

APPENDIX A

NOP and Comments



Date of Notice: January 12, 2024

PUBLIC NOTICE OF PREPARATION FOR AN ENVIRONMENTAL IMPACT REPORT AND PUBLIC NOTICE OF A SCOPING MEETING

ENGINEERING & CAPITAL PROJECTS DEPARTMENT

NOTICE OF PREPARATION: The City of San Diego (City), as the Lead Agency, has determined that the project described below will require the preparation of an Environmental Impact Report (EIR) in compliance with the California Environmental Quality Act (CEQA), which requires that public agencies consider the potentially significant adverse environmental effects of projects over which they have discretionary approval authority before taking action on those projects (Public Resources Code [PRC] Section 21000 et. seq.). According to California Code of Regulations (CCR) Title 14, Section 15064(f)(1), preparation of an EIR is required whenever a project may result in a significant adverse environmental effect. An EIR is an informational document used to inform public agency decision-makers and the general public of the significant environmental effects of a project, identify possible ways to mitigate or avoid the significant effects, and describe a range of reasonable alternatives to the project that could feasibly attain most of the basic objectives of the project while substantially lessening or avoiding any of the significant environmental impacts. Public agencies are required to consider the information presented in the environmental impact report when determining whether to approve a project.

Thereby, this Notice of Preparation of an EIR and Scoping Meeting is publicly noticed and distributed on January 12, 2024. This notice was published in the SAN DIEGO DAILY TRANSCRIPT and placed on the City of San Diego CEQA website at <https://www.sandiego.gov/ceqa> under the "Notice of Preparation and Scoping Meetings" tab.

PUBLIC NOTICE OF SCOPING MEETING: Consistent with Section 21083.9 of the CEQA Statutes and Section 15082 of the CEQA Guidelines, a public scoping meeting will be held to solicit comments regarding the scope and analysis of the EIR. The meeting will be held by the City of San Diego's Engineering & Capital Projects Department on **Tuesday, January 30, 2024**, from 6:00 to 8:00 p.m. in the auditorium at Webster Elementary School located at 4801 Elm St., San Diego, CA, 92102. **Please note that depending on the number of attendees, the meeting could end earlier than 8:00 p.m.** Written comments regarding the scope and alternatives of the proposed EIR will be accepted at the meeting. Requests for translation services to offer public comment may be made by contacting CIP-CEQA@sandiego.gov at least two business days prior to the meeting date. The City is committed to addressing language translation requests swiftly in order to maximize public participation.

HOW TO SUBMIT COMMENTS: Comments on this Notice of Preparation document will be accepted for 30 days following the issuance of this notice and must be received by February 12, 2024. When submitting comments, please reference the project name and number, Fairmount Avenue Fire Station S-14018, in the subject line. Responsible agencies are requested to indicate their statutory responsibilities in connection with this project when responding. Upon completion of the scoping process, all public comments will be organized and considered in the preparation of the draft environmental document.

Comment letters may be submitted electronically via e-mail at CIP-CEQA@san Diego.gov. The City requests that all comments be provided electronically; however, if a hard copy submittal is necessary, it may be submitted to **Nancy Graham, Program Manager, City of San Diego Engineering & Capital Projects Department, 525 B St., MS 908A, San Diego, CA 92101.**

GENERAL PROJECT INFORMATION:

- **PROJECT NAME:** Fairmount Avenue Fire Station Project
- **COMMUNITY PLAN AREA:** Mid-City Communities
- **COUNCIL DISTRICT:** 4

PROJECT HISTORY: The City of San Diego Fire-Rescue Department performs an annual Station Responses study to review the adequacy of the current fire station resource deployment system. In addition, the Fire-Rescue Department has also performed Standards of Response Coverage studies in 2010 and 2017 to analyze the adequacy of the current fire station resource deployment system, the risks to be protected, and the emergency incident outcomes desired by the community. These studies have identified that ten new fire stations need to be built within the most urbanized areas of the city to provide the best response times to keep fires small and to save people from potentially fatal emergencies. This study has identified that a fire station is needed in southern City Heights to better mitigate the fire risk based on the area's population density, wildfire potential, and typical roadway congestion. In 2014, City staff identified the necessary funding to construct a new fire station. In 2018, a site on Fairmount Avenue was acquired to meet the need identified in the Citygate study. More information on this study can be found at: <https://www.sandiego.gov/staging/fire/about/citygate>

PROJECT LOCATION: The project is approximately 0.5 miles east of Interstate 805 and 0.5 miles north of Highway 94. The project area is located north of the intersection of 47th Street and Fairmount Avenue. on the west side of 47th Street. The site is bounded by Fairmount Avenue to the southwest, 47th Street to the north and east, and Chollas Creek to the northwest. The location of the proposed fire station is just north of the intersection of Fairmount Avenue and 47th Street. The proposed impact area of the study is bounded to the east by 47th Street and on the north, south, and west by open space connected to Chollas Creek Canyon (See Figure 1: Project Location Map). The Accessor's Parcel Number (APN) is 541-190-16. Zoning designations of the project site include OP-2-1 (Open Space) and RS-1-7 (Residential-Single Unit). The project site's Community Plan Area (CPA) is Mid-City Communities: City Heights.

Land uses surrounding the project site include low-density residential to the east and north, open space to the north and west, industrial due south, and school to the southeast. A trucking company lies 260 feet southwest of the project site in the industrial use area. Webster Elementary School and Holly Drive Leadership Academy (charter school) occupy the school use area approximately 290 feet to the southeast.

PROJECT DESCRIPTION: The proposed project is the construction of a new fire station to serve the Mid-City communities. The project site is a vacant and unimproved 1.2-acre lot. Vegetation removal, artificial slope creation and grading will be required to create a pad level that will utilize 47th Street for project access and construction. The proposed project is an approximately 22,400-square-foot, 4-story fire station. The fire station will be loaded from a single driveway to the apparatus bay. The 15-stall parking lot under the building overhang will be accessed from a separate driveway. The proposed fire station includes one garage and two apparatus bays (approximately 5,200 square feet), an exercise room (approximately 1,400 square feet), a kitchen, and 10 bunk rooms (approximately 5,850 square feet). A trash enclosure, an emergency generator, and a fuel tank will also service the station. Construction activities will include ground and foundation preparation, utility installation, framing and assembly of the building and associated apparatus bay, paving of a parking lot and driveway areas, and landscaping. The approximate total area of disturbance is 0.7 acres.

PROJECT ACCESS: Access to the project site would be provided by one standard driveway off 47th Street and one larger driveway connected to the apparatus bay, also off 47th Street, both on the east side of the project site. The standard driveway would provide access to the parking area, which consists of 15 passenger vehicle spaces, including two Americans with Disabilities (ADA) accessible spaces.

PROJECT INFRASTRUCTURE: An existing 8" water main is located in 47th Street. Per the City's Public Utilities Department, the existing pressure is 104 psi. Domestic Water Service will be provided with a 2" Water Service and Meter and a 2.5" Reduced Pressure Backflow Device and lateral. Irrigation Service will also be provided with a 2" Water Service and Meter and a 2.5" Reduced Pressure Backflow Device and lateral. Fire Service will be provided with a 6" Water Service and a 6" Reduced Pressure Backflow Device and Lateral. Sanitary Sewer Service will be provided with a 6" lateral and a clarifier. A separate Sanitary Sewer System will be provided for the trash enclosure drain with a 6" lateral. An existing storm drain from 47th Street daylight at the bottom of the site slope and drains offsite.

The project would construct two new sewer lines, one 6" lateral and a clarifier for the fire station, and a separate sewer line for the trash enclosure drain. The City of San Diego Water Department Facility Design Guidelines (2013) and the City of San Diego Sewer Design Guide (2015) were used to develop water and sewer demands.

San Diego Gas & Electric would provide electrical power and natural gas. No major improvements to the local distribution networks are anticipated to be needed to support the growth facilitated by the proposed project. A generator would be added to the project site, along with a generator

enclosure for sound attenuation. The emergency generator with a fuel tank would be located just northeast of the fire station.

OFF-SITE IMPROVEMENTS: Offsite improvements include new 22' wide and 40' wide drive aprons, a new crosswalk, a new concrete curb cut, and a new power pole on 47th Street.

CONSTRUCTION AND PHASING: Development of the project site would occur in 2 phases, including a design phase and a construction phase.

The site is not included on any list compiled pursuant to Government Code Section 65962.5 for hazardous waste sites.

APPLICANT: City of San Diego, Engineering & Capital Projects Department

RECOMMENDED FINDING: Pursuant to Section 15060(d) of the CEQA Guidelines, it appears that the proposed project may result in significant environmental impacts in the following areas: **Air Quality; Biological Resources; Energy, Geology and Soils, Greenhouse Gas Emissions, Health and Safety, Historic Resources (Built Environment and Archaeological Resources), Hydrology, Land Use, Noise, Paleontological, Public Services and Facilities, Public Utilities, Transportation, Tribal Cultural Resources, Visual Quality and Neighborhood Character, Water Quality, and Cumulative.**

AVAILABILITY IN ALTERNATIVE FORMAT: To request this Notice in an alternative format, call the Engineering & Capital Projects Department at (619) 533-4207 or email CIP-CEQA@sanidiego.gov. Your request should include the suggested format that will assist with the review of documents.

ADDITIONAL INFORMATION: For environmental review information, contact Nancy Graham at (619) 236-6891. For information regarding public meetings/hearings on this project, call the Engineering & Capital Projects Department at (619) 533-4207 or email engineering@sanidiego.gov. This notice was published in the SAN DIEGO DAILY TRANSCRIPT and distributed on **January 12, 2024.**

Carrie Purcell
Deputy Director
Engineering & Capital Projects Department

ATTACHMENTS: NOP Distribution List
Figure 1: Project Location Map
Figure 2: Project Site Map

Notice of Preparation Distribution:

Federal Agencies

Federal Emergency Management Agency
U.S. Fish & Wildlife Service Field Office (Carlsbad) (23)

State Agencies

California Department of Fish and Wildlife (32)
Department of Water Resources (45)
State Clearinghouse (46/46A)
California Air Resources Board (49)
State Water Resources Control Board (55)
Native American Heritage Commission (56)

County of San Diego

Air Pollution Control District (65)
Environmental Coordinator Dept. of Planning and Dev. Services (68)
County Water Authority (73)
Department of Environmental Health Land & Water Divisions (76)

City of San Diego

Mayor's Office (91)
Councilmember LaCava, District 1 (MS 10A)
Councilmember Campbell, District 2 (MS 10A)
Councilmember Whitburn, District 3 (MS 10A)
Council District 4 (MS 10A)
Councilmember von Wilpert, District 5 (MS 10A)
Councilmember Lee, District 6 (MS 10A)
Councilmember Campillo, District 7 (MS 10A)
Councilmember Moreno, District 8 (MS 10A)
Councilmember Elo-Rivera, District 9 (MS 10A)
Transportation Review (78)
Development Coordination (78A)
Fire and Life Safety Services (79)
San Diego Fire – Rescue Department Logistics (80)
Library Dept. Government Documents (81)
Central Library (81A)
Beckwourth Branch Library (81C)
City Heights/Weingart Branch Library (81G)
Malcolm X Library & Performing Arts Center (81O)
Oak Park Branch Library (81U)
Park and Recreation Board (83)
Department of Real Estate and Airport Management (85)

Water Review (86A)
Wastewater Review (86B)
Historical Resources Board (87)
Parks and Recreation Department (89)
Park Development (93)
Environmental Services Department (93A)
Facilities Financing (93B)
City Attorney (93C)

Planning Department

Park Planning, Jonathan Avila
Public Spaces, Sameera Rao
Historic Preservation Planning, Suzanne Segur
Environmental Policy, Rebecca Malone
Biodiverse SD, Kristy Forburger

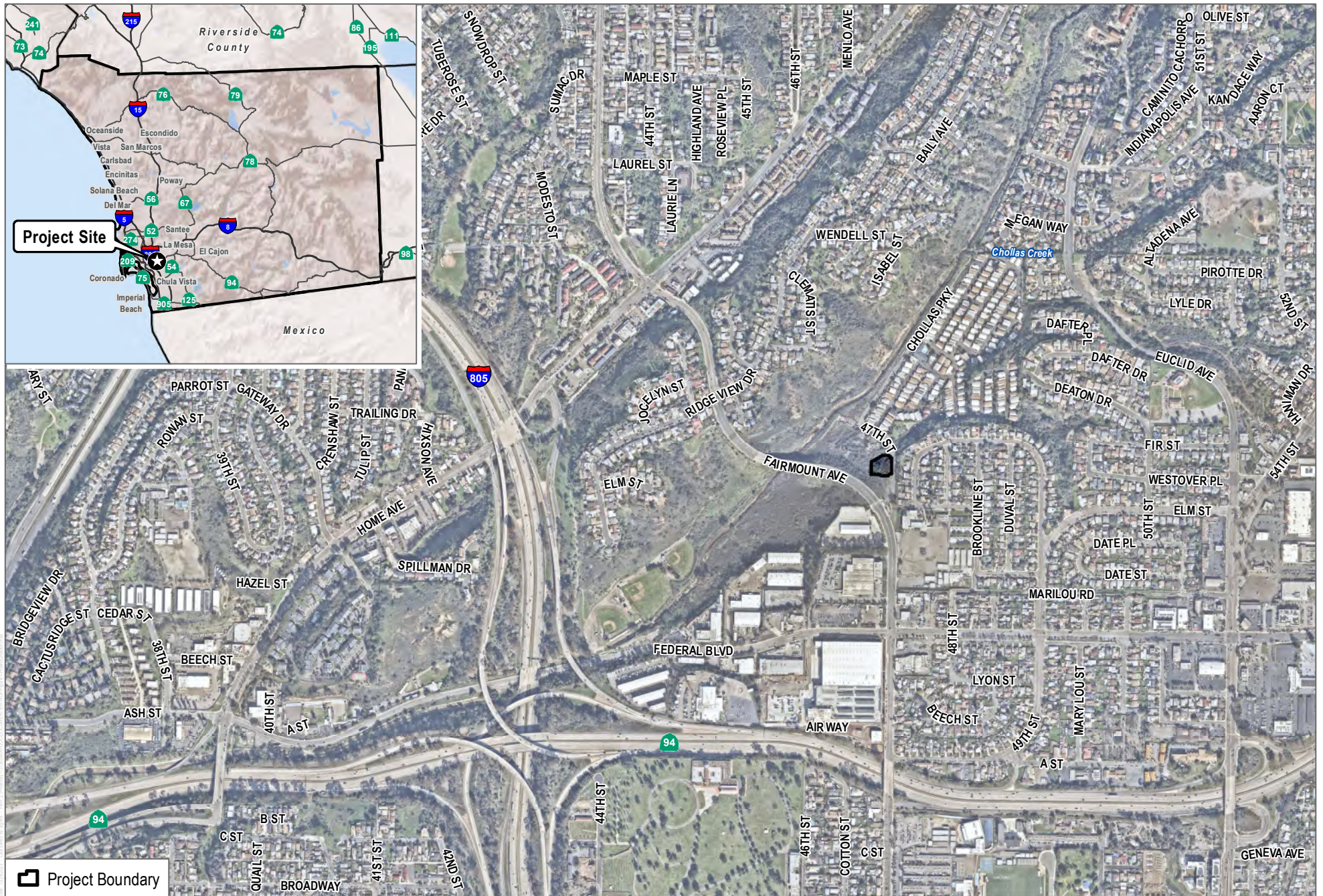
Engineering & Capital Projects

William Gibson
Monica Arredondo
Abdirahman Osman
Nick Ferracone

Other Interested Organizations, Groups and Individuals

San Diego Association of Governments (108)
Metropolitan Transit Systems (112)
San Diego Chamber of Commerce (157)
Sierra Club (165)
San Diego Canyonlands (165A)
San Diego Natural History Museum (166/213)
San Diego Audubon Society (167)
Mr. Jim Peugh (167A)
California Native Plant Society (170)
San Diego Coastkeeper (173)
Endangered Habitats League (182)
San Diego Tracking Team (187)
Carmen Lucas (206)
South Coastal Information Center (210)
San Diego History Center (211)
San Diego Archaeological Center (212)
Save Our Heritage Organisation (214)
Ron Christman (215)
Clint Linton (215B)
Frank Brown – Inter-Tribal Cultural Resources Council (216)

