Clairemont Community Planning Group

Approved Minutes of the Meeting of
September 18, 2018
Alcott Elementary School Auditorium

P Naveen Waney -**Chair** P Nicholas Reed –**Vice Chair** P Margie Schmidt -**Secretary** P Delana Hardacre-**Treasurer**	P Harry Backer P Kevin Carpenter A Cecelia Frank A Chad Gardner	P Richard Jensen P Gary Christensen P Ryan Rolla P Jason Young	P Matt Valenti P Susan Mournian P Billy Paul

P – Present A – Absent L-Late

Item 1. **Call to Order / Roll Call**
Chair Naveen Waney called the meeting to order at 6:00 p.m. Roll call was taken and a quorum present.

Item 2. **Non-Agenda Public Comment** – Issues that are not on the agenda and are within the jurisdiction of the Clairemont Community Planning Group. **NOTE**: 2-minute time limit per speaker.
Public:
James Lamattery: Spokesperson for Raise the Balloon. Expressed concern that no written response received to date from Councilmember Zapf and Mayor Faulconer regarding letter dated 10/20/2016 from CCPG objecting to removal of Land Use for the area within Clairemont from the Morena Corridor Specific Plan process. Suggests that CCPG request that Land Use/Zoning for Clairemont be returned to the Specific Plan prior to next step in the process.
Mike Laughlin: Asks why Councilmember Cate not here?
Barbarah Torres: Announces MTS has a free ride day on 10/2/18.
Quentin Yates: Executive Director for Montgomery-Gibbs Environmental Coalition, states that M-G airport currently only offers leaded fuel on site. This dumps 1.442 metric tons of lead/year on our neighborhoods. No safe level for lead. An FAA approved unleaded fuel is not available there. Encourages all to request city to begin offering unleaded fuel as well as leaded fuel.
Committee Members:
Billy: Noted successful Rose Creek clean-up last Saturday (Mission Bay High to West Mission Bay Dr). Done always on 3rd Saturday in April and 3rd Saturday in Sept. Please consider participating.
Matt: Introduced self as new member.
Nick: Moraga Av. traffic circles construction anticipated between Jan-March 2019. Update next month.

Item 3. **Modifications to the Agenda** – Requires 2/3 approval.
District 6 Council Rep absent d/t family emergency so no report will be made tonight.
Change presenter for item 105 to Scott Ridoute, Surfrider Foundation.
Margie makes motion to modify agenda as above, second by Nick.
VOTE: 13-0-0 Motion passes.

Item 4. **Approval of Minutes:** Motion by Nick, second by Jason to approve minutes with clarification of MCAS Miramar committee report to read "Colonel Charles B. Dockery has taken over command at Miramar".
VOTE: **9-0-4**, abstention by Delana, Kevin & Gary d/t absence, abstention by Matt d/t not board. Motion passes.

Item 5. **Council Representative Reports**
District 2 Council Report, Marc Schaefer, Community Liaison, mpschaefer@sandiego.gov
States that CM Zapf yesterday received a memo from Planning Director Hansen in response to her request regarding issues of concern to both Clairemont and Linda Vista Communities in the Morena Corridor Specific

Plan. Three changes will be made to the specific plan: will include a pedestrian/bicycle bridge, will retain 4 lanes on Morena Blvd, and will retain 45 foot height by right limit in Linda Vista area.
James Lamattery: Applaud CM Zapf effort on our behalf but requests that she also advocate for return of Land Use/Zoning to Morena Corridor Specific Plan.

District 6 Council Report, Dan Manley, Community Liaison, dmanley@sandiego.gov
No report.

Item 6. **Action Items**

101. Nominations for Vacant CCPG Board Seat (Naveen Waney, Nick Reed) Lynn Adams retired and no longer Clairemont resident. Message from Lynn read. Vacancy was posted on agenda. When single vacancy board may appoint new member.
Interested applicants, Barbarah Torres & Erin Cullen, introduced themselves briefly. Ryan nominated Barbarah, second by Jason. Erin Cullen nominated by Susan, second by Delana. Matt raised question of verification of qualifications for both candidate; only Barabarah's qualifications verified at present.
Jason makes motion to appoint Barbarah Torres, second by Harry.
VOTE: 12-1-0, opposed by Richard. Motion passes.
Possible procedural change to clarify appointment process to be addressed at next ByLaws Committee.

