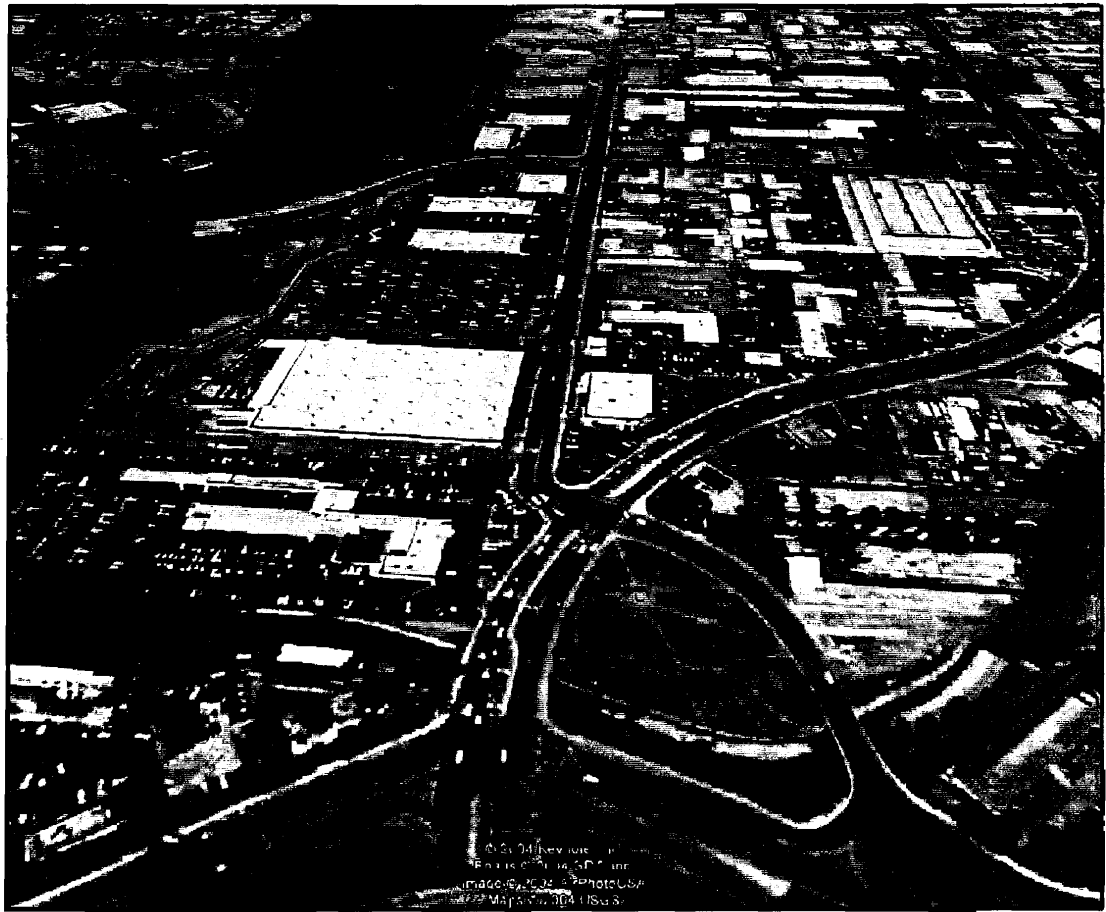
- As a result of historical development patterns, changed demographics and current parking needs, the Grantville community faces problems with the quantity, location and safety of its existing parking supply. Many of the older, predominately commercial and industrial areas were developed with parking 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.



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M

**Marengo
Morton
Architects**
 1216 Redlyn Lane
 La Jolla, CA 92037
 Tel: (858) 459-3769
 Fax: (858) 459-3766

Michael Morton AIA
 Chuck Anthony Marengo P.E.

Marengo Morton Architects is a professional corporation licensed by the State of California. The firm is not responsible for the accuracy of the information shown on this map. The information is provided for informational purposes only. The information is not intended to be used for any purpose other than that for which it was intended. The information is not intended to be used for any purpose other than that for which it was intended. The information is not intended to be used for any purpose other than that for which it was intended.

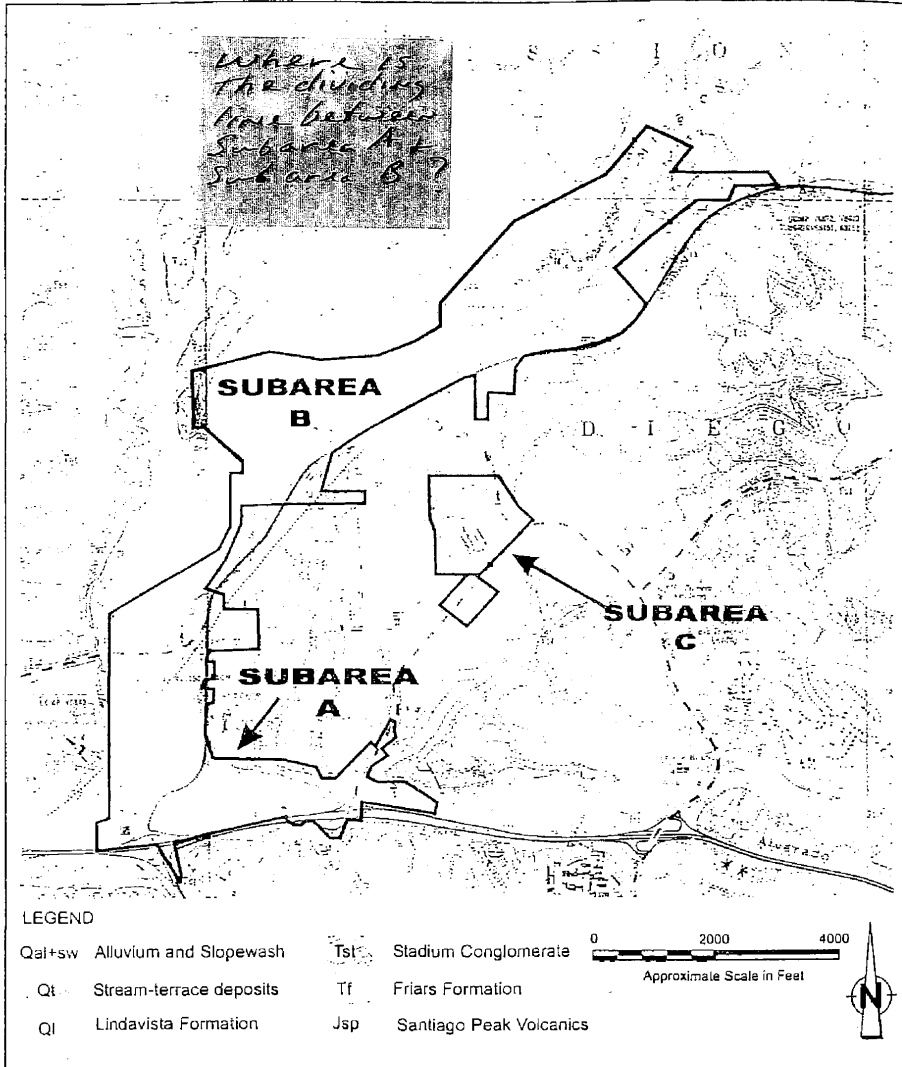
GRANTVILLE
 MISSION DRIVE ROAD
 SAN DIEGO, CA 92129

CONCEPTUAL DESIGN

DATE:	2004-04-01
SCALE:	1"=50'
PROJECT:	KRM
DRAWN BY:	11-22-04

DRS
(ATTACH)

Exhibit A



10/19/04

	Grantville EIR	FIGURE
	Geologic Map	4.7-1

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 Contact Person: Mr. Tracy Reed
Street Address: 600 B Street, Fourth Floor, 104 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: Frans 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 Supplement/Subsequent EIR (Prior SCH No.) Other _____
 Early Cons Neg Dec Draft EIR
NEPA: NOI EA Draft EIS FONSI
Other: Joint Document Final Document Other _____

Local Action Type:
 General Plan Update Specific Plan Rezone Annexation
 General Plan Amendment Master Plan Prezone Redevelopment
 General Plan Element Planned Unit Development Use Permit Coastal Permit
 Community Plan Site Plan Land Division (Subdivision, etc.) 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 Food Plain/Flooding Schools/Universities Water Quality
 Agricultural Land Forest Land/Fire Hazard Septic Systems Water Supply/Groundwater
 Air Quality Geologic/Seismic Sewer Capacity Wetland/Riparian
 Archeological/Historical Minerals Soil Erosion/Compaction/Grading Wildlife
 Coastal Zone Noise Solid Waste Growth Inducing
 Drainage/Absorption Population/Housing Balance Toxic/Hazardous Landuse
 Economic/Jobs Public Services/Facilities Traffic/Circulation Cumulative Effects
 Fiscal Recreation/Parks Vegetation 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

REVISION 3-31-89

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

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

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

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 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 Assesmer 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.

file://C:\Documents%20and%20Settings\trw\Local%20Settings\Temp\GWJ00001.HTM 1/24/2005

RESPONSE TO COMMENT LETTER FROM CHARLES LITTLE, DATED JANUARY 24, 2005**Response to Comment CIA1:**

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 CIA2:

Comment noted.

Response to Comment CIA3:

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 CIA4:

The Business Improvement District (BID) has been removed from the proposed Grantville Draft Redevelopment Plan.

Response to Comment CIA5:

Comment noted.

Response to Comment CIA6:

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 (conf.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
chuck@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 1, 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 mitigation 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.

the unloading and loading from Car Transporters. The design of this intersection does not meet the needs of current traffic.

CLB2
(cont'd.)

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.

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.

CLB3

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.

CLB4

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

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 Thresholds.

CLB5

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

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".

CLB6

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.

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

CLB7

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

“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.”

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

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.

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

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?

LM3

CHAPTER 8 -- ALTERNATIVES

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?

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 some 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.

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

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?

LM4

APPENDIX A

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?

LM5

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?

LM6

Thank you,

LM7

Lynn Murray
6549 Carthage Street
San Diego, CA 92120

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 and 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?
2. What assurance do we have that City employees can handle this job competently?
3. According to Donna Frye, the information regarding police and fire protection may be inaccurate in the proposal. Who is verifying the data?
4. Who is behind the push for this project? Fenton?
5. Will the air quality be impacted by the proposal? To what specific degree?
6. How much, specifically, will traffic be increased?
7. How will increased traffic impact crime in this area?
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!
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?
10. Has this area been neglected so that it will become "blight"?
11. Why haven't zoning laws been enforced in this area?
12. I understand if this proposal is approved, funds will be diverted from schools. Is this correct?
13. I live on Carthage Street, what is the specific impact to my home?

JN2

JN3

JN4

JN5

JN6

JN7

JN8

JN9

JN10

JN11

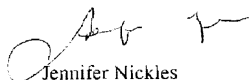
JN12

JN13

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:

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.

HSA1

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 there (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.

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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.

HAB3

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.

HAB4

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.

HAB5

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.

HAB6

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.

HAB7

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.

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Re: Comments regarding the Draft Program
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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).

HAB8

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.

HAB9

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."

HAB10

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."

HSA11

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.

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."

HSA12

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,

HSA13

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.

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RESPONSE TO COMMENT LETTER FROM HOLLY SIMONETTE, DATED FEBRUARY 14, 2005 (cont.d)

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.

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.

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.

The costs associated with these improvements are not known and would depend on numerous factors including engineering, environmental, and land use constraints.

Response to Comment HSA14:

Please refer to response to comment DD8.

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 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.

HSA16

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.

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 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.

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propose to change any land use designation with the Project Area." However, in order to accomplish many of the long-term 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.**

ISA19

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.**

ISA20

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.

ISA21

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.

ISA22

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

ISA23

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.

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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.

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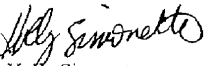
HSA29 (cont'd.) address why it is considered an alternative. Additionally, I request that this alternative be removed from the Draft EIR and not be considered as an alternative.

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

HSA32 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.

Sincerely,

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.

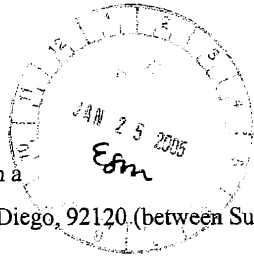
Please also refer to response to comments HSA28 and HSA29.

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

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:

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.

HSB1

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.

HSB2

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.

HSB3

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?

HSB4

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.

RESPONSE TO COMMENT LETTER FROM HOLLY SIMONETTE, DATED JANUARY 25, 2005 (cont.d)

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 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.**

HSB5

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 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.**

HSB6

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 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.

HSB7

Thank you.

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 there 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 Leub

By Councilmember Jim Madaffer



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, streetlights 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

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-nigmed. 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 Website 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@sundiego.gov

HS
(ATTACH)

RIC-110

Serial No. 01711101
City of San Diego, Community Event Dev
DIR 533 5270
02/14/05 2:51 PM Jalfax #977; Page 12/12

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:

- **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
- **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!
- **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?
- **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.
- **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.
- **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!

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.

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.shtm>. 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 15124(b) of the CEQA Guidelines.



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, FAIRMOUNT? 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.

TRACY REED

FEBRUARY 8, 2005

JIM:

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.

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 81 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 MESA RD #173
SAN DIEGO, CA 92108
(619) 702-7710

RESPONSE TO COMMENT LETTER FROM DON STILLWELL, DATED FEBRUARY 8, 2005

Response to Comment DSB1:

Please refer to response to comment DSA1.

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
Torresanta 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 600537

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.

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:

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 place in that area.
MR1
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.
MR2
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).
MR3
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 than in San Carlos and Del Cerro. Enrollments may increase, not decrease. Projected impacts to area schools are inadequately researched in the EIR.
MR4
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
MR5

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.

RESPONSE TO COMMENT LETTER FROM MARILYN REED, DATED FEBRUARY 13, 2005 (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.

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.

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?

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 effectively 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 at 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.

Sincerely,

Marilyn Reed

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 chronic 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.

RESPONSE TO COMMENT LETTER FROM LEE CAMPBELL, DATED FEBRUARY 13, 2005

Grantville EIR Comments

Submitted by:

Lee Campbell lee@campbellot.com; 858-560-1213

General Comments

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.
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.
3. **Action:** Instead of using the word "alternative" when referring to a plan alternative identify the plan, such as, the TOD Plan Alternative.
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.
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 2004Reference 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.
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 specifically identified. 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 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 commentator.

Response to Comment LC5:

Volume II Appendix D, as referenced by the commentator, depicts the project trip distribution. This information is also provided in EIR Volume I Figure 4.2-4. Also, as noted by the commentator, 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

RESPONSE TO COMMENT LETTER FROM LEE CAMPBELL, DATED FEBRUARY 13, 2005 (cont.d)

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 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.

RESPONSE TO COMMENT LETTER FROM LEE CAMPBELL, DATED FEBRUARY 13, 2005 (cont.d)

- 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 loses 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 CNEI analysis for the 2030 horizon year with no community plan project. **Action:** Please include this table in the document.

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 rehabilitated 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.

RESPONSE TO COMMENT LETTER FROM LEE CAMPBELL, DATED FEBRUARY 13, 2005 (cont.d)

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 I

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 pollution. 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 to 163% 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 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 Trailas 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 rehabilitated 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, ~~Terrasanta 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.

RESPONSE TO COMMENT LETTER FROM LEE CAMPBELL, DATED FEBRUARY 13, 2005 (cont.d)

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-stripping 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 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.

RESPONSE TO COMMENT LETTER FROM LEE CAMPBELL, DATED FEBRUARY 13, 2005 (cont.d)

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 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.

RESPONSE TO COMMENT LETTER FROM LEE CAMPBELL, DATED FEBRUARY 13, 2005 (cont.d)

- 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 policies" 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 Tierrasanta 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 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 LC58:

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 discuss 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 not 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.

RESPONSE TO COMMENT LETTER FROM LEE CAMPBELL, DATED FEBRUARY 13, 2005 (cont.d)

“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 1-8 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 its 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 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.

RESPONSE TO COMMENT LETTER FROM LEE CAMPBELL, DATED FEBRUARY 13, 2005 (cont.d)

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.
- 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.

LC75

LC76

Response to Comment LC75:

Please refer to response to comment LC12.

Response to Comment LC76:

Comment noted.

Thank you,

Lee Campbell

**RESPONSE TO COMMENT LETTER FROM LEE CAMPBELL, DATED FEBRUARY 13,
2005 (cont.d)**

Attachments to follow:

LC77

1. Letter from Jim Madaffer Requesting that road extensions be removed.
2. tables 1, 2 and 4 from Draft Grantville EIR vol 2, Appendix d.

Response to Comment LC77:

Comment noted.

Table 1. Distance to CNEL Contour Lines, Existing, BRG Oremville

Area/Segment	Area/Segment Type	Speed Limit, mph	Dist. to Contour Line, ft.	S. Trucks		CNEL at 1500 ft. From Noise Level Contour, ft.	Dist. to Traffic, CNEL, Contour From Noise Level Contour, ft.
				1500	1700		
				60dB	65dB		
WELLS ROAD							
2-15 N/E Hampshire Junction Monument Rd.	6	90	ABOVE	1.44%	0.24%	75.0	235
2-15 N/E Hampshire Rd. to State Rd.	6	90	ABOVE	2.40%	0.24%	74.0	170
PARSONS AVENUE							
U.S. Exit Ramp to Columbia Blvd	6	90	ABOVE	1.84%	0.24%	74.0	170
MISSION GORGE ROAD							
William George Pl. to Twain Ave.	4	30	AT	1.24%	0.24%	97.0	18.5
Twain Ave. to Vineyard Ave.	4	30	AT	1.84%	0.24%	66.5	170
Twain Ave. to Zion Ave.	4	35	AT	1.84%	0.24%	72.5	428
West of Phossum Water Dr.	6	45	AT	1.84%	0.24%	70.0	300
West of Jackson Dr.	6	55	ABOVE	2.80%	0.24%	71.0	190
WASHINGTON ROAD							
Zion Ave. to Central Ave.	4	35	AT	1.84%	0.24%	66.5	170
South of Central Ave.	4	35	AT	1.84%	0.24%	66.5	170

* Above 1500 ft. 30 mph or less, 0.24% slope; 40 mph, 0.17% slope; 45 mph or more, 0.14% slope. 4) 4.6% slope, 33 mph or less; 5) 4.4% slope, 40 mph or more; 6) 4.4% slope, 45 mph or more; 7) 4.4% slope, 55 mph or more; 8) 4.4% slope, 55 mph or more; 9) 4.4% slope, 55 mph or more.

** AT, ABOVE, and BELOW refer to the direction of the surrounding area relative to the contour line.

Where and what is table 2?

Table 3. Distance to CNEI Contour Lines, Horizon Year 2030 With Project, BRG Grantville

Arterial / Reach	Arterial Type*	Speed Limit, mph	Elev.**	% Trucks		Avg. Daily Traffic 2030 + Proj.	CNEI to 60' From Near Lane C/L	Distance to Traffic CNEI Contours, feet				
				Med.	Hvy.			60dB	65dB	70dB	75dB	80dB
FRIARS ROAD												
1-15 MI Ramp 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	268	105	80	54	---
FAIRMOUNT AVENUE												
6-8 MI 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 Twin Ave.	4	30	AT	1.84%	0.74%	34,300	70.5	320	143	56	---	---
Twin Ave. to Vandover Ave.	4	30	AT	1.84%	0.74%	51,000	70.0	300	130	50	---	---
Peters Rd. to Zion Ave.	6	45	AT	1.84%	0.74%	58,700	74.0	520	235	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	55	ABOVE	1.84%	0.74%	74,500	73.5	155	93	72	---	---
WARING ROAD												
Zion Ave. to Orcutt Ave.	4	35	AT	1.84%	0.74%	18,800	66.5	170	89	---	---	---
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, 35 mph or more; 8) 8 lane freeway, 35 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 Granville
General Plan Area Off Map

Aerials / Street	Aerial Type	Speed Limit mph	S. Traffic	A.W. Daily Traffic	CNEL @ 30' From Noise Lane Off		Distance to Traffic CNEL Contours							
					Speed Limit mph	AT	BEAD	BEAD	70dB	70dB				
PRINCE ROAD														
0-15 NB Ramps to Rancho Mission Rd.	6	50	ABOVE 1.84%	79,008	76.5	135	115	84	61					
Rancho Mission Rd. to Sycato Rd.	6	50	ABOVE 1.84%	65,608	75.5	208	105	30	54					
FAIRMOUNT AVENUE														
1-8 NB Off Ramp to Camino Del Rio N.	6	30	ABOVE 1.84%	88,195	77.0	370	170	30	64					
MISSION GORGE ROAD														
Mission Gorge Pl. to Twila Ave.	4	30	AT 1.84%	65,895	71.0	340	155	62						
Twila Ave. to Vandover Ave.	4	30	AT 1.84%	62,395	71.0	340	155	62						
Pratt Rd. to Zion Ave.	6	45	AT 1.84%	66,391	74.0	520	235	110						
West of Primm View Dr.	6	45	AT 1.84%	41,191	72.5	428	200	83						
West of Jackson Dr.	6	55	ABOVE 1.84%	36,191	74.0	170	95	74						
WARNING ROAD														
Zion Ave. to Grand Ave.	4	35	AT 1.84%	17,999	66.5	170	69							
South of Grand Ave.	4	35	AT 1.84%	19,899	67.0	185	75							

* Aerial Types: 1-2 lanes, 35 mph or less; 2 lanes, 40 mph; 3-2 lanes, 45 mph or more; 4) 4-6 lanes, 30 mph or less; 5) 4-6 lanes, 40 mph; 6) 4-6 lanes, 45 mph or more; 7) 4-6 lanes (freeway); 8) 8 lane freeway; 35 mph or more.

** AT, ABOVE, and BELOW refer to the direction of the surrounding area relative to the aerial.

THE CITY OF SAN DIEGO



JIM MADAFFER
COUNCILMEMBER
44th DISTRICT

April 26, 2002

Deanna Spehn, Chair
Tierrasanta Community Council
10371 Metador Court
San Diego, CA 92124

Dear Mrs. Spehn:

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	Clairmont 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-

http://www.tierrasantacc.org/Issues/road%20issue/road_e3.gif

2/14/2005

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

JMWee

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

NCPRA: 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 Kighley 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 programmatic 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.

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.

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.

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 (cont.d)

Response to Comment JR1:

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 Gotlieb? 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 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

JR1

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.

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 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. 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 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, 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 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 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 developed areas in the basin are expected to continue to exceed State and Federal standards in

JR1
(cont'd.)

HS1

HS2

HS3

HS4

HS5

HS6

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.

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, I 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)

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 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 L.A. shows that we're just going to have more people moving to the area, more traffic, more businesses, more people working 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.

JS1

JS2

Response to Comment JS1:

Comment noted.

Response to Comment JS2:

Comment noted. Please refer to response to comment HSB2.

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

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.

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.

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.

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

DF1

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.

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?

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.

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.

DF1
(cont'd.)

DF2

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 (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 FROM THE CITY COUNCIL HEARING, PUBLIC COMMENT ON GRANTVILLE REDEVELOPMENT PROJECT DRAFT PROGRAM EIR TRANSCRIPT, JANUARY 25, 2005 (cont.d)

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 1~~s~~ 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.

RESPONSE TO COMMENT FROM THE CITY COUNCIL HEARING, PUBLIC COMMENT ON GRANTVILLE REDEVELOPMENT PROJECT DRAFT PROGRAM EIR TRANSCRIPT, JANUARY 25, 2005 (cont.d)

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 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 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.

REDEVELOPMENT AGENCY OF
THE CITY OF SAN DIEGO
RESOLUTION NUMBER R- **03963**
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

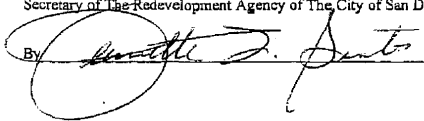
Passed and adopted by The Redevelopment Agency of The City of San Diego JAN 25 2005
by the following vote:

Members	Yeas	Nays	Not Present	Ineligible
Scott Peters	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Michael Zucchet	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Toni Atkins	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Anthony Young	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Brian Maienschein	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Donna Frye	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Jim Madaffer	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ralph Inzunza	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Chair Murphy	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

By  Deputy

(Seal)

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 GRANTVILLE 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.
- MR1** **Committee –**
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.
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.
- LC1**
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 GRANTVILLE 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 48 th St. Grantville
3. Edgan D Tye	Edgar D TYE	" " " "
4. Stephanie Zambana	Steph Zambana	4801 Twain Ave S.D. CA 92120
5. Kathy Layritz	Kathy Layritz	4817 Twain Av. SD. CA. 92120
6. Gordon Bowman	Gordon Bowman	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	Dennis Cooney	4847 Twain Ave SD CA 92120
10. Catherine Jessop	Catherine Jessop	4853 Twain Ave., S.D. 92120
11. DANNY T CASTILLO	Danny T Castillo	4865 Twain Ave. SD 92120
12. JUSTIN FENICHEL	Justin Fenichel	4877 TWAIN AVE SD, CA 92120
13. RICHARD RAMSEY	Richard Ramsey	4883 TWAIN AVE 92120
14. Keith Bryenton	Keith Bryenton	4895 TWAIN AVE 92120
15. Steve Rodriguez	Steve Rodriguez	4923 TWAIN AVE 92120
16. Kelsey Joyce	Kelsey Joyce	4929 Twain Ave 92120
17. EDWARD HENRY	Edward Henry	4959 TWAIN AVE 92120
18. JOHN TILLMAN	John Tillman	4965 TWAIN AVE SD CA 92120
19. LAURA TILLMAN	Laura Tillman	4965 TWAIN AVE SD CA 92120
20. Adeline Runk	A DELINE R A U K	4971 Twain av.

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Print Name	Sign Name	Address
1. Bonnie Wells	B-W	4995 ELSA RD. SAN DIEGO, 92120
2. Jan Wells	Jan Wells	4995 ELSA RD San Diego CA 92120
3. Mark Ulder	Mark Ulder	4977 ELSA Rd 92120
4. DENNIS CONYER	D Conyer	4975 ELSA RD 92120
5. Laurie Koster	Laurie Koster	6525 Crawford St San Diego CA 92120
6. Armand Xair Jr	Armand Xair Jr	4701 Orutt Ave.
7. Stacy Williamson	Stacy Williamson	6301 Crawford St 92120
8. Robert K Baker	Robert K Baker	6337 Crawford St 92120
9. Ernest L. Etzel	Ernest L. Etzel	6373 CRAWFORD ST 92120
10. Dorothy L. Etzel	Dorothy L. Etzel	6373 Crawford St 92120
11. Sam Patterson	SP	6417 CRAWF ST 92120
* 12. Melissa Bacco	Melissa Bacco	6417 Crawford St San Diego CA 92120
13. E.P. Kuchemmeister	E.P. Kuchemmeister	6449 Crawford 92120
14. ROB PEDLEY	Rob Pedley	6316 CRAWFORD ST.
15. Michael Cooney	Michael Cooney	6319 Crawford St 92120
16. Dorothy M. Mungy	Dorothy Mungy	4830 ELSA RD
17. Jennifer Nelson	Jennifer Nelson	4997 Twain Ave
18. Jennifer Patricia	Jennifer Patricia	6315 50th St SD 92120
19. Judy Gervais	JUDY M. GERVAIS	6329 50th Street
20. Lisa + Lisa Strick	Lisa + Lisa	6359 50th St

**GRANTVILLE RESIDENTS OPPOSED
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We urge the City Council to IMMEDIATELY STOP THE PROJECT.