Campo Band of Mission Indians (217)
San Diego County Archaeological Society, Inc. (218)
Native American Heritage Commission (222)
Kumeyaay Cultural Heritage Preservation (223)
Kumeyaay Cultural Repatriation Committee (225)
Native American Distribution (225 A-S) (Public Notice & Location Map Only)
San Diego County Regional Airport Authority (110)
San Diego Gas & Electric (114)
San Diego Unified School District (125/132)
Daily Transcript (135)
Public Notice Journal (144)
City Heights Planning Area Committee (287)
Rolando Community Council (288)
Eastern Area Planning Committee (302)
Southeastern San Diego Planning Group (449)
Encanto Neighborhoods/Chollas Valley Community Planning Group (449A)
Theresa Quiroz (294)
Fox Canyon Neighborhood Association Inc (295)
William D Jones (296)
Colina Del Sol Senior Citizens Center Director (297)
Oak Park Community Council (298 and 299)
Fairmount Park Neighborhood Association (303)
John Stump (304)
Darnell Community Council (306)
Chollas Restoration Enhancement and Conservancy (451)
Groundwork San Diego
Chollas Creek Coalition/Leslie Reynolds
Webster Elementary School
Holly Drive Leadership Academy
Leisureland and Mobile Home Park/Paul Simonds
Leisureland and Mobile Home Park/Linda Coffman
Russ Connolly
Melissa Corona
George Courser
Richard Drury
Lynn Edwards
Molly Greene
Amie Hayes
Kevin Johnston
Steve Lamp
K.C. Swisher
Marry Young



SOURCE: FEMA; SANGIS 2023

FIGURE 1
Project Location
Fairmount Avenue Fire Station



SOURCE: SANGIS 2023

FIGURE 2
Project Site
Fairmount Avenue Fire Station Project

AGENCIES

INTERESTED GROUPS

California Department of Fish and Wildlife

California Department of Transportation

Native American Heritage Commission



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201
wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



February 8, 2024

Nancy Graham
City of San Diego
525 B. St. MS 908A
San Diego, CA 92101
nhgraham@sandiego.gov

Dear Nancy Graham:

SUBJECT: FAIRMOUNT AVENUE FIRE STATION (PROJECT) NOTICE OF PREPARATION (NOP) SCH #2024010280

The California Department of Fish and Wildlife (CDFW) received a Notice of Preparation (NOP) of an Environmental Impact Report (EIR) from the City of San Diego for the Project pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the state. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a **Responsible Agency** under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW oversees implementation

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

Nancy Graham
 City of San Diego
 February 9, 2024
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of the Natural Community Conservation Planning (NCCP) program. The City of San Diego participates in the NCCP program by implementing its approved Multiple Species Conservation Program (MSCP) Subarea Plan (SAP). This affords the City “take” of MSCP covered species that are listed under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 *et seq.*). If any CESA-listed species may be impacted by the Project that are not covered by the MSCP, the project proponent may seek related take authorization as provided by the Fish and Game Code.

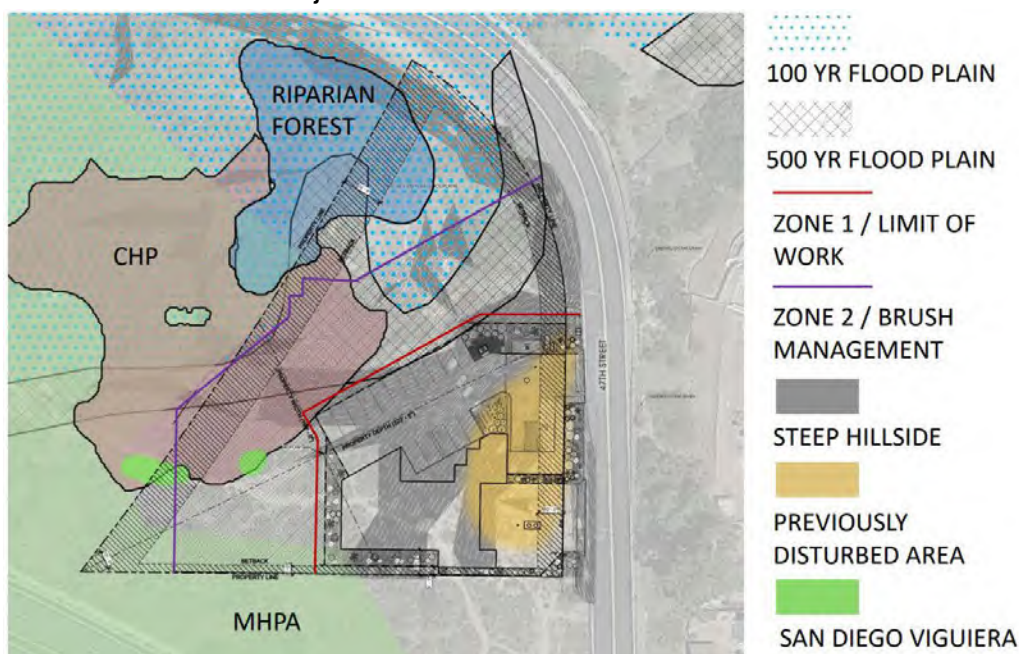
PROJECT DESCRIPTION SUMMARY

Proponent: City of San Diego (City)

Objective: The objective of the Project is to construct a fire station to serve the communities of Mid-City and City Heights. Project activities include vegetation removal, artificial slope creation, grading, installation of sewer and water lines; and construction of a 4-story fire station, a 15-stall parking lot, one garage, two apparatus bays, and a trash enclosure. Off-site improvements include new 22-foot-wide and 40-foot-wide drive aprons, a new crosswalk, curb cut, and power pole on 47th Street.

Location: The Project site is located east of Interstate 805, on the corner of 47th Street and Fairmount Avenue, in the City. Land uses surrounding the Project site include open space to the north and west, low-density residential housing to the east and north, industrial buildings to the south, and a school to the southeast.

Biological Setting: The 1.2-acre Project site is adjacent to, and partially overlaps, the City’s Multi-Habitat Planning Area (MHPA). Chollas Creek is situated approximately 450 feet to the northwest of the Project site.



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COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the City in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources.

To enable CDFW to adequately review and comment on the proposed Project from the standpoint of the protection of plants, fish, wildlife, and natural habitats, we recommend the following information be included in the EIR:

Specific Comments

- 1) **City of San Diego SAP:** CDFW issued NCCP Approval and Take authorization for the City of San Diego SAP per section 2800, *et seq.*, of the California Fish and Game Code on July 16, 1997. The SAP establishes a Multiple Species Conservation Program to minimize and mitigate habitat loss and provides for the incidental take of covered species in association with activities covered under the permit. Compliance with approved habitat plans, such as the SAP, is discussed in CEQA. Specifically, section 15125(d) of the CEQA Guidelines requires that the CEQA document discuss any inconsistencies between a proposed Project and applicable general plans and regional plans, including habitat conservation plans and NCCPs. The proposed Project occurs within the SAP Plan Area and is subject to its provisions and policies. For Project activities to be considered covered under the SAP, the City needs to demonstrate that proposed actions are consistent with the SAP and its associated Implementing Agreement. We encourage the City to include a thorough discussion of consistency of Project activities with the SAP in the draft environmental document. Given the proximity to the MHPA, the discussion should include consistency with the Land Use Adjacency Guidelines as described in Section 1.4.3 of the SAP.

General Comments

- 2) **Biological Resource Inventory:** The document should contain a complete description of the Project, including purpose and need. All habitats within and adjacent to the Project area should be described, including staging areas and access routes to the construction and staging areas. The EIR should identify any areas of overlap with the MHPA boundary. The document should also provide a complete assessment of the flora and fauna within and adjacent to the Project area, with particular emphasis upon identifying endangered, threatened, sensitive, and locally unique species and sensitive habitats. Species to be addressed should include all those which meet the CEQA definition (see CEQA Guidelines, § 15380). Seasonal variations in use of the Project area by wildlife should also be addressed. A general reconnaissance survey should be conducted, as well as focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable. Acceptable species-specific survey procedures should be developed in consultation with CDFW and the U.S. Fish and Wildlife Service (USFWS).

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3) **Biological Impacts:** To provide a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts, the following should be addressed in the EIR:

a) Please provide a discussion of potential adverse impacts from lighting, noise, human activity, exotic species, recreational uses, and drainage.

b) Please provide a discussion regarding indirect Project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands.

c) CDFW also recommends that a habitat gain/loss table be included, which calculates the expected net habitat losses and gains of each type of habitat area lost, restored, enhanced, and created.

4) **Mitigation for Project-related Biological Impacts:** The EIR should include mitigation measures for adverse Project-related impacts to sensitive plants, animals, and habitats. Mitigation measures should emphasize avoidance and reduction of Project impacts and be consistent with the Subarea Plan. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be discussed.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be filled out and submitted online at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

ENVIRONMENTAL DOCUMENT FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required for the underlying Project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

Nancy Graham
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CONCLUSION

CDFW appreciates the opportunity to comment on the NOP to assist the City in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Jessie Lane, Environmental Scientist at Jessie.Lane@wildlife.ca.gov.

Sincerely,

DocuSigned by:

C3D449ECB7C14DE
Jennifer Turner signing for

Victoria Tang
Environmental Program Manager
South Coast Region

ec: California Department of Fish and Wildlife

Cindy Hailey
Cindy.Hailey@wildlife.ca.gov

Office of Planning and Research

State Clearinghouse, Sacramento
State.Clearinghouse@opr.ca.gov

California Department of Transportation

DISTRICT 11
4050 TAYLOR STREET, MS-240
SAN DIEGO, CA 92110
(619) 985-1587 | FAX (619) 688-4299 TTY 711
www.dot.ca.gov



February 12, 2024

11-SD-94

PM 4.3

Fairmount Avenue Fire Station Project
NOP SCH#2024010280

Ms. Nancy Graham
City of San Diego
525 B Street MS 908A
San Diego, CA 92101

Dear Ms. Graham:

Thank you for including the California Department of Transportation (Caltrans) in the review process of the proposed Fairmount Ave Fire Station near State Route (SR-94) and Interstate 805 (I-805). The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

Safety is one of Caltrans' strategic goals. Caltrans strives to make the year 2050 the first year without a single death or serious injury on California's roads. We are striving for more equitable outcomes for the transportation network's diverse users. To achieve these ambitious goals, we will pursue meaningful collaboration with our partners. We encourage the implementation of new technologies, innovations, and best practices that will enhance the safety on the transportation network. These pursuits are both ambitious and urgent, and their accomplishment involves a focused departure from the status quo as we continue to institutionalize safety in all our work.

Caltrans has the following comments:

Traffic Analysis

Please provide a Vehicle Miles of Travel (VMT) analysis and/or local mobility analysis for this project if one is completed. Please use the Governor's Office of Planning and Research Guidance to identify VMT related impacts.¹

¹ California Governor's Office of Planning and Research (OPR) 2018. "Technical Advisory on Evaluating Transportation Impacts in CEQA." https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf

Ms. Nancy Graham
February 12, 2024
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Noise

The applicant must be informed that in accordance with 23 Code of Federal Regulations (CFR) 772, Caltrans is not responsible for existing or future traffic noise impacts associated with the existing configuration of I-805 and SR-94.

Right-of-Way

Per Business and Profession Code 8771, perpetuation of survey monuments by a licensed land surveyor is required, if they are being destroyed by any construction.

Any work performed within Caltrans' Right-of-Way (R/W) will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within Caltrans' R/W prior to construction. As part of the encroachment permit process, the applicant must provide approved final environmental documents for this project, corresponding technical studies, and necessary regulatory and resource agency permits, specifically, the California Environmental Quality Act determination or exemption.

If you have any questions or concerns, please contact Roger Sanchez, LDR Coordinator, at (619) 987-1043 or by e-mail sent to roger.sanchez-rangel@dot.ca.gov.

Sincerely,

Kimberly D. Dodson

Kimberly D. Dodson, G.I.S.P.
Acting Branch Chief
Local Development Review



NATIVE AMERICAN HERITAGE COMMISSION

January 13, 2024

Nancy Graham
City of San Diego
525 B St. Suite 1200 MS #908A
San Diego, CA 92101

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Reginald Pagaling
Chumash

VICE-CHAIRPERSON
Buffy McQuillen
Yokayo Pomo, Yuki,
Nomlaki

SECRETARY
Sara Dutschke
Miwok

PARLIAMENTARIAN
Wayne Nelson
Luiseño

COMMISSIONER
Isaac Bojorquez
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COMMISSIONER
Reid Milanovich
Cahuilla

COMMISSIONER
Vacant

EXECUTIVE SECRETARY
Raymond C. Hitchcock
Miwok, Nisenan

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

Re: 2024010280, Fairmount Avenue Fire Project, San Diego County

Dear Ms. Graham:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b))). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1))). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:

Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

- a. A brief description of the project.
- b. The lead agency contact information.
- c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
- d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).

- a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

- a. Alternatives to the project.
- b. Recommended mitigation measures.
- c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).

4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:

- a. Type of environmental review necessary.
- b. Significance of the tribal cultural resources.
- c. Significance of the project's impacts on tribal cultural resources.
- d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

- a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
- b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- Avoidance and preservation of the resources in place, including, but not limited to:
 - Planning and construction to avoid the resources and protect the cultural and natural context.
 - Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - Protecting the cultural character and integrity of the resource.
 - Protecting the traditional use of the resource.
 - Protecting the confidentiality of the resource.
 - Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - Protecting the resource. (Pub. Resource Code §21084.3 (b)).
 - Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
 - Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
 - The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (https://ohp.parks.ca.gov/?page_id=30331) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. 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.
 - a. 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.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
- a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
- a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, § 15064.5(f) (CEQA Guidelines § 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code § 7050.5, Public Resources Code § 5097.98, and Cal. Code Regs., tit. 14, § 15064.5, subdivisions (d) and (e) (CEQA Guidelines § 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address: Pricilla.Torres-Fuentes@nahc.ca.gov.