102. Morena Corridor Specific Plan (MCSP) PEIR Letter of Response-PTS: 582608 (Margie Schmidt)
States the task is to respond to the MCSP Program Environmental Impact Report (PEIR). City of SD is required to respond to all written comments and they will be included in final PEIR. Thanks CM Zapf & Marc Schaefer for advocacy on behalf of the community. Background: MCSP sub-committee formed in Spring 2015 has had large community participation in the process. Land Use component for area in Clairemont removed from process d/t initiation of the Community Plan Update process. Draft MCSP released June 2017. Draft PEIR released 8/1/18; written comments due 10/1/18. MCSP sub-committee developed draft response. Summarized PEIR findings of significant and unavoidable impacts to: Transportation & Circulation, Visual Effects & Neighborhood Character, Noise, Air Quality, Historical & Tribal Resources, and Paleontological Resources. Provided information on Alternatives evaluated in the PEIR: Existing, MCSP, No-project, Mid-density Land Use, and Low-density Land Use. Reviewed memo from Planning Director Hansen to CM Zapf and draft response provided by MCSP sub-committee. CCPG board could adopt draft response with/without modifications, develop different response or provide no response. All individuals able and encouraged to provide own written response to PEIR. Speaker expressed gratitude to community members and sub-committee members for involvement in this process. Info on address for comments will be posted on CCPG website.
Discussion by board members and modifications made to response letter.
Public Comments:
Dave Bulach-suggests recommending low density alternative.
Mike Laughlin-asks about park equivalencies.
Carol Schleisman-read a passage from the PEIR and states likely additional density with increased height in remainder of Clairemont.
Teresa Whitaker-supports bicycle and pedestrian transit including cycle track.
James Lamattery-restates that Land Use and Zoning removed from process; will not be resolved until 2020 with community plan update.
Donna Regalatto-reminds all that can respond individually to the PEIR.
John Zebarth-agrees that land use should not have been removed, thanks CM Zapf, has proposal for Morena Blvd alignment that accommodates all desired components, questions if PEIR adequately assesses changes made by planning director in his memo.
Motion made by Jason to approve response letter, second by Susan.
VOTE: 13-0-0. Motion passes.

103. Verizon Wireless State Route 52 & Genesee Ave. Conditional Use Permit PTS:439737 (Dayna Aguirre, dayna.aguirre@sequoia-ds.com)

Site is in backyard of single family residence at 5763 Lodi St. Will demolish and reconstruct gazebo that houses antennas with one-hour fire rated materials. No change in equipment, no generator in project.
Kevin: Rejuvenation of an existing use permit. PRS voted unanimous support.
Richard: Noted RF warnings on fence.
Motion by Nick to approve project as is, second by Ryan.
Vote: 12-0-0. Recusal by Naveen d/t familiarity with property. Motion passes.

104. Clairemont Beautification Committee Introduction/Letter of Support (Lynn Little, CTC)
States are concerns with quality and quantity of maintenance on Balboa Ave. A group of interested community members desire to establish a committee to coordinate with City of SD regarding Balboa medians initially, including potential use of existing Balboa Maintenance Endowment Fund resources. Will potentially advocate for additional landscape improvements in all of Clairemont in future. Seeking support and volunteer participation by board member(s). This will not be a sub-committee of the CCPG.
Billy, Delana & Kevin volunteered to participate.
Jason recommended removal of one sentence from letter of support; Lynn accepts suggestion.
Dave Bulach commented regarding a previous mitigation for invasive palm removal from Tecolote Canyon extricating trees by helicopter.
Motion made by Margie to approve letter with modification, second by Nick.
VOTE: 13-0-0. Motion passes.

105. City of San Diego Ordinance Banning Styrofoam Use from Restaurants (Scott Ridoute, Surfrider Foundation)
Polystyrene not biodegradable; is suspected carcinogen; is found in our food stream (i.e. in fish). Other communities (i.e. San Francisco) have instituted similar bans. Banned items include food service ware, coolers, meat trays, egg cartons, etc. Also restricts single use plastic utensils and straws; they will be available only on request. Waivers will be available for businesses that show financial hardship.
Ordinance has passed Rules Committee; final vote will occur on 10/15/18 by City Council. Numerous organizations are in support of ordinance. Alternatives to polystyrene are paper (with wax lining), bamboo, & other biodegradable materials. Asking CCPG to sign letter of support. More info available at fightthefoam.org.
Billy makes motion to support the letter, second by Jason.
VOTE: 7-6-0 Motion passes.