Print Name	Sign Name	Address
1. Elizabeth M. Strab	Elizabeth M. Strab	1354 50th St. SD, CA 92120
2. NEIL PATTERSON	Neil Patterson	6360 90th 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 Lemmen	Brandon Lemmen	6405 50th St 92120
6. Thomas Graham	Thomas Graham	6425 50th St 92120
7. SHARON L. GRAHAM	Sharon L. Graham	6425 50th St. SD 92120
8. Holly Simonette	Holly Simonette	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**

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. LYNN MURRAY	<i>Lynn Murray</i>	6549 Carthage St.
2. Carol Carlson	<i>Carol Carlson</i>	6514 Eldridge St.
3. Eric Carlson	<i>Eric Carlson</i>	6514 ELDRIDGE ST.
4. ESTHER LOWE	<i>Esther Lowe</i>	6601 Carthage St
5. JENNIFER K. KLEIN	<i>Jenn</i>	6511 Carthage St
6. Todd Pappertus	<i>Todd Pappertus</i>	6555 Carthage St.
7. Veronica Pappertus	<i>Veronica Pappertus</i>	6555 Carthage St.
8. Chris Kuterwas	<i>Chris Kuterwas</i>	6543 Carthage St.
9. Aric Petersen	<i>Aric Petersen</i>	6532 Delfern St.
10. Jody Petersen	<i>Jody Petersen</i>	6532 Delfern St.
11. Steve Przybylo	<i>Steve Przybylo</i>	6579 Carthage St.
12. Marlene Demers	<i>Marlene Demers</i>	6511 Eldridge St.
13. PETER MARKERT	<i>Peter Markert</i>	6599 ELDRIDGE ST.
14. Lois ELARSON	<i>Lois Larson</i>	6522 Delfern
15. Cindy Story	<i>Cindy Story</i>	6552 Delfern St.
16. C.J. Story	<i>C.J. Story</i>	6552 Delfern St.
17. TONY DOGGETT	<i>Tony Doggett</i>	6553 Delfern St.
18. Ronald PERCELL	<i>Ronald Percell</i>	6543 DELFERN
19. Carol Dillon	<i>Carol Dillon</i>	4982 ALFRED Ct.
20. Bonnie Dillon	<i>Bonnie Dillon</i>	2562 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	<i>D. Gardner</i>	6543 CARTHAGE ST SAN DIEGO, CA 92120
2. EARL MURRAY	<i>Earl Murray</i>	6549 CARTHAGE ST SAN DIEGO, CA 92120
3. Jeff Myers	<i>J. Myers</i>	6612 CARTHAGE ST SD CA 92120
4. Mary Myers	<i>Mary Myers</i>	6631 Carthage St
5. Heather Myers	<i>H. Myers</i>	6612 Carthage St San Diego, CA 92120
6. Jennifer Renee	<i>J. Renee</i>	6612 Carthage St San Diego, CA 92120
7. Brandon Myers	<i>B. Myers</i>	6647 Carthage St
8. Jeannette L. Chaf	<i>Jeannette L. Chaf</i>	6561 CARTHAGE ST.
9. Shea Digby	<i>Shea Digby</i>	5459 Mission Gorge Rd #204 San Diego, CA 92120
10. Charles Digby	<i>Charles Digby</i>	5459 Mission Gorge Rd #204 San Diego, CA 92120
11. John W. Williamson	<i>John W. Williamson</i>	owner of Rental @ 4951 Havenwood Ave
12. ALISON C. MARVEL	<i>Alison C. Marvel</i>	6713 Carthage St. SD, CA 92120
13. Katherine Clark	<i>Katherine Clark</i>	6543 Carthage St SD, CA 92120
14. Joel Stihwaga	<i>Joel Stihwaga</i>	4319 Twain Ave SD CA 92120
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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>



Arnold Schwarzenegger
Governor

Mike Chrisman
Secretary, Resources Agency

Dick Murphy, Chair
Mayor, City of San Diego

Donna Frye, Vice-Chair
Councilmember, 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.

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.

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

SDRC1

San Diego River Conservancy

**DRAFT PRELIMINARY
COMMENTS ON DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT
GRANTVILLE REDEVELOPMENT 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 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* contained 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:

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.

- Cumulative Impacts Analysis
- Alternative Analyses
- Growth Inducement
- Cultural Resources
- Aesthetics (views, light/glare)
- Noise

SDRC4
(cont'd.)

2. **Consistency with Relevant Planning and Regulatory Documents**

It appears that portions of the draft EIR may not be consistent with the "letter" or "spirit" of the following planning or regulatory documents (or portions thereof):

- 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)

SDRC5

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.

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

SDRC7
(cont'd.)

(footnote citation). For this reason, it becomes even more important that the impact analyses in the Program EIR be thorough and accurate.

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.

SDRC8

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.

SDRC9

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).

SDRC10

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 be evaluated thoroughly.

SDRC11

9. **Floodplain / Floodway Guidelines**

The Draft EIR fails to establish project development guidelines to protect the River (e.g.,

SDRC12

**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 Grantville 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 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 in 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.

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.

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:

SDRC19
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.

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

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:

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.

SDRC20

Dick Murphy, Chairman:

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 concrete 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.

SDRC21

Jim Peugh, Board Member:

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.

SDRC22

Dick Murphy, Chairman:

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.

SDRC23

Donna Frye, Vice-Chair:

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.

SDRC24

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 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.

SDRC28 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 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 Grantville 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 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:

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.

SDRC33

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:

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

SDRC34

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:

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.

SDRC35

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:

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.

SDRC36

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:

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.

SDRC37

Donna Frye, Vice-Chair:

Motion to accept report from Deborah Jayne and add to that the extension to allow adequate time to comment about the FIR 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.

SDRC38

Donna Frye, Vice-Chair:

Leave to staff discretion how to participate. Attending a meeting or meeting with staff.

Jim Peugh, Board Member:

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.

SDRC39

Donna Frye, Vice-Chair:

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

SDRC40

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 beneficial uses. And I think that would probably get us there. Because I agree with you. I
(cont'd.) 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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Appendix A

Notice of Preparation, Responses to the Notice of Preparation, and Scoping Meeting Comments

**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 **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 Supplement/Subsequent EIR **NEPA:** NOI **Other:** Joint Document
 Early Cons (Prior SCH No.) _____ EA Final Document
 Neg Dec Other _____ Draft EIS Other _____
 Draft EIR FONSI

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

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

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

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

Present Land Use/Zoning/General Plan Designation: Commercial, office, industrial, parks, openspace, 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.

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 *[Handwritten 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

For SCH Use Only:

Date Received at SCH _____

Date Review Starts _____

Date to Agencies _____

Date to SCH _____

Clearance Date _____

Notes:

Applicant: _____

Address: _____

City/State/Zip: _____

Phone: (____) _____

Project APN #'S

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THE CITY OF SAN DIEGO
NOTICE OF PREPARATION

Subject:	Notice of Preparation of a Draft Environmental Impact Report		
Agency Name:	City of San Diego Community and Economic Development Department	Consulting Firm Name:	BRG Consulting, Inc.
Street Address:	600 B Street, Fourth Floor, MS 904	Street Address:	304 Ivy Street
City/State/Zip:	San Diego, CA 92101	City/State/Zip:	San Diego, CA 92101
Phone:	(619) 533-7519	Phone:	(619) 298-7127
Contact:	Mr. Tracy Reed	Contact:	Tim Gribus

The City of San Diego Community and Economic Development Department (Redevelopment Agency) will be the Lead Agency and will prepare an Environmental Impact Report for the project identified below. We need to know the views of your agency as to the scope and content of the environmental information which is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency will need to use the EIR prepared by our agency when considering your permit or other approval for the project.

Due to the time limits mandated by State Law, your response must be sent at the earliest possible date but not later than 30 days after receipt of this notice. The NOP review period is July 26, 2004 – August 30, 2004. A public scoping meeting will also be held on Monday, July 26, 2004 at 6:00 p.m. at the Mission Valley Church of the Nazarene, 4675 Mission Gorge Place, San Diego.

Please send your response to Mr. Tracy Reed at the address shown above. We will need a contact person in your agency. Available project information may also be reviewed at the Community and Economic Development Department.

Project Location: The boundaries of the proposed Grantville Redevelopment Project area are shown on the attached **Figure 1**. The area proposed for inclusion in the Grantville Redevelopment Project is approximately 831 acres located in the north eastern portion of the City of San Diego. The project area is located primarily within the Navajo Community Plan, but also includes portions of the Tierrasanta community and College Area Community.

Subarea A. Subarea A is primarily comprised of commercial, office, and light industrial uses. Subarea A includes parcels north of Interstate 8 between Fairmount Avenue and Waring Road. The northern boundary includes parcels on both sides of Friars Road from Fairmont to the four corners of Zion Avenue and Mission Gorge Road. The far west side of the San Diego River defines the western boundary. The eastern boundary includes parcels on both side of Mission Gorge Road from Zion Avenue in the north to Mission Gorge Place in the south, along with the parcels on both sides of Mission Gorge Place. The southeast portion of Subarea A also includes the first seven parcels on the southern side of Adobe Falls Road (starting at Waring Road).



Redevelopment Agency

600 B Street, Suite 400, MS 904 • San Diego, CA 92101-4506
Tel (619) 533-4233 Fax (619) 533-5250

Subarea B. Subarea B is comprised primarily of industrial uses with limited office and commercial uses. The southern edge of this subarea is comprised of parcels at the intersection of Mission Gorge Road and Old Cliffs Road. The area continues north along both sides of Mission Gorge Road and reaches its furthest northern point just south of Margerum Avenue (excluding the industrial park off Katelyn Court and Goen Place on the eastside of Mission Gorge Road). The western edge of the San Diego River is the western boundary for this area, except at the northwest corner of Subarea B. The eastern edge of the area also includes 12 commercial/industrial parcels on both side of Princess View Drive from the eastern corner of Mission Gorge Road heading north.

Subarea B contains sand and gravel processing facilities to the northwest of Princess View Drive with industrial storage to the south along the western portion of Mission Gorge Road. This area is bounded to the north by the Mission Trails Regional Park. In this area sand and gravel processing operations take place on both sides of the San Diego River with a western boundary of the residential neighborhood along Colina Dorada Drive.

Subarea C is comprised of a shopping center complex made up of the parcels bound to the northwest by the alley between Waring Road and Glenroy Street; by Zion Avenue to the northeast; by Carthage Street to the southeast; and by Orcutt Avenue to the southwest. Additional area to the north, across Zion Avenue includes Allied Gardens Community Park with other community services such as the Edwin A. Benjamin Library, Lewis Middle School, and two churches.

Project Description: The San Diego Redevelopment Agency is pursuing the Grantville Redevelopment Plan to promote a variety of land uses, improve traffic flow, parking, and services which would eliminate physical and economic blighting conditions. California Community Redevelopment Law (Health and Safety Code Section 33000 et. seq.) ("CRL") controls redevelopment activity. Redevelopment is defined pursuant to Section 330202 of the CRL 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."

Environmental Issues to be Examined in the EIR: The following environmental topics will be addressed in the EIR: Land Use; Transportation/Circulation; Air Quality; Noise; Cultural Resources; Biological Resources; Geology; Hazards and Hazardous Materials; Paleontological Resources; Aesthetics; Water Quality/Hydrology; Population/Housing; Public Services; and Mineral Resources.

Attachments: Figure 1 – Proposed Redevelopment Project Area

CERTIFICATE OF PUBLICATION

RECEIVED
JUL 21 2004
COMMUNITY AND ECONOMIC DEVELOPMENT DEPARTMENT

Tracy Reed
City of San Diego/Community & Econ.
600 B Street, 4th Floor, M.S. 904
San Diego, CA 92101

IN THE MATTER OF
EIR Scoping Meeting

NO.

The City of San Diego
COMMUNITY AND ECONOMIC DEVELOPMENT DEPARTMENT
Date of Notice: July 19, 2004
NOTICE OF PREPARATION AND PUBLIC NOTICE OF AN EIR SCOPING MEETING

The City of San Diego Community and Economic Development Department intends to prepare an Environmental Impact Report (EIR) for the proposed Grantville Redevelopment Project as described below. A public scoping meeting is to be held by the Community and Economic Development Department for the proposed project on Monday, July 26, 2004 at 6:00 PM. The scoping meeting will be held at the Mission Valley Church of the Nazarene, 4675 Mission Gorge Place, San Diego. Comments regarding the scope of the EIR will be accepted at this meeting. This notice was published in the SAN DIEGO DAILY TRANSCRIPT and distributed on July 21, 2004.

SUBJECT: Grantville Redevelopment Project, CITY COUNCIL/REDEVELOPMENT AGENCY APPROVAL of a redevelopment plan to promote a variety of land uses, improve traffic flow, parking, and services which would eliminate physical and economic blighting conditions. California Community Redevelopment Law (Health and Safety Code Section 33000 et. seq.) ("CRL") controls redevelopment activity. Redevelopment is defined pursuant to Section 330202 of the CRL 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."

PROJECT LOCATION. The area proposed for inclusion in the Project is approximately 831 acres in the north eastern portion of the City of San Diego. The project area is located primarily within the Navajo Community Plan (82%), but also includes portions of the Tierrasanta community (18%) and College Area Community (less than 1%). Subarea A. Subarea A is primarily comprised of commercial, office, and light industrial uses. Subarea A includes parcels north of Interstate 8 between Fairmount Avenue and Waring Road. The northern boundary includes parcels on both sides of Friars Road from Fairmont to the four corners of Zion Avenue and Mission Gorge Road. The far west side of the San Diego River defines the western boundary. The eastern boundary includes parcels on both sides of Mission Gorge Road from Zion Avenue in the north to Mission Gorge Place in the south, along with the parcels on both sides of Mission Gorge Place. 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 B. Subarea B is comprised primarily of industrial uses with limited office and commercial uses. The southern edge of this subarea is comprised of parcels at the intersection of Mission Gorge Road and Old Cliffs Road. The area continues north along both sides of Mission Gorge Road and reaches its furthest northern point just south of Margerum Avenue (excluding the industrial park off Katelyn Court and Goen Place on the eastside of Mission Gorge Road). The western edge of the San Diego River is the western boundary for this area, except at the northwest corner of Subarea B. The eastern edge of the area also includes 12 commercial/industrial parcels on both side of Princess View Drive from the eastern corner of Mission Gorge Road heading north. Subarea B contains sand and gravel processing facilities to the northwest of Princess View Drive with industrial storage to the south along the western portion of Mission Gorge Road. This area is bounded to the north by the Mission Trails Regional Park. In this area sand and gravel processing operations take place on both sides of the San Diego River with a western boundary of the residential neighborhood along Colina Dorada Drive. Subarea C is comprised of a shopping center complex made up of the parcels bound to the northwest by the alley between Waring Road and Glenroy Street; by Zion Avenue to the northeast; by Carhage Street to the southeast; and by Orcutt Avenue to the southwest. Additional area to the north, across Zion Avenue includes Allied Gardens Community Park with other community services such as the Edwin A. Benjamin Library, Lewis Middle School, and two churches.

COMMUNITY PLAN AREAS: Navajo, Tierrasanta, and College Area.
COUNCIL DISTRICT: 7

ANTICIPATED SIGNIFICANT EFFECTS: The EIR will analyze potential impacts associated with the following: Land Use, Transportation/Circulation, Air Quality, Noise, Cultural Resources, Biological Resources, Geology, Hazards and Hazardous Materials, Paleontological Resources, Aesthetics, Water Quality/Hydrology, Population/Housing, Public Services, and Mineral Resources.

COMMENTS REQUESTED: The Community and Economic Development Department needs to know your ideas about the effects of this project might have on the environment and your suggestions as to mitigation or ways the project would be revised to reduce or avoid any significant environmental impacts. Your comments will guide the scope and content of environmental issues to be examined in the EIR. Your comments may be submitted in writing to: Mr. Tracy Reed, Special Projects Manager, Community and Economic Development, 600 B Street, Fourth Floor, MS 904, San Diego, CA 92101. Available project information may also be reviewed at this location.
NOP REVIEW PERIOD: July 26 through August 30.

I, Joyce Ramirez, am a citizen of the United States and a resident resident of the county aforesaid; I am over the age of eighteen years, and not party to or interested in the above entitled matter. I am the principal clerk of the Daily Transcript, a newspaper of general circulation, printed and published daily, except Saturdays and Sundays, in the City of San Diego, County of San Diego and which newspaper has been adjudged a newspaper of general circulation by the Superior Court of the County of San Diego, State of California, under the date of January 23, 1909, Decree No. 14894; and the

PUBLIC NOTICE

is a true and correct copy of which the annexed is a printed copy and was published in said newspaper on the following date(s), to wit:

JULY 19

I certify under penalty of perjury that the foregoing is true and correct.


Dated at San Diego, California this 19 day of

July, 2004
Joyce Ramirez
(Signature)

Project Title: Grantville Redevelopment Project

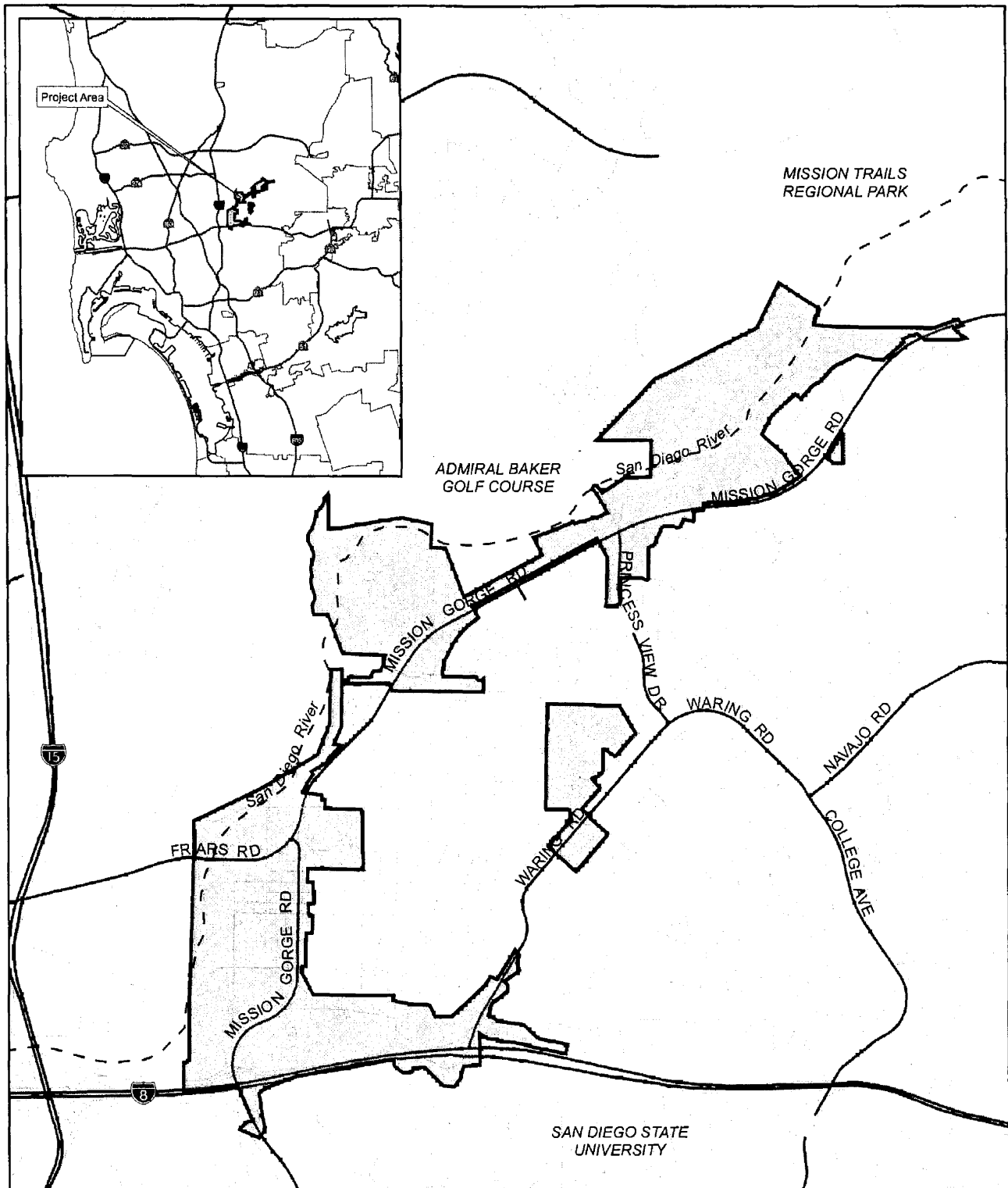
Project Applicant: City of San Diego Redevelopment Agency

Date: July 21, 2004

Signature: 

Title: Senior Project Manager - BRG Consulting, INC.

Telephone: (619) 298-7127



SOURCE: SanGIS and BRG Consulting, Inc., 2004

6/30/04



Grantville EIR

Grantville Project Location

FIGURE

1

NOP Distribution

FEDERAL GOVERNMENT

COMMANDING GENERAL
ATTN COMMUNITY PLANS & LIAISONS
MCAS MIRAMAR AIR STATION
PO BOX 452000
SAN DIEGO CA 92145-2000

MS REBECCA TUDEN
US EPA
75 HAWTHORN ST WTR 8
SAN FRANCISCO CA 94105

US DEPT OF THE INTERIOR
FISH & WILDLIFE SERVICE
6010 HIDDEN VALLEY RD
CARLSBAD CA 92009

US ARMY CORPS OF ENGINEERS
ATTN: DR RONALD F LOCKMANN
ENVIRONMENTAL PLANNING UNIT
911 WILSHIRE BLVD
LOS ANGELES CA 90017-3401

US ARMY CORPS OF ENGINEERS
TERRY DEAN
16885 WEST BERNARDO DR STE 300A
SAN DIEGO CA 92127

STATE GOVERNMENT

CALTRANS PLANNING
ATTN LU SALAZAR
1450 FRAZEE RD SUITE 506
SAN DIEGO CA 92108

CALIFORNIA DEPT OF FISH & GAME
MR DON CHADWICK
4949 VIEWRIDGE AVE
SAN DIEGO CA 92123

SUE O'LEARY
CALIF INTEGRATED WASTE MGT BOARD
PERMITTING AND INSPECTION BRANCH
PO BOX 4025
SACRAMENTO CA 95812-4025

CALIFORNIA ENVIRONMENTAL
PROTECTION AGENCY CAL EPA
1001 I ST
SACRAMENTO CA 95814

CA REGIONAL WATER QUALITY CONTROL
BOARD
9174 SKY PARK CT #100
SAN DIEGO CA 92123

OFFICE OF PLANNING & RESEARCH
STATE CLEARINGHOUSE
1400 TENTH STREET #202
SACRAMENTO, CA 95815

California Air Resources Board
Attn: EIR Regional Impact Div.
P.O. Box 2815
Sacramento, CA 95812

Department of Conservation
Office of Mine Reclamation
801 K Street, MS 09-06
Sacramento, CA 95814-3529

California Department of Conservation
Division of Land Resource Protection
801 K Street, MS 18-01
Sacramento, CA 95814-3528

Mr. Dwight Sanders
Environmental Planning & Mgmt.
State Lands Commission
100 Howe Ave., #100-S
Sacramento, CA 95825-8202

NAP Distribution

COUNTY GOVERNMENT

County of San Diego
Agriculture Department
5555 Overland Ave. MS 01
San Diego, CA 92123

Environmental Coordinator
County of San Diego
Dept. of Planning and Land Use
5201 Ruffin Road, Ste. B MS O-650
San Diego, CA 92123

San Diego County Water Authority
4677 Overland Avenue
San Diego, CA 92123-1233

Air Pollution Control District
9150 Chesapeake Drive, MS O-176
San Diego, CA 92123

County of San Diego
Department of Park & Recreation
5201 Ruffin Road, M.S. O-29
San Diego, CA 92123

Mr. Michael Dorsey, Chief
Hazardous Materials Division
Dept. of Environmental Health
PO BOX 129261
San Diego, CA 92112-9261

Gregory J. Smith
San Diego County Tax Assessor
County Administration Center
1600 Pacific Highway, MS A4
San Diego, CA 92101

Ms. Anna Noah
Environmental Services Unit
Department of Public Works
5555 Overland Ave., MS 0385
San Diego, CA 92123

CITY GOVERNMENT

Ann Gonsalves
Development Services Department
City of San Diego
1222 First Avenue, MS 505
San Diego, CA 92101

Program Manager
Historical Resources Board
City of San Diego
202 C Street, MS 4A
San Diego, CA 92101

Ann Hix
Open Space - Park & Recreation Dept.
City of San Diego
1250 Sixth Avenue, MS 804A
San Diego, CA 92101

City of San Diego
Fire & Life Services

OTHER REGIONAL GOVERNMENT

Mr. Chris Jacobs, Senior Planner
Development Services
City of La Mesa
8130 Allison Avenue
La Mesa, CA 91941

Ms. Nan Valerio
SANDAG
401 B Street #800
San Diego, CA 92101

San Diego Gas & Electric
8326 Century Park
San Diego, CA 92123-4150

NOA Distribution

ENVIRONMENTAL ORGANIZATIONS

San Diego River Park Foundation
Mr. Rob Hutsel
PO BOX 149
La Jolla, CA 92038

Sierra Club, San Diego Chapter
Document Review Team
3820 Ray Street
San Diego, CA 92104

Mr. Mel Hinton
Conservation Committee
San Diego Audubon Society
4891 Pacific Hwy. #112
San Diego, CA 92110

SAN DIEGO NATURAL HISTORY MUSEUM
ATTN TOM DEMERE
PO BOX 121390
SAN DIEGO CA 92112-1390

Calif. Native Plant Society
c/o Natural History Museum
P.O. Box 121390
San Diego, CA 92112-1390

Wetland Advisory Board
c/o Robin Stribley
Open Space Div. Park & Recreation
1250 Sixth Avenue, 4th Floor, MS 804A
San Diego, CA 92101

CENTER FOR BIOLOGICAL DIVERSITY
DAVID HOGAN
PO BOX 7745
SAN DIEGO CA 92167

ENDANGERED HABITATS LEAGUE
LYNNE BAKER
13626 ORCHARD GATE RD
POWAY CA 92064-2126

HISTORICAL & ARCHAEOLOGICAL ASSOCIATIONS

SOUTH COASTAL INFORMATION CENTER
COLLEGE OF ARTS & LETTERS
SAN DIEGO STATE UNIVERSITY
4283 EL CAJON BLVD STE 250
SAN DIEGO CA 92105

San Diego Historical Society
Environmental Document Review
P.O. Box 81825
San Diego, CA 92138

SAN DIEGO ARCHAEOLOGICAL CENTER
MS CINDY STANKOWSKI DIRECTOR
16666 SAN PASQUAL VALLEY RD
ESCONDIDO CA 92027-7001

SAVE OUR HERITAGE ORGANISATION
2476 SAN DIEGO AVE
SAN DIEGO CA 92110-2838

SAN DIEGO COUNTY ARCHAEOLOGICAL
SOCIETY INC
EIR REVIEW COMMITTEE
PO BOX A 81106
SAN DIEGO CA 92138-1106

Native American Heritage Commission
915 Capital Mall Room 288
Sacramento, CA 95814

OTHER

Friends of Adobe Falls
Audrey Delahoussaye
5681 Del Cerro Blvd.
San Diego, CA 92120

NAVAJO COMMUNITY PLANNERS INC
MR JOHN PILCH CAHIR
6224 ROSE LAKE AVE
SAN DIEGO CA 92119

Mission Trails Regional Park
Citizens Advisory Committee
Walter Odenning, PhD
4245 Tambor Ct.
San Diego, CA 92124

COLLEGE AREA COMMUNITY COUNCIL
PROJECT DISTRIBUTION
C/O THOMAS PHELPS
5255 RINCON ST
SAN DIEGO CA 92115

TIERRASANTA COMMUNITY COUNCIL
MS DEANNA SPEHN CHAIR
10371 MATADOR CT
SAN DIEGO CA 92124

Tierrasanta Community Council
4985 La Cuenta Drive
San Diego, CA 92124

No. Distribution

MISSION TRAILS REGION PARK
DOROTHY LEONARD CHAIR
1 FATHER JUNIPERO SERRA TRAIL
SAN DIEGO CA 92119



Arnold
Schwarzenegger
Governor

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



Jan Boel
Acting Director

Notice of Preparation

July 23, 2004

To: Reviewing Agencies
Re: Grantville Redevelopment Project
SCH# 2004071122

Attached for your review and comment is the Notice of Preparation (NOP) for the Grantville Redevelopment Project draft Environmental Impact Report (EIR).