Sincerely,

Pricilla Torres-Fuentes

Pricilla Torres-Fuentes
Cultural Resources Analyst

cc: State Clearinghouse

ORGANIZATIONS

Interested Groups

Green Team

Groundwork San Diego

Leisureland Mobile Villa

San Diego County Archaeological Society

San Diego Audubon Society

Sierra Club San Diego Chapter

Webster Community Council



Dear Ms. Graham,

We are writing to express our deep concerns regarding the proposed construction of the Fairmont Avenue Fire Station, and its potential impact on [Biological Resources](#) including: biodiversity, native plants, and the Chollas Creek Watershed as a whole.

The site currently hosts diverse plant and animal species, including native plants and animals that are crucial for the health of the ecosystem. The development threatens to disrupt this balance, especially in the Chollas Creek Watershed, undermining its role in water quality maintenance and connectivity to wildlife. We monitor the water quality of the Chollas Creek every month and we understand that a natural landscape is the best way to filter pollutants out of the water before it flows to the San Diego Bay. Additionally, given the recent flooding, it is imperative that we protect green spaces to slow down the flow of water to prevent flooding.

As you know, biological resources also refers to the ecosystem services that a healthy canyon ecosystem provides to humans. As the Groundwork Green Team, we are also urging you to protect this native canyon ecosystem to provide benefits to our community such as heat absorption, carbon sequestration, improved air quality, and the mental and physical health benefits that come from accessing outdoor spaces. The Green Team would like to see this space be preserved for historically disenfranchised youth to have equitable access to our canyons in the Chollas Creek Watershed.

We urge the city to reconsider the location and prioritize the preservation of our invaluable green space.

We envision this area as a potential trailhead to explore the watershed trails, enhancing community access to nature while preserving its environmental balance and connecting with the Chollas Creek Watershed Regional Parks Master Plan.

Sincerely,
Groundwork San Diego-Chollas Creek - Green Team

daniel asoa

Leo

Chris Gonzalez

Tito King Solomon

Jorge Estrada

Marce Valdez

Jayden Porterfield

Aurora Morales

Johnnie Dubose

Xiomara Aguirre.

Alan Pineda

Lilly Roser

Andrea Nova

Benjamin Peralta

Isaac Nova

February 7, 2024

City of San Diego

Sent via email to CIP-CEQA@sandiego.gov

Re: Comments on EIR process for the proposed Fairmount Fire Station

Groundwork San Diego – Chollas Creek advocates for and appreciates the EIR process for the proposed Fairmount Fire Station. Our Board of Directors opposes this project due to the elimination of critical Chollas Creek Watershed open space and the impacts of that loss to the community and watershed environment. Our EIR comments include:

1. **Land Use and Planning:** Approximately 1.28 acres of a pristine canyon will forever be changed by the fire station foot print and brush clearing activities to protect the structure. This project also does not align with the City's promises of environmental justice for development in disadvantaged communities.
2. **Noise:** The residents adjacent to the proposed site and all along the canyon area will be impacted by the piercing emergency response sirens that will occur during any hour of a day.
3. **Recreation:** The community has been promised more parks and open spaces to work towards achieving equity and mitigating climate change impacts. Please review whether the use of this land for building infrastructure instead of park aligns with the goals of the City's Parks Master Plan and Climate Action Implementation Plan where more parks and open spaces in the Chollas Creek Watershed Regional Park are needed to achieve equity and address climate change.
4. **Hydrology and Water Quality:** The recent storms and flooding have been a devastating reminder that further developing on precious open space in the Chollas Creek Watershed is not in the best interest of the community or watershed environment. The removal of native vegetation, addition of impervious surfaces, and grading will again change the environment's ability to absorb rain, further affecting Creek flooding.

We support our community members and environmental advocates that are calling for the proposed location to be classified as open space in a community that needs more green spaces.

We also want to understand why the other locations identified for this project, that are located in already developed areas of the community with acceptable emergency response times, are not being considered.

With this fire station project set to become the most expensive in San Diego History, we look forward to seeing those other proposed locations also go through an EIR process so the best location for the community is selected.

Board of Directors President

Derryl Williams

Board of Director Members

*Melissa Corona, Charles Davis, Vicki Estrada, Jon Gohl, Roxanne Kilbourne,
Ed Lopez, Dr. Hugh Mehan, Jeff Marston, Hugh Mehan, Cheryl Pryatel*



Date: January 26, 2024

To: City of San Diego Engineering & Capital Projects Department

From: Mark Koons

Subject: Leisureland Comments regarding the Fairmount Avenue Fire Station EIR Scoping Meeting

Thank you for providing an opportunity for Leisureland Mobile Villa to offer comments as part of the Fairmount Avenue Fire Station Environmental Impact Report (EIR) Scoping Meeting. Our property, which is directly adjacent to the proposed site, has been family-owned for more than 100 years. We are keenly aware of the challenges this site presents and would like to ensure those are considered as the city explores locations for a local, regional fire station.

- **Environment**

- The City of San Diego has identified the surrounding project area as a Multi-Habitat Planning Area (MHPA), with the primary objective of preserving that natural habitat. The decision to establish a fire station at this location starkly contradicts its designated purpose.
- A comprehensive technical report by Dudek in 2019 identified numerous sensitive receptors that would be negatively impacted if such a project were to proceed. These include, among others:
 - Coastal sage scrub
 - Mixed chaparral
 - Cooper's hawk
 - Coastal California gnatcatcher
 - Orange-throated whiptail
 - San Diegan tiger-whiptail
 - Red-diamondback rattlesnake
 - Two-striped garter snake
 - Dulzura pocket mouse
 - Northwestern San Diego pocket mouse
 - San Diego black-tailed jackrabbit
 - San Diego desert woodrat
 - Yuma myotis
 - Monarch
- Preserving the biodiversity in San Diego and safeguarding the few remaining expanses of open terrain is necessary and falls in line with the city's sustainability goals
- In the summer of 2021, Mayor Todd Gloria officially designated Chollas Creek as a regional park, part of the city's [Parks Master Plan](#), a strategic move aimed at bolstering the

conservation of natural resources. However, the proposed fire station project is positioned within the confines of Chollas Creek, thereby conflicting with the city's designations and plans for the preservation of this environmentally significant location. In particular, this project would impede on the Plan's objectives to:

- Offer safe, convenient access to a park space or recreation program for every resident
 - Reinforce San Diego's globally recognized biodiversity
 - Contribute to community economic development, social well-being, and a healthy environment
 - Address long-standing inequities in the City's parks system suffered by people that live in communities of concern and other marginalized populations allowing everyone to fairly share the same benefits from parks and attain full and equal access to recreational opportunities regardless of one's background, identity, ability, and location
 - Highlight sustainability and resilience through stronger, more adaptable resources; fair access to social and economic opportunities for all residents; livability and quality of life in neighborhoods; and connections between housing, jobs, amenities, and public spaces
 - Ensure effective planning and management for their primary values, benefits and opportunities.
 - For example, regional resource and open space parks will continue to be managed to conserve biological diversity, protect watersheds, and provide ecological services – including to help moderate climate change effects - with other uses limited to those compatible with their primary purposes
 - Integrating parks, public spaces, natural areas, scenic views, beaches, and cultural landscapes within a Citywide network.
- The project would be inconsistent with protecting **“canyon, hills, and creek-side natural wildlife habitats from urban encroachment,”** as called for in San Diego's [“Mid-City Communities Plan”](#) (adopted 1998, last updated 2015)
 - **The Natural and Cultural Resources Element** within the Mid-City Communities Plan identifies the region where the project is planning to be built **as open space and within a flood plain (prone to liquefaction, soil issues, water quality issues).**
 - A fire station is a critical community asset, and placing it in a flood-prone area may render it inaccessible during emergencies, leaving the community vulnerable
 - Placing a fire station in a flood-prone area exposes firefighters and other personnel to unnecessary risks during flooding events.
 - Floodwaters can damage the structural integrity of the fire station building and its equipment, leading to expensive repairs and maintenance
 - Building in flood-prone areas may disrupt local ecosystems and contribute to habitat degradation
 - Incidentally, this issue came to a head the week of January 22, 2024, as Leisureland Mobile Villa sustained great flood damage caused by a storm

LEISURELAND MOBILE VILLA

drain failure maintained by the City. Facilities at the park were damaged, including the office and clubhouse, and three homes were completely totaled. Once the flooding subsided, the roads and driveways were covered in mud, debris, rocks and mounds of dirt - the whole valley flooded

- Given the immediate need to shore up the city's drainage system, particularly in this part of the city, wouldn't an investment in storm drainage be a more prudent use of capital improvement dollars
- Does the city still value and support the goals and recommendations contained in the Plan, centered on protecting the surrounding environment, such as:
 - **Soil Quality**
 - Minimize development in areas prone to liquefaction (soil losing its rigidity, very problematic with earthquakes especially)
 - Avoid building construction in areas with inadequate soil condition
 - **Open Space**
 - Permanently link and preserve all canyons, slopes and floodways, designated as such in this Plan, as open space
 - Ensure the preservation of an open space system through appropriate designation and protection
 - Protect canyon, hillside, and creek-side natural wildlife habitats from urban encroachment and conflicting uses
 - Develop passive recreational space in undeveloped canyons, where the natural integrity of the canyon can be preserved
 - Preserve sensitive slopes, canyons, floodways and other areas designated as open space through acquisition, zoning, resource regulation or other available methods
 - Give highest priority to the acquisition of open spaces susceptible to development
 - **Wildlife Preservation**
 - Improve and enhance riparian habitat in Chollas Creek as a means of improving water quality
 - Prepare and implement a master plan for the enhancement of Chollas Creek which protects natural wildlife and riparian habitat
 - Preserve sensitive hillside areas and areas of native vegetation
 - Preserve and enhance Chollas Creek as a linear open space system to provide passive recreational opportunities, visual relief and biological habitat preservation
- **Traffic & Safety**
 - Whenever utility work needs to be done in the project area, it creates congestion and traffic issues, which will pale in comparison to the ongoing use requirements for this fire station

LEISURELAND MOBILE VILLA

- The proposed project is on a very narrow street where fire trucks will need to make multiple point turns to enter and exit the site, causing an undue burden to those entering and exiting the neighborhood
- The substantial dimensions of fire trucks will obscure sightlines for existing drivers, becoming a major safety hazard for the community
- It is imperative to note that the community's senior residents and students rely on MTS Bus Route 13, located right by 47th St & Fairmount Ave, which requires traversing a narrow, steep, and dangerous strip of concrete in need of major maintenance
- We anticipate, as part of this EIR, the city will complete a comprehensive traffic study at this location
- **Noise**
 - A fire station's continuous, round-the-clock operations will no doubt have a negative impact on the proposed project's closest neighbors – a senior mobile home community for those 55 and over and the Webster Elementary School located directly above the proposed site
 - The project area's current road infrastructure, coupled with the road's curvature, will intensify any sound within the confines of Chollas Creek, including sirens and fire truck maneuvers such as reversing or engine idling
 - Given that senior citizens are a recognized demographic sensitive to loud noises, it's expected the proposed project will burden them with heightened stress levels and anxiety, affecting their overall quality of life
- **Miscellaneous**
 - The projected cost of this project was originally \$12 million in 2014 when the site was designated on Home Ave. Once the project was relocated to the 47th St/Fairmount Ave location, the financial cost increased significantly to \$28M. This unnecessary escalation raises substantial concerns regarding the city's fiscal responsibility. Additionally, the current state of the site presents significant issues that challenge the rationale for such a development. The \$28 million price tag does not incorporate the completion of this EIR, inflation and cost overruns

Thank you for considering these comments. My family looks forward to reviewing the DRAFT EIR and all its findings.

Sincerely,

Mark Koons

Mark Koons
Leisureland Mobile Villa



San Diego County Archaeological Society, Inc.

Environmental Review Committee

13 January 2024

To: Ms. Nancy Graham, Program Manager
Engineering and Capital Projects Department
City of San Diego
525 B Street, MS908A
San Diego, California 92101

Subject: Notice of Preparation of a Draft Environmental Impact Report
Fairmount Avenue Fire Station Project

Dear Ms. Graham:

Thank you for the Notice of Preparation for the subject project, which we accessed via the City's website earlier this month.

We are pleased to note the inclusion of historical 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 notification of the public review of the DPEIR and ensure availability of a copy of the cultural resources technical report(s).

SDCAS appreciates being included in the City's environmental review process for this project.

Sincerely,

A handwritten signature in dark ink, appearing to read "James W. Royle, Jr.", is written over the typed name.

James W. Royle, Jr., Chairperson
Environmental Review Committee

cc: SDCAS President
File

February 12, 2024

Nancy Graham
Program Manager
City of San Diego Engineering & Capital Projects Department
525 B St., MS 908A,
San Diego, CA 92101

Re: Fairmount Avenue Fire Station S-14018

Dear Nancy Graham,

Thank you for the opportunity to comment on the Notice of Preparation for the proposed Fairmount Fire Station S-14018. San Diego Audubon Society supports the EMS services of the City of San Diego, however, we do not support the selection of this project location as it will reduce the size of the MHPA set aside for wildlife and potentially cause disturbance beyond the project area. As bird species are declining in North America with 3 billion birds lost since the 1970s (Rosenberg et al. 2019) and extant wildlife and habitats are threatened by climate change, the City of San Diego should prioritize protecting species recognized as special status, MSCP species, and the existing MHPA. In response to the Notice of Preparation for this project, we request that the following concerns be investigated and addressed.

We request that the City of San Diego disclose information on the site selection process for transparency to the general public. As this project is the most expensive fire station ever to be built by the City of San Diego at a proposed cost of 28 million dollars and on average may cost 233 percent more once completed, the disclosure of the proposed costs at alternative sites should also be provided to the public. Public disclosure of all considered sites and any information, geospatial data and analysis, and maps that contributed to the decision-making of the site selection process should be provided so that the public can understand why this site was selected over other sites. As the City provided a map of the new proposed service area with projected response times at the NOP meeting held earlier in February, we request that the City of San Diego provide the same information with an analysis of the current EMS service areas and projected population assessments to this area.

With the destruction of the natural area and replacement with impervious surfaces, what are the future impacts of flooding to the surrounding areas? As this proposed project is on the edge of a canyon, the volume of water is a major concern as the project aims to replace permeable natural surfaces and increase impervious surfaces that accumulate and accelerate water runoff. As the flooding on January 22nd that displaced 200 residents in the Mountain View area did not instill confidence in the general public that the City of San Diego is prepared for worse-case flooding scenarios, please provide the general public flood model scenarios and hydrological analysis of water runoff for the project area and surrounding urban and natural areas in Chollas Creek addressing potential impacts during 100-year flood conditions, 500-year flood

conditions, 1000-year flooding conditions, and future flooding conditions that may be exacerbated by Climate Change scenarios including assessment of areas that may have been burned and El Niño conditions.