Item 7. **<u>Informational Items</u>**

201. County of San Diego CPA Initiation Request for Mt. Etna/Crime Lab Site (Yara. L. Fisher, AICP, AECOM)
Four acre site at 5255 Mt. Etna Dr at Balboa & Genessee. Was previously Clairemont Community Hospital, County Crime Lab since 1994, now vacant. Designated community commercial in Community Plan. Seek Community Plan Amendment (CPA) to redevelop surplus County site into affordable housing with high-density residential designation. Purpose for seeking CPA is to lower development costs for entitlement process, to prepare the environmental review and to prepare for demolition. Desire to prepare the site for ministerial review process. County intends to select a project that has at least 50% affordable homes, would be required to maintain affordability for at least 99 years, likely supportive services on site. Hope to select a proposal by December 2018.
There is a 2 step process to a CPA: initiation and general application which was submitted in 8/24/2018, if approved would work with city to achieve CPA.
EIR Notice of Preparation for public review (30 day process) with comments due 10/9/18. Comment on preferred alternatives & mitigation & preferred project; county must review and respond to comments. Scoping meeting 9/25 6-8pm at County Operations Center. Planning Commission initiation meeting on 11/1/18. Board of Supervisors will select developer on 12/11/18. Goal is to get public review EIR out in Spring 2019 and return to CCPG in Summer 2019 with Fall approval date for project.
For initiation process must describe goals of project and how are consistent with the Community Plan or the General Plan and identify public benefits of the project. These include meeting City's affordable housing goals

within transit priority area, infill development consistent with Housing SD strategy and Climate Action Plan. Hope that will be a model of public outreach for future projects.
Richard makes motion that meeting be extended 30min to allow adequate discussion, second by Billy.
VOTE: 12-1-0, motion passes.
Community comments: Need definitions and deadlines regarding all components of process and project.
Is truly a transit priority area? How qualifies for TOD project?
CPA not only upzoning but also changes buffering of adjacent sites. Current zone allows up to 107 units with first floor commercial. Just need to remove buffer. Are proposing 300 units.
Why give "kernel" of best land within few miles of Pacific Ocean to people who can't afford to live here?
Representative of Clairemont Coalition on Homelessness states County has noble goals and support the project.
Concerns that ministerial process takes voice of community away.
Concerns about having 454 units of unknown height directly adjacent to single family homes.
Visual example of 300 homes (with >300 cars) in adjacent area in comparison to County Crime Lab Site.
Concerns that County making decision about developer/development "behind closed doors".
Infrastructure issues already exist in area (schools, traffic, parking, etc). Costs for upgrades to water & waste.
Concerns that parking requirements may be waived in transit priority area.
Concerns re: density, mental health and drug use issues of potential residents.
Not truly early in process. Ask that move public review so is prior to signing agreement with developer.
Goals are admirable but have very accelerated time line.
Site below SDGE high power lines and will be subjecting new residents to EMF.
No public forum yet. Feasibility study by County recommended 116 units only. Will affect home values near.
Board comments:
Richard voiced concerns about changing the Community Plan and making this a ministerial project.
Richard makes motion to request extension of NOP for 1 month, second by Billy.
Presenter states are looking for input on components to analyze and will restart 30-day period for EIR NOP and will set a second scoping meeting.
Jason: Use site within Clairemont for meetings.
Harry: Will project house homeless from Clairemont or from other areas?
Susan: Asks for public site that details the schedule. Delana concurs.
Margie: Concerned about making this a ministerial project and amending Community Plan without community input. Timeline is egregious and need to foster better participation.
Nick: Vetting by CCPG and community as a whole is necessary. Does support affordable housing.
Matt: Comments on need for more community participation.
Kevin: Site was initially a supportive use for the community as a hospital; this will instead put a burden on community. Support mixed use but this is too dense. County should go thru process like any other developer.
Ryan: Concerned re cut through traffic in neighborhoods rather than using Balboa & Genessee.
Billy: Minimal community outreach to date.
Naveen: Proposes need for ad hoc sub-committee. Procedural issues raised, must make change item to action.
VOTE: 13-0-0 Motion passes to make this item an action item.
Prior motion by Richard amended to include development of an ad hoc sub-committee to work with city and county, second by Billy.
VOTE: 13-0-0 Motion passes.
Matt selected as Chair, Richard as Vice-chair, Barbarah, & Ryan all appointed from CCPG board.
Community members appointed are Quentin Yates, Brian Grutoes, and Linda Alexander.