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

Please direct your comments to:

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

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

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

Sincerely,

Scott Morgan
Senior Planner, State Clearinghouse

Attachments
cc: Lead Agency

**Document Details Report
State Clearinghouse Data Base**

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

Type NOP Notice of Preparation
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 619-533-4233 **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
Railways
Waterways San Diego River
Schools
Land Use Commercial office, industrial, parks, open space, community facilities, mining

Project Issues Aesthetic/Misual; 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

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

Date Received 07/23/2004 **Start of Review** 07/23/2004 **End of Review** 08/23/2004

NOP Distribution List

County: San Diego

SCH# 2004071122

Regional Water Quality Control Board (RWQCB)

Resources Agency

- Resources Agency
Nadell Gayou
- Dept. of Boating & Waterways
Suzi Betzler
- California Coastal Commission
Elizabeth A. Fuchs
- Colorado River Board
Gerald R. Zimmerman
- Dept. of Conservation
Roseanne Taylor
- California Energy Commission
Environmental Office
- Dept. of Forestry & Fire Protection
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- Office of Historic Preservation
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Region 4
- Dept. of Fish & Game 5
Don Chadwick
Region 5, Habitat Conservation Program
- Dept. of Fish & Game 6
Gabrina Gatchel
Region 6, Habitat Conservation Program
- Dept. of Fish & Game 6 I/M
Tammy Allen
Region 6, Inyo/Mono, Habitat Conservation Program
- Dept. of Fish & Game M
George Isaac
Marine Region

Other Departments

- Food & Agriculture
Steve Shaffer
Dept. of Food and Agriculture
- Dept. of General Services
Robert Sleppy
Environmental Services Section
- Dept. of Health Services
Wayne Hubbard
Dept. of Health/Drinking Water

Independent Commissions, Boards

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- Office of Emergency Services
John Rowden, Manager
- Governor's Office of Planning & Research
State Clearinghouse
- Native American Heritage Comm.
Debbie Treadway

Fish and Game

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

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

Business, Trans & Housing

- Caltrans - Division of Aeronautics
Sandy Hesnard
- Caltrans - Planning
Terri Pencovic
- California Highway Patrol
John Olejnik
Office of Special Projects
- Housing & Community Development
Cathy Creswell
Housing Policy Division

Dept. of Transportation

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Mike Eagan
District 1
- Dept. of Transportation 2
Don Anderson
District 2
- Dept. of Transportation 3
Jeff Pulverman
District 3
- Dept. of Transportation 4
Tim Sable
District 4
- Dept. of Transportation 5
David Murray
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- Dept. of Transportation 6
Marc Birnbaum
District 6
- Dept. of Transportation 7
Cheryl J. Powell
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John Pagano
District 8
- Dept. of Transportation 9
Gayle Rosander
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- Dept. of Transportation 10
Tom Dumas
District 10
- Dept. of Transportation 11
Mario Orso
District 11
- Dept. of Transportation 12
Bob Joseph
District 12

Cal EPA

Air Resources Board

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- Transportation Projects
Kurt Karperos
- Industrial Projects
Mike Tollstrup

California Integrated Waste Management Board
Sue O'Leary

State Water Resources Control Board
Jim Hockenberry
Division of Financial Assistance

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

State Water Resources Control Board
Steven Herrera
Division of Water Rights

Dept. of Toxic Substances Control
CEQA Tracking Center

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

Other _____

Last Updated on 05/21/04

July 12, 2004

Eric, Lee,

Attached are the environmental comments I submitted to the Navy regarding placing Navy housing on Admiral Baker Field. It's a fairly well documented and referenced document, not a personal opinion piece.

Although this was written about Admiral Baker Field, all aspects of the considerations...geologic, hydrologic, noise, wildlife and the rest...apply to the entire valley floor, including the Grantville area. No development in the valley should proceed until these are addressed. All references are from official documents pointing out potential problems with this valley, should someone attempt to develop it. None of the warnings or problems have gone away since they were written by the various agencies involved.

Should you desire to see any of the references which are listed as available but not attached, I will be glad to make them available to you.

Jere Cordell



THE CITY OF SAN DIEGO

TRACY REED

Special Projects Manager
Economic Development Division • Community and Economic Development
MS 904 • (619) 533-7519 • (619) 533-5250 (FAX) • email: treed@sandiego.gov • www.sandiego.gov

MEMO

8/24

Tim

Document this is
a submittal from

Lee Campbell

10857 Viachs Drive

SD CA 92124

050/560-1213

JHAC



10295 Viacha Drive
San Diego, CA 92124-3408
November 12, 1999

Ms. Sheila Donovan
Regional Planning Team, Southwest Division
Naval Facilities Engineering Command
1220 Pacific Highway
San Diego, CA 92132-5190

- Reference A: City of San Diego Environmental Impact Report #77-02-08 (available)
Reference B: City of San Diego Notice of Preparation of a Draft Environmental Impact Report, dated March 16, 1992 (available)
Reference C: Fault Map of Southern California (attached)
Reference D: Excerpts of FEMA seismic fault maps for Mission Gorge and Admiral Baker Field (attached)
Reference E: San Diego Association of Governments (SANDAG) Final Draft San Diego River Habitat Conservation Plan, Figure 23 (attached)
Reference F: Floodplain and Proposed Dike Boundaries (from Ref A) (attached)
Reference G: Sierra Club, San Diego Chapter, letter to The Mayor and City Council dated December 8, 1989 (available)
Reference H: Union-Tribune article on illegal hazardous waste storage (attached)
Reference I: Conservation Measures on Preserving Bell's Least Vireo Habitats in Mission Gorge (attached)

Dear Ms. Donovan and team members,

Allow me to comment on some environmental aspects of site selection for the proposed 1,600 military housing units for MCAS Miramar.

While most proposed sites are north of Highway 52, I read where the current Admiral Baker Field golf course along Mission Gorge Road is under consideration as well. I consider this site unsatisfactory for this purpose for several reasons over and above the obvious loss of recreational facilities.

Geology

Citing Reference A, "The coastal floodplains of San Diego are typically flat-bottom valleys bordered by steep slopes and bluffs 100 to 300 feet high and separated by urbanized coastal mesa tops. Besides their important natural functions, floodplains contribute definition, open space buffers, and greenbelt values to the urban geography. " The Admiral Baker site is described as "composed of alluvium and slope wash material derived from up-river granitic sources...(surrounded by) slope areas (100-250 MSL) comprised of Santiago Peak Volcanics overlain by the Friars Formation." Reference B says of the area, "Adverse geotechnical conditions, including seismic activity (Rose Canyon fault), potentially compressible soils, and alluvium-colluvium-fill present construction constraints." Continuing, the area is... "a seismically active region. The Rose Canyon fault is classified as active and is located to the

west...the site is subject to liquefaction due to shallow groundwater and soil type.” Returning to Ref. A, “Potential local seismic events on the La Nacion and/or Rose Canyon Fault Systems, ranging in intensity from VI-VIII on the Modified Mercalli scale..., could affect a concealed fault paralleling the subject property, thereby increasing the risk hazard on the site.”

This hidden fault runs right along the eastern boundary of the Admiral Baker property as it is almost exactly under Mission Gorge Road. I have attached Reference C which shows this spur fault of the Rose Canyon Fault as Mission Gorge I. I have also attached Reference D which shows the concealed fault in more detail running under Mission Gorge Road through this valley and shows that the surrounding slopes to be slide-prone formations and the area itself subject to potential ground failure (liquefaction). The whole area has a risk zone rating of C, moderately at risk.

When studies were conducted as to whether to place a 30 million-gallon-per-day waste water recycling plant in this exact location, it was discovered that the waste-water hydraulic load in this sewage corridor coming in from the Santee and Padre Dam water-sewer districts had the water and sewer capacity at their limits in this area. The additional hydraulic load that would be imposed by this development would far exceed these capacities and considerable additional infrastructure would have to be installed. Much of this was discovered by your own office, coincidentally, when you were investigating whether you could use the reclaimed water to irrigate Admiral Baker Field. If you will remember, further discussions ensued on the sewer lines through this area. They were old at that time and have since been re-sleeved. While that has prolonged their life from normal use breakage, you yourselves noted that they constitute an unacceptably long run of pipes parallel with and contiguous to the seismic fault under Mission Gorge Road for not having any of the self-closing emergency valves which newer sewer pipes have in seismic areas. This would present a high-volume sewage catastrophe of phenomenal proportions, and alone should preclude placing military housing units here.

Hydrology

My neighbors and I have seen the golf course flood many times in the past 13 years and, as it is a low river bottom, described in Reference A as, “...within the floodway (FW) and floodplain fringe (FPF) of the San Diego River.” The area holds its water a long time with no where for it to drain further down to. Ref B states that, “Development of the site would create impervious surfaces, thereby resulting in potential water quality impacts from stormwater runoff. In addition, potentially significant sedimentation and erosion impacts could occur during construction...” “In addition, the riverwash soils present at the site are subject to severe erosion and highly susceptible to liquefaction.” “The soils are subject to erosion and differential settlement.” “...the site is adjacent to the San Diego River and thus any removal of vegetation or soil modification in drainage patterns...could impact water quality in the river.”

Ref B calls for “preventive floodproofing” structures in this area “...to reduce the potential hazard to life and property in areas subject to high velocity floodway or shallow inundation.” “The cumulative effect of extensive structural development in the floodplain fringes could allow a density of urbanization that would be incompatible with community and City open space and rehabilitation of the river and floodplain as a viable natural resource.” References E and F show this area to be in both the floodplain and the floodplain fringe.

The seemingly tiny San Diego river has broken the levy to the golf course repeatedly and the

river has gained such volume that it has carried thule reed rafts downstream large enough to place a house on and the water has held such sustained force that people were able to jet ski up it at this point. Worsening conditions on this north side of the river is the fact that at this time, the south side is being raised 8-12 feet for commercial development, so the north side would receive all the brunt of any river flooding.

Finally, Ref G notes the extensive coordination on the part of the City of San Diego with various agencies, including the California Environmental Quality Act (CEQA) to arrive at the City's Resource Protection Ordinance. This Ordinance "...allows public facilities in the floodplain only when findings are made that there are no other less environmentally harmful places to put them." There must be less environmentally harmful places than in the floor of the Mission Gorge San Diego River valley.

Hazardous Conditions

Lastly, the hazardous conditions that exist there that would preclude putting housing in this location. The most obvious is the Redi-Mix stone quarry and rock crushing company. Their quarry blasting has been and continues to be a source of annoyance and friction with the surrounding communities. The company complies with and in fact stays way under all laws and state limits for blasting as far as decibels of noise, pounds-per-square-inch of blast air over pressure, lateral ground movement/shaking and opacity of resident dust cloud. Nevertheless these all regularly occur and the Tierrasanta Community Council regularly fields complaints from residents of cracked pools, cracked walls, upset shelves of dishware and hysterically frightened children and pets. Even though the quarrying and blasting company comply with all the laws, the courts have found that they are engaged in a "hazardous enterprise." What that means is that no matter how carefully they comply with all laws and precautions, there is the presumption that someday something could accidentally happen and a catastrophic event could occur such as an explosion or a landslide. This is not a location to put 1,600 more families.

Further, while a surface sweep of unexploded ordinance has been done, constructing housing would turn over considerable dirt and unavoidably expose shells and mortar rounds. This would not only endanger the construction crews, but the eventual residents. Tierrasanta residents unfortunately already know how attractive a cannon shell is to a child to play with and its terrible consequences.

Additionally, this location is under the area where the two approaching air corridors making their approach to Montgomery Field join to make parallel approaches to the runways. This is an area which could have airplane crashes and in fact an airplane crashed into Admiral Baker Field just a few years ago.

Further, when studying this area for the waste water recycling plant, it was discovered that 100 barrels of improperly-stored hazardous waste had been leaking in the M1-B zoned area which constitutes the eastern edge of this area, at the northwest corner of Mission Gorge and Princess View. Ref H exposed this illegal storage in the press. I have pictures of this area. To my knowledge, this had never been cleaned up as it has never changed owners or underlying uses. Putting these families in here could necessitate a considerable and costly hazardous materials soils cleanup.

Lastly, there are SDG&E high-tension wires on towers running the length of this area under

consideration. While they might not be hazardous to the occasional golfer on the golf course, the cumulative effect from living full time right under these is still under study at various universities and a housing development under such wires would be very questionable at this time. Plus there is the possibility that a wire could fall onto the area, as some were damaged and fell or nearly so in a recent plane crash in this area.

Biology

The other two-thirds of what had been open space in the bottom of Mission Gorge has recently been or is currently being lost to industrial park development. This whole area has been habitat to deer, bobcat, coyote and the variety of small rodents and reptiles that support the raptors that live there, including red tail hawk, Cooper's hawk, chaparral cock, kestrel, valley quail and great horned owl, among others. The valley bottom has already been 2/3 decimated. With housing put in there, it would be 100% gone and the wildlife which it currently supports. Those that did not leave or die off, would congregate more heavily in the proposed housing development as well as in the homes surrounding the canyon wall. There would be 1,600 young military families with their small children and small pets packed in with displaced rattlesnakes, coyotes, bobcats, the occasional mountain lion, pack rats, skunks and other wildlife who will not give up their habitat lightly nor quickly. We in the area have already seen the dangers which this cohabitation imposes and take considerable precautions. Densely packing thousands more people in an even smaller area would be untenable for humans and animals alike.

The Least Bell's Vireo, a federally-endangered species, nests in this area. Ref G notes that the SANDAG Least Bell's Vireo Advisory Task Force had spent three years developing a plan that will protect and preserve the Vireo's habitat. Again, the City put a lot of resources and staff time into this plan. Ref I shows that the south side of the Admiral Baker Field is conserved habitat. Installing a housing development in this area would infringe on this conserved habitat and on the identified nesting areas.

Aesthetics/Viewshed

As this area constitutes the shallow floor of the huge Mission Gorge valley, Admiral Baker Field is the only remaining green belt in this enormous viewshed, overlooked by thousand of residents. As mentioned above, 2/3 of the aesthetics of this valley has recently been lost to industrial development. If the last 1/3 is lost to high-density housing the loss of property value of the surrounding homes would be easily \$5,000 to \$10,000 for each overlooking home. Multiplied by at least one thousand overlooking residences, the loss of property values would exceed one million dollars to the current residents and that would be just an initial estimate contributing to much larger future losses as property values would have gone, but did not with the loss of this irreplaceable view and green belt.

Also there is the unavoidable impact of light and glare and its impacts on the surrounding community which would have to be considerably mitigated.

Noise

And equal to the view loss, the noise from these 1,600 units would also detract from property values. As there is a stone quarry adjacent to this location which conducts blasting and has large rock crushing equipment anchored firmly to the ground, noise conductivity studies were

conducted to assess the airborne and subterranean nature of sound in this bowl shaped area. It was discovered that there is an extremely unusual ability to conduct sound in this valley. Hard blue granite just under the surface acts like a tympani drum to super-conduct sound through the ground. Many of us are familiar with the "Tierrasanta hum" which has been studied and found to be caused by a company with an industrial shredder mounted in the ground some miles away which surfaces in Tierrasanta. More particularly when the Amaron Pipe Company was in the Mission Gorge valley, its sound came to the surface under the homes on the surrounding hillsides. More astoundingly, the valley is subject to an amazing extent to the "Capitol Dome effect" noted for being able to whisper on one side of the U. S. Capitol dome and hear it clearly on the other side. I myself have had repeated City planners come to my home when considering developments to put in where Admiral Baker Field is now, and be amazed by hearing people in golf shoes walking through gravel 3/4 mile away. Normal conversations can be heard up to a mile away as can a normal volume radio. Dogs barking 2 miles away sound like they are at 100 yards. More on this incredible sound conductivity below regarding the quarry blasting. To inject 1,600 families with their attendant stereos, automobiles, dogs, backyard playground sets, BBQs and the like, would make an unacceptable cacophony for them, and since noise rises, for the current residents on the canyon walls as well.

Traffic

Those same above-mentioned sewage recycling discussions addressed possibly putting a temporary bridge over the San Diego River at the northeast corner of the golf course for recycling plant construction purposes with access in from the corner of Mission Gorge and Princess View. It was then discovered that there are Bell's Least Vireos, a federally endangered species, nesting at that site. That made the temporary bridging out of the question. It would also mitigate against any permanent traffic solution there, and that corner would be the only alternative for traffic at the east end of the development. Additionally, traffic demand patterns were just studied for the installation of the two recent light industrial parks spanning Mission Gorge Road. Based on these studies, road widening was determined and accomplished; traffic lights were designed and installed; center dividers, islands and meanders were chosen and installed; and at-grade accesses were constructed for the parks. All these would now be obviated and have to be replaced by the considerably more intense traffic that the housing development would impose.

Air Quality

The air quality of the housing would be affected by the yet-unknown nature of the business which will be coming into the industrial park across the river from Admiral Baker Field, which is directly upwind from the housing as the predominant wind through the canyon is south-to-north. While no tenants are certain, the two most likely uses are sporting goods manufacturing and bio-tech research. If the sporting goods are athletic shoes, considerable glue fumes would be vented. It has been asked, but not yet answered, whether bio-tech research would entail the venting of rendered-inert viruses, or the odors of pens of test animals such as rats, chimpanzees or swine.

Public Services

Public services would be stretched as the area is officially in Tierrasanta and as such is served by the Eastern substation of the San Diego Police Department, which is located on Aero Drive.

As the Shore Patrol no longer polices military housing areas, this would now be the furthest and least accessible area for the Eastern substation to respond to a call. This would considerably worsen the average response time from this substation and having officers clear out on this fringe of the area would detract from their ability to respond to the current areas reasonably accessible to the substation.

Cultural Resources

As this is river bottom, known to be a source of water and living area to the native peoples of the area, continuous paleontological monitoring would have to be conducted throughout the construction of any housing. A paleontological review of the literature would have to be conducted prior to commencing any developing. Any cultural artifact discoveries would require mitigation, and, if significant, could halt the construction altogether even after it had commenced.

Cumulative Effects

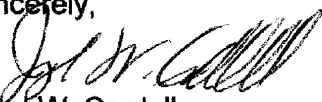
The California Environmental Quality Act (CEQA), Section 15130 of the Guidelines, requires that when considering the development of a project, that all possible environmental impacts be considered cumulatively as well as to their individual effects. This includes cumulative effects from past, present, and potentially future impacts. I am confident that such a summation of impacts would direct such a military housing development to be established elsewhere and not in this fragile and potentially hazardous area.

Summary

In sum I would like to paraphrase Mr. Carl Zobell, the distinguished recent Chairman of the San Diego City Planning Commission, at a session at which I was present. He expressed a sentiment that was echoed by several other commissioners upon the year-plus inconclusive hearings on the quarrying operation at this location vis-a-vis the surrounding residents. He said, in effect, "To allow residential housing to have encroached up onto the incongruous pre-existing uses of the Mission Gorge valley floor is the single biggest planning mistake this City has ever made. To think that we allowed all these people to build and live this close to such a hazardous and incompatible undertaking is amazing. I only hope we have learned something from this mess and never let anything remotely approaching it happen again." Why, then, would the military even consider telling around 5,000 people, who have no say over where they are told to live, that they had to live in the middle of this situation and make one of the of the City's biggest mistakes even worse? It would be any number of environmental disasters waiting to happen.

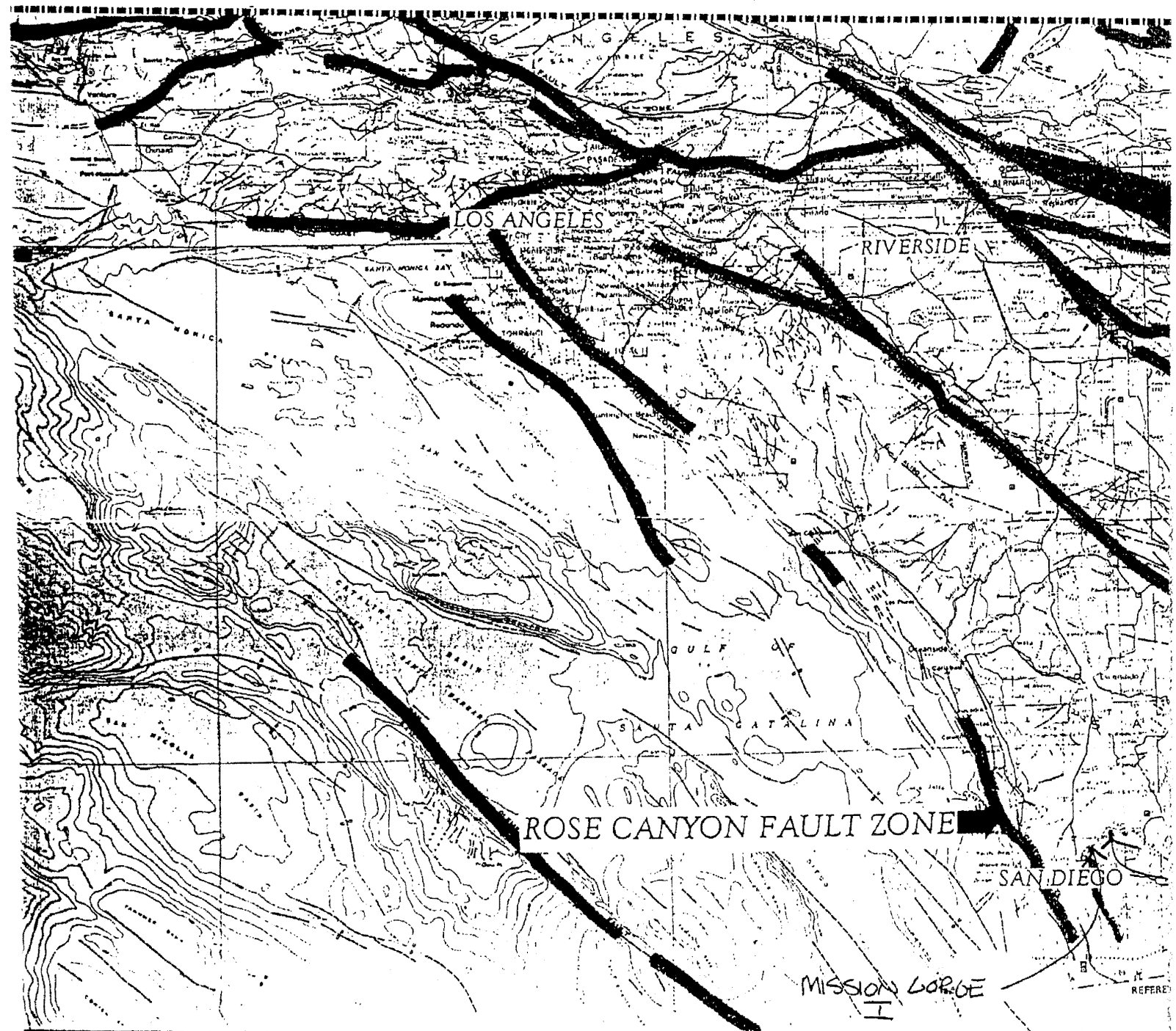
If you have questions on the above matters, I would be glad to respond and, where I can, produce documentation from my files. I can be reached at the above address or at (858) 560-2045. I seriously urge you to not place these housing units here. It would only worsen the quality of life for the current residents, the intended residents and the wildlife.

Sincerely,



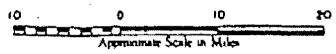
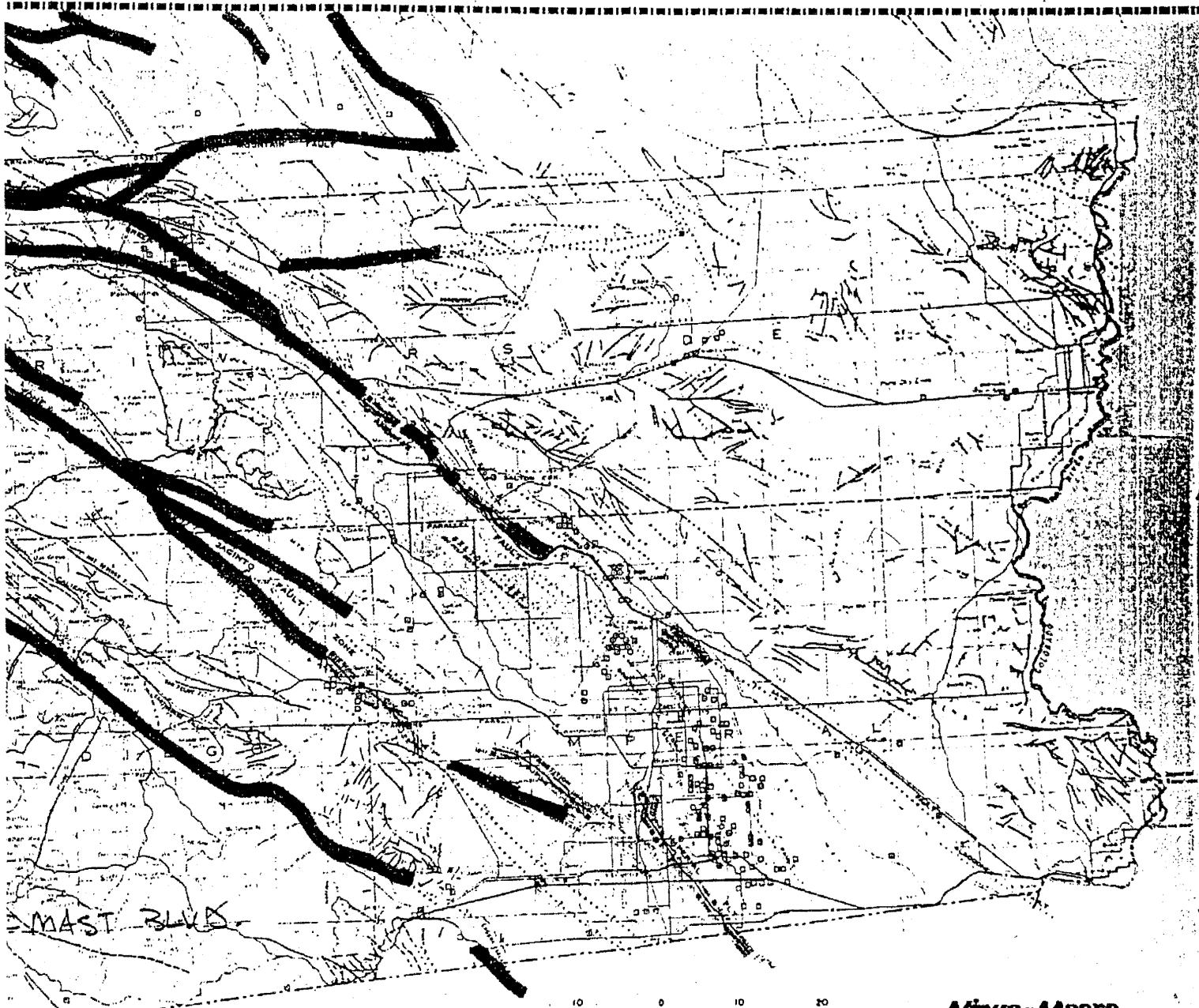
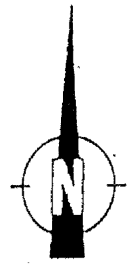
Jeryl W. Cordell
CDR, USN (Ret.)