What is the impact on wildlife from reducing the existing MHPA area and increasing human disturbance near the protected area? Empirical studies suggest that habitat loss has large, consistently negative effects on biodiversity (Fahrig 2003). We are concerned that reducing the acreage of the MHPA area and increased disturbance from human activity near a wildlife-protected area may negatively affect the biodiversity with disturbance creating an impact beyond the project boundary. Impacts on migratory and resident wildlife that are present year-round including federally threatened and City of San Diego MSCP species the California Gnatcatcher, Birds of Conservation Concern Cooper's Hawk, Wrentit, Allen's Hummingbird, and California Thrasher (USFWS 2021). I documented several California Gnatcatcher during the 2023 season from March to July in the Chollas Creek from 54th to Euclid with other surveys indicating the project site has more suitable habitat compared to 54th and Euclid. What impact will this project have on the California Gnatcatcher currently occupying the area? As fire is a major concern threatening California Gnatcatcher habitat, given the anticipated increased frequency of fire with climate change, what are the long-term impacts on the local and greater population from this project and how will these losses be mitigated? What kind of short-term and long-term impacts will the reduction of the protected area have on all local bird, mammal, insect, and reptilian populations inhabiting this area? What kind of impacts will this project have on the larger population of the animals inhabiting this area? We request that the City provide a year-round assessment of all species inhabiting the area including seasonal changes to the population of all species.

What are the cumulative impacts of habitat loss and Climate Change on wildlife and habitat from this project? The integrity of the chaparral ecosystem is currently being challenged by rising temperatures, increased variability in precipitation, and longer and more persistent droughts. Climate scenarios for California project continued warming through the century leading to increased physiological stress, canopy thinning, and mortality of chaparral vegetation across portions of the state. Climate change forecasts suggest enhanced fire activity, including an extended fire season and more frequent large fires. In this already stressed system, non-climate stressors, like increased fire frequencies, can lead to decreased shrub biomass, loss of species diversity, and conversion to other vegetation types. (Molinari et al. 2018). We request that the City of San Diego provide an assessment for all birds, mammals, insects, and herpetofauna that inhabit the area.

Are there cumulative impacts by reducing the total MHPA acreage across the City of San Diego from this project and from additional projects? One study on fragmentation in a scrub habitat demonstrated extinctions within the remaining habitat can occur quickly with the loss of species diversity in plants, birds, and rodents. In the same study, recolonization rarely occurred and larger reserves were recommended over smaller ones to avoid these outcomes (Soulé et al. 1992). As MHPA were set aside to ensure the long-term viability and sustainability of native



ecosystem function and natural processes throughout the MHPA, eliminating acreage in the MHPA may eventually fragment and compromise the habitat. How does this reduction in total acreage in the MHPA from this project affect the habitat and the species inhabiting the areas? How does the reduction in the acreage of MHPA align with long-term planning for wildlife considering threats to habitat from climate change? How will these losses and climate change threats be mitigated to ensure that wildlife has ample habitat in the future? We request that the City of San Diego provide a detailed analysis of the cumulative impacts of reducing the total acreage of protected areas to the species that inhabit this area and the habitat.

What is the impact on the surrounding MHPA area for carbon emissions from the fire truck? According to the California Air Resources Control Board, emergency vehicles are not subject to in-use emissions regulations, however, emissions have the potential to impact the local area. Please provide an analysis of these impacts to the surrounding urban and natural areas of the project.

What is the impact of noise disturbance and lighting on wildlife from the proposed fire station? As the proposed project area is in a canyon, fire alarms will echo throughout the canyon at all hours of the day and night, with fire truck alarms measured at around 110-120 dBA. A paper summarizing the literature on the effects of noise on wildlife indicates that terrestrial wildlife responses begin at noise levels of approximately 40 dBA, with the majority of studies documenting effects from noise, including altered vocal behavior to mitigate masking, reduced abundance in noisy habitats, changes in vigilance and foraging behavior, and impacts on individual fitness and the structure of ecological communities (Shannon et al. 2016). What kind of impact will noise from fire alarms from the fire station and fire engines and lighting disturbance have on the wildlife inhabitants in the neighboring MHPA? How will it affect the species that may be the most sensitive to disturbance? As fire alarms will be heard at a great distance throughout a canyon, we request that the noise impact on wildlife be studied throughout the natural areas of Chollas Creek as far as the fire alarm from the truck can be heard from the station. Additionally, as impacts to wildlife may not occur until after the station is functional, to better understand these impacts, we request that the wildlife in this area be monitored year-round with a particular focus on impacts on breeding and to measure if losses have occurred within any of the bird, mammal, herpetofauna, and insect populations inhabiting the area. If the wildlife has declined in proximity to the fire station, we request expansion of MHPA be set aside by the City of San Diego to mitigate the losses from this project. Additionally, the placement of the project is concerning as the fire station will be located on a blind curve with the existing infrastructure of a narrow road. As this is a blind curve, this may subsequently increase the frequency of the fire department using the alarm on the truck, causing additional disturbance to the wildlife and residents. We request that the City of San Diego provide the general public with evidence that the blind curve will not cause additional safety issues for residents or noise disturbance. Per our Light's Out, San Diego! campaign at San Diego Audubon, light pollution may cause disorientation to migrating birds due to attraction to the light, contribute to exhaustion as birds may fly in circles, increase the chances of building collisions and bird strikes, and cause delays in migration. As the fire station will be illuminated all night, we are concerned about the impacts

Fostering the protection and appreciation



of birds, other wildlife, and their habitats...

of light pollution on the neighboring MHPA and the wildlife corridor used by mammals and request that appropriate measures be implemented to help reduce the impacts on wildlife including placement of lighting to avoid illuminating natural areas, reduction of excess lighting, and reducing bird strikes using bird-safe windows as examples of measures. We request the City of San Diego address specific measures to reduce the impact of lighting and noise disturbance on wildlife, the wildlife corridor, and resident and migratory birds.

We were informed by community members that former residents who owned property in the proposed project area were forced to vacate the area by the City of San Diego under eminent domain proceedings as this area was designated as a protected natural area. Why is the City of San Diego retracting the original decision and proposing a project in the same area where former residents were forced to leave? This project will destroy a relatively pristine habitat inhabited by federally threatened and City of San Diego MSCP species and other wildlife, increase human disturbance potentially affecting the protected area beyond the project boundaries, cost an excessive 28 million dollars, and take nature away from the local community that needs local access, we hope that the City of San Diego will reconsider the location of this project. Thank you for your time and consideration.

Respectfully,

Lesley Handa
Lead Ornithologist
San Diego Audubon Society

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SIERRA CLUB

SAN DIEGO CHAPTER

Sierra Club San Diego Chapter

4241 Jutland Dr., Ste 303, San Diego CA 92117

February, 2024

Sent via email to: CIP-CEQA@sandiego.gov

Nancy Graham, Program Manager,
City of San Diego Engineering & Capital Projects Department,
525 B St., MS 908A,
San Diego, CA 92101

Dear Ms. Graham:

Sierra Club San Diego has written previous letters advocating for a full EIR on the **Fairmont Avenue Fire Station** and appreciates the steps taken by the City of San Diego. The following comments are in response to the Notice of Preparation process. We offer these comments in the spirit of cooperation to find the best location for the Fairmont Fire Station.

Sierra Club officers have visited the site on several occasions, talked with people in the community, and discussed this project with other community groups. We wanted to write this letter to continue to emphasize the importance of protecting the sensitive environmental space and finding a better location for this fire station. Please include in the notice of preparation and the subsequent EIR viable alternative locations for this fire station.

This proposed fire station is being planned in a steep canyon in an environmentally sensitive area, in multi-habitat planning area (MHPA) and in multiple-species conservation area (MSCP) land. Building a fire station in environmentally protected and sensitive lands must be avoided due to the lasting

effects on our habitat and lands.

This project is also being proposed next to a quiet senior retirement center. Building a fire station next to a senior retirement center will diminish their quality of life and will add more pollution to an already polluted and environmentally sensitive area.

In reality, the FAIRMONT AVENUE FIRE STATION name is a misnomer that distracts from the actual environmentally sensitive location for this station. The proposed project has nothing to do with Fairmont Avenue unless it is deflecting criticism for the lack of a fire station on Fairmont Avenue. This far-removed site has nothing to compare with the heavily populated Fairmont Avenue. The actual location is 1950 47th Street in what most would classify as a semi-rural environment. Closer examination finds the property as a steep slope remnant that should serve as an environmentally sensitive open space which Sierra Club advocates for.

Sierra Club wants a fire station in this community, but this is simply the wrong location for this fire station. In the notice of preparation please provide alternative to this location.

Environmental Justice

This poorly sited proposal is located just above, adjacent to, and threatening the already highly impacted Chollas Creek and associated wetlands. There's more than a 100-year history of Chollas Creek and surrounding canyons being utilized as notorious burn sites and toxic waste dumps. These community impacts would be compounded with additional environmental impacts this proposed fire station would inflict on this senior citizen Community of Concern.

The project located at 1950 47th Street (APN 541-190-1600) in the RS-1-7 zone within the Eastern Area of the Mid-City communities planning area, Central Urbanized Planned District Multi-Habitat Planning Area, FEMA Floodways & Floodplains, Very High Fire Hazard Severity Zone and the Airport Influence Area. This should not be a high priority location for a fire station or any other development.

An Airport Land Use Compatibility Plan (ALUCP) focuses on a defined area around

each airport known as the Airport Influence Area (AIA). The AIA is comprised of noise, safety, airspace protection and overflight factors, in accordance with guidance from the California Airport Land Use Planning Handbook published by the California Department of Transportation, Division of Aeronautics.

<https://www.san.org/Airport-Projects/Land-Use-Compatibility>

The primarily senior residents located adjacent to the proposed fire station are already being forced to bear external challenges by a wide assortment of negative quality of life factors including the potential for flooding, fire hazards and nearly constant San Diego International Airport noise and associated air quality pollutants. The addition of diesel exhaust from Fire Trucks, diesel Paramedic ambulances, and noise from engines and sirens would negatively impact this vulnerable senior population living in the creek bottom mobile home park within a few hundred yards of the proposed station.

Please address the issue associated with these environmental justice issues

Impacts on Sensitive Wetland and Canyons.

The San Diego Regional Water Control Board has documented the substantial existing TOXIC pollutants of Chollas Creek:

“The San Diego Regional Water Quality Control Board (San Diego Water Board) adopted the Chollas Creek Metals TMDLs Basin Plan Amendment (TMDLs) on June 13, 2007. These TMDLs were approved by the State Water Resources Control Board (State Water Board) through Resolution No. 2008-0054 on July 15, 2008. The State Office of Administrative Law (OAL) approved the TMDLs on October 22, 2008 as File No. 2008-0909-01 S. The U.S. Environmental Protection Agency (USEPA) approved the TMDLs on December 18, 2008. Based on the approval date from OAL, the official commencement date for these TMDLs is October 22, 2008. The TMDL documents are available for review at the San Diego Water Board Office. To request a file review please contact the Regional Board receptionist at (619) 516-1990, or email rb9_records@waterboards.ca.gov.”

“Since 1994, Chollas Creek storm water samples have frequently exceeded the Basin Plan narrative water quality objective for toxicity. These samples have also exceeded chronic and acute water quality criteria for metals established in the

California Toxics Rule. Specifically, during the period 1994 - 2001, concentrations of copper and zinc during storm events have frequently exceeded acute and chronic criteria, while concentrations of cadmium and lead have frequently exceeded chronic and periodically exceeded acute criteria. These conditions resulted in the Creek being placed on the CWA Section 303(d) list in 1996 for toxicity, cadmium, copper, lead and zinc. Cadmium was delisted by the State Water Board in the 2006 list update.”

“On February 8, 2017, the San Diego Water Board adopted Resolution No. R9-2017-0015 amending the San Diego Basin Plan to incorporate site specific WERs into water quality objectives for toxic pollutants and Total Maximum Daily Loads for Copper and Zinc in Chollas Creek. This Basin Plan Amendment was approved by the State Water Board on September 17, 2019 and by the Office of Administrative Law on March 5, 2020. The United States Environmental Protection Agency (USEPA) approved the TMDL Basin Plan Amendment on March 26, 2020.”

From the preceding paragraphs it should be readily apparent the Regional Water Quality Control Board evaluates Chollas Creek water quality reports closely and critically, including grading and earth cut and fill movement. The [Construction General Permit Order 2009-0009-DWQ](#) allows grading in California and provides for the Regional Board delegating this safe grading responsibility to the County and Cities. The Regional Board also enforces grading violations, with particular attention to waterways and wetlands, two areas subject to impact by the proposed project. The Construction General Permit requires development of a StormWater Pollution Prevention Plan (SWPPP) by a certified Qualified SWPPP Developer (QSD), a requirement that will demand exacting standards to prevent project runoff and compounding of street runoff because of the impervious surfaces required by the proposed project.

As this Chollas Creek watershed is already facing high levels of toxic pollutants, we must steer away from adding more toxic pollutants to a watershed needed as we continue to restore ecological habitats and clean up our toxic environments.

The Project site has continuously been classified and established as Environmentally Sensitive Lands

Th City’s first revision of 09-2019 defines the project site as Environmentally

Sensitive Lands. The City of San Diego Subarea Plan guides the establishment of the City of San Diego Multi-Habitat Planning Area (MHPA) preserve system. The project is defined by city staff as located within “MHPA Adjacency” In the Mid-City City Heights community.

Also, continuing to develop in MHPA land will continue to affect our already damaged ecosystems. By creating a fire station that will bring more noise, lights and destruction to our habitats, we are allowing for continued destruction of many very environmentally sensitive species. More lights may result in prey being more easily targeted by nocturnal species. More sound may scare off some species to the point where they do not return to their natural habitat. More development will result in more invasive species which can do irreparable damage to our already sensitive environment.

Developing MHPA or “MHPA adjacent” land must be stopped before continuing to wrecking our local and preserved habitat. With Governor Newsom signing SB 337 into law, we must be looking to preserve our protected lands and expand those areas instead of destroying them by building in the wrong places.

City staff suggests that, ***“The Project has been reviewed in accordance with the California Environmental Act (CEQA). The environmental Analysis Section (EAS) is not able to make a determination at this time pending submittal of additional information and resolution of the other reviewing disciplines’ (LDR-Planning, LDR Engineering , LDR-Geology, LDR-Landscaping and PUD-Sewer and Water) issues. (New Issue)”***

This “capital improvement project” has at no time been determined to be in compliance with the ESL regulations without deviations. *Per San Diego municipal code 126.0502(f)* the project should be denied by City Staff, as is apparent from the comprehensive Staff evaluation. By all indications, the City is “running out the clock” to stall serious determinations on applicable CEQA, San Diego Municipal Code “interpretations” for an in-house, self-serving Capital Improvement Project with a preordained Mitigated Negative Declaration “decision”. This self-dealing is compounded by the City’s prior ownership and the false economies of a project whose costs have soared to untenable levels. Instead of this insider review. This project is going to cost taxpayers millions of dollars more than a fire station in a

correct location would because of the engineering challenges involved.

Prohibitions on this land use from the project's Community issues

This project appears to violate community zoning, height limitations, the community plan, and environmentally sensitive lands restrictions. We are gratified that these community characted will be reviewed through a NOP and an subsequent EIR.

Land Use and Zoning

The proposed fire station violates community Zoning and height restrictions of 30-feet vs the proposed 50-feet.

"Findings – an SDP (site development permit) may be approved or conditionally approved only if the decision made makes all of the findings in Section 126.0505(a) and the supplemental findings in Section 126.0505(b) through (m), as applicable."

We learn from Staff that the project is effectively prohibited as it is not included in the Community Plan and the RS-1-7 community zoning does not accommodate the use as a Fire Station, along with a violation of the 30 feet height limit, attempting to rise to 50 feet.