Item 8. **Workshop Items:** None

Item 9. **Potential Action Items:** None

Item 10. **Reports to Group:** Deferred
Adjournment at 9:00 PM

The next meeting will be held on October 16, 2018, 6:30pm at Alcott Elementary School.

September 18, 2018

Rebecca Malone, Environmental Planner
City of San Diego Planning Department
9485 Aero Drive, MS413
San Diego, CA 92123

SUBJECT: COMMENTS IN RESPONSE TO THE MORENA CORRIDOR SPECIFIC PLAN DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT(PEIR)

The Clairemont Community Planning Group (CCPG) respectfully submits the following comments regarding the Morena Corridor Specific Plan draft PEIR.

We wish to concentrate our comments on our two greatest areas of concern identified in the PEIR: Significant impacts identified to Transportation and Circulation (6.2.5), as well as significant impacts to Visual Effects and Neighborhood Character (6.7-1 & 6.7-2).

Transportation and Circulation

Project Objectives as listed in the Morena Corridor Specific Plan (3.2) which include to "enhance multi-modal connectivity between neighborhoods (and) Mission Bay Park" and to "create a complete mobility system that promotes access and increases safety for pedestrians (and) bicycles" are not adequately addressed in the traffic study nor the Transportation & Circulation component of the PEIR. "Improve access to Mission Bay Park" is also a guiding principle of the Specific Plan.

In the PEIR only vehicular traffic is thoroughly assessed and is identified as a significant and unavoidable impact to all of the intersections and street segments which a pedestrian or bicycle must use to travel from Clairemont area to Mission Bay Park over the Clairemont Drive overpass. It is dangerous travel at present with numerous vehicular intersections to cross. With increased daily vehicular trips (DVT) added by the Specific Plan land use changes in Linda Vista area (which were assessed in the PEIR), as well as DVT added by the Balboa Station Area Specific Plan increased density (which was not incorporated into this PEIR) the Clairemont Drive overpass access to Mission Bay Park will become significantly more dangerous and will definitely be problematic for residents and transit riders. This is not in compliance with the project objectives.

The Clairemont community has from the outset of the Morena Corridor Specific Plan process voiced this concern and has insisted that a separate pedestrian/bicycle bridge be identified because that is the only way to truly mitigate for the danger of the numerous points of interaction with vehicles on the Clairemont Dr. overpass. Yet this was glaringly absent from the current version of the Specific Plan and the impacts were not addressed in the PEIR. We support item 1 of Planning Director Hansen's memo to Councilmember Zapf dated 9/17/18: "the plan will include language supporting a pedestrian and bicycle bridge between Mission Bay Park and the Specific Plan area over the I-5 freeway." We expect that analysis of this feature will be included in the PEIR.

As an additional consideration, it is our understanding that our community's adjacency to Mission Bay Park is being considered for future park development credits through equivalencies. If a pedestrian/bicycle bridge were identified and planned for in this Specific Plan, the idea of utilizing the accessibility of Mission Bay Park as park equivalency for our park deficient community would seem more logical. Without safe and convenient access to Mission Bay we would object to any consideration of park equivalencies.

Furthermore, none of the Transportation and Circulation mitigation measures (6.2.5) for the above addressed roadways and intersections (Clairemont Dr and it's intersections from Denver St to West Mission Bay Dr.) are presently incorporated into the draft Specific Plan. Nor are there any mitigation measures identified for roadways that are presently failing (LOS F), specifically Morena Blvd from where it splits from West Morena Blvd to where it rejoins Morena Blvd (including the Knoxville, Tecolote and Buenos intersections). This area includes the high vehicular traffic associated with the Tecolote Rd/Sea World Dr. overpass which is again a currently dangerous pathway for pedestrians and bicyclists to access Mission Bay Park. The overpass was not assessed from the vantage point of pedestrians/bicyclists in the PEIR and there are no safety improvements identified for these dangerous areas in the Specific Plan.