FAULT MAP OF SOUTH WITH LOCAT VOLCANOES, THERMAL SPRIN



EASTERN CALIFORNIA

LOCATIONS OF THERMAL SPRINGS AND THERMAL WELLS




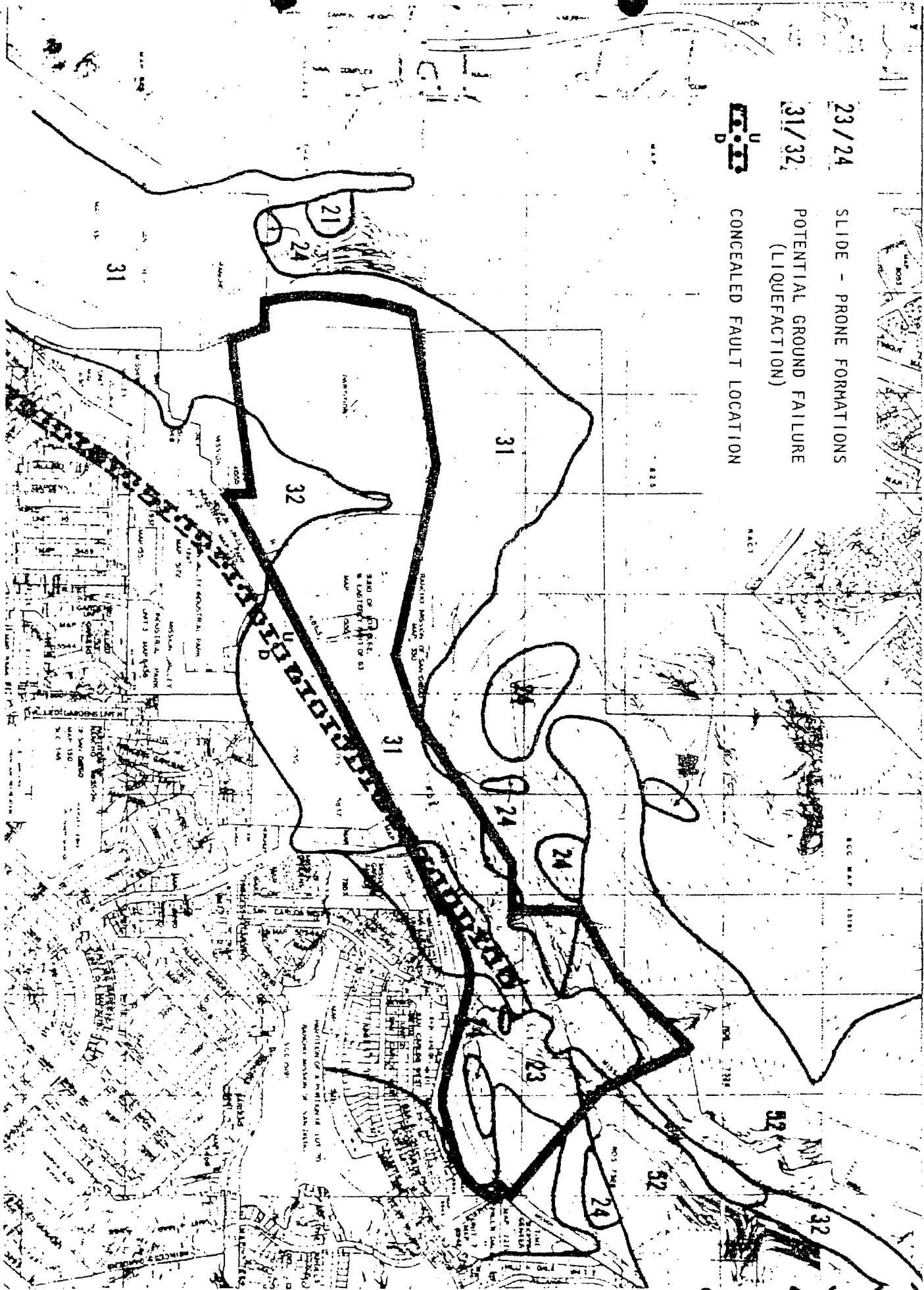
Ninyo-Moore

CALIFORNIA GEOLOGIC DATA MAP SERIES, MAP NO. 1-FAULTS, VOLCANOES,
THERMAL SPRINGS AND WELLS

The preparation of this map was financed in part through a comprehensive planning grant from the Department of Housing and Urban Development, under the provisions of Section 701 of the Housing Act of 1968, as amended.

Ref C (2 of 2)

23/24 SLIDE - PRONE FORMATIONS
31/32 POTENTIAL GROUND FAILURE
(LIQUEFACTION)
 CONCEALED FAULT LOCATION



RISK ZONE RATING KEY

B LOW

C MODERATE



CONCEALED FAULT LOCATION

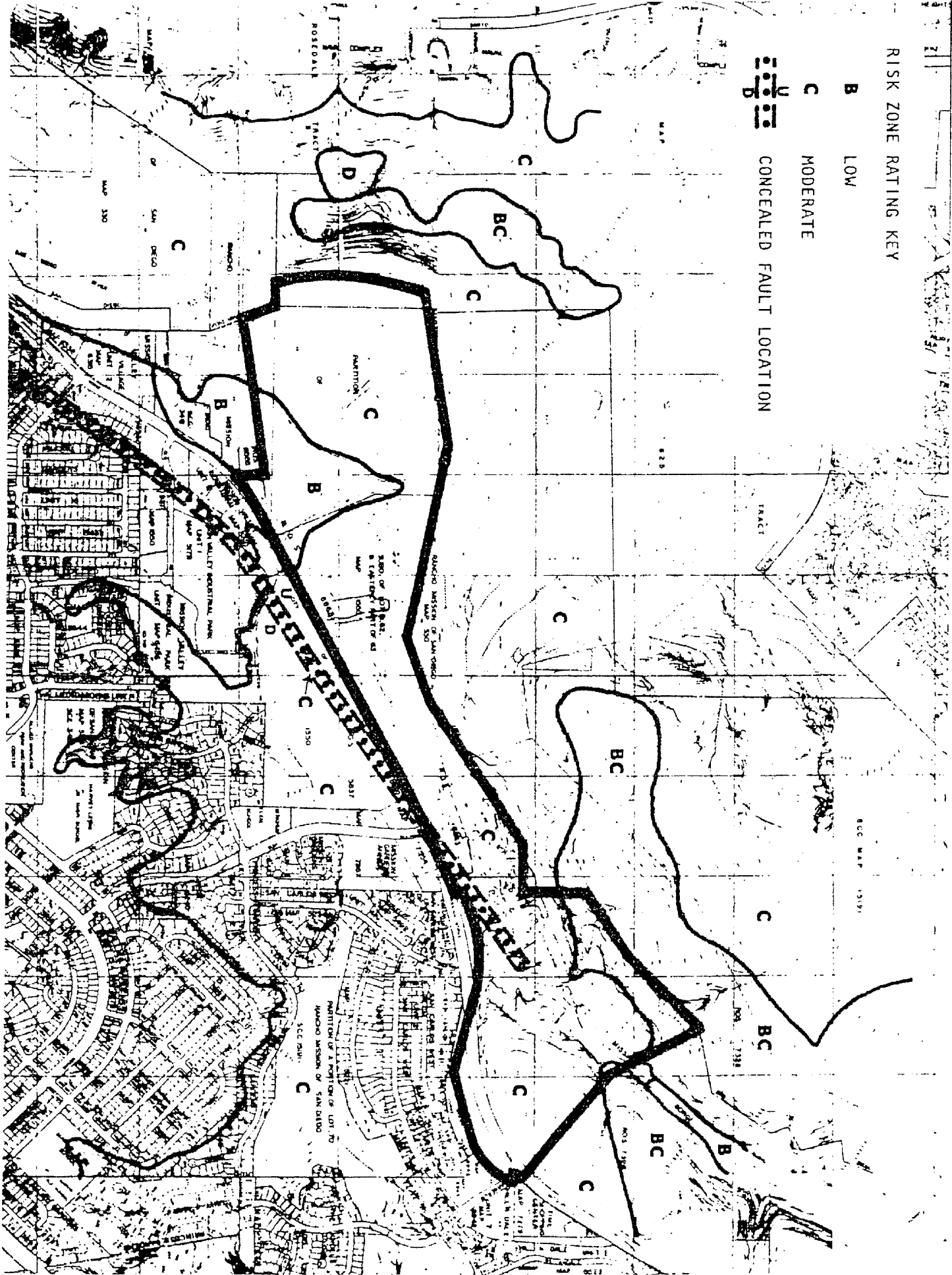
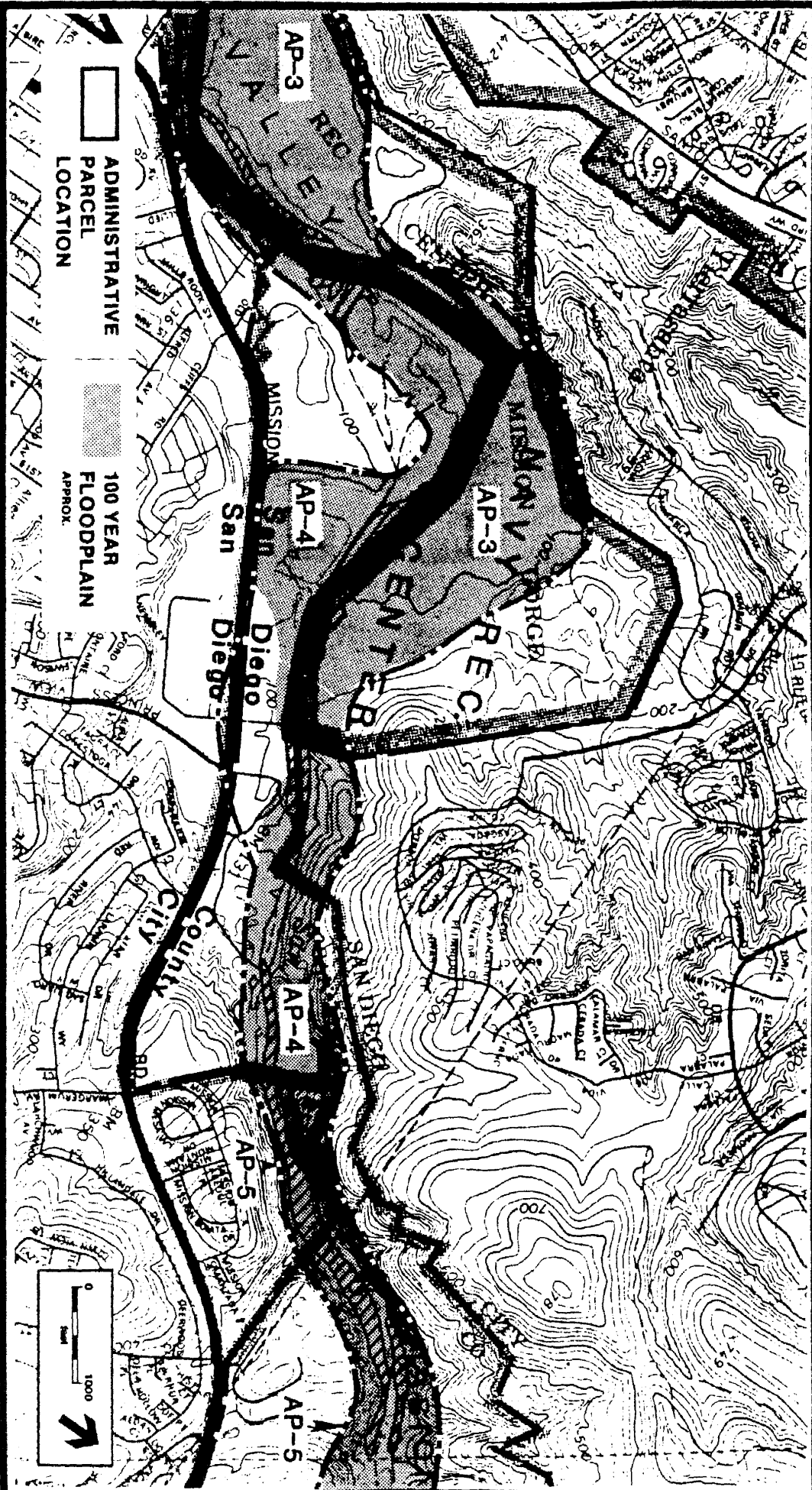
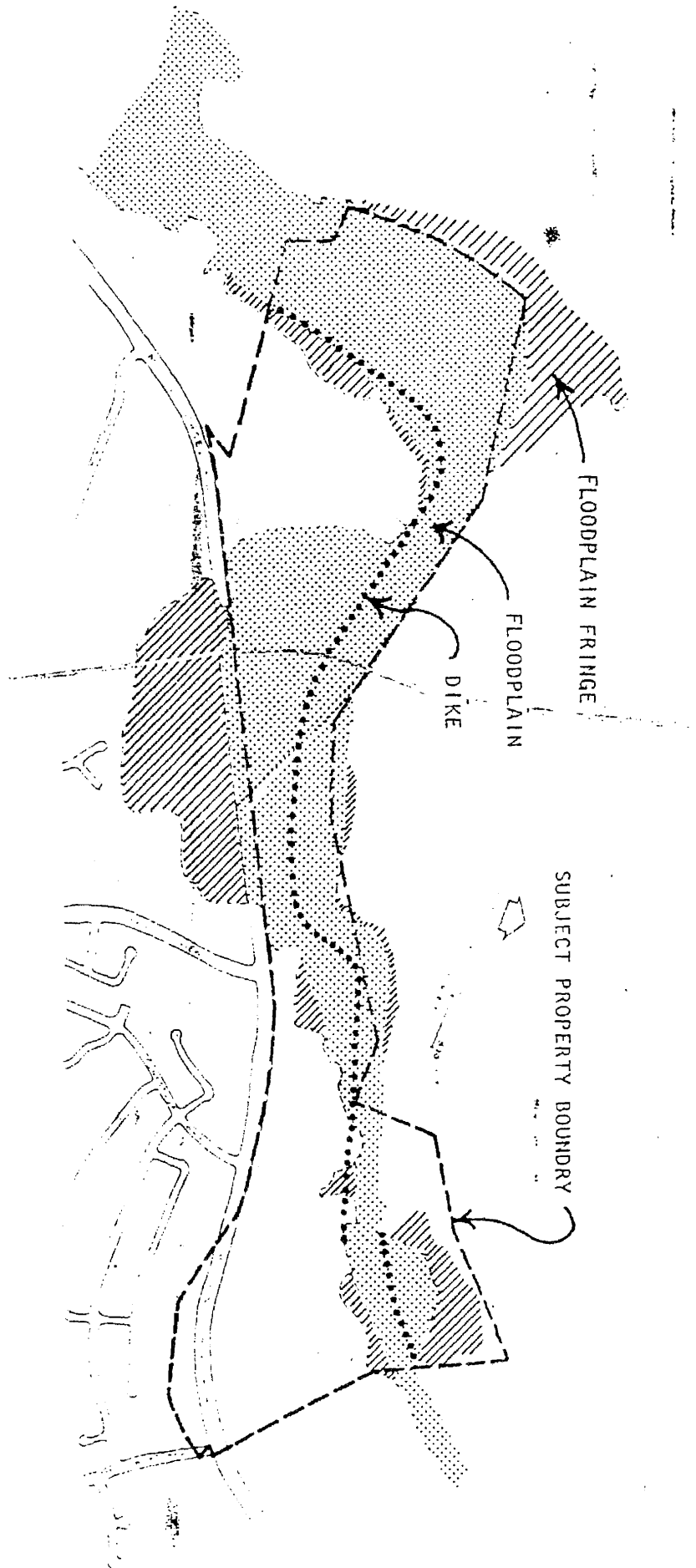


FIGURE 23 FPA BOUNDARY AND ADMINISTRATIVE PARCELS



Ref E



Ref F

Ref H

Mission Gorge company probed over storage of hazardous waste

OCT 22 4 20 10 14

By Michael Richmond
Tribune Environment Writer

A Mission Gorge company is under investigation for illegal storage of hazardous materials that investigators found stored at the business after a tip from an informant.

The company, San Diego Environmental Services Inc., of 7370 Mission Gorge Road, has been issued a notice of violation by the county Department of Health Services for illegal storage of wastes such as acids, corrosives and flammable liquids.

Mac McClanahan, a hazardous-waste investigator for the California Highway Patrol, said yesterday that more than 100 steel drums containing wastes were found at San Diego Environmental Services. The material had been picked up from various San Diego area companies that had contracted with the company to transport it to licensed waste-treatment or disposal facilities.

McClanahan said San Diego Envi-

ronmental Services' state permit for transportation of hazardous wastes expired Aug. 30. Under the permit, the company was authorized to store wastes no longer than six days.

Some of the hazardous material dates back to 1988, McClanahan said.

The investigation was launched after authorities were tipped by an informant about wastes stored at the Mission Gorge site, McClanahan said. He said the investigation is continuing and that further enforcement action, including filing of criminal charges, is possible.

The wastes do not pose a health hazard to the public, health officials said.

Representatives of San Diego Environmental Services could not be reached for comment yesterday. McClanahan said the company is cooperating in the investigation.

Meanwhile, the 18 companies and agencies that generated the wastes will be held responsible for disposal

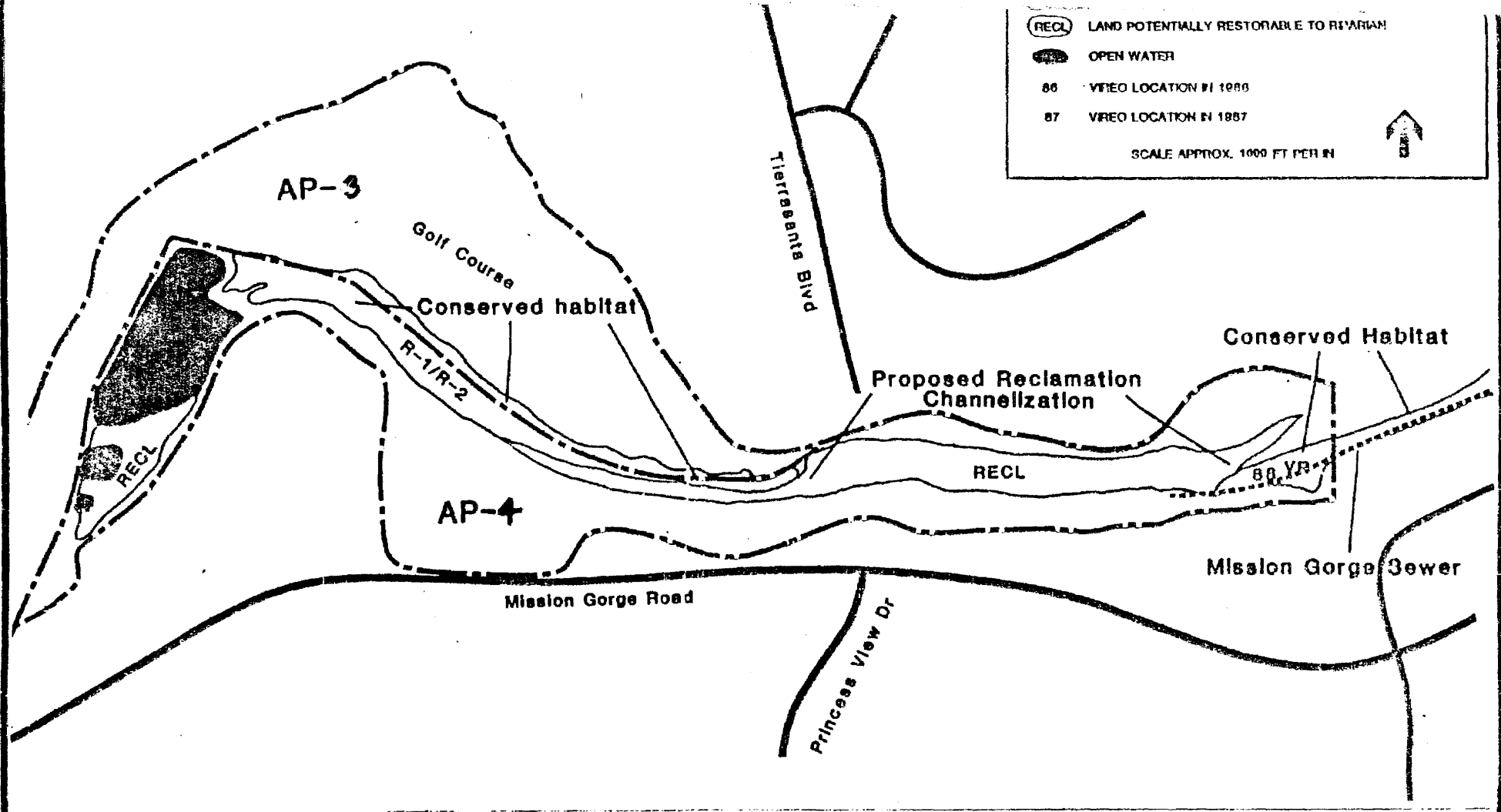
of the material, according to health officials. Several school districts are among those whose wastes were picked up by the company, they said.

"Each of the 18 responsible parties have a continued legal responsibility for the material," said Larry Aker, deputy director of the county Department of Health Services.

Aker said that proper disposal of the wastes could be quite costly. He said some of the containers have been mixed and that sorting them out will take time.

"It's a real mess," he said.

Aker and Dan Avera, head of hazardous materials management for the county, said they hope the discovery of the illegally stored materials conveys a message to other waste generators that they should know more about companies they contract with to transport their hazardous materials.



Ref I

FIGURE 34 CONSERVATION MEASURES IN UPPER AP-3 AND AP-4

RECON



San Diego County Archaeological Society, Inc.

Environmental Review Committee

25 July 2004

To: Mr. Tracy Reed
Community and Economic Development Department
City of San Diego
600 B Street, Fourth Floor, MS 904
San Diego, California 92101

Subject: Notice of Preparation of a Draft Environmental Impact Report
Grantville Redevelopment Project

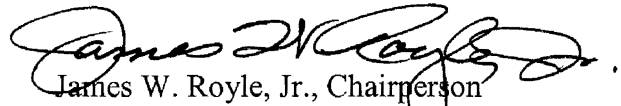
Dear Mr. Reed:

Thank you for the Notice of Preparation for the subject project, received by this Society last week.

We are pleased to note the inclusion of cultural resources in the list of subject areas to be addressed in the DEIR, and look forward to reviewing it during the upcoming public comment period. To that end, please include us in the distribution of the DEIR, and also provide us with a copy of the cultural resources technical report(s).

SDCAS appreciates being included in the City's environmental review process for this project.

Sincerely,


James W. Royle, Jr., Chairperson
Environmental Review Committee

cc: SDCAS President
File



UNITED STATES MARINE CORPS
MARINE CORPS AIR BASES WESTERN AREA MIRAMAR
P.O. BOX 452001
SAN DIEGO, CA 92145-2001

11103
G-5/NOPGRTVL
August 11, 2004

CITY OF SAN DIEGO
COMMUNITY AND ECONOMIC DEVELOPMENT
ATTN TRACY REED
600 B STREET MS 904
SAN DIEGO CA 92101

RE: GRANTVILLE; NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL
IMPACT REPORT, COMMERCIAL/INDUSTRIAL REDEVELOPMENT

Dear Ms. Reed,

This is in response to the Notice of Preparation of a Draft Environmental Impact Report dated July 21, 2004 regarding the proposed Grantville redevelopment and subsequent industrial or commercial construction.

The proposed project will be affected by operations of military fixed and rotary-wing aircraft transiting to and from Marine Corps Air Station (MCAS) Miramar. The project is located outside the adopted and projected 60-65 dB Community Noise Equivalent Level (CNEL) noise contours and is consistent with the land use compatibility guidelines for Miramar operations. However, the location is affected by the down wind landing pattern and Field Carrier Landing Practice (FCLP) Flight Corridors for fixed-wing operations. In addition, this location is affected by the Yuma Flight Corridors for helicopters operations.

Occupants will see and hear military aircraft and experience varying degrees of noise and vibration. Consequently, we are recommending full disclosure of noise and visual impacts to all initial and subsequent purchasers, lessees, or other potential occupants.

In addition, we recommend you examine the impacts regarding electronic transmissions from cellular antennas due to the proximity of this area in relation to Miramar flight operations. Cellular antenna proposals should be examined on an individual

basis to avoid conflicts with military training requirements. The identification for cellular antenna proposals in this area should include site location by latitude and longitude, frequency, transmission range, elevation Above Ground Level, type of antenna and its gain.

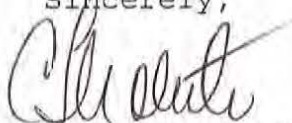
Normal hours of operation at MCAS Miramar are as follows:

Monday through Thursday	7:00 a.m. to 12:00 midnight
Friday	7:00 a.m. to 6:00 p.m.
Saturday, Sunday, Holidays	8:00 a.m. to 6:00 p.m.

MCAS Miramar is a master air station, and as such, can operate 24 hours per day, 7 days per week. Fiscal and manpower constraints, as well as efforts to reduce the noise impact of our operations on the surrounding community, impose the above hours of operation. Circumstances frequently arise which require an extension of these operating hours.

Thank you for the opportunity to review this land use proposal. If we may be of any further assistance, please contact Ms. C. Laura Thornton at (858) 577-6603.

Sincerely,



P. S. PARKHURST
Colonel, U.S. Marine Corps
Community Plans and Liaison Officer
By direction of the Commander



NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-4082
(916) 657-5390 - Fax



August 18, 2004

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


Re: Grantville Redevelopment Project DEIR
SCH# 2004071122

Dear Mr. Reed:

Thank you for the opportunity to comment on the above-referenced Negative Declaration. To adequately assess the specific related project impacts on cultural resources, the Commission recommends the following actions be taken:

- Contact the appropriate California Historic Resources Information Center for a record search. The record search will determine:
 - If a part or all of the area of project effect (APE) has been previously surveyed for cultural resources.
 - If any known cultural resources have already been recorded on or adjacent to the APE.
 - If the probability is low, moderate, or high that cultural resources are located in the APE.
 - If a survey is required to determine whether previously unrecorded cultural resources are present.
 - If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure.
 - The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological Information Center.
 - Contact the Native American Heritage Commission for a Sacred Lands File search of the project area and information on tribal contacts in the project vicinity who may have additional cultural resource information.
 - Please provide U.S.G.S. location information for the project site, including Quadrangle, Township, Section, and Range.
 - We recommend that you contact all tribes listed on the contact list to avoid the unanticipated discovery of sensitive Native American resources after the project has begun.
 - Lack of surface evidence of archeological resources does not preclude their subsurface existence.
 - Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5 (f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.
 - Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans.
- Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5 (e), 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.