"While the Mid-City: City Heights Community Plan does not designate the site as a Fire Station, the site is identified in the San Diego Fire-Rescue Department's Citygate Standards of Response Coverage Report. However, the RS-1-7 does not accommodate this use per SDMC 131.0422, Table131-04B (New Issue)

The reference to the San Diego Fire Rescue *Citygate Standards of Response Coverage Report* has no relation to the community zoning or selection as a Fire – Rescue. It is a decitful red herring. The complete and only reference is as follows.

Capitol Improvement Program (CIP) created: pursuing land purchase at 47th and Fairmont Avenue. The project site selection at this point should have been dismissed entirely in light of the huge expediture required to purchase and construct on 47th Street. An excellent start would be the reselection of an actual

Fairmont Avenue Fire Station as originally advertised to the public.”

“Development Regulations for the RS-1-7 zone do not allow for a structure with a height over 50 feet Per SDMC 131.0431 Table 131-04D, the maximum height is 30 feet.”

This project violates virtually all the restrictions called for in Chapter 14 for environmentally sensitive lands to avoid the project impacts. San Diego Municipal Code Chapter 14: Purpose of Environmentally Sensitive Lands Regulations: Sierra Club finds nearly all aspects of the proposed project untenable and antithetical to any standard of environmental protection. The statutes, ordinances and narratives cited below are completely and intentionally ignored or “worked around”.

“General Regulations (3-2021) Ch. Art. Div. 14 3 1 1 Article 3: Supplemental Development Regulations (Added 12-9-1997 by O-18451 N.S.) Division 1: Environmentally Sensitive Lands Regulations (Added 12-9-1997 by O-18451 N.S.) §143.0101 Purpose of 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. These regulations are intended to protect the public health, safety, and welfare while employing regulations that are consistent with sound resource conservation principles and the rights of private property owners.”

“It is further intended for the Development Regulations for Environmentally Sensitive Lands and accompanying Biology, Steep Hillside, and Coastal Bluffs and Beaches Guidelines to serve as standards for the determination of impacts and mitigation under the California Environmental Quality Act and the California Coastal Act. These standards will also serve to implement the Multiple Species

Conservation Program by placing priority on the preservation of biological resources within the Multi-Habitat Planning Area (MHPA), as identified in the City of San Diego MSCP Subarea Plan and VPHCP. The habitat based level of protection which will result through implementation of the MHPA is intended to meet the mitigation obligations of the Covered Species addressed. In certain circumstances, this level of protection may satisfy mitigation obligations for other species not covered under the MSCP Subarea Plan but determined to be sensitive pursuant to the CEQA review process. This determination will be addressed in the environmental documentation. (Added 12-9-1997 by O-18451 N.S.; amended 10-18-1999 by O-18691 N.S.; effective 1-1-2000.) (Amended 3-1-2006 by O-19468 N.S.; effective 4-1-2006.) (Amended 2-9-2018 by O-20899 N.S.; effective 3-11-2018.)”

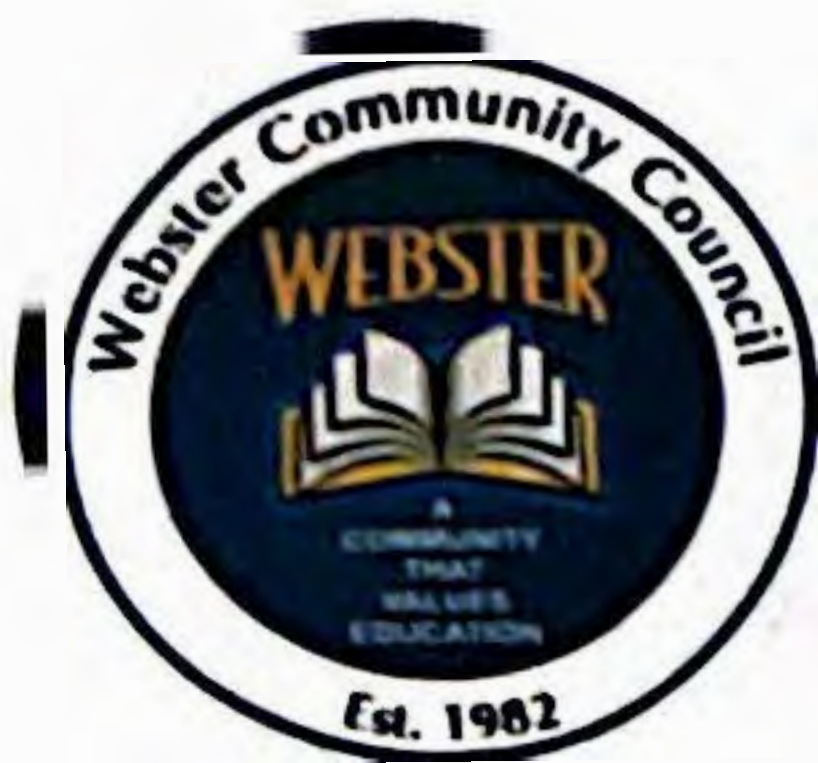
The City of San Diego Municipal Code Chapter 14 General Regulations (03-2021) comments continue in exacting detail as to when and where the particular circumstances and standards must be adhered to. The property at 1950 47th Street is applicable to these high standards of Environmentally Sensitive Lands Regulation.

The Sierra Club requests that these serious environmental concerns be taken into consideration during the entire EIR process.

Sincerely,

Dr. Peter A. Andersen, Vice-Chairperson
Conservation Committee
Sierra Club San Diego

Charles Rilli, Conservation Organizer
Sierra Club San Diego



February 15, 2024

City of San Diego

Sent via email to CIP-CEQA@sandiego.gov

Re: Comments on EIR process for the proposed Fairmount Fire Station

The Webster Community Council thanks the City for the opportunity given to our community to participate in the EIR Scoping process for the proposed Fairmount Fire Station and provide comments. The Webster Community Council advocates for and appreciates the EIR process for the proposed Fairmount Fire Station. Our Council opposes this project due to the destruction of the Chollas Creek Watershed open space and sacred Kumeyaay land. Our reasons include:

1. **Land Use and Planning:** The proposed fire station contradicts the Mid-City Community Plan for Chollas Creek. Building a fire station at this location in the Chollas Creek Watershed when other locations are feasible sends a negative message to underserved residents about community equity and environmental justice. Approximately 1.28 acres of a pristine canyon will forever be changed by the fire station footprint and brush clearing activities to protect the structure.
2. **Recreation:** The site of the proposed new station is within the Chollas Creek Watershed in an underserved, park-deficient area where more parks and green spaces are needed. The City cannot achieve its Parks Master Plan goals in this area by building a fire station in what should be open space with a trailhead and/or a pocket park that nearby residents have requested.
3. **Hydrology and Water Quality:** The recent storms and flooding have been a devastating reminder that further development on precious open space in the Chollas Creek Watershed is not in the best interest of the community or watershed environment. The removal of native vegetation, addition of impervious surfaces, and grading will again change the environment's ability to absorb rain, further affecting the Creek and causing downstream flooding.

We also want to understand why the other locations identified for this project, that are located in already developed areas of the community with acceptable emergency response times, are not being considered. With this fire station project set to become the most expensive in San Diego History, we look forward to seeing those other proposed locations also go through an EIR process, so the best location for the community is selected.

Respectfully,

Webster Community Council Members:

Stephanie Eastman *Margarette Heckman*
John Eastman *Mich Wasson*
John Durr *Shan*
Cillo Arz *Maricela Arz* *Kristen Hunt*
Angie *Peru Williams* *Johnny Clark*

COMMUNITY LETTERS

February 16, 2024

Nancy Graham, Program Manager
City of San Diego Engineering &
Capital Projects Department
525 B St., MS 908A
San Diego, CA 92101

CIP-CEQA@sandiego.gov

Dear Ms. Graham:

RE: Public Scoping Meeting / Open House, Fairmount / 47th St. Fire Station Project (January 30, 2024)

I am a member of the Chollas Creek Coalition, a representative for Oak Park on the board of the Eastern Area Communities Planning Committee, and President of the Oak Park Community Council.

I would like to submit my comments about the proposed location of this fire station and suggestions for more strategic, and less environmentally damaging locations.

Land Use & Planning: *As part of the EIR, will other potential sites be researched for feasibility, or is the present location, which was acquired in 2017 by the City, pretty much "a done deal?"*

The steep topography of this parcel, and the fact that it naturally is open space park land draining through natural habitat to a creek, certainly would initiate advanced engineering Best Mgt. Practices (BMPs) just to control slope erosion and consequent sediment discharges to the creek and immediate land, not to mention destruction of existing habitats. And after construction, what about O & M? A routine scheduled cleaning of the the drainage control channels "before the rainy season [typically in Aug. & Sept.]" would not suffice because, as we've learned in the last 15 years, the rains could come even in spring and summer.

So, what about other, less steep or even flat locations that are available and more cost-effective to develop, especially if they are already City assets? And if not, *would the City consider purchasing a strategically private, commercially developed parcel for advancing public safety?*

The City owns flat land on Federal Blvd. that is available for a fire station and with much more strategic access to neighboring communities. And if there is an easier and more cost-effective location to develop but privately owned, would the City purchase it?

Water Quality of Chollas Creek: As mentioned before, *developing steep land above creeks* is much more costly in design, construction (including construction "as-builts" or "amendments" to City-approved designs) and on-going maintenance, because the goal is to minimize, to the maximum extent practicable, sediment and other pollutants to the creek and immediate habitats.

Noise: Fire trucks and ambulances conducting routine maintenance at the station and going out on a call: In time, birds will migrate away from it, but neighboring humans are stuck with it.

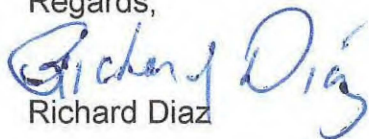
Just a tidbit on closing

A major headwater of Chollas Creek is Chollas Lake in Oak Park. Maps show a blue-line stream from the lake, running through residential areas, before it outfalls into a concrete-lined channel alongside the Leisureland community. This creek water commingles with that from the major unlined open-space channel originating much farther north.

That's why what happens to scarce natural habitat in Chollas Creek downstream from Oak Park means so much to us. And to under-served Southeast SD neighborhoods.

Meeting with others while hiking, biking, jogging, birding,... even simple field trips... that's important to our communities.

Regards,


Richard Diaz



Date: January 26, 2024

To: City of San Diego Engineering & Capital Projects Department

From: Joe Real

Subject: A Leisureland Resident's Comments regarding the Fairmount Avenue Fire Station EIR Scoping Meeting

Thank you for providing me with the opportunity, as a resident of Leisureland Mobile Villa, to present comments as part of the Fairmount Avenue Fire Station Environmental Impact Report (EIR) Scoping Meeting. I live right across the street from the project location. As of recently, I've had to deal with excessive flooding at my home due to our neighborhood being located right by a flood plain. This experience has only emphasized my belief that the chosen location for this fire station project would not be feasible for the City of San Diego. Please review below why this is the case:

- **Flood Concerns**
 - A fire station is a critical community asset, and placing it in a flood-prone area may render it inaccessible during emergencies, leaving the community vulnerable
 - Placing a fire station in a flood-prone area exposes firefighters and other personnel to unnecessary risks during flooding events.
 - Floodwaters can damage the structural integrity of the fire station building and its equipment, leading to expensive repairs and maintenance
 - Building in flood-prone areas can disrupt local ecosystems and contribute to habitat degradation
- **Open Space Concern**
 - The City of San Diego's Mid-City Communities Plan (1998), Parks Master Plan (2021), and Multi-Habitat Planning Area (MHPA) designation of the Chollas Creek region heavily emphasize the importance of ensuring open space in the immediate area. The City needs to be held accountable in maintaining the protections promised to the residents of our community.
- **Traffic & Safety Concerns**
 - Whenever utility work needs to be done in the project area, it creates congestion and traffic issues, which will pale in comparison to the ongoing use requirements for this fire station
 - The proposed project is on a very narrow street where fire trucks will need to make multiple point turns to enter and exit the site, causing an undue burden to those entering and exiting the neighborhood
 - The substantial dimensions of fire trucks will obscure sightlines for existing drivers, becoming a major safety hazard for the community

- It is imperative to note that the community's senior residents and students rely on MTS Bus Route 13, located right by 47th St & Fairmount Ave, which requires traversing a narrow, steep, and dangerous strip of concrete in need of major maintenance

- **Noise Concerns**
 - A fire station's continuous, round-the-clock operations will no doubt have a negative impact on the proposed project's closest neighbors – a senior mobile home community for those 55 and over and the Webster Elementary School located directly above the proposed site
 - The project area's current road infrastructure, coupled with the road's curvature, will intensify any sound within the confines of Chollas Creek, including sirens and fire truck maneuvers such as reversing or engine idling
 - Given that senior citizens are a recognized demographic sensitive to loud noises, it's expected the proposed project will burden them with heightened stress levels and anxiety, affecting their overall quality of life
- **Fiscal Responsibility Concern**
 - The projected cost of this project was originally \$12 million in 2014 when the site was designated on Home Ave. Once the project was relocated to the 47th St/Fairmount Ave location, the financial cost increased significantly to \$28M. This unnecessary escalation raises substantial concerns regarding the city's fiscal responsibility. Additionally, the current state of the site presents significant issues that challenge the rationale for such a development. Further, the \$28 million price tag does not incorporate the completion of this EIR, inflation and cost overruns

Thank you for considering these comments. I look forward to reviewing the draft EIR and all its findings.

Sincerely,

Joe Real

Joe Real

[REDACTED]

To: City of San Diego Engineering & Capital Projects Department

From: Valerie A. Traina, [REDACTED]

Date: January 30, 2024

Re: San Diego Fairmount Avenue Fire Station Environmental Impact Report Scoping Mtg.

Dear Engineering & Capital Projects Manager:

The proposed fire station at Fairmount Ave & 47th Street would cause havoc to the immediate environment. I live in Leisureland Mobile Villa, a senior citizens' manufactured home park comprised of about 300 fixed-income residents adjacent to the proposed site. I've seen the architectural drawing of the prospective building that would stand at least 4 stories tall.

The construction of the giant building's foundation alone would destroy a huge portion of the Chollas Canyon area while creating noise and dust pollution for probably a year. As I've lived here (with my husband) more than 9 years, he and I have watched numerous nonhuman species of mammals and birds who've made the canyon their permanent home. *It's a blessing to observe these magnificent animals, a major reason why we chose to purchase our home here.* A sampling of the animals is as follows: coyotes; opossums; squirrels; cotton-tailed rabbits; red tailed hawks; California coastal garter snakes; king snakes; rattle snakes; Monarch butterflies; gophers; sparrows; house finches; Allen's Hummingbirds; rufous hummingbirds; Anna's hummingbirds; Western thrashers; scrub jays; mourning doves; vireos; wrens; goldfinches; hooded orioles; ravens; grackles; crows; and numerous birds and insects we've yet to identify.

All of them live in this vibrant ecosystem which is largely undisturbed since there's only one way in and out of the small canyon. Also, the canyon across from the mobile homes has been protected from construction of any kind. Within the mobile home park, there are also large swaths of untouched greenbelts that have given the animals refuge.