It is contradictory under the current version of the Specific Plan to advance Transit Oriented Development plans with objectives stating goals of increasing pedestrian and bicycle travel without realistically assessing and intervening for safety by those modes of travel to the pre-eminent destination in the area, Mission Bay Park!

Just south of the above described area are new planned roadways which if constructed will open at LOS of F. Such foreseeable and inappropriate planning for transportation is unconscionable.

The only significant transportation change recommended by the current draft Specific Plan and studied in the PEIR in the Clairemont area is to change Morena Blvd from Gesner St south to the Linda Vista community from a 4-lane Major Arterial to a 3-lane Collector. The principal reason for this is to provide for a 2-way cycle track along the west side of the roadway. While the community is supportive of safe bicycle and pedestrian infrastructure there is great concern that that configuration will dramatically impact vehicle travel (LOS A degraded to LOS C or D) and will not appropriately provide safe bicycle transit because it would necessitate cyclists to cross the increased traffic of Morena Blvd to access the residential and commercial areas along the east side of the roadway. This corridor includes very few existing signalized intersections that would allow safe passage across Morena Blvd. Again the PEIR did not take any steps to evaluate prospective use of this cycle track.

The above numerous objections regarding Transportation components of the draft Specific Plan and the pedestrian/bicycle infrastructure assessments in the PEIR must be addressed prior to finalization. We support item 2 of Planning Director Hansen's memo to Councilmember Zapf dated 9/17/18: "the plan will be amended to retain 4 lanes in the segment of Morena Blvd from Ingulf St to Knoxville St including 2 northbound lanes, 2 southbound lanes, and left turn pockets at intersections." We expect further information and analysis of pedestrian and bicycle safety measures in this area.

Visual Effects and Neighborhood Character

Regarding other "significant and unavoidable" impacts, the following comments relate to Visual Effects and Neighborhood Character (Impact 6.7-1 & 6.7-2). The current draft Specific Plan identifies the Tecolote Station area for dramatic increases in both density and height (with TODEP density of up to 109 du/acre and height up to 100 feet). This is most definitely significant, but it is not unavoidable. The Tecolote Station is adjacent to the freeway and less than a quarter mile away from the extensive single-family neighborhoods of Bay Park and Overlook Heights. This is completely in conflict with several of the Specific Plan Guiding Principles of ensuring "that new development respects general mass, volume and scale of the existing built environment," to "improve visual quality", and to "preserve public views". The Visual Effects and Neighborhood Character impacts would be significantly lessened in the Low-Density Alternative. We recognize item 3 of Planning Director Hansen's memo to Councilmember Zapf dated 9/17/18: "The Transit Oriented Development Enhancement Program within the plan will be

amended to remove the ability to seek a maximum height of 100 feet in the Tecolote Village District and to remove the ability to seek a maximum height of 65 feet in the Morena Station District through a future Planned Development Permit process. The proposed 'by-right' height limit of 45 feet will remain." We insist that, besides limiting by-right heights, relative densities also be reduced.

Additional Issues

Another Project Objective (3.2) is to "promote high residential density and employment opportunities consistent with the City of Villages strategy and the CAP". It is clear the current draft Specific Plan will promote the former by potentially adding 10,000 new residents, but it does so at the expense of more than 6,000 jobs lost (see pages 8-2, paragraph 2). Again, this is an unconscionable contradiction.

Finally, we wish to reinforce that the current Draft Specific Plan, which would result in numerous significant and unavoidable impacts, is not the environmentally superior alternative. The Low-Density Land Use Plan alternative for the Linda Vista portion of the Specific Plan would still meet the Specific Plan objectives (of creating higher-density residential in proximity to transit) with substantially less significant impacts to the communities of Clairemont and Linda Vista.

Conclusion

In summary, the Clairemont Community Planning Group acknowledges that some increased residential density within walking distance of the new Mid-Coast Trolley stations is warranted. We appreciate and support the modifications to the draft Morena Corridor Specific Plan delineated in the memo from Planning Director Hansen to Councilmember Zapf dated 9/17/18 and we hope this signals a more collaborative approach to planning efforts with our community.