Sincerely,


Carol Gaubatz
Program Analyst
(916) 653-6251

CC: State Clearinghouse

CITY OF SAN DIEGO
M E M O R A N D U M

DATE: August 19, 2004

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

FROM: Paul Kilburg, Senior Planner, Park & Recreation Department, Open Space Division

SUBJECT: Grantville Redevelopment Project

The Park and Recreation Department, Open Space Division manages several City of San Diego designated and dedicated open space areas within or adjacent to the proposed Grantville Redevelopment Project. The areas include Navajo Canyon Open Space Park, Rancho Mission Canyon, Mission Trails Regional Park, Tierrasanta Open Space and Mission Valley Riparian (San Diego River) Open Space. The above referenced areas are also within the boundaries of the Multiple Habitat Area (MHPA). The Park and Recreation Department, Open Space Division will offer comments and recommendations to assist in avoiding or minimizing potential impacts to sensitive species and habitats as the project progresses. Areas to be addressed in the Draft Environmental Impact Report should include:

Land Use: The project should follow Multiple Species Conservation Plan (MSCP) Land Use Adjacency Guidelines. Non-native invasive plant species should not be planted as part of landscape design. Use of drought tolerant native vegetation should be encouraged within project. Buffer zones should be incorporated to soften urban/open space interface.

Transportation/Circulation: Discuss opportunities for multi-use trail connections to appropriate open space areas, especially along the San Diego River. Incorporate trail designs and alignments to encourage bicycle transportation alternatives.

Noise: Minimize noise impacts to open space areas especially during bird nesting season (California gnatcatcher March 1 to August 15 and Least Bell's Vireo, March 15 to September 15).

Cultural Resources: Incorporate measures to identify and protect cultural resources including the historic Mission Period archaeological features along the San Diego River.

Biological Resources: The proposed project should be in conformance with the MSCP Subarea Plan (March 1997). Incorporate buffer zones to minimize impacts to sensitive flora and fauna including the Least Bell's Vireo and California gnatcatcher. Minimize lighting impacts to open space and wildlife habitats. Maintain wildlife corridors and connections within the project area.

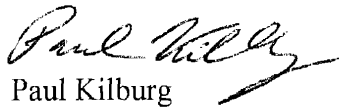
Paleontological Resources: Fossil remains excavated in the course of the project should be donated to Mission Trails Regional Park to be used for environmental education purposes.

Aesthetics: Preserve existing view-sheds and reduce visual impacts to open space areas. Incorporate vista points and interpretive education opportunities within project.

Water Quality/Hydrology: Incorporate measures to avoid or minimize impacts to open space lands due to stormwater and landscape irrigation runoff.

Please route future documents relating to the proposed Grantville Redevelopment Project to me at M.S. 804A.

If you have further questions, please call me at 619-533-6739.



Paul Kilburg
Senior Planner

cc: Ann Hix, Deputy Director, Park and Recreation, Open Space Division
David Monroe, District Manager, Park and Recreation, Open Space Division



County of San Diego

GARY W. ERBECK
DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
P.O. BOX 129261, SAN DIEGO, CA 92112-9261
(619) 338-2222 FAX (619) 338-2088
1-800-253-9933
www.sdcdeh.org

RICHARD HAAS
ASSISTANT DIRECTOR

August 20, 2004

Mr. Tracy Reed
City of San Diego
Community and Economic Development Department
600 B Street, Fourth Floor, MS 904
San Diego, CA 92101

Dear Mr. Reed,

This letter is in response to your request for comments regarding the Grantville Redevelopment Project Notice of draft Environmental Impact Report (EIR) Preparation. Department of Environmental Health (DEH) staff have reviewed the subject Notice.

Chris Conlan, Senior Vector Ecologist, Community Health Division, provided the following comment:

The project design should use "Best Management Practices" (BMPs) so the facility does not become a mosquito-breeding hazard. All BMP's should be designed to hold water for less than 72 hours and be maintained so that they do not become clogged with vegetation or debris and become a mosquito-breeding hazard over time. In addition, due to the proximity to the San Diego River, care needs to be taken so as not to alter the shoreline in any way so as to cause more thick vegetation and slow the flow thus creating mosquito habitat. There is a lot of potential to create standing water areas in this project so care will need to be taken so as not to allow this to happen. Please contact Mr. Conlan at (858) 694-2137 if you have specific questions or concerns about this issue.

John Kolb, Environmental Health Specialist, Hazardous Materials Division (HMD), provided the following comment:

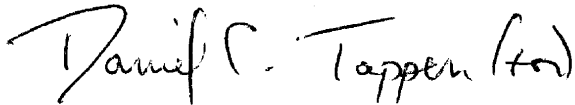
Be cognizant of potential issues that may arise from the co-location of commercial and industrial businesses (that may utilize hazardous materials and generate hazardous waste) in close proximity to schools, residential areas, hospitals, long-term health care, and day care facilities. Please contact Mr. Kolb at (619) 338-2472 if you have specific questions or concerns about this issue.

Mike Verneti, Supervising Environmental Health Specialist, Land and Water Quality Division (LWQD), provided the following comment:

The enclosed JPG document (on floppy disk) shows the open and closed DEH Site Assessment & Mitigation (SAM) sites in the Grantville Redevelopment Project. We suggest that the EIR address these sites since future redevelopment may move or disturb contaminated soil and

potentially impact groundwater. Our Public Records Program maintains documents for these SAM sites and requests for review can be made through our Web site at <http://www.sdcounty.ca.gov/deh/lwq/sam/> by completing the request forms for public records review, or by contacting the Custodian of Records directly at 619-338-2268. Please contact Mr. Verneti at (619) 338-2242 if you have specific questions or concerns about this issue.

Sincerely,

A handwritten signature in black ink that reads "Daniel C. Tappin (for)". The signature is written in a cursive style.

JACK MILLER, Chief
Community Health Division
Department of Environmental Health

cc: Chris Conlan, Senior Vector Ecologist, CHD
John Kolb, Environmental Health Specialist, HMD
Mike Verneti, Supervising Environmental Health Specialist, LWQD

August 26, 2004

Mr. Tracy Reed
Project Manager
Grantville Redevelopment Project
600 "B" Street
Fourth Floor, MS 904
San Diego, CA 92101

Via U.S. Mail & Email

Re: Program Environmental Report
Resident Issues/Concerns

Dear Mr. Reed:

Pursuant to the Comment Form for the Grantville Redevelopment Project, Program Environmental Impact Report, we respectfully submit our concerns/issues on the following topics that we feel need to be addressed in the Environmental Impact Report:

ISSUE 1: TRANSPORTATION/CIRCULATION

Traffic in the proposed redevelopment area is already congested. This is not disputed and, in fact, is cited as a reason for redevelopment along Mission Gorge Road. The area is accessed and abutted by Waring Road, Interstate 8 (I-8), Alvarado Canyon Road, Montezuma Road, Mission Gorge Road and Interstate 15 (I-15). During the morning hours, those of us using Waring Road to access Interstate 8 West are frequently frustrated and held up because this lane onto the freeway merges with the I-8 west traffic exiting onto Mission Gorge and entering I-15 North. You have to be very aggressive to cross over that traffic. In the mornings, we can sit in traffic to get on the freeway for 10-12 minutes. There is only one lane on Waring Road leading to the I-8 West and one carpool lane. The carpool lane is not used that much, except by those that are angry at having to wait on Waring so they take the carpool lane. There is now a new proposed development for Adobe Falls Road (104-140 units possibly) and those residents will add to this morning traffic. We understand that there are currently motels there with more units than the proposed development, but the residents of these motels are not getting up to go to work at 7:30 in the morning. When this was brought up at a Navajo Community Planners meeting, the architect for the proposed development said "you're in a redevelopment area, get used to traffic." That concerns us!

During the evening rush hour the Waring Road offramp is used as a means to bypass others by using the shoulder, just to get in front of other cars and at the last minute make a lane change to get back onto the I-8 to avoid the traffic. You have the I-15 South dumping two lanes onto the I-8 East at Waring Road. There are cars, and even semi trucks, that have figured out that in order to bypass the traffic jam on the I-8, you take the Mission Gorge exit, work your way into

the I-15 traffic heading onto the I-8, then cut over using, again, Waring Road. This area is a mess!

Increased density due to the Grantville Redevelopment Area will only add more traffic to Waring Road and surrounding streets.

ISSUE 2: POPULATION/HOUSING

Regarding "Subarea 'C'." Allied Gardens is not a "blighted" area, and should not be included in the Grantville Redevelopment Area. Councilmember Madaffer is well aware that residents in Allied Gardens do not want any additional housing built in the Allied Gardens Shopping Center area and vacant lot adjacent to the library. The area does not need more housing just so the City of San Diego can pocket a few more property tax dollars. The community will fight any attempt to increase the density in Allied Gardens in the future.

There was a glowing article in *The San Diego Union Tribune* about Allied Gardens at the time of its 50th anniversary. This article mentioned that there were only single-family residences here and that it was like stepping back into the 1950s. That's exactly what its like. As neighbors, we are all very close. We take care of each other. We watch out for each other. Kids can still play ball and ride their bikes in the street. A teenaged son of a neighbor recently said he thought we lived in Pleasantville! Please don't ruin another beautiful, close-knit community.

Respectfully submitted,

Handwritten signatures of Eric and Carol Carlson in cursive script.

Eric & Carol Carlson

Comment Form

Grantville Redevelopment Project Program Environmental Impact Report

SCOPING MEETING

On the lines provided below, please list those issues or concerns you feel need to be addressed in the Program Environmental Impact Report for the Grantville Redevelopment Project. Please be as specific and detailed as possible so that the EIR may address all of your concerns or issues. If necessary, please attach additional pages. Once completed, please submit your written comments to: Mr. Tracy Reed, Project Manager, 600 B Street, Fourth Floor, MS 904, San Diego, CA 92101, fax: (619) 533-5250, email: treed@sandiego.gov. Your comments must be received by **August 30, 2004**.

Please see attached letter for full explanation. Basically, we're concerned with (1) traffic & (2) increased density & housing.

(OVER)

Grantville Redevelopment Project
Scoping comments for the Draft Environmental Impact Report (DEIR)
Provided by the Tierrasanta Community Council
30 August 2004

General Comments:

1. A principal concern with the Grantville project lies in the coarse definition of the area boundary. The identification of this boundary was accomplished via a map showing parcels color-coded to land-use designations, but this map was inadequately detailed and thus its depiction of the Grantville area turned out to be somewhat misleading. Specifically, a wide swath of property at the eastern terminus of Tierrasanta Blvd was shown to be in the Grantville area, but the green-colored parcel at that terminus appeared to include parcels that have since been determined to lie outside the area boundary. This occurred because the green-colored parcel was insufficiently detailed in its depiction, and because the actual parcels included in the project boundary were not more specifically annotated or detailed to avoid such confusion. The DEIR needs to resolve any and all such uncertainties.
2. Most of the eastern portion of Grantville lies in the active Rock Quarry. The DEIR not only needs to outline the redevelopment of this large area, but it also needs to explain how this process will be managed over the 30-year span of time between now and when the quarry's use permit expires.
3. The DEIR should explain the process by which the Project Area Committee will be formed for this redevelopment area and what role, if any, representatives from Tierrasanta will play.
4. There will be a push to redevelop this area in a way that maximizes tax increment revenue, and it is clear that the majority of the tax increment will be used to benefit Navajo (probably 81% or more). But it is not clear that Tierrasantans will have input into how these funds are used (where they are spent). If Tierrasanta contains 18% of the current Grantville project area, then one may conclude 18% of the tax increment should be returned to Tierrasanta. What will be the methodology by which realized tax increment funds are allocated to projects? Should Tierrasanta

in fact expect to receive 18% of the tax increment realized from this project? Will 18% go to Tierrasanta in general, or will the 18% only go to the parts of Tierrasanta that lie within the Grantville area? What will be Tierrasanta's role in determining how the 18% of this increment will be spent in Tierrasanta? Who will have authority over these funds? What are the specific restrictions on how these funds are used?

5. The DEIR should make clear whether the Navy will derive any financial benefit from the tax increment realized from this project.

Land Use:

6. 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?
7. As noted above, the Program DEIR must more cleanly define the boundary of the project area. The parcels included in the project at the eastern terminus of Tierrasanta Blvd must be clearly and unambiguously defined such that there is no misunderstanding about what is within the project area and what is excluded from the project.
8. Along with the parcel identifications there should be concise descriptions of the land-use zoning and right-of-way restrictions placed on each parcel. The DEIR should answer the question: "how might this parcel be redeveloped in the future within the context of Grantville?"
9. 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.

10. The DEIR should better define and identify the small parcel within the ADM Baker golf course that lies within the Tierrasanta Community Plan planning area. Who is the owner of this parcel and what is its zoning designation?
11. The DEIR must explain in detail the relationship between Grantville and the San Diego River Park project/concept, the San Diego River Conservancy, and other bodies that purport to hold sway over what will become of the San Diego River as it passes from the Rock Quarry to I-15.
12. Tierrasanta understands that the owner of the Rock Quarry intends to engage HG Fenton to develop and sell (or sell and develop) the westernmost area of the Rock Quarry property. The DEIR must explain impacts and/or restrictions that the Grantville project will apply or impose on development of the westernmost area of the Rock Quarry property.
13. As noted above, the DEIR should explain how decisions made in this redevelopment process will be carried forward for some 30 years when the active Rock Quarry land-use agreement is finally concluded. Is there any likelihood the Grantville decisions made today will have any bearing in the distant future when the lease expires? What will be the impact of Grantville on the Rock Quarry's owner in determining whether and when to conclude the quarry operations and transform the land to other uses? Will tax increment calculations derived in 2004/2005 in fact be used as the baseline for determining the revenue to be returned the area when the quarry operations are stopped in approx 2032 (as planned)?

Transportation & Circulation:

14. The DEIR should perform the mandated traffic study in order to satisfy City requirements to support the removal from the Tierrasanta Community Plan of a Tierrasanta Blvd extension across the San Diego River to Mission Gorge Bl.
15. If the DEIR does not perform this traffic study to resolve this uncertainty, then it should clearly describe all details related to the traffic right-of-way and similar land-use easements between Tierrasanta Blvd and Mission Gorge at Princess View.

Air Quality:

16. The DEIR must explain impacts and/or restrictions that the Grantville project will apply or impose on dust and debris impacts resulting from development of portions of the project area north of Mission Gorge Blvd, particularly since this would directly impact residents of southern Viacha Drive. What restrictions will exist or be imposed to limit the commercialization of this area via construction processes that produce excessive dust and debris?

Noise:

17. The DEIR must explain impacts and/or restrictions that the Grantville project will apply or impose on noise impacts resulting from development of portions of the project area north of Mission Gorge Blvd, particularly since this would directly impact residents of southern Viacha Drive. What restrictions will exist or be imposed to limit the transformation of this area into commercial or industrial uses that could be responsible for increased production of noise (both during construction and after construction has completed)?

Cultural Resources:

18. 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 San Diego River.

Biological Resources:

19. 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 ADM 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.

Geology:

20. no comment

Hazards & Hazardous Materials:

21. no comment

Paleontology:

22. See above in "Cultural Resources."

Aesthetics:

23. 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.
24. As noted above, 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.

Water Quality and Hydrology:

25. no comment

Population & Housing:

26. The DEIR should clearly explain the current zoning restrictions on the various parcels to make clear the areas most likely to be targeted for development for residential uses.

Public Services:

27. no comment

Mineral Resources:

28. The DEIR should explain in detail the processes in place that will guide the closure of the Rock Quarry. What are the agreements, rules, laws and/or municipal code that govern this transformation? What are the steps to be followed in taking the active quarry (northeastern part of Grantville) and either developing it into new uses or transforming it back into its original state? What are the steps to be followed in taking the inactive quarry (central and western parts of Grantville that lie north of the San Diego River), and the active sand & gravel operation, and either developing it into new uses or transforming it back into its original state?

Alternatives to the Proposed Project:

29. It appears that initiatives to improve the San Diego River area (to turn it into a park, to build a river walk, to establish a park-like connection between this future river park and the eastern terminus of Tierrasanta Blvd) are alternatives to Grantville in terms of what will happen to the areas immediately adjacent to the river. This is because development as a park or as open space would result in no tax increment benefit. As noted above, the DEIR should explain the relationships between these potentially overlapping projects and the projected ramification to tax increment should non-developmental projects occur in the area.

Growth-Inducing Impacts:

30. no comment

Cumulative Impacts:

31. no comment



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-4185.1

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

AUG 30 2004

Re: Notice of Preparation of an Environmental Impact Report for the Grantville
Redevelopment Project (SCH# 2004071122)

Dear Mr. Reed:

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 Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for Grantville Redevelopment Project in the City of San Diego (City), County of San Diego, California. 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. This project is the adoption of a redevelopment plan to accomplish these goals. The area proposed for inclusion in the Grantville Redevelopment Project is approximately 831 acres located in the north eastern portion of the City. The project area is located 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.

The Wildlife Agencies concur with statements in the NOP that the project could result in significant impacts to the environment. We are especially concerned about potential impacts to (1) the San Diego River; (2) wetlands and riparian habitats, and the federally and state-listed 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) narrow endemic species. To assist us in our review of the DEIR, assist the City in compliance with pertinent Federal and State statutes and laws, and ensure consistency with the MSCP, we request that the DEIR contain the following information.

1. A complete discussion of the purpose and need for the project and each of the project alternatives.

**TAKE PRIDE
IN AMERICA** 

Mr. Reed (FWS-SDG-4185.1)

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2. A complete description of the proposed project, including all practicable alternatives that have been considered to reduce project impacts to sensitive habitats and biological resources, including the MHPA.
3. Verification that all requirements and conditions of the MSCP Subarea Plan and Implementing Agreement are met¹ with particular acknowledgment that the San Diego River and much of the land adjacent to it are within the MHPA. As such, refer to the MSCP documentation for guidance on land use adjacency guidelines. Other issue areas in the DEIR that may be influenced by the MSCP include "Land Use," "Landform Alteration/Visual Quality," "Traffic/Circulation," "Biological Resources," "Drainage/Urban Runoff/Water Quality," "Noise," and "Cumulative Effects."
4. 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 (e.g., least Bell's vireo).
5. A discussion of the organizations, agencies, jurisdictions, and other entities which are conducting efforts to protect, restore, and/or enhance biological resources supported by the San Diego River. This discussion should include the following information.
 - a. 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.
 - b. 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. This discussion should include all activities associated with Supplemental Environmental Projects approved by the San Diego Regional Water Quality Control Board within the portion of the watershed of the San Diego River encompassed by the project area (e.g., Adobe Falls, San Diego River Invasive Exotic Weed Eradication Program).
 - c. 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)² (City and Merkel & Associates 2003).

1 This includes the requirement that native vegetation be restored as a condition of future development proposals along this portion of the San Diego River corridor (page 21 of the MSCP Subarea Plan).

2 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.

Mr. Reed (FWS-SDG-4185.1)

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6. 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.
 - a. 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.
 - b. 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. Maps and tables should be included to summarize such information.
 - c. 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.
 - d. A map showing potential wildlife corridors through and/or adjacent to the subject property.
 - e. Results of early and late spring plant surveys for sensitive spring blooming annuals. Results of surveys should include a section which discusses the rationale for why species with a high potential for occurrence may not have been detected.
 - f. 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.
 - g. 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.
 - i. 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.

Mr. Reed (FWS-SDG-4185.1)

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- ii. Methods [e.g., Best Management Practices (BMPs)] to prevent soil erosion and siltation of habitats on and off site. BMPs should be located outside of sensitive biological areas and their biological buffer.
 - iii. Methods (e.g., BMPs) to be employed to prevent discharge and disposal of toxic and/or caustic substances, including oil and gasoline, from the proposed development.
 - iv. 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.
 - v. 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.
- h. Specific mitigation plans to fully offset project related impacts, including proposals for mitigating the cumulative impacts of direct and indirect habitat loss, degradation, or modification.
- i. Project impacts should be mitigated through the preservation, creation, restoration, and/or enhancement of affected habitat types consistent with MSCP guidelines.
 - ii. Mitigation 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.
 - iii. Measures to be taken to perpetually protect habitat values of preserved and/or mitigation areas. Issues that should be addressed include: restrictions on vehicle, equestrian, and people 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.
 - iv. 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

Mr. Reed (FWS-SDG-4185.1)

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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).

- v. 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). The DEIR should provide thorough justification for any proposed River crossings.
- vi. Measures to be taken to avoid or minimize biological impacts from fuel management that might be associated with redevelopment. These measures should include alternatives to fuel 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. This discussion should acknowledge that the City's proposed brush management regulations state "no brush management is required in areas containing wetland vegetation."³ The discussion should also identify the benefits of accomplishing fire protection by one-time building design and placement rather than on-going (though often inadequately maintained) fuel management areas.
- vii. A description of the 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" (page 10). All redevelopment activities within the area of potential effect⁴ 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.

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.

4 The area of potential effect includes tributaries to the San Diego River. For example, the NOP indicates that Subarea A of the project area includes the first seven parcels on the southern side of Adobe Falls Road, starting at Waring Road. This is within Alvarado Canyon which is tributary to the San Diego River.

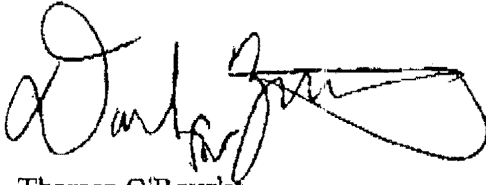
Mr. Reed (FWS-SDG-4185.1)

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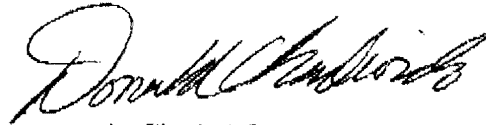
Furthermore, the existing negative impacts should be reduced by enhancing and/or restoring sensitive biological resources.

The Wildlife Agencies appreciate the opportunity to comment on this NOP. 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, Mike Porter
United States Army Corps of Engineers, Terry Dean
State Clearinghouse

References

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

Subject: Fwd: Fw: project objectives/scoping comments

Date: Tuesday, August 31, 2004 9:42 AM

From: Tracy Reed <TReed@sandiego.gov>

To: <tim@brginc.net>, <dparsons@webrsg.com>

FYI

-TR

From: "Lee Campbell" <lee@campbellot.com>

Reply-To: "Lee Campbell" <lee@campbellot.com>

Date: Tue, 31 Aug 2004 09:33:00 -0700

To: "Tracy Reed" <treed@sandiego.gov>

Subject: Fw: project objectives/scoping comments

>>> "Lee Campbell" <lee@campbellot.com> 08/30/04 13:05 PM >>>

tracy

1. improved street design around kaiser should be investigated to allow better ingress and egress.

2. natural barriers (e.g., trees bushes) along the river on the west side of miss gorge road should be installed to help muffle noise along mission gorge road due to traffic. this noise is amplified across the san diego river and admiral baker field into the community of tierrasanta. note this may be appropriate for the east side of mission gorge road also.

3. use of fairmont ave extension in grantville to friars road should be investigated to divert traffic from the granville south end business district.

4. a walking and bike path route to san diego state along or approximately in parallel with the hwy 8 corridor should be investigated.

5. nothing should be done to encourage any more diversion of freeway traffic through the grantville community.

6. off street parking should be provided along with on street parking, but without parking meters or ace parking garages.

7.attached is a suggested use for the project objectives. this could be used in the eir and design to validate each development within the redevelop area. this is only a cut at this and am sure could use more work. however if we are going to have goals a mechanism must be devised for testing and documenting adherence to goals which is consistant and ues throughout the project..

please add to the scoping comments as appropriate.

thanks

lee

Subject: Re: Program Environmental Impact Report For THE PROPOSED GrantvilleRedevolment Project

Date: Tuesday, June 29, 2004 12:09 PM

From: Tracy Reed <treed@sandiego.gov>

To: <lchuck@sprynet.com>

Cc: <tim@brginc.net>

Chuck

Thanks for your comments.

.....Tracy

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

Phone: (619) 533-7519

Fax: (619) 533-5250

Email: TReed@sandiego.gov

City: www.sandiego.gov

Agency: www.sandiego.gov/redevelopment-agencyopment

>>> "Chuck Little" <lchuck@sprynet.com> 06/29/04 11:40AM >>>

Regarding TRAFFIC circulation :

The intersections North of Highway 8, where Fairmount Ave., Mission Gorge Road , Camino Del Rio North And Alvarado Canyon Road converge .This is and has been for a very long time a major traffic horror story. Each time the City has allowed major up grades or new building on the existing properties it has added to the traffic problems ,with no helpful answers to the traffic circulation .

The added traffic generated by the Trolley will surely add to the confusion.

The traffic lights are not coordinated .

Both Mission Gorge Road and Fairmount have left turn lanes however they are used by the Auto transport trucks to load and unload cars.

Red curbs are used by the auto transport trucks and delivery trucks as parking spots .

IF this redevelopment project goes thru it must address these problems. And the E I R must make a honest assessment of the situation.

August 23, 2004

Mr. Tracy Reed
Project Manager
600 B Street
Fourth Floor, MS 904
San Diego, CA 92101

RE: Grantville Redevelopment Project Program Environmental Impact Report

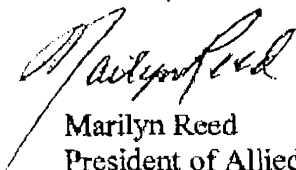
Dear Mr. Reed;

On behalf of the Allied Gardens Community Council, I would like to submit the following comments and concerns for consideration in developing the draft Environmental Impact Report on the Grantville Redevelopment Project.

1. Vehicular traffic (noise, speed and volume), foot traffic (contributing to excessive trash and noise), loud exhaust systems and boom boxes all have disrupted the once quiet environment for residents along Waring Rd., Zion Ave., Mission Gorge Rd., and Twain Ave. Consideration needs to be given to the creation of new road outlets to mitigate the traffic densification that would result from redevelopment projects.
2. More trees should be planted. The trees should alternate flowering with evergreen flowering trees.
3. The guidelines to road construction should be followed and reference to the *New Street Design Manual* used.
4. Eliminate banners, flags, streamers, pennants and inflatables as most are violations of Code Compliance (except under certain circumstances) and contribute to visual blight.
5. With densification of neighborhoods, open space becomes extremely important to the quality of life for residents. More soccer fields, parks and walking/running paths should be considered.

Other concerns have been presented previously. Please include them in development of the Environmental Impact Report.

Sincerely,



Marilyn Reed
President of Allied Gardens Community Council

City of San Diego
Memorandum

Date: August 23, 2004
To: Tracy Reed, Community and Economic Development Department
From: Kamran Khaligh, Transportation Development Section
Project: Grantville Redevelopment Project (NOP for DEIR)

We have reviewed the NOP for DEIR for the Grantville Redevelopment Project dated July 21, 2004 and have the following comments:

A traffic impact analysis should be prepared to evaluate the near-term and horizon year impact of the proposed redevelopment plans on the fronting and nearby roads, intersections, and freeways including freeway ramps. Excerpts of this analysis should be included and discussed in the EIR. Adequate mitigations should be provided for all project near-term and horizon year significant impacts.

Please have your traffic engineer contact the Transportation Development staff for further discussion on the scope of this study.

Please call me at 446-5357 if you have any questions.