Building the fire station would involve blasting, drilling and digging by pneumatic machines that would uproot trees and bushes used for nesting and look-outs by birds. A host of other living beings use each tree and bush for the whole of their lives. Insects, for instance that live their entire lives there are food for the many omnivorous birds. The land disturbance would be compounded by the noise pollution and vibration of the numerous vehicles' motors and mechanical claws. Coyotes wouldn't feel safe creating dens within earshot of this disturbance. With a decrease of predators, rodents would breed out of control. There are numerous domino effects when humans tinker with natural environments. *None are desirable.*

Ecologists could give your department a more complete understanding of the harm the building of the fire station would do to the area's nonhuman inhabitants. And, if it is built, the consequences of the new traffic into the canyon, the numerous new humans using the administrative offices there, the constant in-and-out of fire engines and related official vehicles would drive out many of the species and greatly reduce the populations of others. This is disastrous to contemplate. The huge building will create a large shadow over parts of the canyon, further changing the environment.

My husband and I matter. Our neighbors matter. The wildlife and their related ecosystem are vital to our enjoyment of this area. Wildlife can't vote and thus I must speak out to protect other species. The fire station would be an imposition that's UNWANTED AND UNNECESSARY.

I urge you, on behalf of all of Leisureland's human and nonhuman residents to build the fire station on a slab of commercial land that's already zoned for municipal buildings.

Sincerely,

Valerie A. Traina (& Alan Isaacs)

COMMUNITY EMAILS

From: [REDACTED]
To: [CIP CEQA Document Process](#)
Subject: [EXTERNAL] Project Name: Fairmount Avenue Fire Station / Project Number: S-14018
Date: Sunday, February 11, 2024 1:04:19 PM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Attn: Nancy Graham, Project Manager
City of San Diego Engineering & Capital Projects
525 B St., MS 908A, San Diego, CA 92101

Dear Ms Graham,

As a fairly new resident of Leisureland Mobile Villas, I am writing to express my deep concern about the proposed fire station along the single, narrow street that provides access to my home. My son is an LA City firefighter and I know how often those sirens go off during an average night. I am a 72-year old retiree who chose my home in this location because of the peacefulness afforded by the surrounding protected area, and I presumed it would remain peaceful and protected until I heard about the EIR. I find it outrageous that you would even consider putting a fire station in a reverberating canyon location. There must be other, more open locations that would not disturb and distress residents to such a degree. I happen to be relatively healthy for a woman of my age, but there are many in this neighborhood that aren't, and I can only imagine how fire engine sirens reverberating in the canyon are going to affect them. I foresee sleepless nights for many, including myself, and the city doing that to us seems unconscionable.

In addition, during the daytime, there are significant safety risks for elementary school children that attend Webster Elementary. Why on God's green earth would you even consider putting children in danger?

The owner of the park, Mark Koons, has written an extensive letter detailing the myriad environmental concerns the proposed fire station raises, and I also echo each one of them.

There must be other locations for a new fire station. Please consider them first!!

Sue Bennorth
[REDACTED]

From: [REDACTED]
To: [CIP CEQA Document Process](#)
Subject: [EXTERNAL] Comments: Scoping meeting Fairmount FS
Date: Friday, February 16, 2024 4:04:43 PM
Attachments: [Fire Sta. Scoping 01-30-24 Graham.pdf](#)

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Dear staff,

Please see attached file.

The "wet signature" copy is in the mail.

Thanks,

Richard Diaz

--

- Oak Park Community Council

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February 16, 2024

Nancy Graham, Program Manager
City of San Diego Engineering &
Capital Projects Department
525 B St., MS 908A
San Diego, CA 92101

CIP-CEQA@sandiego.gov

Dear Ms. Graham:

RE: Public Scoping Meeting / Open House, Fairmount / 47th St. Fire Station Project (January 30, 2024)

I am a member of the Chollas Creek Coalition, a representative for Oak Park on the board of the Eastern Area Communities Planning Committee, and President of the Oak Park Community Council.

I would like to submit my comments about the proposed location of this fire station and suggestions for more strategic, and less environmentally damaging locations.

Land Use & Planning: *As part of the EIR, will other potential sites be researched for feasibility, or is the present location, which was acquired in 2017 by the City, pretty much “a done deal?”*

The steep topography of this parcel, and the fact that it naturally is open space park land draining through natural habitat to a creek, certainly would initiate advanced engineering Best Mgt. Practices (BMPs) just to control slope erosion and consequent sediment discharges to the creek and immediate land, not to mention destruction of existing habitats. And after construction, what about O & M? A routine scheduled cleaning of the the drainage control channels “before the rainy season [typically in Aug. & Sept.]” would not suffice because, as we’ve learned in the last 15 years, the rains could come even in spring and summer.

So, what about other, less steep or even flat locations that are available and more cost-effective to develop, especially if they are already City assets? And if not, *would the City consider purchasing a strategically private, commercially developed parcel for advancing public safety?*

The City owns flat land on Federal Blvd. that is available for a fire station and with much more strategic access to neighboring communities. And if there is an easier and more cost-effective location to develop but privately owned, would the City purchase it?

Water Quality of Chollas Creek: As mentioned before, *developing steep land above creeks* is much more costly in design, construction (including construction “as-builts” or “amendments” to City-approved designs) and on-going maintenance, because the goal is to minimize, to the maximum extent practicable, sediment and other pollutants to the creek and immediate habitats.

Noise: Fire trucks and ambulances conducting routine maintenance at the station and going out on a call: In time, birds will migrate away from it, but neighboring humans are stuck with it.

Just a tidbit on closing

A major headwater of Chollas Creek is Chollas Lake in Oak Park. Maps show a blue-line stream from the lake, running through residential areas, before it outfalls into a concrete-lined channel alongside the Leisureland community. This creek water commingles with that from the major unlined open-space channel originating much farther north.

That’s why what happens to scarce natural habitat in Chollas Creek downstream from Oak Park means so much to us. And to under-served Southeast SD neighborhoods.

Meeting with others while hiking, biking, jogging, birding,... even simple field trips... that’s important to our communities.

Regards,

Richard Diaz



From: [REDACTED]
To: [CIP CEQA Document Process](#)
Subject: [EXTERNAL] Environmental Impacts: Fairmount Avenue Fire Station S-14018
Date: Monday, February 5, 2024 12:13:38 PM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

RE: Environmental Impacts: Fairmount Avenue Fire Station S-14018

Dear Ms. Graham,

There are so many environmental concerns that many others will address. I chose to share about one not specifically stated in the various communications: Light pollution.

There would be a definite night time light pollution/intrusion of the station's structural lighting on us, the station's immediately neighboring property of over 400 residents in Leisureland Park - 188 homes slated to be directly adjacent to the proposed project.

In addition, and of significant concern to all other living beings in the Preserve, light pollution affects birds and other wildlife that are guided by moonlight during migration. They get confused, lose their way, and often die due to artificial light sources. Large numbers of insects, a primary food source for birds and other animals, are drawn to artificial lights and are either instantly killed upon contact with light sources, and/or, in general, are less available as food sources for wildlife as well.

Thank you so much for your time and care on this matter of significant impact.
Sincerely,

Joni De Groot, [REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]
To: [CIP CEQA Document Process](#)
Subject: [EXTERNAL] Question Submission: Scoping- EIR, Fairmount Fire Station tomorrow 1/30/24
Date: Monday, January 29, 2024 11:11:24 AM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Hello,

My understanding of Completed EIR's is to propose well-researched options/alternatives for Fire Station project sites. However I do not see this covered in my copy thus far. My concern re: input tomorrow evening is that many alternative site options can be based from many who may not have a command of all the necessary factors and features of varied sites.

The EIR would and should.

The primary question therefore is, given all the negative impacts sited in the EIR thus far, what are the alternative site options?

Joni and Henry De Groot

[REDACTED]

From: [REDACTED]
To: [CIP CEQA Document Process](#)
Subject: Public Comment from Henry and Joni De Groot
Date: Monday, January 29, 2024 11:15:18 AM

Submitted on Mon, 01/29/2024 - 11:15

NOP/SCOPING MEETING:
(Mid-City Communities: City Heights) Fairmount Avenue Fire Station / WBS
S-14018 / Notice of Preparation and Scoping Meeting

MEETING DATE:
01/12/2024

NAME:
Henry and Joni De Groot

EMAIL ADDRESS:
[REDACTED]

COMMENT:

Hello,

Our understanding of Completed EIR's is to propose well-researched options/alternatives for Fire Station project sites. However we do not see this covered in the copy thus far. Our concern from approximately 400 residents in Leisureland Park here, is re: input tomorrow evening -- that many alternative site options can be based from many who may not have a command of all the necessary factors and features of varied sites. The EIR would and should state those due to their research and findings.

The primary question therefore is, given all the negative impacts sited in the EIR thus far, what are the alternative site options the REVIEWERS propose?

Many, many thanks!
Joni and Henry De Groot

[REDACTED]

From: [REDACTED]
To: [CIP CEQA Document Process](#)
Subject: Re: [EXTERNAL] Environmental Impacts: Fairmount Avenue Fire Station S-14018
Date: Tuesday, February 6, 2024 6:07:56 PM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Thank you so much, Nancy ~

Stay warm and dry!
Joni De Groot

On Feb 6, 2024, at 5:07 PM, CIP CEQA Document Process <CIP-CEQA@sandiego.gov> wrote:

Ms. De Groot –

This email confirms that your letter was received within the scoping period identified in the notice of preparation for the Fairmont Avenue Fire Station Project.

Thank you.

Nancy Graham, AICP

Program Manager, Entitlements & CEQA Compliance
City of San Diego
Engineering & Capital Projects Department

T (619) 236-6891

sandiego.gov

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From: Joni De Groot [REDACTED]
Sent: Monday, February 5, 2024 12:13 PM
To: CIP CEQA Document Process <CIP-CEQA@sandiego.gov>
Subject: [EXTERNAL] Environmental Impacts: Fairmount Avenue Fire Station S-14018

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

RE: Environmental Impacts: Fairmount Avenue Fire Station S-14018

Dear Ms. Graham,

There are so many environmental concerns that many others will address. I chose to share about one not specifically stated in the various communications: Light pollution.

There would be a definite night time light pollution/intrusion of the station's structural lighting on us, the station's immediately neighboring property of over 400 residents in Leisureland Park - 188 homes slated to be directly adjacent to the proposed project.

In addition, and of significant concern to all other living beings in the Preserve, light pollution affects birds and other wildlife that are guided by moonlight during migration. They get confused, lose their way, and often die due to artificial light sources. Large numbers of insects, a primary food source for birds and other animals, are drawn to artificial lights and are either instantly killed upon contact with light sources, and/or, in general, are less available as food sources for wildlife as well.

Thank you so much for your time and care on this matter of significant impact.
Sincerely,

Joni De Groot, Leisureland Park

[REDACTED]
[REDACTED]

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: [EXTERNAL] Fairmount Avenue Fire Station S-14018
Date: Thursday, February 15, 2024 2:50:44 PM

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The Eastern Area Communities Planning Committee (EACPC) thanks the City for the opportunity for our communities to participate in the EIR Scoping process for the proposed Fairmount Fire Station and provide comments.

On behalf of our communities, we oppose this project that will negatively impact wildlife and sensitive habitat in the Chollas Creek Watershed and affect quality of life for our residents in this area.

Our EIR comments on building a fire station at this proposed site:

- **Hydrology and Water Quality:** The entire valley where the proposed fire station would be located flooded during the January 22, 2024 storm. Just a few feet from the proposed location, the mobile home park sustained major damage with three homes destroyed. There will be significant, permanent construction impacts to native vegetation and habitat and removal of both will not help this area absorb runoff and will potentially lead to more flooding.
- **Recreation:** The site of the proposed new station is within the Chollas Creek Watershed in an underserved, park-deficient area where more parks and green spaces are needed. The City cannot achieve its Parks Master Plan goals in this area by building a fire station in what should be open space with a trailhead and/or a pocket park that nearby residents have requested.
- **Land Use and Planning:** The proposed fire station contradicts the Mid-City Community Plan for Chollas Creek. Building a fire station at this location in the Chollas Creek Watershed when other locations are feasible sends a negative message to underserved residents about community equity and environmental justice.
- Further, we have concerns regarding access, topography, MHPA, and high fire risk.
- We support evaluating the site that recently became available at the former San Diego Police Firing Range on Federal Blvd as an alternative.

Respectfully,

EACPC Board Members: [Lynn Edwards](#), [Bob Scott](#), [John Hogan](#), [Alex Zukas](#), [Andy Huelskamp](#), [Daniele Laman](#), [Derryl Williams](#), [Elida Chavez](#), [Jennifer Bennett](#), [Kristen Hurst](#), [Laura Riebau](#), [Richard Diaz](#)

From: [REDACTED]
To: [CIP CEQA Document Process](#); [REDACTED]
Subject: [EXTERNAL] Opposition to the "Fairmont" Fire Station
Date: Thursday, February 15, 2024 9:01:32 PM

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Greetings City Of San Diego,

I oppose the proposed Fairmont Fire Station based on the January 22 flooding throughout the city. The removal of native plants and cutting into the Chollas Creek Watershed will not abate any potential for flooding in the area, and only results in negative impacts. Brush clearing activities to protect the structure will forever change the footprint of this pristine canyon land. Also, this project also does not align with the City's promises of environmental justice for development in disadvantaged communities. The Chollas Creek Watershed is a vital natural resource encompassing a network of water channels, parks and surrounding open space.

According to the City's own website, "In 2002, the City Council adopted the [Chollas Creek Enhancement Program](#), laying out a visionary path for the Chollas Creek Watershed guided by the community's vision. This comprehensive program includes policies, design guidelines and an implementation strategy, all of which were developed collaboratively with City staff, community leaders, and community members. Together, they identified opportunities for improvement and watershed restoration through nature-based solutions and the creation of enjoyable public spaces accessible to all.

The Chollas Creek Enhancement Program offers detailed design guidelines for wetland restoration, channel reconstruction, landscaping, trail system, public art, education, and programming, ensuring a comprehensive approach to the watershed's enhancement. Some of the projects that were realized as a result of the Chollas Creek Enhancement Program include the South Crest Trails Park, creek restoration along street sections of Imperial Avenue, Market Street and Euclid Avenue, Wightman Street Neighborhood Park and Charles Lewis III Memorial Park.

The development of the Chollas Creek Watershed Regional Park Master Plan will build off the work from the Chollas Creek Enhancement Program in close collaboration with community members, community leaders and community-based organizations, reimagining Chollas Creek to align with present-day needs, challenges, and opportunities. The Chollas Creek Watershed Regional Park Master Plan will help shape a vibrant future for Chollas Creek, embracing community values and ensuring its preservation and enhancement for today and in the future."

Narrowly focused actions to combat climate change can harm nature. Fortunately, there are actions that can concurrently benefit both the climate and nature. Evidence suggests that restoration stands out as one of the most cost-effective and swiftly implementable nature-based climate mitigation measures. This underscores the importance of prioritizing restoration efforts. In San Diego County, there is a need to emphasize invasive species removal, commonly referred to as weeding, as part of restoration initiatives. Despite hosting a significant inventory of restoration projects, many have yielded indifferent success, with a tendency for projects to involve planting, watering, and weeding for a limited period before abandonment, often without repercussions for failing to achieve stated objectives.