Sincerely,

Naveen H. Waney, AIA
Chair of Clairemont Community Planning Group

cc: Mike Hansen, Director, Planning Dept, City of San Diego
Michael Prinz, Senior City Planner, City of San Diego
Mayor Kevin Faulconer
Councilwoman Lorie Zapf, District 2, City of San Diego
Councilwoman Barbara Bry, District 1, City of San Diego
Councilman Chris Ward, District 3, City of San Diego
Councilwoman Myrtle Cole, District 4, City of San Diego
Councilman Mark Kersey, District 5, City of San Diego
Councilman Chris Cate, District 6, City of San Diego
Councilman Scott Sherman, District 7, City of San Diego
Councilman David Alvarez, District 8, City of San Diego
Councilwoman Georgette Gomez, District 9, City of San Diego
City of San Diego Planning Commission
CCPG Morena Corridor Specific Plan Ad Hoc Subcommittee Members
CCPG Board Member

October 8, 2018

Steve Haupt
District Manager
Parks and Recreation
City of San Diego
202 C Street, MS 5D
San Diego, CA 92101

Dear Steve,

The Clairemont community has formed a **Clairemont Landscape Community Group (CLCG)** at the recommendation of the Clairemont Community Planning Group in discussions with the City. Lynn Little and Janet Dave, who were members of the previous Balboa Avenue Citizens Advisory Committee, are chair and vice-chair of this newly formed group. In the early 2000's, they worked with the landscape designer and the City on the initial design for Balboa median landscaping. Kiah Amande of Neighborhood Watch, who has been a strong advocate for landscape improvements in Clairemont, is also a member of the group. In addition, CCPG will be represented by Billy Paul, Kevin Carpenter and Delana Hardacre.

The initial focus of the committee is to work with the CCPG to make recommendations to the City regarding Balboa Median landscaping and maintenance through the Balboa Avenue Streetscape Maintenance Fund. The committee is looking to refresh existing Balboa medians, including the median west of Moraga that is currently being managed by SANDAG because of the trolley construction. In addition, the committee plans to explore ways to better maintain existing trees in Clairemont, plant more trees and beautify additional medians and streetscapes. The committee will investigate ways to work with organizations such as San Diego Trees, San Diego Urban Forests Council and Clairemont Town Council Foundation to find additional sources of funding to improve the Clairemont landscape.

The CCPG is writing this letter to the City, recommending that the City meet with the Clairemont Landscape Community Group (CLCG) as soon as possible to address the following issues regarding the Balboa medians:

1. Evaluate the state of the current medians and replace dead and dying plant material. Remove all gold lantana and replace with a compatible native plant to be determined.
2. Remove the four gold medallion trees that were planted in the last year to replace tipu trees that died from excess and incorrectly placed irrigation. Replace with new tipus to adhere to the original design.
3. Evaluate maintenance needs and recommend any changes to the landscape maintenance contractor, including periodic mulching of bare areas.
4. Meet with a financial representative of the City to get an annual accounting of the $866K maintenance fund expenditures and interest earned since inception in 2005.

October 4, 2018

San Diego Mayor and City Council

Re: Support for a City of San Diego Expanded Polystyrene (EPS) Reduction Ordinance

Dear Honorable Mayor Faulconer and City Council Members,

We, the undersigned, strongly support and encourage you to move forward with developing and approving an ordinance restricting the sale and distribution of expanded polystyrene (EPS) products for the use of food service ware, fish and meat trays, egg cartons, coolers, and beach toys in the City of San Diego. We also support including a provision for to-go utensils and straws only upon request, and when requested, only biodegradable straws be provided. The evidence is overwhelmingly clear; for the well-being of human health, our environment, wildlife, and our economy, it is time for San Diego to join 119 other California jurisdictions and adopt a proven policy to phase out EPS.

Expanded polystyrene poses human health risks that can't be eliminated by voluntary efforts alone. These plastic products are made from styrene, a known animal carcinogen that was found "reasonably anticipated to be a human carcinogen," in a congressionally mandated, science-based, public health document prepared by the National Toxicology Program. The International Agency for Research on Cancer also supported this claim, stating that EPS is "probably carcinogenic to humans." It was also listed as a carcinogen under California's Proposition 65 in 2016.