Kamran Khaligh



Terry Tamminen
Agency Secretary
Cal/EPA



Department of Toxic Substances Control

5796 Corporate Avenue
Cypress, California 90630



Arnold Schwarzenegger
Governor

August 31, 2004

Mr. Tracy Reed
Environmental Projects Manager
City of San Diego
Community and Economic Development Department (Redevelopment Agency)
600 B Street, MS 904
San Diego, California 92101

NOTICE OF PREPARATION (NOP) FOR A DRAFT ENVIRONMENTAL IMPACT REPORT (EIR) FOR THE CITY OF GRANTVILLE REDEVELOPMENT PROJECT SCH # 2004071122

Dear Mr. Reed:

The Department of Toxic Substances Control (DTSC) has received your Notice of Preparation of an Environmental Impact Report (EIR) for the above project. As stated in your document the project includes 831 acres located in the northeastern portion of San Diego. Your document states the following: "Subarea A is primarily comprised of commercial, office, and light industrial uses. Subarea B is comprised primarily of industrial uses with limited office and commercial uses. It also includes sand and gravel processing facilities to the northwest of Princess View Drive with industrial storage to the south along the western portion of Mission Gorge Road. In this area sand and gravel processing operations take place on both sides of the San Diego River... Subarea C is comprised of a shopping center complex made up of the parcels ...". Based on the review of the currently submitted document DTSC has comments as follows:

- 1) The EIR should identify and determine whether current or historic uses at the project site may have resulted in any release of hazardous wastes/substances. The EIR should summarize in a table any sampling results for the soil, air and groundwater.
- 2) The EIR should identify any known or potentially contaminated sites within the proposed Project area. For all identified sites, the EIR should evaluate whether conditions at the site pose a threat to human health or the environment. A Phase I Assessment may be sufficient to identify these sites. Following are the databases of some of the regulatory agencies:

- National Priorities List (NPL): A list that is maintained by the United States Environmental Protection Agency (U.S.EPA).
- Site Mitigation Program Property Database (formerly CalSites): A Database primarily used by the California Department of Toxic Substances Control.
- Resource Conservation and Recovery Information System (RCRIS): A database of RCRA facilities that is maintained by U.S. EPA.
- Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS): A database of CERCLA sites that is maintained by U.S.EPA.
- Solid Waste Information System (SWIS): A database provided by the California Integrated Waste Management Board which consists of both open as well as closed and inactive solid waste disposal facilities and transfer stations.
- Leaking Underground Storage Tanks (LUST) / Spills, Leaks, Investigations and Cleanups (SLIC): A list that is maintained by Regional Water Quality Control Boards.
- Local Counties and Cities maintain lists for hazardous substances cleanup sites and leaking underground storage tanks.
- The United States Army Corps of Engineers, 911 Wilshire Boulevard, Los Angeles, California, 90017; (213) 452-3908; maintains a list of Formerly Used Defense Sites (FUDS).

3) The EIR should identify the mechanism to initiate any required investigation and/or remediation for any site that may be contaminated, and the government agency to provide appropriate regulatory oversight. If hazardous materials/wastes were stored at the site, an environmental assessment should be conducted to determine if a release has occurred. If so, further studies should be carried out to delineate the nature and extent of the contamination, and the potential threat to public health and/or the environment should be evaluated. It may be necessary to determine if an expedited response action is required to reduce existing or potential threats to public health or the environment. If no immediate threat exists, the final remedy should be implemented in compliance with state regulations and policies.

4) All environmental investigation and/or remediation should be conducted under a Workplan, which is approved by a regulatory agency that has jurisdiction to oversee

hazardous waste cleanup. The findings and sampling results from the subsequent report should be clearly summarized in the EIR.

- 5) Proper investigation and remedial actions, if necessary, should be conducted at the site prior to the new development.
- 6) If any property adjacent to the project site is contaminated with hazardous chemicals, and if the proposed project is within 2,000 feet from a contaminated site, then the proposed development may fall within the "Border Zone of a Contaminated Property." Appropriate precautions should be taken prior to construction if the proposed project is within a "Border Zone Property."
- 7) If building structures, asphalt or concrete-paved surface areas or transportation structures are planned to be demolished, an investigation should be conducted for the presence of lead-based paints or products and asbestos containing materials (ACMs). If lead-based paints or products or ACMs are identified, proper precautions should be taken during demolition activities. Additionally, the contaminants should be remediated in compliance with California environmental regulations and policies.
- 8) The project construction may require soil excavation and soil filling in certain areas. Appropriate sampling is required prior to disposal of the excavated soil. If the soil is contaminated, properly dispose of it rather than placing it in another location. Land Disposal Restrictions (LDRs) may be applicable to these soils. Also, if the project proposes to import soil to backfill the areas excavated, proper sampling should be conducted to make sure that the imported soil is free of contamination.
- 9) Human health and the environment of sensitive receptors should be protected during the construction or demolition activities. A study of the site might have to be conducted to determine if there are, have been, or will be, any threatening releases of hazardous materials that may pose a risk to human health or the environment.
- 10) If it is determined that hazardous wastes are, or will be, generated by the proposed operations, the wastes must be managed in accordance with the California Hazardous Waste Control Law (California Health and Safety Code, Division 20, chapter 6.5) and the Hazardous Waste Control Regulations (California Code of Regulations, Title 22, Division 4.5).
- 11) If it is determined that hazardous wastes are or will be generated and the wastes are (a) stored in tanks or containers for more than ninety days, (b) treated onsite, or (c) disposed of onsite, then a permit from DTSC may be required. If so, the facility should

contact DTSC at (818) 551-2171 to initiate pre application discussions and determine the permitting process applicable to the facility.

12) If it is determined that hazardous wastes will be generated, the facility should obtain a United States Environmental Protection Agency Identification Number by contacting (800) 618-6942.

13) Certain hazardous waste treatment processes may require authorization from the local Certified Unified Program Agency (CUPA). Information about the requirement for authorization can be obtained by contacting your local CUPA.

14) If the project plans include discharging wastewater to storm drain, you may be required to obtain a wastewater discharge permit from the overseeing Regional Water Quality Control Board.

15) If during construction/demolition of the project, soil and/or groundwater contamination is suspected, construction/demolition in the area should cease and appropriate health and safety procedures should be implemented. If it is determined that contaminated soil and/or groundwater exist, the EIR should identify how any required investigation and/or remediation will be conducted, and the appropriate government agency to provide regulatory oversight.

16) The addresses, locations, cross streets and street boundaries should be clearly stated and easily identified if possible. Most projects are identified in our agency's database by street address, city, and zip code or cross streets if possible.

17) If weed abatement occurred on the subject property, onsite soils could contain pesticide residue. If the site was used for dairy and cattle industry operations, the soil could contain related dairy, animal, or hazardous waste. If so, activities at the site may have contributed to soil and groundwater contamination. Proper investigation and remedial actions should be conducted at the site prior to any construction or replacement of the project.

DTSC provides guidance for cleanup oversight through Environmental Oversight Agreements (EOA). For additional information on the EOA, please visit DTSC's web site at www.dtsc.ca.gov.

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If you have any questions regarding this letter, please contact Ms. Teresa Hom, Project Manager, at (714) 484-5477 or email at thom@dtsc.ca.gov.

Sincerely,



Greg Holmes
Unit Chief
Southern California Cleanup Operations Branch - Cypress Office

cc: Governor's Office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044

Mr. Guenther W. Moskat, Chief
Planning and Environmental Analysis Section
CEQA Tracking Center
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806

CITY OF SAN DIEGO
M E M O R A N D U M

DATE: June 28, 2004

TO: Interested Navajo and Tierrasanta Residents and Business Owners

FROM: Tracy Reed, Grantville Study Co-Project Manager

SUBJECT: Public Scoping Meeting for Grantville Draft Environmental Impact Report

The purpose of the Environmental Scoping Meeting is a focused meeting to solicit comments from the public as to the scope and content of environmental issues to be examined in the Draft Environmental Impact Report (EIR), including potential alternatives to the project and mitigation measures. The scoping meeting is not a forum to debate the merits of the proposed project. Public comment will be taken; however, there will be no formal recommendation or vote as part of the meeting. The public comment will be provided to the EIR consultant for use in preparation of the Draft EIR.

If you have any questions please contact me at (619) 533-7519 or TReed@san Diego.gov or Maricela Leon at (619) 533-5265 or MLEon@san Diego.gov

Project Information is available at: www.sandiego.gov/redevelopment-agency/grantville

Overview of CEQA/EIR Process

Initial Determination:

- Initial review of the project and determination as to the appropriate process to follow under CEQA.
 - Not all projects require the preparation of an EIR (CEQA Exemptions and Negative Declarations)
 - The Redevelopment Agency has determined that the project may have a significant effect on the environment and that preparation of an Environmental Impact Report (EIR) will be required to comply with CEQA.

EIR Process:

- EIR preparation is a relatively lengthy and labor-intensive process. Normally requires the lead agency to hire a consulting firm to prepare the documentation.

Scoping Process:

Initial step in EIR preparation is to solicit input from public agencies and general public as to the scope and content of the EIR.

- **Notice of Preparation (NOP)** - brief document sent to public agencies and individuals stating that the Agency is preparing an EIR for the proposed project and requesting that the agencies respond in writing as to specific issues that should be addressed in the EIR. The NOP review period is 30 days.
- **Scoping Meeting** - The Agency is holding this scoping meeting tonight to seek further input from the public as to the scope and content of the EIR.

Draft EIR:

The next step in the EIR process is the preparation of the Draft EIR. This phase takes several months as various technical studies will be completed (e.g., traffic, biology, cultural resources).

- The DRAFT EIR is made available for review and comment by the public and public agencies for a period of 45-days.
- Agencies and individuals are requested to submit comments in writing.
- The DRAFT EIR is anticipated to be available in December 2004.

Grantville Redevelopment Project Program Environmental Impact Report

The following environmental topics will be addressed in the Program Environmental Impact Report:

- Land Use
- Transportation/Circulation
- Air Quality
- Noise
- Cultural Resources
- Biological Resources
- Geology
- Hazards and Hazardous Materials
- Paleontological Resources
- Aesthetics
- Water Quality/Hydrology
- Population/Housing
- Public Services
- Mineral Resources
- Alternatives to the Proposed Project
- Growth-Inducing Impacts
- Cumulative Impacts

Comment Form

Grantville Redevelopment Project Program Environmental Impact Report SCOPING MEETING

On the lines provided below, please list those issues or concerns you feel need to be addressed in the Program Environmental Impact Report for the Grantville Redevelopment Project. Please be as specific and detailed as possible so that the EIR may address all of your concerns or issues. If necessary, please attach additional pages. Once completed, please submit your written comments to: Mr. Tracy Reed, Project Manager, 600 B Street, Fourth Floor, MS 904, San Diego, CA 92101, fax: (619) 533-5250, email: treed@sandiego.gov. Your comments must be received by **August XX, 2004**.

Submitted by (please print):

Name:	Agency/business/group name (if applicable):
Address:	Phone number:
City/state/zip:	Date:

CITY OF SAN DIEGO GRANTVILLE MEETING

MODERATOR: The main purpose of tonight's meeting is to get public testimony from everybody, written and orally. Written is a lot easier for us to follow and we can, you know, follow what's written down. There are forms in the back that explain what's going on with redevelopment in that there is a form for people to fill out. I've already gotten three submitted to me so far. It explains what the environmental process is somewhat, what the purpose of the scoping meeting is and what items would be involved as part of the EIR. This has been noticed in the newspaper. Everybody that's on our mailing list got the public notice also and, like I said, this is the main process of starting off the environmental document that everybody hear's about the environmental document. So it's very important for you to come up and speak, say your name, fill out a speaker slip. Also fill out the form if you want to give us public testimony. It's the only type of meeting where you really get public testimony and this will be all transcribed from the tape and it will be part of the environmental document and Tim Gnibus is with Butler Roach Group, who is the one that's our consultant for putting together the environmental document. Tim's the expert on this.

MALE: Tim, before you get going, it's real important if you want to speak at different times, please (unintelligible) speaker slips with the Environmental Impact Report (unintelligible).

MODERATOR: And we've got the map up here so if somebody wants to come up and point to a certain location or something, we can kind of fine tune it.

TIM: Okay, thank you. Once again, my name is Tim Gnibus and I'm with BRG Consulting and we are the environmental consultant firm that is preparing the Environmental Impact Report that addresses the Grantville Redevelopment Project. I do want to thank you for being here. I know that some of you were here last month and there may be a couple new faces. I am going to go through the process a little bit again for those of you that weren't here last month, but, specifically, for tonight's meeting, it's a very focused meeting. We are trying to get your input as to what we should be looking at in the Environmental Impact Report. So, anything from specific issues related to traffic or maybe geology or biology, those kind of issues. So our purpose tonight is to get comments from you. We're also

looking for comments related to potential alternatives and other issues that we may not be anticipating right now in terms of the environmental scope.

I wanted to talk a little bit about the CEQA process and when I say CEQA, I'm saying the California Environmental Quality Act. From now on I will use CEQA, and it's spelled C-E-Q-A and I'll run through, in general, the process so you have a little bit more of a broader understanding of where we're going. This is the actual first step in the process. There are basically three major phases. There's the Notice of Preparation and Scoping Phase. There's a Draft EIR Phase and there's a Final EIR Phase. We are in the initial stages as Tracy said. We are trying to determine the scope of the document. That scoping process involves typically a scoping meeting. It also involves a notice called the Notice of Preparation. The Notice of Preparation is actually sent to public agencies, such as CalTrans and the Fish and Wildlife Service and perhaps adjacent jurisdictions to inform them that we are preparing an Environmental Impact Report for this project and we're soliciting their input as to concerns or issues that they see. The Notice of Preparation period is a 30-day long period and it's actually beginning tonight and is going to end on August 30 and, during that time, we will be receiving comments from the public and public agencies and we will be looking at those comments and we will be figuring out what else we need to look at in the Environmental Impact Report.

So after the close of the Notice of Preparation period, you won't see any activity related to the EIR until the draft EIR is prepared and right now, that's scheduled to be released in December of this year and it is a 45-day public review comment period where the document will be made available in a variety of fashions. Copies will be made available in local libraries, at the redevelopment agency. We will post it on the Internet and you'll have the ability to review the document and make comments as to the scope and the content and any issues that we may have overlooked or any other thoughts you may have as to the environmental impacts of the project.

What we will do is we will take all the written comments received on the draft EIR and respond to each one of those and that comes in two forms. We revise the draft EIR to respond to the comments, and we also specifically state a response to each one of the comments you may have raised and together we combine those elements and form what we call a final EIR and that's the last phase of the CEQA process. If we're going according to

schedule here, that document would be prepared sometime in about February of next year and that's the document that's forwarded to the Planning Commission and the redevelopment agency for their consideration as part of approval of this project.

So, and just a real brief description of an EIR. Some of you may have seen an EIR before and others have no idea what one looks like, but they're usually about this thick, several hundred pages. I have provided a list of the topics that we plan on analyzing in the document and each topic has its own section with a description of the setting of the environmental topic, potential impacts and then mitigation measures. We also look at alternatives to the project and we look at what we call cumulative impacts. We don't look at just this project by itself. We look at other projects that may be occurring in the area and what those effects may have on this project area. A good example with that is probably traffic.

So really that's a brief introduction to the process and what we would like to do is just encourage written comments foremost, but if you have any specific comments you want to give verbally, go ahead and do so and we are recording it. Actually, we have two tape recorders here to make sure we get your comments and also if you have any questions, I'll try to answer them for you and with that I think we can just go ahead and open it up.

MODERATOR: Right. Thank you.

MALE: Let's start with the (unintelligible) questions or issues (unintelligible) (THIS SPEAKER IS TOO FAR AWAY FROM THE TAPE RECORDER) in particular public comment and we'll allow three minutes on the public comment (unintelligible).

MALE: TOO FAR AWAY TO HEAR ANYTHING.

MALE: Yeah, I mean, I've gotten three comments, written comments sent to me, just for the record.

TIM: We have a total of five. We have a total of five letters so far.

MALE: TOO FAR AWAY AGAIN!!! they create an idea of what they might want to say, if you want (unintelligible).

TIM: Yes.

MALE: And what are the specific public services.

TIM: Public services are police, fire, emergency services, schools, parks and recreation, sewer, water, library.

MALE: On (unintelligible) description it makes reference to residential and (unintelligible) we don't have residential in our area so (unintelligible). To carry it one step further, even if they're working in the residential planning area, (unintelligible) whatever (unintelligible).

TIM: If it's, we will be looking at the community plan land uses so if there are areas that are zoned residential in the project area or adjacent to it, we might be looking at in terms of what land use compatibility.

MALE: I haven't gotten into details, but some of the commercial (unintelligible) as mentioned. It's already along Mission Gorge.

MALE: You have the land use is industrial. It's going to affect the air quality, noise, and so forth and so on, much different from (unintelligible) office, so how do you look at the land uses. This is (unintelligible) A, we got a bunch of different uses (unintelligible) so how do you segregate them when you have office buildings, industrial (unintelligible) impact.

TIM: And there's a lot of, I'll try to be brief here, but there are a lot of different types of air quality impacts associated with a particular use. Industrial might have well with any of the uses, the primary air quality impact is from traffic and so we look at different trip generation rates for each of the uses and calculate how many trips would be generated based on potential development and so industrial will have a different level of impact than commercial uses than whatever open space. That's one distinction. Then in terms of specific uses, if they are point uses, what we call point uses where we might have a smokestack or something, we have to take a closer look at those to see do any exist in the project area and what are the issues associated with those. We might contact the Air Pollution Control District to get historical data from them.

MALE: How about the (unintelligible).

TIM: Yes.

MALE: Are you asking that question (unintelligible).

MALE: And that is something that can be (unintelligible) even though the community (unintelligible) updated (unintelligible).

TIM: It may show up in the form of an alternative and it depends on what type of impacts were identified. The main goal of the alternatives is to reduce impacts so it depends on what the issue is. If we have a significant traffic impact perhaps we might be looking at an alternative land use that wouldn't concentrate more density around the trolley station or something like that. I'm just throwing that out there, I have no idea at this point.

MALE: Does that answer your question.

MALE: Do you work with (unintelligible).

TIM: Are you saying that they prepared one for the trolley station.

MALE: (unintelligible)

TIM: And that's the kind of comment we would like to hear because we can go find that document and look at it.

MALE: (unintelligible) years ago we went to the planning process, but (unintelligible).

TIM: Okay, thank you.

MALE: I guess another thing too that was helpful in another scoping meeting we did, like if you know any activity that happened. When we did one in the college area, people brought up that on this property here 20 years ago it used to be a gas station and there is records available for that, but in the college area we actually found two that the community identified that weren't on the county records. So those are other things that are pretty important to bring up or whatever is if you've got a historical nature of what may be transpired on the property 20-30 years ago it somehow may not have been recorded.

MALE: Have you heard from the (unintelligible) member about the new Alvarado (unintelligible) Mission Gorge (unintelligible) that is going to go through the commercial site (unintelligible)

and I just wonder if you have that built into your plans because the interchange as we initially envisioned it is not going to change. There's still going to be (unintelligible) Interstate 8 (unintelligible) exist; however, there will be a way for Alvarado connecting route (unintelligible) through that semi-industrial center (unintelligible).

FEMALE: (unintelligible)

MALE: I'm aware of it, I'm not sure Tim's aware of. Right, there is a proposal, I don't know who's if it is (unintelligible), CalTrans or both or even city transportation department that has looked at some ways to revise that intersection so that Alvarado Canyon Road doesn't have to kind of get on the offramp to get down to Mission Gorge, try to make that and that's a thing that I do know of, but I think it's also good that, Tim, that we need to do our research on that from who produced those sketches or schematics for that interchange and I've heard prices quoted on it too.

MALE: Do you know anything about that?

MALE: I'm not sure. I've seen it a few times (unintelligible) and I'm just not sure.

MALE: (unintelligible)

MALE: (unintelligible)

MALE: We'll do some research on that.

TIM: Great comment, we will research that and see who's planning it and how far along it is and how it fits in the context of what's going on here.

MALE: That project in and of itself is going to be (unintelligible).

MALE: Right, they do modeling as part of the whole traffic flow and I wouldn't say everything needs an EIR, but I guess something of that nature and that size and that cost probably (unintelligible).

FEMALE: Well, first off, I talked to you a little bit before the meeting about Friars Road and I-15 so that's one of the big concerns. I don't think that's even in the redevelopment area,

but it impacts as traffic backs up. Likewise, it backs up too on Fairmount at Fairmount and Mission Gorge. It backs up way back and which I imagine presents a problem for Kaiser employees when they're trying to even go home too as well as other people. Speed on Waring Road through residential areas, on Zion Avenue, on Twain Avenue. There are the theater streets, Princess View, these are all streets that are right in the heart of Allied Gardens where the speeds, we've had any number of traffic studies and police being out there taking the speed studies or catching speeders and they've been clocked at exorbitant speeds, so what's going to happen then. Do you correlate with the Police Department in getting some kind of documentation, the number of tickets on speeding and so forth that are going on in the area.

TIM: Typically, we wouldn't do that. We would be aware of it through comments, but some of it gets down to more the community plan level in terms of what the community planners envision for a certain street and how to treat it and those recommendations are shown in the community plan so we're looking at what we call level of service and which you mentioned the congested intersection and so forth, and typically we don't get into speed limit violations and how that's done because if there's a safety issue then that's might be where it's triggered I suppose.

FEMALE: Generally what happens when you get clogs on these main thoroughfares, they start coming up through the residential areas and that's what I was talking to you about and they start speeding through the residents, through the neighborhoods and that could be a very bad problem as far as safety is for children and even walking and so forth, bicyclists. Also another concern is Waring Road at the intersection right down near I-8 and Waring Road. That backs up in the morning a lot, trying to get on to I-8 and from Allied Gardens, I think everybody feeds from San Carlos (unintelligible) down there. (unintelligible) and that's another bad point right there. Also too, on the San Diego River Master Plan, I noticed is there going to be some kind of coordination there between the plans and bringing that into the CIR here so you're going to use their documents and so forth as far as.

TIM: We're hoping to, we don't know how far along they are with their data, but we're hoping to be able to pull a lot of that into the study.

FEMALE: Right because I had heard something about that at one

point they were looking into developers who were thinking about putting homes or houses and things like that along the river. That, again, causes, I don't know exactly where, but that would cause some kind of densification again for our area impacting our streets, our schools and so forth. And let's see, the last one is that you have a tank farm that's next to Qualcomm Stadium and that tank farm is a main polluter right there so do you take that data into consideration when you're looking at pollution levels here because they're a big contributor to this area.

TIM: Okay.

FEMALE: And last, but not least, when the Chargers are at Qualcomm Stadium, when they leave when everyone empties out of Qualcomm, they generally bypass Friars Road or try to and they head to Waring or if they don't make it to Waring and it gets too locked up, they again come up through the neighborhood trying to get out various ways, so again it would have to do with the impact of Qualcomm Stadium, which is also outside of this redevelopment area, but it impacts our area quite a bit and with traffic and so forth so that's another concern.

MALE: Diane (unintelligible).

DIANE: Yes, there were. I just wanted to mention that there's some square footage that's been added to the Kaiser Permanente Medical Center. It's all been permitted, but there have been 52 beds that were added in two stages and there's a little administrative building on Orcutt, right behind what's now Grab 'N Go, it used to be Kentucky Fried Chicken, and there's been a bit of expansion at the Vandevere property, Vandevere and Riverdale.

MALE: Maybe it's a good idea for Tim.

DIANE: I don't have it off the top of my head, but I could get it.

MALE: Yeah, I think maybe it's a good idea for Tim to meet with you probably to get what all the uses and stuff and footage that Kaiser has to be able to get a really good handle on all those numbers. That's going to be a great resource for us to not have to go look through permits and stuff to figure out what the footage and uses are.

DIANE: We can get that easily and I don't know exclusively as a result, but there are some traffic and safety issues now

particularly as I have observed at Orcutt as it spills on to Mission Gorge Road right between Grab 'N Go and Bank of America and then there's a curb cut to access the Vons shopping center on Mission Gorge Road and they're just within feet of each other and there's an increased amount of traffic, cars using both of those egress and ingress particularly as they leave, it creates some risky and hazardous situations and then also we have studied, Kaiser Permanente has studied the feasibility of getting a traffic signal at the entrance one of the main entrances to the hospital on Zion, but it's been determined that it's too close to Crawford, but, again, any increases in traffic along Zion is just going to create additional safety hazards and risks for people trying to leave that and make right and left turns, but I'd be happy to get with you and get.

MALE: I mean, that's data that's.

DIANE: We have it easily.

MALE: I have a little concern about the area those (unintelligible) is between Zion and (unintelligible) Road on the opposite side of the street. There are single-family residences and apartments in that area and even though they are not (unintelligible).

MALE: I have a sort of general question. I understand this isn't a project so to have a project to build something you initially have to (unintelligible) and (unintelligible) building some things so we're not going to (unintelligible) traffic, is that correct?

TIM: If I understood you correctly. We take the existing setting and we look at what the existing conditions are today. That's our baseline, so that's what we (unintelligible) for traffic and then we project the development potential and project the traffic associated with that, that's the project and so we see where the project either creates another deficiency or increases an existing one so it's that.

MALE: How do you go about producing the development.

TIM: It's based on a community plan, plan uses.

MALE: But there is a mitigation monitoring plan as part of.

TIM: Yeah, well the second and maybe, the second part of your

question of there will be, this is a program EIR so there will be steps to follow for subsequent projects in the project area as they come forward and staff actually needs to make a determination that the project's consistent with the assumptions that are made from this EIR. Sometimes you might need to do a different type of environmental document and maybe it's not an EIR. Maybe it's a negative declaration or there's a new mitigation (unintelligible) or something that you couldn't foresee now that would need to be implemented as part of that specific project.

MALE: I'm just going to run off a couple of things if you don't mind.

MALE: Does it relate to this?

MALE: Yes. I have heard (unintelligible) so if I'm off base, you can tell me why (unintelligible). We've got the River Coalition, the River Conservancy, and they want to build a river park. If we're talking about redeveloping the area, (unintelligible) of the area, so wouldn't the concept of having the river park reduce the money that we're going to expect from this and sort of mitigate what you're trying to accomplish.

MALE: There's going to be a give and take.

MALE: You'll lose some of your.

MALE: Community plan says you have a certain buffer from habitat. Yes that's (unintelligible) of the land and community plan says you need a 100-foot buffer from habitat, then it comes down to where is the habitat line drawn, but yeah there is going to be a give and take.

MALE: At what point in time will the (unintelligible) boundary between the golf course and the Federal property and (unintelligible).

MALE: Eric, excuse me, could you kind of project a little bit down this way, because we have idea what you're talking about.

MALE: The question was we have a slightly uncertain boundary with the golf course and Federal property and the (unintelligible) property so I'm just wondering at what point in time we will know the answer to that.

MODERATOR: Well I think the biggest question there is the direction we're going right now, we're including two parcels that Federally owned that are part Admiral Baker and one private parcel that appears to be part of Admiral Baker. That's the direction we're going on right now and I don't know about who owns what, how that will be resolved, but our direction right now is that what we're leaving in is those private parcels.

MALE: We have to know the answer to that question before we can finish.

MODERATOR: Right, yeah, I know the Navy's doing research and we're going to be doing additional research, but two of those, yes, the part that are owned by the Feds. There's a third parcel that appears not to be part of the Federal land.

MALE: But we're not sure. My point is are we going to know from this preliminary plan, from the draft EIR, we'll certainly have to know by the end.