Halting the loss and degradation of carbon- and species-rich ecosystems on both land and in the ocean is vital to the survival of our species. In San Diego, such ecosystems encompass a diverse range, from old chaparral to undisturbed desert soils with their vegetation. Efforts should extend beyond local boundaries, recognizing the importance of indirect actions to prevent deforestation in intact forests elsewhere, which serves as a significant contributor to both species loss and greenhouse gas emissions

globally.

I know other sites were considered. I suggest you go back to those options. There are many places in this city where a new fire house would not impact the environment as tragically. I have no information about those sites, but I have some suggestions worth reviewing to keep the fire station in the neighborhood: The police firing range on Federal, the Union Bank of CA building on Euclid, part of the Naval Hospital land, the cul-de-sac near Central Ave Park in the heart of City Heights.

Thank you.

Jen Eastman



From: [REDACTED]
To: [CIP CEQA Document Process](#)
Subject: [EXTERNAL] Fairmount Fire Station Project, Project Number WBS S-14018
Date: Monday, February 12, 2024 3:29:23 PM

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Nancy Graham, AICP
Program Manager, Entitlements & CEQA Compliance
City of San Diego
Engineering & Capital Projects Department

T (619) 236-6891
sandiego.gov

Good afternoon Ms. Graham,
Can you confirm if the deadline for the Environmental Impact "Comment Cards" deadline was extended to February 16, 2024? The reason for the extension was due to the January 22nd flooding in which we have been severely compromised at Leisureland Mobilehome Villa. Even the Fire Department could not enter the park since all exits were flooded with high water. We have been busy cleaning up, and our attention has been on repairing and saving some of your homes. Even our Clubhouse will be closed for 4-5 months due to extensive damage. Three homes were destroyed when the San Diego City's culvert broke due to the heavy rains, and water ravaged our park. Many cars were ruined and in the shop for extensive repairs. A delay would be the only fair thing to provide our residents who have been under such stress and work to clean up their homes.

Most Sincerely

Sharon Harich
[REDACTED]
[REDACTED]
[REDACTED]







From: [REDACTED]
To: [CIP CEQA Document Process](#)
Subject: [EXTERNAL] Fw: Fairmount Fire Station Project, Project Number WBS S-14018
Date: Monday, February 12, 2024 5:07:09 PM

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Fairmount Fire Station Project, Project Number WBS S-14018

Nancy Graham, AICP

Program Manager, Entitlements & CEQA Compliance

City of San Diego

Engineering & Capital Projects Department

T (619) 236-6891

The City of San Diego has identified the surrounding project area as a Multi-Habitat Planning Area-MHPA. The objective is to preserve the natural habitat. Building the Firehouse on the requested site will demolish the entire area the Fire Station footprint is taking. Additionally, it will cause damage to the extended areas due to noise, light, construction, and traffic. Our ecosystem is a delicate balance, which is why the City of San Diego declared this a natural habitat and forced the sale of the land from private owners. The plans are to develop this land for the environment and the enjoyment of the community experiencing nature in a protected state as details are noted in the 2019 Dudek report. Your Firehouse footprint interrupts the plans of development in the process of engaging the local low-income neighborhoods, Leisureland Mobilehome Villa Senior Citizens, and other nature enthusiasts. You should be aware that ALL of the network walking trails are connected to our cornerstone area at Chollas Creek and there are plans for hikers to have a Nature's Pocket Park. The Firehouse Footprint is in direct conflict with the intended Pocket Park. Additionally, Ranger-led hiking programs for our Senior citizens in the park will likely be disrupted.

The program leads are Leslie Reynolds the executive director of Groundwork San Diego; Ranger Gilbert Herrera, with the Chollas Lake Park, and other donors who are interested as well.

Please protect the City of San Diego's list on the 2019 Dudek report. Below I have identified what we are also requesting protection of:

- Coastal sage scrub
- Mixed Chaparral
- Cooper's Hawk
- Coastal California gnatcatcher
- Orange-throated whiptail
- San Dieman tiger-whiptail
- Red-diamondback rattlesnake
- Two-striped garter snake
- Dulzura pocket mouse
- North Western San Diego pocket mouse
- San Diego desert woodrat
- Yuma myotis bat
- Monarch butterflies

Name: Thomas M. Harich

[REDACTED]

[REDACTED]

From: [REDACTED]
To: [CIP CEQA Document Process](#)
Subject: [EXTERNAL] Firestation Project S-14018 Attn: Nancy Graham, Program Manager
Date: Monday, February 12, 2024 3:18:35 PM

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Nancy,

My name is Margaret Merino and my address is [REDACTED]
I, along with 185 other homes, not sure of how many people, but more than the amount of homes, will be impacted by this project. Our community is Leisureland Mobile Home park. To buy a home here you have to be at least 55 years old. We can have others living in our homes that are at least 18 years of age. The Firestation Project S-14018 would be built in essence on what is now a hillside. There are homes, not directly above the hillside, but in close proximity to where the firestation would be. Also, 47th street is one lane going in and one lane coming out, not very well suited for a 35 or longer foot truck that has to pull out and back into a fire station. That is only one of many hurdles that would have to happen to build that firestation. The Chollas creek canyon that is on the west side of our mobile home park runs north all the way to Euclid Ave, which is home to I don't know how many species of wildlife and plant life. SDG&E had a project in the south end of that canyon right where the street turns from running north and south to running east. That was very disruptive to the traffic here as many times we were down to one lane with personnel at each end either stopping or waving traffic going one way so the traffic going the other way to proceed. Then there's the noise factor of not only when it's being built but after it's built and coming and going at all hours of the night and day. And from what I understand there would be no medical response at this station. So needless to say I'm opposed to this station being built here.

Sincerely,

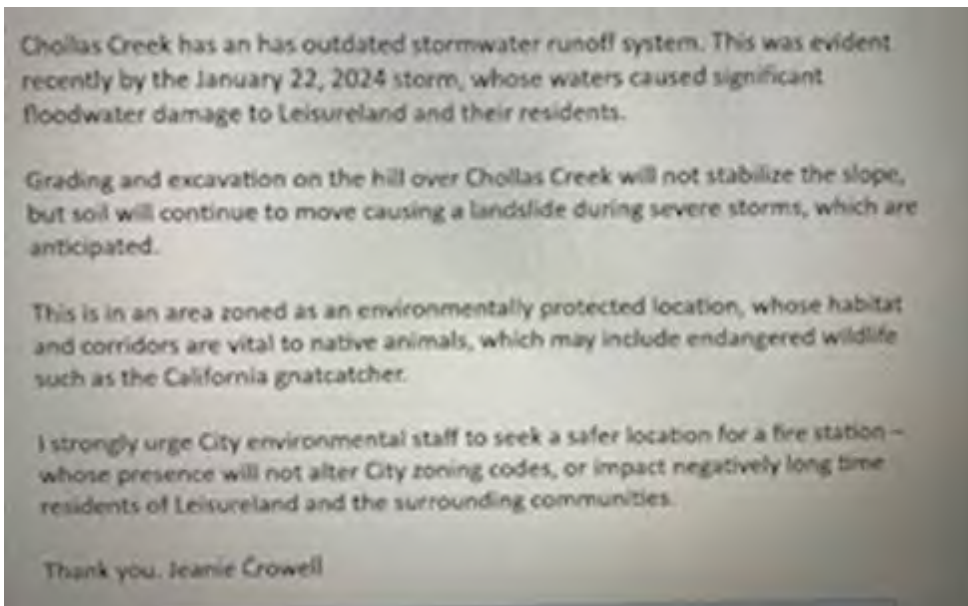
Margaret Merino
[REDACTED]

From: [REDACTED]
To: [CIP CEQA Document Process](#)
Cc: [REDACTED]
Subject: [EXTERNAL] My Comments for EIR Scoping Mtg: Fire Station
Date: Tuesday, January 30, 2024 11:06:39 AM
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

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Good morning. Please see comments provided by a resident of Leisureland Mobile Villa re the Fairmount Fire Station EIR Scoping Meeting. Thank you.

Paul



Paul Simonds | Senior Vice President
Curt Pringle & Associates

[REDACTED]

From: [REDACTED]
To: [REDACTED]
Subject: [EXTERNAL] RE: Additional Comments and Request for Expanded Environmental Review on Notice of Preparation Fairmount Avenue Fire Station Project Fairmount Avenue Fire Station S-14018
Date: Monday, February 12, 2024 4:08:27 PM
Attachments: February 12 2024 Fairmount Area Fire Station Notice QUBB RMPENT 61 - Comments.pdf.pdf
CEQA Alternatives.pdf

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Supplemental comments and documents

RE: SUPPLEMENTAL Additional Comments and Request for Expanded Environmental Review Fairmount Avenue Fire Station S-14018

From: Graham, Nancy <NHGraham@sandiego.gov> on behalf of CIP CEQA Document Process <CIP-CEQA@sandiego.gov>
Sent: Monday, February 12, 2024 9:38 AM
To: [REDACTED] Graham, Nancy <NHGraham@sandiego.gov>; CIP CEQA Document Process <CIP-CEQA@sandiego.gov>; CLK City Clerk <CityClerk@sandiego.gov>; SDAT City Attorney <CityAttorney@sandiego.gov>
Subject: RE: Additional Comments and Request for Expanded Environmental Review on Notice of Preparation Fairmount Avenue Fire Station Project Fairmount Avenue Fire Station S-14018

Mr. Stump -

This email confirms that your letter was received within the scoping period identified in the notice of preparation for the Fairmont Avenue Fire Station Project.

Thank you.

Nancy Graham, AICP
Program Manager, Entitlements & CEQA Compliance
City of San Diego
Engineering & Capital Projects Department

T (619) 236-6891

sandiego.gov

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From: [REDACTED]
Sent: Sunday, February 11, 2024 4:12 PM
To: Graham, Nancy <NHGraham@sandiego.gov>; CIP CEQA Document Process <CIP-CEQA@sandiego.gov>; [REDACTED]
Cc: [REDACTED]
Subject: [EXTERNAL] : Additional Comments and Request for Expanded Environmental Review on Notice of Preparation Fairmount Avenue Fire Station Project Fairmount Avenue Fire Station S-14018

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JOHN STUMP

February 11, 2024

Nancy Graham, Program Manager and Carrie Purcell, Deputy Director City of San Diego
Engineering & Capital Projects Department, 525 B St., MS 906A, San Diego, CA 92101.
CIP-CEQA@sandiego.gov

RE: Additional Comments and Request for Expanded Environmental Review on Notice of Preparation Fairmount Avenue Fire Station Project Fairmount Avenue Fire Station S-14018
[CEQA Notice of Preparation 1-12-24.pdf \(sandiego.gov\)](#)

Dear Ms. Graham and City of San Diego Environmental Review Department,

"What's past is prologue" | *The Tempest*, Act 2, Scene 1

I. LIST OF COMMENTS AND SUBJECTS FOR ANALYSIS ALREADY SUBMITTED:

I am submitting additional comments on a needed project in the wrong location.

It appears that the project's location was selected first and then a fire station designed to fit on that site. The acquisition of this mysterious site has been the subject of complaints submitted to the City Auditor Fraud and Abuse Hotline and the City of San Diego's political corruption Ethics Commission. The acquisition of this site suggested some of the characteristics of the dealings to acquire 101 Ash Street with the Hughes Moreno brokerage group. These complaints submitted in May of 2023 are still pending. I will attach this letter and renew these complaints, with this submission.

I have resubmitted, as part of Notice of Preparation comments, both my September 24, 2019, and May 11, 2023 letters on this needed project in the wrong location - see prior Preliminary Comments letter of January 24, 2024. The September 24th letter lists a minimum of six (6) categories of early research for the preparation of the full environmental study, that should now be included in the new work. I ask that the study also include noise and air quality impacts studies on the adjacent senior citizen and school impacts. (I see that the preliminary project plan has already included diversion of the toxic project chemicals to the sanitary sewer system, for filtering by PURE WATER drinking systems). These three (3) prior letters, and their attachments should be incorporated, by reference, into this February 11, 2024, letter.

I also submitted a January 28, 2024, letter with a Cost Benefit excel spreadsheet to permit the easy comparison of the subject Proposed South Fairmount Area Station with the Completed North Area Fire Station 17. This letter asked that the now noticed preparation study complete this or a similar cost comparison when analyzing the proposed site as compared to other alternatives. This prior letter and the excel spreadsheet must be incorporated, by reference, into this February 11, 2024 letter.



JOHN STUMP

February 11, 2024

Nancy Graham, Program Manager and Carrie Purcell, Deputy Director City of San Diego Engineering & Capital Projects Department, 525 B St., MS 908A, San Diego, CA 92101.
CIP-CEQA@sandiego.gov.

RE: Additional Comments and Request for Expanded Environmental Review on Notice of Preparation Fairmount Avenue Fire Station Project Fairmount Avenue Fire Station S-14018
[ECP Notice of Preparation 1-12-24.pdf \(sandiego.gov\)](#)

Dear Ms. Graham and City of San Diego Environmental Review Department,

"What's past is prologue" [*The Tempest*, Act 2, Scene I]

I. LIST OF COMMENTS AND SUBJECTS FOR ANALYSIS ALREADY SUBMITTED:

I am submitting additional comments on a needed project in the wrong location.

It appears that the project's location was selected first and then a fire station designed to fit on that site. The acquisition of this mysterious site has been the subject of complaints submitted to the City Auditor Fraud and Abuse Hotline and the City of San Diego's political corruption Ethics Commission. The acquisition of this site suggested some of the characteristics of the dealings to acquire 101 Ash Street with the Hughes Moreno brokerage group. These complaints submitted in May of 2023 are still pending. I will attach this letter and renew these complaints, with this submission.

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Two print media articles: "Cost of Fire station help opponents" and Opposition growing to new fire station proposed for semi-rural site in City Heights" were included in my preliminary comments, of January 24, 2024. These articles layout and present specific CEQA concerns that must be addressed in the new scoping studies. The picture of the proposed designed to fit new fire station illustrated why this new fire station was likely to be the most expensive in San Diego's history! The architect's illustration of the proposed specialized fire station, built to fit the sloped and environmentally sensitive location, has been described as a *Billionaire's Chollas Rural Retreat* or a *Trump Towers Fire Station*.



. A normal City of San Diego fire station, recently built for the Northern Fairmount area looks like this:



See [Fire Station 17 | City of San Diego Official Website](#)

The above picture of the rapidly and economically built Fire Station 17 for the Northern Fairmount Area illustrates how and why a site that would qualify for a minimum CEQA Negative Declaration should be considered for the proposed Southern Fairmount Area Fire Station. My January 28, 2024, letter asked for completion of a cost comparison excel spread sheet as part of the alternatives comparison section of the Scoping for this project.

ROW	FIRE STATION COST COMPARISONS	South AREA Station	E/A	North AREA Station	E/A	DELTA	%
1	Initial Proposal Development						
2							
3	Detailed Proposal for Costing						
4							
5	CEQA Scoping and Report						
6							
7	CEQA Negative Determination						
8							
9	Land Acquisition, Commissions, & costs						
10							
11	Site Demolition and Preparation						
12							
13	CEQA Scoping and Report						
14							
15	CEQA Studies & Report Preparation						
16							
17	CEQA Approvals and Litigation						
18							
19	Revised Detailed Construction Plans						
20							
21	Site Demolition and Preparation						
22							
23	CEQA and Community Mitigation						
24							
25	Fees, Permits, Licenses, Inspections						
26							
27	Construction						
28							
29	Furnishings						
30							
31							
32							
33	TOTAL STATION COSTS:						

Only a cost comparison analysis will provide the public and policy makers with a factual basis to compare the subject proposed station with less costly alternatives at different sites.