The EPA ranks polystyrene manufacturing as the fifth worst global industry in terms of hazardous waste creation. Additionally, styrene is derived from petroleum or natural gas. The extraction and use of fossil fuels to create EPS has a direct impact on climate change through increased greenhouse gas emissions. Additionally, the process of manufacturing EPS is energy intensive, causing additional greenhouse gas emissions. An estimated 8% of global petroleum consumption is used to make and manufacture plastics. Replacing EPS with more sustainable alternatives not derived from fossil fuels will lead to a reduction in greenhouse gas emissions.

Like other non-biodegradable single-use plastics, EPS foam is a primary contributor to the pollution in our environment. It is often the most abundant item counted in our environment, largely because of its ability to fragment into smaller pieces. In San Diego County, volunteers removed 20,883 pieces of polystyrene from our beaches in 2017. It often escapes the waste stream and makes its way into storm drains, waterways, and ultimately our ocean. Its ubiquity, durability, and ability to accumulate high levels of persistent pollutants make degraded EPS products harmful.

Research shows that EPS debris can be a vector for toxic chemicals in the marine environment. Once there, sunlight and currents degrade plastic debris into smaller particles called microplastics, which absorb and concentrate toxic chemicals up the marine food chain and into our bodies. A University of California, Davis study found that a quarter of all fish sampled in California stores had trace amounts of plastics. From plankton to fish, and to humans that eat seafood, plastic pollution is changing the very chemistry of life.

The combination of toxic chemicals in manufacturing, its persistence in the environment, and the potential to deliver toxic chemicals to marine life, and up the food chain to humans, all point to the need to eliminate EPS. Only a ban on EPS products will eliminate the public health risk.

Some claim that businesses will suffer with an EPS ban, but the fact is that in the 119 California jurisdictions that have passed an EPS reduction ordinance, restaurants have seen negligible impact. Approximately 120 restaurants in Surfrider San Diego's Ocean Friendly Restaurant program have eliminated EPS food ware with no reported negative impact on their bottom line. Moreover, the impact of having cleaner beaches and a clean ocean is of paramount concern. San Diego is a vacation destination, primarily because of our coastal resources, but the aesthetic degradation of our beaches from EPS litter can have a much greater impact on tourism, a $10 billion industry, than the overstated dangers to the restaurant industry.

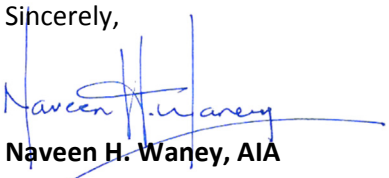
The City of San Diego's current alternative, the curbside recycling program for EPS food ware, is an inadequate solution. The City contracted HF&H Consultants to determine the viability and potential efficacy of this program. HF&H's report made it clear that due to food contamination, cleaning costs, and the products' lightweight, recycling facilities often do not separate and recycle EPS food ware containers. The City of Los Angeles's Project Manager was interviewed and indicated that EPS food service containers that are collected are "often contaminated, and therefore not recycled."

San Diego taxpayers are currently paying approximately $90,000 annually for EPS food ware items to be hauled out of San Diego County under the guise that they are being recycled, only for the large majority of them to end up in a landfill. The San Diego City Council adopted a waste diversion plan of 75% waste by 2020, 90% by 2035 and 100% by 2040. Diverting EPS food ware to a landfill outside of San Diego does not help achieve these results. To meet these goals and reduce taxpayers' costs, polystyrene food ware needs to be eliminated. Furthermore, recycling a fraction of EPS food ware containers does nothing to address the litter problem, the impact on wildlife, and the potential human health impacts. While we support continuing to recycle EPS packaging, recycling EPS food ware is clearly not the answer.

While education and outreach efforts are helpful, they do not have the same impact as public policy. We encourage San Diego to move forward with passing an EPS foam ordinance and join cities across the world in banning this harmful marine and coastal resource pollutant. We encourage San Diego to follow the lead of many others and pass a broad polystyrene ordinance that encompasses not only food service ware, but also includes non-encapsulated EPS foam for retail sale such as coolers, cups and plates. Additionally, we ask that you prohibit EPS foam items being brought to beaches and parks.

Plastic pollution is a global problem with local solutions. For the sake of human health, our environment, marine life, and economic well-being, we urge you to adopt an EPS food ware ban.

Sincerely,



Naveen H. Waney, AIA
Chair, Clairemont Community Planning Group