MODERATOR: Right, probably what we do the next big step is the preliminary report and by then we have to have more identification regarding ownership.

MALE: So you know who's (unintelligible).

MODERATOR: Yeah.

MALE: So regarding the quarry property, we've got these big settling ponds. Could you describe what's going to happen to them and how your process is going to treat that. I don't know what the existing land use is for settling ponds, but it was created fairly recently, but what's going to happen, is there an answer to the what's going to happen question. Can you describe what's going to happen.

TIM: I'm not sure if I know either. I imagine, I'm not aware of the settling ponds and obviously I think in water quality and hydrology and biology there so.

MALE: (unintelligible) those ponds were typically (unintelligible) the land use was allowed by zone (unintelligible).

MALE: Don't they have to have a reservation plan as part of their extraction plan.

MALE: It depends on when the permit was issued.

MODERATOR: If it's a current permit, it does have to have a state approved (unintelligible). The City actually (unintelligible). If it's an older permit that's not necessarily (unintelligible).

MALE: We've heard that the Superior Ready Mix wants to develop the western part of their property sooner rather than later and the eastern part, the active quarry, will (unintelligible) 10, 20, 30 years. Is what we know is Superior's current plan to do the development is that going to figure in to this (unintelligible). Is that going to be addressed.

TIM: To the degree that we were aware of them. We will try to address those.

MODERATOR: The community plans to address that of what it is now and what it would be in the future and how it recommends those steps and that's what we'll be looking at.

MALE: Can I ask one of you a question? Are you guys looking for a rezone at that (unintelligible).

MODERATOR: Don't know yet. We are in the very early stages of figuring out what to do because now we're not satisfied or happy with how it looks with the (unintelligible), but we're just beginning the process.

MALE: So it sounds like you're not far enough along to (unintelligible).

MODERATOR: (unintelligible)

MALE: Because if they're going to rezone it, then.

MODERATOR: I know but like I said, we'll do some more research within the community plans that I think the community plan does talk about current and future land uses, but not in detail, not as in it should be this commercial zone or this industrial zone. It may say this should be industrial zone with this purpose and then we'll look at, it's the land use vs. zoning maybe be inconsistent sometimes in those cases you may have an agricultural zone as a holding pattern for the mining operations, but the community plan states that down the road it

can become industrial, light industrial, but it doesn't specify the zone timing. Does that make some sense.

MALE: (unintelligible)

MALE: (unintelligible) planning the future, so by him knowing about the road (unintelligible) support is that are you talking about later, (unintelligible) about these things (unintelligible).

MODERATOR: Yeah, it helps to know what's going on and what's been looked at or what hasn't been looked at or what's been brought up because it can put into the traffic modeling, it can be put into flood control planning. If something's all of a sudden it can be completely turned from earth to concrete then you've got a drainage problem. One of the things that I know is that the culvert under Fairmount and Mission Gorge there's been some documentation done that there needs to be an extra culvert there when we do get the floods. Some of the channel has been, the bottom has been concreted in upstream, but downstream is ruffraff and it makes a sharp turn so those types of things, they're going to be put into it as part of the modeling for the water flow and stuff like this.

MALE: (unintelligible) future, (unintelligible) right here, right now.

MODERATOR: That's going to be somewhere in the alternatives too is the future.

MALE: So we have alternatives in the plan.

MODERATOR: Right.

MALE: I just (unintelligible) I think the future does have to be studied particularly as (unintelligible) traffic and circulation that from a redevelopment perspective to me that's very important money flow into that area and so whether it be the roads that are (unintelligible) community plan or capacities that are needed to fill the community plan objectives. I don't which way that works. (unintelligible) to comment. But there's got to be some (unintelligible) to traffic engineering. The other issue (unintelligible) kinds of things, we need to be studied with an eye towards the community plan (unintelligible) so the study, there has to be some correlation as to what it is today.

MODERATOR: Right, like I know one of the things that interesting, supposedly this week they were supposed to go to planning commission with the (unintelligible) plan, drafts from the (unintelligible) plan is supposed to go to planning commission this Thursday and it's been postponed for some reason and from the preliminary it's out on the website and I haven't been able to look at it, but one of the things I read in the papers or documents was that as you channelize things and reduce the width, that increases the flow rate and so forth and so on.

END FIRST TAPE

TAPE 2

MALE: (unintelligible) solve all the problems. (unintelligible) but instead it's a study of this could be well (unintelligible) complaints. It's intended to generate a certain amount of revenue, which is in turn intended to be reinvested in the community and that (unintelligible).

MODERATOR: Right, typically in a community plan you have a list of CIP projects that you want to do, which you would fold into the implementation plan, five-year implementation plan after the redevelopment plan is adopted. In this case, we may be taking things out of the EIR, alternatives of same in the implementation plan, here's an alternative that should be in the five-year plan.

MALE: (unintelligible)

MODERATOR: And we're going to be taking alternatives and putting it in the five-year implementation plan and saying, we're going to improve this intersection within year two or three or when something takes place.

MALE: (unintelligible)

MODERATOR: All right, let's move over to public comment. Again, if you would keep your time to three minutes, we would greatly appreciate it.

MODERATOR: It might be better for them to come over here since we have the tape recorder.

TIM: That will work. Turn that around there.

(fixing tape recorder in the room--men just talking about that--not worth transcribing)

MODERATOR: First up, Art Sloan.

MALE: I'll submit the comments in writing.

MODERATOR: Okay. Next Charles Little.

CHARLES LITTLE: My name is Charles Little and I'm 5975 Fairmount. I want to ask a question and that may be to cut to the chase here. On this draft preliminary plan, is this something you will follow to come up with this so-called EIR?

MODERATOR: Yes.

CHARLES LITTLE: Per se. Because there's things I see in here, the replanning which they've talked about, but you're not going to really change anything in our overall planning, I wonder about that, improved traffic flow, parking. For example now, I want to tell you something of what's happening I've told you before about what happens on Mission Gorge Road. They come off on Fairmount. There's a red zone right after you come off and then it narrows down to one lane after you get through. You come through there. They've got truckers that are parked in that red zone. Cops do nothing about it. You've got a left turn lane same thing and the (unintelligible) that street uses that and truckers use that for their loading zones to unload and load vehicles.

TIM: What street to what street?

CHARLES LITTLE: From Mission Gorge to (unintelligible). On Fairmount. The other thing is one day I caught a policeman over at the post office and tried to ask him about why this happens. You also see it on Mission Gorge Road and you see it frequently on Mission Gorge Road and I asked him about it. Why in the hell don't you guys do something about that. He kind of it was almost like somebody's telling them don't mess with them. He says to me, "Where well else are they going to park? That's not my problem." Though we have enough problem on those streets with just the normal flow of traffic and then we got a police force that is not enforcing the laws. You go on up 20, there's red zones there by the store. You go by there and the same damn thing's happening because you see these trucking companies that

are loading and unloading vehicles so you can do all these things, but if we don't have a police force that's working to take care and enforce the laws, where are we. There's many things in here and I'm going to write you another letter, but, for example, one of the things you talk about in here is providing affordable housing. Where have we got that planned? And replacement of public improvements. You haven't done anything on that since we've been in this. And the restoration of waterways. Is that a city function? It didn't sound to me like it was. And the other thing that worries me as I listen to this, it sounds to me that part of this EIR is going to be word of mouth instead of real facts and that bothers me.

TIM: I don't think that's true of an EIR because it's.

CHARLES LITTLE: Well we shall see when we shall see. But it's like this stuff in here somebody took this off of a computer to tell a friend without any thought of what we're talking about. The other thing I'd be curious about is when we're going to find out that all these costs are running up because I know we borrowed \$125,000 to start with and I'm damn sure that's gone through by now, so we should get an update on that once in awhile. Thank you for putting up with me.

MODERATOR: Next comments (unintelligible).

FEMALE: My concern is traffic and safety. With all future roads closed, how are you going to take care of and accommodate increased traffic. We need a reality check for the safety of the residents and businesses. More cars and no roads is not going to give you a balanced equation. I'm very concerned about the safety. Safety. Safety.

MODERATOR: Thank you. Next (unintelligible).

MALE: I want to address a problem that we have here in the wintertime. As you know, we get heavy rains and we get not so heavy rains in the season. I've been in this neighborhood for about the last 40 years and there's never been a time in the wintertime that San Diego Mission Road hasn't been closed and in the period of heavy rains that can be closed up to three weeks and we need to address because I use it all the time to leave this area so I don't have to get on that freeway and I know a lot of other people do too, but in the wintertime, it really (unintelligible). I think in 1979, two people were drowned, they were swept off San Diego Mission Road on their way to the church, the Mission, and that water was probably about 5 feet

high and they tried to drive through it. In the ERA we should address that somehow. Maybe a little bridge. Oh also, I was, at one time on the statement down here, there was a proposal and \$5 million set aside to build another outlet across the San Diego River over to Camino del Rio North, how come we haven't done that to help relieve this traffic.

TIM: I guess I know too much sometimes, but the cost went up excessively. It was actually to a hearing about 1-1/2 years ago and decided not to put the link in for environmental and cost reasons. It was in the Mission Valley plan.

MALE: It should would help us out in the Mission Gorge redevelopment area if we had that bridge and solve quite a bit of that freeway problem.

TIM: I understand, it was in the plan and that's what the modeling (unintelligible).

MALE: I tell what, if you can take it back to the powers that be (unintelligible). Thank you.

MODERATOR: (unintelligible)

MALE: (unintelligible) teacher. My main concern I have a lot of concerns about traffic, which is a big, big problem, but my main concern is air quality because we get a tremendous breeze along Mission Gorge coming this way towards the south so that we did not and we've lived here 40 years, we have not had to put air conditioning in until 5 years ago and because you get that breeze and it comes up in the afternoon and evening. My concern is that whenever the industrial business development comes along and (unintelligible) the river, you will block that not only on Mission Gorge but I think even people up the hill get it (unintelligible) and so I agree that (unintelligible) about blocking (unintelligible).

MODERATOR: Can I get your name?

FEMALE: Anne Lee.

TIM: Thank you guys for providing your comments and we'll encourage you to submit written comments if you didn't speak tonight and, like I said, we will take all of those into consideration and conducting our next steps and study and the last point is that the comment period ends on August 30 so

there's still some time if you have additional comments you want to make, please feel free to do so. Thank you.

MODERATOR: And the form will, hopefully, be by the end of this week or at least by the start of next week will be on our internet site so if you know people who weren't here and didn't get a copy of the form, they can print it off the website.

MALE: Okay, great.

MALE: (unintelligible)

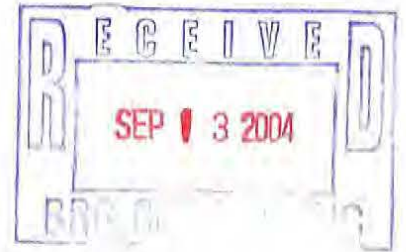
MODERATOR: Okay, old business done. (unintelligible)

FEMALE: In the preliminary draft preliminary plan on page 4 of that plan, they talk about the area where sub areas P and some of the problems and divisions that we're proposed to (unintelligible) redevelopment included deterioration and dilapidation in that area (unintelligible) dilapidated, (unintelligible).

TRACY: Well I mean, that will come out as part of the plan.====

MALE: Yeah I would just like to point when we do those minutes, I think the minutes from the past all the meetings have been very brief and as a result don't really reflect accuracy of what has transpired at the meetings and so I'd recommend that all the meetings should be tape for accuracy purposes but I'd like to point out --

I STOPPED TYPING HERE AS THIS DID NOT SOUND LIKE PART OF THE MEETING THAT YOU NEEDED.



Comment Form

Grantville Redevelopment Project Program Environmental Impact Report

SCOPING MEETING

On the lines provided below, please list those issues or concerns you feel need to be addressed in the Program Environmental Impact Report for the Grantville Redevelopment Project. Please be as specific and detailed as possible so that the EIR may address all of your concerns or issues. If necessary, please attach additional pages. Once completed, please submit your written comments to: Mr. Tracy Reed, Project Manager, 600 B Street, Fourth Floor, MS 904, San Diego, CA 92101, fax: (619) 533-5250, email: treed@san Diego.gov. Your comments must be received by **August 30, 2004**.

We strongly believe that the Environmental Impact Report should address future zoning and use changes that will occur once the Redevelopment Project is adopted. Community Plan amendments will occur. We see the City of Villages Opportunity Areas Map (Action Plan Appendix A) as adopted in the General Plan as a guiding document for future Community Plan amendments as well as for Environmental Impact Report Scoping.

(OVER)

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treeed@sandiego.gov. Your comments must be received by **August 30, 2004.**

Referring to 6-28-04 Draft Preliminary Plan

*Promote a variety of land uses? Improve Traffic Flow, Parking Services.
Replanning Redesign
Street design*

*Replanning and Land Assembly. This sounds like condemnation then
Eminent Domain*

Replacement of Public Improvements and Facilities

*Provide Affordable Housing Restoration of Waterways Reduction of
Urban Runoff.*

*The above has some merit, however the how can these be done needs
to be addressed in the EIR.*

*Traffic Circulation certainly could NOT have been addressed in a
EIR for the remodeling of Cash Hodson or the building of
Home Depot + Savon Drugs. If it was looked into we should
require someone who can see to look into the problem for this EIR.*

*The EIR should examine how we can proceed with the redevelopment
Project when much of the area will be affected by the City's River Task
Force Master Plan, A outdated Navajo Community Plan should be updated
before the Redevelopment Project spends more of our money.*

*Yes IT IS Our Money we Taxpayers.
177 Much More Needs to be Addressed But This could be
a Start.*

*lchuck@sprynet.com
619 5631808*

*Charles E Little
PO Box 600190
San Diego, CA 92160*

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The Concern is that Fenton Development is paying to have its employee as the chairman of the advisory committee so it can use eminent domain once redevelopment is approved to build a shopping center on the other side of Mission Gorge from Home Depot. Mission Gorge's traffic problem is largely due to Fenton's Home Depot shopping center and the rumors are that property will be taken through eminent domain to expand Mission Gorge so Fenton could build that other shopping center. It appears that Tracy Reed has full knowledge of this plan. We would like your comments in writing and posted on your web site. Our position is that you should be recommending that any proposed project should resolve any traffic congestion problem without the use of eminent domain.

(OVER)

Submitted by (please print):

Name: House of Cars	Agency/business/group name (if applicable):
Address: 6101 Mission Gorge Rd. San Diego, CA 92120	Phone number: C/O Arthur Sloane 619 237 0689
City/state/zip: San Diego, CA 92120	Date: July 27, 2004

Redevelopment Agency
600 B Street, Suite 400, MS 904 ♦ San Diego, CA 92101-4506
Tel (619) 533-4233 Fax (619) 533-5250
Community and Economic Development
www.sandiego.gov/redevelopment-agency/grantville

Comment Form

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① ^{It should be} Limitations on size of a proposed Redevelopment project i.e. - limitations should have been imposed on the multi-level/multi-unit apartments across from Fenton Plaza

② How can circulation be improved when all roads in the Community plan have been stopped. i.e. Navajo Rd Extension, Jackson Dr and Proctor View to Turquoise Blvd.

③ We already have numerous sites along the S.D. River that are considered California Hot Topic Spots. How will air quality be improved if they are allowed to remain and traffic increases in our area.

④ Why is there such opposition to single family homes? The only plans developers seem to entertain are multi-level apartment complexes? Density given rise to more traffic - how can this be justified in the EIR?

Name: <u>Martyn Reed</u>	Agency/business/group name (if applicable):
Address: <u>6266 Leaman St.</u>	Phone number: <u>(619) 286-6578</u>
City/state/zip: <u>S.D., CA 92120</u>	Date: <u>6/28/04</u>

Comment Form

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Bill Berwin representing Mission Corporate Center
6160 Mission Gorge Blvd. We would like to
see the EIR account for a possible community plan
amendment allowing mixed-use zoning in and around the
new trolley station.

(OVER)

Comment Form

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Traffic Circulation

The intersections North Highway B, Where Fairmount Ave., Mission Gorge Road, Camino Del Rio N and Alvarado Canyon Road Converge. This is and for a very long time as been a traffic horror story.

Each time the city allows remodel or new building they add to the problems.

If this redevelopment project proceeds the added traffic will surely make the problems much greater.

The lights are NOT coordinated in any manner.

Mission Gorge Road and Fairmount Ave have left turn lanes, however the Auto Transport Trucks use them to unload and load Autos. The curbs that are painted red are also used for parking areas for loading and unloading.

A EIR Report will be very interesting to see and read

Submitted by (please print):

Name: <u>Charles Little</u>	Agency/business/group name (if applicable):
Address: <u>P.O. Box 600190</u>	Phone number: <u>619 563 1808</u>
City/state/zip: <u>San Diego CA 92160-0190</u>	Date: <u>6/29/04</u>

Comment Form

Grantville Redevelopment Project Program Environmental Impact Report SCOPING MEETING

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DIFFERENT DESIGNS 8/MISSION GORGE RD & 1/4 MILE
NORTH TO CORRECT TRAFFIC

IMPACT OF INSTALLING / NOT INSTALLING FAIRMONT
EXTENSION

FLOODING AT MISSION GORGE & 8, POSSIBLE IMPROVEMENTS,
OBJECTIONS OF OTHER GOVERNMENTAL AGENCIES
CITIES AVOIDING RESPONSIBILITY IGNORED.

HOW TO BEST TREAT OUR NEW NEIGHBOR, THE
TROLY STATION & IMPACT OF ITS RIDERS COMING
TO GRANTVILLE AREA & WHAT TYPES OF BUSINESSES
& SERVICES WILL BEST SUIT THEIR NEEDS

Submitted by (please print):

Name: <u>DAN DALIENBACH</u>	Agency/business/group name (if applicable):
Address: <u>6136 MISSION GORGE RD #230</u>	Phone number: <u>619-283-0588</u>
City/state/zip: <u>SAN DIEGO, CA. 92120</u>	Date: <u>6/29/04</u>

Comment Form

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Health & Safety is our most important concern. Our Health & Safety is seriously impacted by the traffic problem at Mission Gorge Road, Fairmont Avenue, Alvarado Canyon Road & Highway 8, and the flooding on Mission Gorge Place and Mission Gorge Road.

Upgrading or re-developing a property under the current situation is not financially practical or profitable for a property owner or a business owner.

The land use constraints are a major obstacle to fixing anything.

SEE ATTACHED.

Submitted by (please print):

Name: <i>Daniel Smith</i>	Agency/business/group name (if applicable): <i>Advisory Committee Member</i>
Address: <i>6136 Mission Gorge Rd</i>	Phone number: <i>619 2835557</i>
City/state/zip: <i>San Diego CA 92120</i>	Date: <i>7/10/04</i>

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Below are responses to statements made in the project report.

Page 11, Item #VI – Attainment of the purpose of the law:

Flooding at Mission Gorge, Fairmont Ave., Hwy 8 from urban runoff from SDSU, La Mesa by way of “Alvarado Creek” causes the flooding of San Diego Toyota, Mission Gorge Place and Mission Gorge Road. Only the San Diego River is mentioned as a flood source of water. Alvarado creek at the new trolley station, etc. has been a big problem for years. The City, MTB and others, has done maintenance of the drainage ditch in the past but not for the last few years. The piping under Mission Gorge Road and piping within 300 feet east of the Mission Gorge Road is not working.

Page 1, Item #I:

Paragraph 1 - Purpose and Intent: “Promote a variety of land uses”

Paragraph 2: “CRL” controls redevelopment activity” “The planning.....
C. replanning

Paragraph 8: “A redevelopment plan provides the framework to implement activities, including land uses, density, etc.

Page 2, Paragraph 9-10, “planning, redesign, etc.

If no land uses changes are adopted as part of the establishment of the redevelopment project then no redevelopment will occur. It is vital that land use regulations changes needed be within the project text.

The lacking of adequate zoning code enforcement is a major problem for the area. If enforcement of zoning were successful then the area would have far less problems with parking, sign clutter, right of way, and encroachment. The area needs the cities enforcement arm now and in the future to eliminate many problems along Mission Gorge Road especially.

The Navaho Planners and other planning groups in the area must begin the process of amending the over burdensome land use regulations put upon the community. The CPI0Z Community Plan implementation overlay zone must be removed from the area.

Page 4, Item #III – Background:

B Contains a general statement of land uses, building intensities. What are the proposed densities and intensities referred to here?

This general statement should I say that the CPI0Z should be removed from the areas land use regulations. The general statement and accompany map is needed to designate the areas of transit orientated development, high density, mixed use.

Page 5, Item #IV, 2nd paragraph: Conformance:

Again the community plan needs to be amended to promote “redevelopment”.

Page 6 – 3rd Paragraph:

Absolutely, the Navaho plan needs amended. Commercial/industrial property owner needs to be spoken of in this report. not just the residents. The commercial/industrial property owners are affected by the lack of zoning code enforcement has done more to adversely effect the areas than has the development. There have been only a few new buildings in the area in the last 10 years.

Page 6 – 5th Paragraph: Community plan implementation overlay zone.

This paragraph miss states what the community attempted to address in 1989. The CPI0Z was a land use regulation pushed down the throats of property owners by the cities planning department when the no growth proponents were at city hall. We fought this for over 2 years. This is the single most distinctive element of the land use regulation. It must go.

Page 7 – 2nd paragraph: Mission Valley East light rail transit project.

The trolley station location was intended to create the transit-orientated development. The statement that it is “Likely to bring re-use proposals near the station is a understatement. The project should state that high density near the station with mixed use is the goal of the project.

Page 7 – 4th Paragraph: Goals & Objectives:

The Navaho plan was last updated when the city had a moratorium on development and was anti growth. They were successful in stopping growth in Granville with the CPI0Z. Their goal was implemented. We need to do a 180 to assist and promote redevelopment.

Page 8 – 3rd Paragraph:

How do we match the appearance and character of Industrial use with the community and residential area. Are we describing a building style, colors or what?

Page 10 – 5th Paragraph:

General statement – We must propose these changes now as part of this project.

Page 12, Item #VIII:

This is an incorrect statement; there are residential uses within the project area. Also residential use should be permitted in the project area.

I. Purpose and Intent of Redevelopment in the Grantville

1 The San Diego Redevelopment Agency is pursuing the Grantville Redevelopment Plan ("Redevelopment Plan") to promote a variety of land uses, improve traffic flow, parking and services which would eliminate physical and economic blighting conditions.

2 California Community Redevelopment Law (Health and Safety Code Section 33000 et. seq.) ("CRL") controls redevelopment activity. Redevelopment is defined pursuant to Section 33020 of the CRL 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 CRL which comprise the following:

- 3 a) alteration, improvement, modernization, reconstruction or rehabilitation, or any combination of these, of existing structures in a project area;
- 4 b) provision of open space and public or private recreation areas; and
- 5 c) replanning or redesign or development of undeveloped areas in which either of the following conditions exist:
- 6 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
- 7 2) the area requires replanning and land assembly for reclamation or development in the interest of the general welfare because of widely scattered ownership and other reasons.

8 A redevelopment plan provides the framework to implement activities to alleviate blight in a proposed project area. Before the adoption of a redevelopment plan, a preliminary plan is prepared to select the proposed boundaries of a project area, establish compliance with the city's general plan including land use, density

and building intensities, and describe impacts on residents in the area and its surrounds.

9 The purposes of the CRL would be attained by the proposed adoption of the Grantville Redevelopment Plan. Redevelopment would achieve the purposes of the CRL by:

- 10
- eliminating physical and economic blighting conditions;
 - replacement of obsolete and deteriorated public improvements and facilities;
 - rehabilitation of commercial and industrial 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 along and reduction of urban runoff; and
 - revitalization of commercial and industrial districts.

II. Selection of the Project Area

On March 30, 2004 the San Diego City Council ("City Council") designated the Grantville Redevelopment Survey Area by Resolution No. 299047. From that survey area, proposed Project Area boundaries were selected for further study and analysis.

The boundaries of the proposed Grantville Redevelopment Project ("Project Area" or "Project") are as shown on the Redevelopment Plan Map, attached hereto as Exhibit A. The area proposed for inclusion in the Project is approximately 831 acres in north eastern portion of the City of San Diego ("City"). The Project Area is primarily within the Navajo Community Plan (82%) as well as the Tierrasanta (18%) and College Area Community Plans (less than 1%) and is described as follows.

Subarea A Primarily comprised of commercial, office, and light industrial uses; Subarea A includes parcels north of Interstate 8 between Fairmount Avenue and Waring Road. The northern boundary includes parcels on both sides of Friars from Fairmount to the four corners of Zion Avenue and Mission Gorge Road.

Community Park with other community services such as the Edwin A. Benjamin Library, Lewis Middle School, and two churches.

Existing development includes commercial, industrial, and office/professional structures. Problem conditions that are proposed to be addressed through redevelopment include deterioration and dilapidation, defective design, substandard design, incompatible uses, constant flooding, soil contamination, urban runoff, traffic circulation, inadequate lot size, depreciated/stagnant property values, impaired investment, retention of neighborhood/community serving commercial centers, and low lease rates in portions of the Project Area.

III. Background

The City Council adopted Resolution No. R-147378, on May 6, 1958, creating the San Diego Redevelopment Agency ("Agency") for the purpose of pursuing redevelopment activities in the City pursuant to the CRL. The Agency is authorized by the City Council to implement redevelopment plans within designated redevelopment project areas throughout the City.

Adoption of the Grantville Preliminary Plan is the second step in the formation of a project area in accordance with the CRL. The first step was the selection and adoption of the Grantville Survey Area. After a public review and comment period, Planning Commission meetings and a joint public hearing of the Agency and City Council the redevelopment plan would be adopted.

Section 33324 of the CRL states: "A preliminary plan need not be detailed and is sufficient if it:

- a) Describes the boundaries of the project area;
- b) Contains a general statement of land uses, layout of principal streets, population densities and building intensities, and standards proposed as the basis for the redevelopment of the project area;
- c) Shows how the purposes of this part would be attained by such redevelopment;
- d) Shows that the proposed redevelopment conforms to the master or general community plan; and

Con

- e) Describes, generally, the impact of the project upon residents thereof and upon surrounding neighborhoods."

IV. Conformance with the General Plan and Affected Community Plans

The City of San Diego has adopted a General Plan Map as the Land Use Element of the General Plan. This map illustrates the location of residential areas, commercial activity, industrial development, public facilities, the alignment of the transportation network and the open space/park system. This map indicates only those land uses of regional or city-wide significance and its locational designations are advisory only. The fine detail often seen on planning maps is included in the City's community plans which have been developed for specific areas throughout the city. These community plans provide land use guidelines for property within each plan area. The proposed Project Area falls primarily within the Community Plans of the Navajo Community Planners, with a minor area within the Tierrasanta Community Plan. The only exceptions are the southern portions of the Interstate 8 interchanges at Fairmount Avenue and Waring Road, which are in the College Area Community Plan. Both of these areas are California Department of Transportation ("Caltrans") right-of-ways and were included for possible traffic improvement purposes, which are subject to Caltrans regulations.

All redevelopment activities will need to conform to the pertinent Community Plan and the approval process for activities covered by the pertinent Community Plan. Additionally, the San Diego River Task Force is developing a Master Plan for the San Diego River, which is expected to be completed in late 2004. The following discussion summarizes portions of the San Diego River Master Plan and Community Plans that are relevant to the proposed redevelopment project area and implementation activities.

The Navajo area is located in the easterly portion of the City of San Diego and includes the neighborhoods of Allied Gardens, Del Cerro, Grantville, and San Carlos. The Navajo area is approximately 8,000 acres in size and is bounded on the north by Mission Gorge Road, on the east by the cities of El Cajon and La Mesa, on the south by Highway 8 and on the west by the San Diego River channel.

Navajo is developed predominantly as single-family communities with significant open space dedicated to recreational uses such as: Mission Trails Regional Park and Lake Murray. All properties in active residential use are excluded from the Grantville redevelopment project area boundaries. The Grantville community, the primary focus of redevelopment is the main entrance into the Navajo area as well as the area's employment and retail center.

The Grantville community presents a dual visual image. The commercial and industrial development along Mission Gorge Road has impacted adjacent residential development with overflow on-street parking and traffic congestion for residents attempting to enter and exit the entire Navajo area.

THE NAVAJO COMMUNITY PLAN

3 The Navajo Community Plan was adopted in 1982 and was intended to regulate development until 2000. It is anticipated the plan will need to be amended to address its expiration, possible re-use development near the Grantville trolley station, and to accommodate restoration and potential reuses along the San Diego River. Since 1927, sand and gravel extraction activities have been taking place over a 420 acre site on both sides of the river.

The area has been impacted by commercial and industrial development along Mission Gorge Road. Traffic congestion in this area is related to the uses, age, and inadequate design of development along Mission Gorge Road, which is the primary road connecting the community with Interstate 8. Residents of the community wish to preserve the well-maintained single-family character of their neighborhoods, as well as retain a high level of neighborhood/commercial serving retail. In addition, residents are concerned with relieving traffic congestion and the deteriorating building conditions along commercial and industrial areas of Mission Gorge Road.

Community Plan Implementation Overlay Zone (CPIOZ)

5 Revitalization of the commercial/industrial corridor is an issue the community attempted to address in 1989, by adoption of the Community Plan Implementation Overlay Zone (CPIOZ) as an

amendment to the existing Navajo Community Plan. There are three CPIOZ categories (commercial, industrial, and residential) that regulate design standards, such as building height, roof treatments, streetscape, building setbacks, parking and other criteria.

Mission Valley East Light Rail Transit Project

2 In 2002, the Navajo Community Plan was amended to coordinate the Circulation Element with development of the Grantville trolley station. The completion of the trolley extension through Grantville is likely to bring re-use proposals near the station, which may require a community plan amendment to implement.

San Diego River Master Plan

The City of San Diego's River Task Force is developing a Master Plan for the San Diego River and surrounding areas of up to one-half mile on each side, extending from the mouth of the River to border with the City of Santee. The Master Plan will address recreational opportunities, wildlife habitat conservation, and restoration. The full implementation of the San Diego River Master Plan may require a community plan amendment to be fully implemented.

Goals and Objectives

4 The Navajo Community Plan established goals and objectives to guide the growth and revitalization of the Navajo area. The formulation and adoption of a community plan is only the first step in a two-step process. The second and equally important step is the implementation of the goals, objectives and recommendations of the Community Plan. Some of the goals and objectives contained in the Navajo Community Plan that are relevant to the proposed redevelopment Project Area include:

Transportation

- Address substandard level of service for vehicle movement along Mission Gorge Road.
- Complete the extension of the Mission Valley Light Rail Transit Lane to serve the College Area Community.

Commercial Revitalization

- Continue the ongoing efforts to revitalize the commercial areas along Mission Gorge and Waring Roads.
- Promote interest and commitment by local businesses and the community-at-large in the revitalization of all commercial areas of the community.

Industrial Revitalization

- 3
- Ensure that the appearance and character of industrial uses are compatible with the character of the surrounding commercial and residential areas.
 - Develop a circulation network that will provide for less congested access to the Grantville industrial area.

San Diego River Revitalization

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

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.

Utilities

Undergrounding of electrical distribution lines and telephone lines along major streets is jointly financed by the City and SDG&E. Priorities for undergrounding are based upon 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.

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 its existing parking supply. Many of the older, predominantly 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.

*Code
amendment*

THE TIERRASANTA COMMUNITY PLAN

Approximately 130 acres of sand and gravel operations fall under the jurisdiction of the Tierrasanta Community Plan (page, 54), which was adopted in 1982. The sand and gravel processing area is isolated from the Tierrasanta community at its southeastern corner and can only be accessed from Mission Gorge Road. The Tierrasanta Community Plan designates the site as open space that should be acquired by the City for inclusion in the Mission Trails Regional Park, once extraction operations have ceased and any other use of this site would require an amendment to the Tierrasanta Community Plan (page 56, #9).

It is anticipated that the Open Space Element of the Tierrasanta Community Plan may need to be amended at the conclusion of extraction activities if there are not available funds to acquire this site for open space purposes. The Open Space Element states, "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" (page 55, #2).

v. General Statement of Proposed Planning Elements

As a basis for the redevelopment of the Project under consideration, it is proposed that uses be permitted in compliance with the General Plan, community plans and the Zoning Ordinance of the City of San Diego, as amended from time to time, and all other applicable state and local codes and guidelines.

A. Land Uses

In the City of San Diego, land uses shall be those permitted by the General Plan, appropriate community plan and the Zoning Ordinance. Among the permitted land uses within the Project Area are:

- Commercial
- Industrial
- Office/professional
- Recreational

B. General Statement of Proposed Layout of Principal Streets

The principal streets within the Project Area are also as shown on Exhibit A. These include the following:

- Mission Gorge Road
- Adobe Falls Road
- Fairmount Avenue
- Twain Avenue
- Princess View Drive
- Zion Avenue
- Old Cliffs Road
- Waring Road
- Friars Road
- Orcutt Avenue

The layout of principal streets and those that may be developed in the future shall conform to the Circulation Element of the City of San Diego General Plan, as currently adopted or as hereafter amended.

Existing streets within the Project Area may be widened, reduced, or otherwise modified and additional streets may be created as necessary for proper pedestrian and/or vehicular circulation.

C. General Statement of Proposed Population Densities

6 Permitted densities within the proposed Project Area shall conform to the General Plan, appropriate community plan and Zoning Ordinance of the City of San Diego, as currently adopted or as hereafter amended, and other applicable codes and ordinances. This Plan and the Project do not propose any changes to allowed population densities, development densities, or land use designations.

D. General Statement of Proposed Building Intensities

Building intensity shall be controlled by limits on: (1) the percentage of the building site covered by the building (land coverage), (2) the ratio of the total floor area for all stories of the building to the area of the building site (floor area ratio), (3) the size and location of the buildable area on the building site; and (4) the height of the building. The limits on building intensity shall be established in accordance with the provisions of the General Plan, appropriate community plan and the Zoning Ordinance of the City of San Diego, as they now exist or are hereafter amended. The Redevelopment Plan does not propose any changes to allowed population densities, land use designations, or building intensities.

E. General Statement of Proposed Building Standards

Building standards shall conform to the building requirements of applicable codes and ordinances.

VI. Attainment of the Purposes of the Law

The selection of the proposed Project Area boundaries is guided by the existence of blight, as defined by the CRL. Redevelopment would attain the purposes of the CRL by alleviating blighting conditions that the private sector, acting alone, cannot remedy. Among the blighting conditions present in the proposed Project Area are the following:

- Deterioration and dilapidation, defective design, substandard design, incompatible uses, inadequate lot size, depreciated/stagnant property values, impaired investment, and low lease rates in portions of the Project Area.
- Significant environmental remediation may need to take place with respect to re-use of industrial properties as well as returning the San Diego River to a natural state once sand and gravel processing is completed.
- Flooding from the San Diego River and urban run-off into the San Diego River. *from the west, east, north, south*
- *Flooding from the Alvarado Creek and urban run-off from the east*

VII. Conformance to the General Plan of the City

This Plan conforms to the General Plan, and the related community plans of the City of San Diego. It proposes an identical pattern of land uses, and includes all roadways and public facilities as indicated by the General Plan, and related community plan.

VIII. General Impact of the Proposed Redevelopment Project Upon the Residents of the Project Area and Surrounding Neighborhoods

There are no existing residential uses within the proposed Project Area and residences lying outside of the Project Area would generally benefit from redevelopment through traffic congestion relief as well as improved retail and recreational offerings. It is the desire of the Redevelopment Agency of the City of San Diego to avoid or minimize the displacement of residents as a result of redevelopment activities. While displacements are not expected to occur, the Agency would be responsible for relocating residents displaced by the Agency and for providing last resort housing if necessary, as well as replacing any low and moderate income housing units removed from the housing stock.

Plan implementation will be subject to future review and approval by the Agency, legislative body (City Council) and other appropriate bodies as directed by the Agency.

Grantville Redevelopment Project Area

Mitigation Monitoring and Reporting Program

April 2005

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MITIGATION MONITORING PROGRAM (MMRP)

Grantville Redevelopment Project

City of San Diego Redevelopment Agency, California

INTRODUCTION

The City of San Diego Redevelopment Agency will adopt this Mitigation Monitoring and Reporting Program (MMRP) in accordance with Public Resources Code (PRC) Section 21081.6 and Section 15097 of the California Environmental Quality Act (CEQA) Guidelines. The purpose of the MMRP is to ensure that the Grantville Redevelopment project, which is the subject of the Final Environmental Impact Report (FEIR), complies with all applicable environmental mitigation and permit requirements. Mitigation measures for the project will be adopted by the City of San Diego Redevelopment Agency, in conjunction with the certification of the Final EIR. Those mitigation measures have been integrated into this MMRP. Within this document, approved mitigation measures are organized and referenced by subject category and include those for: (1) transportation/circulation; (2) air quality; (3) noise; (4) cultural resources; (5) biological resources; (6) geology/soils; (7) hazards and hazardous materials; (8) paleontological resources; (9) aesthetics; and (10) water quality/hydrology. Each of these measures has a numerical reference. Specific mitigation measures are identified, as well as the method and timing of verification and the responsible party that will ensure that each action is implemented.

Mitigation measures applicable to the project include avoiding certain impacts altogether, minimizing impacts by limiting the degree or magnitude of the action and its implementation, rectifying impacts by repairing, rehabilitating, or restoring the affected environment, and/or reducing or eliminating impacts over time by preservation and maintenance operations during the life of the action.

Public Resources Code Section 21081.6 requires the Lead Agency, for each project that is subject to the California Environmental Quality Act (CEQA), to monitor performance of the mitigation measures included in any environmental document to ensure that implementation does, in fact, take place. The City of San Diego Redevelopment Agency is the designated lead agency for the Mitigation Monitoring and Reporting Program. The Agency is responsible for review of all monitoring reports, enforcement actions, and document disposition. The Agency will rely on information provided by the monitor as accurate and up to date and will field check mitigation measure status as required. The Five-Year Implementation Plan, adopted as part of the redevelopment project, will guide the Agency as it implements specific redevelopment projects in the Project Area. When adopted, the Implementation Plan will be in place for the next five years (fiscal years 2005-06 to 2009-010). Estimated funding and prioritization of improvements are defined in the implementation plan.

MITIGATION MONITORING AND REPORTING PROGRAM
Grantville Redevelopment Project

No.	MITIGATION MEASURE	METHOD OF VERIFICATION	TIMING OF VERIFICATION	RESPONSIBLE PERSON	DATE OF COMPLETION/ INITIALS
Section 4.1 – Land Use					
	No mitigation measure is proposed, as no significant land use impact has been identified.				
Section 4.2 – Transportation/Circulation					
T1	<p>Improvements identified within the Navajo and Tierrasanta Community Plans shall be implemented through the establishment of the proposed redevelopment project area and inclusion of these improvements in the Five-Year Implementation Plan adopted for the Project Area. The Five-Year Implementation Plan identifies these improvements as under construction by the fifth program year (Fiscal Year 2009-2010). The improvements shall include improvements to significantly impacted roadway segments and intersections shall be implemented as required to address the impact of new development in the Project Area. Pursuant to City of San Diego Traffic Impact Analysis Guidelines, a traffic impact study would be required for any future redevelopment within the Project Area for any project 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. These traffic studies shall evaluate impacts to the Mission Gorge Road corridor, and identify appropriate roadway segment and intersection mitigation for project impacts, consistent with the Navajo and Tierrasanta Community Plan recommendations.</p> <p>The roadway segment improvements include:</p> <ul style="list-style-type: none"> • 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. 	Identification and prioritization of improvements shall be defined in the Five-Year Implementation Plan.	During redevelopment within the Project Area.	Executive Director of Redevelopment Agency or designee.	

T2	<p>The Five-Year Implementation Plan adopted for the Project Area shall include the initiation and completion of Mission Gorge Road traffic improvements including Interstate 8 at Alvarado Canyon Road. This includes the Fairmount Avenue/Mission Gorge/I-8 Interchange. The Five-Year Implementation Plan identifies these improvements as under construction by the fifth program year (Fiscal Year 2009-2010).</p>	<p>Identification and prioritization of improvements shall be defined in the Five-Year Implementation Plan.</p>	<p>During redevelopment within the Project Area.</p>	<p>Executive Director of Redevelopment Agency or designee.</p>	
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Section 4.3 – Air Quality

AQ1	<p>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:</p> <ul style="list-style-type: none"> • 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. 	<p>Project applicants of discretionary projects shall submit construction and operational emission mitigation plans.</p>	<p>During Construction.</p>	<p>Executive Director of Redevelopment Agency or designee.</p>	
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No.	MITIGATION MEASURE	METHOD OF VERIFICATION	TIMING OF VERIFICATION	RESPONSIBLE PERSON	DATE OF COMPLETION/ INITIALS
Section 4.3 – Air Quality (cont'd.)					
	<ul style="list-style-type: none"> • 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. • <i>Use zero emission volatile organic compound (VOC) paints.</i> 				
AQ2	<p>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.).</p>	Project applicants of discretionary projects shall submit construction and operational emission mitigation plans.	At the time development plans are proposed.	Executive Director of Redevelopment Agency or designee.	
Section 4.4 – Noise					
N1	<p>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:</p> <ul style="list-style-type: none"> • 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. 	Project applicants of discretionary projects shall submit construction noise mitigation plans to the Development Services Department.	During Construction	Neighborhood Code Compliance.	

No.	MITIGATION MEASURE	METHOD OF VERIFICATION	TIMING OF VERIFICATION	RESPONSIBLE PERSON	DATE OF COMPLETION/ INITIALS
Section 4.4 – Noise (cont'd.)					
	<ul style="list-style-type: none"> 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. 				
N2	<p>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:</p> <ul style="list-style-type: none"> Multi-family residential buildings or structures to be located within exterior CNEL contours of 60 dB or greater of any noise source, including 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: <ul style="list-style-type: none"> Double-glazed windows. HVAC systems. 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. 	Project applicants for any permit for a proposed multi-family use and/or discretionary projects shall submit site specific building technique plans to the Development Services Department.	During planning and construction.	Development Services Director or designee (for discretionary projects).	

No.	MITIGATION MEASURE	METHOD OF VERIFICATION	TIMING OF VERIFICATION	RESPONSIBLE PERSON	DATE OF COMPLETION/ INITIALS
Section 4.5 – Cultural Resources					
CR1	<p>The following measures shall be implemented prior to proceeding with any redevelopment activities in the Project Area:</p> <ol style="list-style-type: none"> 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. 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. 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. 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. Any artifacts recovered shall be curated at an appropriate location or museum as determined acceptable by the City. 	<p>Submittal of resource monitor's letter of retainer to the Development Services Department; submittal of resource recovery and disposition plans to the Development Services Department; qualified archaeologists' attendance at preconstruction project meeting(s).</p>	<p>Prior to any discretionary Redevelopment Project activities occur in the Project Area.</p>	<p>Development Services Director or designee (for discretionary projects).</p>	
CR2	<p>The following procedures shall be implemented before any Redevelopment Project activities can occur in the Redevelopment Project Area:</p> <ol style="list-style-type: none"> 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. Obtain a concurrence on these determinations from the State Office of Historic Preservation and City Historical Resources Board. <p>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.</p>	<p>Historical resources survey, a concurrence of the determinations, and mitigation measures shall be submitted to the Development Services Department.</p>	<p>Prior to any discretionary Redevelopment Project activities occur in the Project Area.</p>	<p>Development Services Director or designee (for discretionary projects).</p>	

No.	MITIGATION MEASURE	METHOD OF VERIFICATION	TIMING OF VERIFICATION	RESPONSIBLE PERSON	DATE OF COMPLETION/ INITIALS
Section 4.6 – Biological Resources					
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.	Project design, engineering, and construction practice plans shall be submitted to the Agency.	Prior to approval of specific discretionary development plans within the Redevelopment Project Area.	Executive Director of Redevelopment Agency or designee.	
BR2	<p>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.</p> <ul style="list-style-type: none"> i. Trails shall be kept out of the biological buffer except in areas of lower biological sensitivity. Trails within the buffer shall 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 shall be carefully chosen and shall 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 shall 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 shall be installed at the outside edge of the buffer areas. The limits of spur trails within the buffer shall be effectively demarcated and/or fenced to avoid human encroachment into the adjacent habitat. The fencing shall be designed to prevent encroachment by humans and domestic animals into the buffer areas and riparian corridor. The signage shall 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, shall be outside of the riparian buffer and the riparian corridor (i.e., they shall be within the development footprint). All filtration and attenuation of surface flows provided by the proposed BMPs shall occur prior to the discharge of the flows into the buffer areas. 	Survey results and mitigation plan(s) shall be submitted to the Agency.	The reviews shall be conducted at the earliest possible period of tiered project review.	Executive Director of Redevelopment Agency or designee.	

No.	MITIGATION MEASURE	METHOD OF VERIFICATION	TIMING OF VERIFICATION	RESPONSIBLE PERSON	DATE OF COMPLETION/ INITIALS
Section 4.6 – Biological Resources (cont'd.)					
	<ul style="list-style-type: none"> v. Brush management zones shall 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 shall be added within the vicinity of both upland and wetland sensitive habitats, and where possible, existing lighting within such areas shall be removed. vii. As to noise, methods shall 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 shall be removed. viii. All areas within biological buffers shall be added to the MHPA, if not already within it, and shall 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.	Any and all applicable resource agency permits shall be submitted to the Agency.	Prior to any project impacts occurring within areas under the jurisdiction of federal, state, or local biologist.	Executive Director of Redevelopment Agency or designee.	
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.	Grading plans delineating occupied habitat and grading and construction limits shall be submitted to the Agency; verification methods will be determined by the resource agencies and subject to conditions of permit issuance.	Prior to issuance of grading permits and field inspection during grading and construction.	Executive Director of Redevelopment Agency or designee.	

No.	MITIGATION MEASURE	METHOD OF VERIFICATION	TIMING OF VERIFICATION	RESPONSIBLE PERSON	DATE OF COMPLETION/ INITIALS
Section 4.6 – Biological Resources (cont'd.)					
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.	Grading plans delineating occupied habitat and grading and construction limits shall be submitted to the Agency; verification methods will be determined by the resource agencies and subject to conditions of permit issuance.	Prior to issuance of grading permits and field inspection during grading and construction.	Executive Director of Redevelopment Agency or designee.	
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.	Specific action plans shall be submitted to the Agency on a case-by-case basis.	Coordination with responsible listing agencies shall be completed as early as possible and in conjunction with, or prior to, the CEQA process for actions which may affect any federal and/or state listed sensitive species.	Executive Director of Redevelopment Agency or designee.	

No.	MITIGATION MEASURE	METHOD OF VERIFICATION	TIMING OF VERIFICATION	RESPONSIBLE PERSON	DATE OF COMPLETION/ INITIALS
Section 4.6 – Biological Resources (cont'd.)					
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.	Assurance that the mitigation area will be protected from future development shall be submitted to the Agency.	Prior to approval of any redevelopment plans within the mitigation area.	Executive Director of Redevelopment Agency or designee.	

No.	MITIGATION MEASURE	METHOD OF VERIFICATION	TIMING OF VERIFICATION	RESPONSIBLE PERSON	DATE OF COMPLETION/ INITIALS
Section 4.7 – Geology/Soils					
GS1	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>Grading and construction plans and other pertinent geotechnical design considerations shall be submitted to the Development Services Department, subject to the recommendations of the geotechnical investigations and monitoring by the City Engineering Department.</p>	<p>Prior to design and construction of any development within the Project Area.</p>	<p>Executive Director of Redevelopment Agency or designee.</p>	
Section 4.8 – Hazards and Hazardous Materials					
HM1	<p>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.</p>	<p>Soil sample and hazardous materials survey results and mitigation plan(s) shall be submitted to the Dev. Svcs. Dept.</p>	<p>Prior to redevelopment of specific properties of potential environmental concern within the Redevelopment Project Area.</p>	<p>Executive Director of Redevelopment Agency or designee.</p>	

No.	MITIGATION MEASURE	METHOD OF VERIFICATION	TIMING OF VERIFICATION	RESPONSIBLE PERSON	DATE OF COMPLETION/ INITIALS
Section 4.8 – Hazards and Hazardous Materials (cont'd.)					
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.	Soil sample and hazardous materials survey results and mitigation plan(s) shall be submitted to the Dev. Svcs. Dept.	Prior to redevelopment of specific properties of potential environmental concern within the Redevelopment Project Area.	Executive Director of Redevelopment Agency or designee.	
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.	Soil sample and hazardous materials survey results and mitigation plan(s) shall be submitted to the Dev. Svcs. Dept.	Prior to redevelopment of specific properties of potential environmental concern within the Redevelopment Project Area.	Executive Director of Redevelopment Agency or designee.	
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.	Soil sample and hazardous materials survey results and mitigation plan(s) shall be submitted to the Dev. Svcs. Dept.	Prior to redevelopment of specific properties of potential environmental concern within the Redevelopment Project Area.	Executive Director of Redevelopment Agency or designee.	
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.	Soil sample and hazardous materials survey results and mitigation plan(s) shall be submitted to the Dev. Svcs. Dept.	Prior to redevelopment of specific properties of potential environmental concern within the Redevelopment Project Area.	Executive Director of Redevelopment Agency or designee.	

No.	MITIGATION MEASURE	METHOD OF VERIFICATION	TIMING OF VERIFICATION	RESPONSIBLE PERSON	DATE OF COMPLETION/ INITIALS
Section 4.8 – Hazards and Hazardous Materials (cont'd.)					
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.	Soil sample and hazardous materials survey results and mitigation plan(s) shall be submitted to the Dev. Svcs. Dept.	Prior to redevelopment of specific properties of potential environmental concern within the Redevelopment Project Area.	Executive Director of Redevelopment Agency or designee.	
Section 4.9 – Paleontological Resources					
PR1	<p>Prior to preconstruction (precon) meeting:</p> <ol style="list-style-type: none"> 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. 3. Second Letter Containing Names of Monitors has been sent to Mitigation Monitoring Coordination (MMC). <ol style="list-style-type: none"> 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. 	Verify the requirements for Paleo monitoring are noted on construction documents for discretionary projects.	Prior to, during, and post construction.	Development Services Director or designee.	

No.	MITIGATION MEASURE	METHOD OF VERIFICATION	TIMING OF VERIFICATION	RESPONSIBLE PERSON	DATE OF COMPLETION/ INITIALS
Section 4.9 – Paleontological Resources (cont'd.)					
	<p>4. Records Search Prior to Precon Meeting</p> <p>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.</p> <p>Precon Meeting:</p> <ol style="list-style-type: none"> 1. Monitor Shall Attend Precon Meetings <ol style="list-style-type: none"> 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 <p>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.</p> 3. When Monitoring Will Occur <p>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.</p> <p>During Construction:</p> <ol style="list-style-type: none"> 1. Monitor Shall be Present During Grading/Excavation <ol style="list-style-type: none"> 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. 				

No.	MITIGATION MEASURE	METHOD OF VERIFICATION	TIMING OF VERIFICATION	RESPONSIBLE PERSON	DATE OF COMPLETION/ INITIALS
Section 4.9 – Paleontological Resources (cont'd.)					
	<p>2. Discoveries:</p> <p>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.</p> <p>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.</p> <p>3. Night Work:</p> <p>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.</p> <p>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.</p> <p>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.</p>				

No.	MITIGATION MEASURE	METHOD OF VERIFICATION	TIMING OF VERIFICATION	RESPONSIBLE PERSON	DATE OF COMPLETION/ INITIALS
Section 4.9 – Paleontological Resources (cont'd.)					
	<p>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.</p> <p>e. All other procedures described above shall apply, as appropriate.</p> <p>4. Notification of Completion: The Paleontologist shall notify MMC and the RE, or BI as appropriate, of the end date of monitoring.</p> <p>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:</p> <ol style="list-style-type: none"> 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. 4. Final Results Report <ol style="list-style-type: none"> 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. 				

No.	MITIGATION MEASURE	METHOD OF VERIFICATION	TIMING OF VERIFICATION	RESPONSIBLE PERSON	DATE OF COMPLETION/ INITIALS
Section 4.10 – Aesthetics					
A1	<p>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 Navajo and Tierrasanta Community Plans, including:</p> <ul style="list-style-type: none"> • 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 Trails Regional Park should be sensitive to it, as proposed within the Urban Design Element of the Tierrasanta Community Plan. 	Review of plans by the Agency.	At the time of development review.	Executive Director of Redevelopment Agency or designee.	

No.	MITIGATION MEASURE	METHOD OF VERIFICATION	TIMING OF VERIFICATION	RESPONSIBLE PERSON	DATE OF COMPLETION/ INITIALS
Section 4.11 – Water Quality/Hydrology					
WQ1	<p>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:</p> <ul style="list-style-type: none"> • 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, • 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. <p>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:</p> <ul style="list-style-type: none"> • Silt fence, fiber rolls, or gravel bag berms • Street Sweeping • Storm drain inlet protection • Stabilized construction entrance/exit • Vehicle and equipment maintenance, cleaning, and fueling • Hydroseed, soil binders, or straw mulch 	Project applicants shall submit site-specific water quality management plans and hydrology reports to the Agency and City Engineering Department.	Prior to approval of specific development plans within the Redevelopment Project Area.	Executive Director of Redevelopment Agency or designee.	

No.	MITIGATION MEASURE	METHOD OF VERIFICATION	TIMING OF VERIFICATION	RESPONSIBLE PERSON	DATE OF COMPLETION/ INITIALS
Section 4.11 – Water Quality/Hydrology (cont'd.)					
WQ2	<p>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:</p> <ul style="list-style-type: none"> • Infiltration basins • Retention/detention basins • Biofilters • Structural controls 	Project applicants shall submit site-specific water quality management plans and hydrology reports to the City Engineering Department.	Prior to approval of specific development plans within the Redevelopment Project Area.	Executive Director of Redevelopment Agency or designee.	
HD1	<p>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.</p>	Project applicants shall submit site-specific water quality management plans and hydrology reports to the City Engineering Department.	Prior to approval of specific development plans within the Redevelopment Project Area.	Executive Director of Redevelopment Agency or designee.	
HD2	<p>The Five-Year Implementation Plan adopted for the Project Area shall include the initiation of hydrology studies and completion of Alvarado Creek enhancements and drainage improvements.</p>	Identification and prioritization of improvements shall be defined in the Five-Year Implementation Plan.	During redevelopment within the Project Area.	Executive Director of Redevelopment Agency or designee.	
Section 4.12 – Population/Housing					
	<p>No mitigation measure is proposed, as no significant population/housing impact has been identified.</p>				

Section 4.13 – Public Services				
	No mitigation measure is proposed, as no significant public services impact has been identified.			
Section 4.14 – Mineral Resources				
	No mitigation measure is proposed, as no significant mineral resources impact has been identified.			

Source: BRG Consulting, Inc., 2005.