My email of: Tuesday, February 6, 2024 6:23 PM To: Graham, Nancy
NHGraham@sandiego.gov Subject: [EXTERNAL] City's coffers short of cash for projects
https://enewspaper.sandiegouniontribune.com/infinity/article_popover_share.aspx?quid=edfbb2c9-4f39-4382-afdf-42c1c23449bc&share=true listed City funding shortfalls including: "...\$235 million for firefighting facilities, including new stations and a new training center.". This tight money condition is one reason the alternatives analysis must consider other more economical building sites for the new southern Fairmont area Fire Station. This email and Union Tribune article must be incorporated, by reference, into this February 9, 2024 letter.

II. CITY OF SAN DIEGO INTERNAL STUDIES RELATED TO FIRE STATION NEEDS, COMMUNITY EQUITY, COST, LOCATIONS AND EFFECTIVENESS:

The City of San Diego has made several attempts to improve public safety and control costs for Fire Stations and facilities. Of particular note, in regards to the current Scoping Notice, is the IBA's 04/4/2017 [IBA Report 17-15](#) Fire-Rescue Standards of Response Cover Review: Fiscal Impacts & Implementation Scenarios report which then lists as "CIP 1" the now Fairmont Avenue Fire Station S-14010, as the "Home Avenue" and "partially Funded; negotiating land purchase" (IBA Report Number 17-15, page 2, Table 1: Recommended New Fire Stations, 2017 Citygate Report) and again as "2010 Priority "1 Home Avenue CIP 1 of 6" " (IBA Report Number 17-15, page 3, Table 2: 2010 to 2017 Report Crosswalk Citygate Report). IBA Report Number : 17-15 also states that the:

"Cost per Fire Station: \$13 million one-time capital expenditure
\$1.5 million annual operating expenditures (12.0 FTEs)"

(IBA Report Number 17-15, page 4).

Later, that same IBA Report Number: 17-15 states: "Finally, each additional fire station will require the purchase of fire apparatus (one fire engine per station, plus a ladder truck at select stations). Fire engines and ladder trucks cost approximately \$850,000 and \$1.3 million, respectively, and have an expected useful life of 12-18 years. " (IBA Report Number 17-15, page 4). This same IBA Report Number 17-15, then continues with an interesting discussion of the fleet financing methods for fire engines and ladder trucks. There is no definite discussion of the necessary "furnishing" of new residential fire stations; so those costs must be documented, separately and their useful life is likely only 3-5 years.

IBA Report Number: 17-15 states as Capital Improvement Project 1 the new Home Avenue Fire Station (now **FAIRMOUNT AVENUE FIRE STATION S-14018**) in **Table 4: Estimated Costs for Full Citygate Report Implementation** and **Table 5: Estimated Costs for Modified Citygate Report Implementation** at a acquisition and construction cost of \$13,000,000. The new Home Avenue Fire Station / **FAIRMOUNT AVENUE FIRE STATION S-14018** has slipped in priority and GREATLY increased in estimated costs because of poor decision making concerning were to select a site in the target area and selecting a controversial site that requires extensive CEQA study, environmental mitigation, and extensive architectural

and engineering costs to make a specialized fire station design work on the purchase land. (IBA Report Number 17-15, page 8, Table 4 and page 9, Table 5):.

City departments have chosen approaches that increase costs, increase the time to complete and staff a working fire station, and bought controversy from the community.

The Independent Budget Analyst and Independent Auditor Reports listed below have been selected because they contain information that must be considered in any full CEQA environmental report. The scoping commentor requests that these IBA and Audit reports be included in the Scoping documentation. Additionally, the referenced San Diego County Grand Jury reports with the required City Response letters must be included in the scoping comments for this project.

A. Fire Rescue and Lifeguards Related IBA Reports

10/18/2017 [IBA Report 17-36](#) Review of Fourth Amendment to 2011 Emergency Medical Services Agreement with Rural/Metro (American Medical Response)

04/4/2017 [IBA Report 17-15](#) Fire-Rescue Standards of Response Cover Review: Fiscal Impacts & Implementation Scenarios

06/21/2016 [Report 16-15](#) Firehouse Bond Ballot Proposal

10/2/2014 [Report No. 14-39 REV](#) San Diego Infrastructure: Needs for Existing and New Fire Stations
[Report No. 14 39 REV- Attachment 1](#) (10/03/14)

06/6/2014 [Report No. 14-22](#) Proposed Response to Grand Jury Report "Emergency Response Times: Does Your ZIP Code Dictate Your Chance of Survival?"
[Report No. 14 22 - Attachment 1](#) (6/10/14)
[Report No. 14 22 - Attachment 2](#) (6/10/14)

04/24/2014 [Report No. 14-14](#)
Second Amendment to 2011 Emergency Medical Services Agreement
[Fire Rescue Lifeguards reports from 2015 and earlier](#) are available in the City of San Diego's

IBA ARCHIVED SITE.

10/3/14 [Report No. 14-39 REV](#) (PDF)
[Report No. 14 39 REV- Attachment 1](#) (PDF) (10/03/14)
San Diego Infrastructure: Needs for Existing and New Fire Stations

6/10/14 [Report No. 14-22](#) (PDF)
[Report No. 14 22 - Attachment 1](#) (PDF) (6/10/14)
[Report No. 14 22 - Attachment 2](#) (PDF) (6/10/14)

B. AUDIT REPORTS

2023

Performance Audit of the City's Capital Improvement Project Approval Process

- [Highlights of the City's CIP Approval Process](#)
- [Video Presentation to Audit Committee](#)

2022

Performance Audit of the City's Financial Condition

- [Financial Condition Highlights](#)
- [Video Presentation to Audit Committee](#)

Performance Audit of the City's Lease Management and Renewal Process

- [City's Lease Management and Renewal Process
Highlights](#)
- [Video Presentation to Audit Committee](#)

Performance Audit of the Development Services Departments Code Enforcement Division

- [Code Enforcement Highlights](#)
- [Video Presentation to Audit Committee](#)

Performance Audit of Workplace Safety and Workers Compensation

- [Workplace Safety and Workers Compensation Audit
Highlights](#)
- [Video Presentation to Audit Committee](#)

2021

Performance Audit of the City's Climate Action Plan

- [Climate Action Plan Audit Highlights](#)
- [Video Presentation to Audit Committee](#)

Performance Audit of the City's General Fund User Fees

- [City's General Fund User Fees Audit Highlights](#)
- [Video Presentation to Audit Committee](#)

Performance Audit of the City's Major Building Acquisition Process

- [The City's Major Building Acquisition Process -
Report Highlights](#)

- [City Auditor's Comments to the Revised Management Response to the July 2021 Performance Audit of the City's Major Building Acquisition Process](#)
- [City Auditor's Comments to the City Attorney's Rebuttal Response to the Performance Audit of the City's Major Building Acquisition Process Audit Report](#)
- [Video Presentation to Audit Committee](#)
- [Performance Audit of The City's Use of Cares Act Funding](#)
- [The City's Use of Cares Act Funding - Report Highlights](#)
- [Video Presentation to Audit Committee](#)
- [Performance Audit of the Public Utilities Department's Industrial Wastewater Control Program - Part II](#)
- [PUD's Industrial Wastewater Control Program - Part II Highlights](#)
- [Video Presentation to Audit Committee](#)
- 2020**
- [Follow-Up Performance Audit of the Public Utilities Department's Industrial Wastewater Control Program](#)
- [PUD's Industrial Wastewater Control Program Highlights](#)
- [Video Presentation to Audit Committee](#)
- [Performance Audit of Development Services Department Administration of Deposit Accounts for Development Projects](#)
- [DSD Deposit Accounts Highlights](#)
- [Performance Audit of the City's Public Liability Management](#)
- [Public Liability Management Highlights](#)
- [Video Presentation to Audit Committee](#)
- 2018**
- [Performance Audit of Community Planning Groups](#)
- [Community Planning Groups Highlights](#)
- [Performance Audit of Development Impact Fees](#)
- [Performance Audit of Development Services Accela Permitting System Implementation](#)
- [Performance Audit of the City's Grant Management](#)
- [City's Grant Management Highlights](#)
- [Performance Audit of the City's Financial Condition](#)
- [Financial Condition Highlights](#)
- [Business and Industry Incentives Program](#)

[Highlights](#)
[Performance Audit of the Fleet Operations Vehicle Acquisition Process](#)
1) [Fleet Vehicle Acquisition Highlights](#)
[Performance Audit of the Real Estate Assets Departments Portfolio Management Practices](#)
• [Real Estate Assets Department's Portfolio Management Highlights](#)
2014
[Performance Audit of the San Diego Fire-Rescue Department's Overtime Costs](#)

C. CITYGATE STUDY

"In 2014, City staff identified the necessary funding to construct a new fire station. In 2018, a site on Fairmount Avenue was acquired to meet the need identified in the Citygate study. More information on this study can be found at: <https://www.sandiego.gov/staging/fire/about/citygate> " (Notice of Preparation Fairmount Avenue Fire Station Project Fairmount Avenue Fire Station S-14018 [ECP Notice of Preparation 1-12-24.pdf \(sandiego.gov\)](#) .. page 2, January 12, 2024). The Citygate study is here after referred to as "CITYGATE STUDY" and incorporated by reference into these scoping comments.

D. PRINT MEDIA

Print media article from the [San Diego Union Tribune](#) "**Panel seeks clarity on city spending Grand jury probes how developer impact fees will be doled citywide Developer impact fees are collected to cover the city's costs for infrastructure improvements such as the new fire station in Mission Valley. (U-T file) By David Garrick**" repots the San Diego County Grand Jurie's report concerns about fire station and other infrastructure financing, below:

"San Diego's controversial plan to use developer money from wealthy neighborhoods to build infrastructure in low-income areas is facing new criticism for lacking specifics about how exactly city officials would move the money around.

The county grand jury says the city hasn't spelled out how it will combine \$500 million stranded in 44 neighborhood-specific infrastructure accounts with separate money flowing into a new citywide infrastructure fund the policy creates.

A report the grand jury released last week doesn't evaluate the fairness of shifting infrastructure money from wealthy areas to poor neighborhoods. It only says the city's plan lacks crucial details that are of vital public importance.

The grand jury's foreperson, Ed Lopatin, said the question of whether the policy is smart or fair is a decision for San Diego's elected officials, not grand jury. It focused only on how the city plans to implement the policy.

City officials declined to comment, citing rules regarding grand jury reports that set strict timelines for responses. The mayor and City Council are required to provide a comprehensive response by Aug. 28.

The policy, which the City Council approved last fall, prompted a group of residents called Livable San Diego to sue, arguing the shifting of developer money from wealthy to poor areas is unconstitutional and violates state law.

The lawsuit doesn't criticize the city's desire to boost low-income areas, but it says the city can't legally shift developer money away from neighborhoods where the development occurred because that's where the mitigation is needed.

City officials have hailed the policy, called "Build Better San Diego," as something that will allow infrastructure projects to be built more quickly and more equitably.

Developer impact fees are typically spent on roads to mitigate traffic congestion added by new construction and on parks, libraries, fire stations and underground piping to support new residential, commercial and industrial projects.

The new policy ends the city's decades long practice of keeping developer impact fees in 44 separate pots of money and requiring the money be spent in the specific neighborhoods where it was collected.

Critics say this practice has perpetuated — and even exacerbated — inequities between wealthy and poor areas. With more development typically taking place in wealthy areas, more infrastructure money from developers also has gone to those communities.

In contrast, the new policy requires the city to pool the money into one pile and spend it in neighborhoods that most need it. In addition, money from the citywide fund can be apportioned to individual neighborhoods whose own pots are just short of having enough for a specific project.

That part of the plan, doling out the new citywide money to individual neighborhoods, is the focus of the grand jury's criticism.

The report says the city needs a five-year plan to spend the \$511 million stranded in neighborhood-specific accounts, including specifics on how money from the new citywide fund would be used to accelerate spending the stranded money.

"The grand jury believes the city needs to develop an objective and demonstrable plan for systematically liquidating the legacy developer impact fee fund balances," the report says. "In the absence of a tactical, executable plan, the money sitting idle in the community lock boxes may remain until additional funding sources are identified."

The volunteer panel also wants to know the sources for all the money that will be included in the five-year plan.

"The plan should detail the sources and timing of all additional discretionary funds, including the use of new developer impact fee funds collected under Build Better SD, that will facilitate build out of the infrastructure projects originally identified and promised under the old structure," the report says.

The grand jury also says city officials should consider refunding to developers stranded money they have no specific plans to spend, noting that the state Mitigation Fee Act requires detailed plans for how developer fees kept for more than five years will eventually be spent.

Returning money to developers in such cases would be a major shift in policy for the city.

The fourth recommendation in the report calls for routine audits of all city developer impact fee accounts. The grand jury notes that the city charges the individual neighborhood funds annual administration fees as high as 8 percent for overseeing the accounts, which leaves less money available for projects.

The grand jury report noted that city officials said there was \$222 million stranded in neighborhood-specific accounts when the new policy was approved last fall — far less than the \$511 million in the neighborhood-specific accounts.

The source of the discrepancy is \$289 million that has been appropriated for specific projects but not yet spent.

San Diego typically collects about \$60 million per year in developer fees across the city. They can only be used for new projects, not for maintenance of existing facilities or infrastructure.

A 2019 analysis by a city-hired consultant found that Los Angeles, San Francisco and San Jose collect most of their developer fees for infrastructure on a citywide basis, not by specific neighborhood.

While the city's emphasis on spending citywide infrastructure funds in low-income areas has gotten the most attention, the new policy includes additional criteria beyond income and a history of being underserved.

Areas of the city will also be prioritized based on having large populations or significant recent population growth. Other factors include whether a neighborhood faces environmental or public safety threats.

Mayor Todd Gloria has hailed the new policy as a significant shift toward a more equitable San Diego.

"For the past 40 years, we've used developer fees to pay only for specifically listed infrastructure in the communities where the fees were generated," he said last fall. "Once upon a time, that made sense — but not anymore. Now, that system only perpetuates historic inequities and leads to millions of desperately needed infrastructure dollars sitting unused."

Livable San Diego, the group suing the city over the new policy, last week called the new policy an attempt by Gloria to take more control over developer impact fees by creating a citywide fund he can use at his discretion.

The citywide infrastructure account will be divided up into four separate accounts, one each for parks, fire stations, libraries and mobility — roads, bike lanes and related projects." david.garrick@sduniontribune.com

I also submitted, as a comment by email, a copy of a San Diego Union Tribune article: "EPA sets tougher rules on soot in the U.S. Move aims to improve health of Americans by targeting pollution" https://enewspaper.sandiegouniontribune.com/infinity/article_popover_share.aspx?guid=13773b26-7570-44f5-a571-02205ef987ef&share=true This submission was to request that the EIR quantify and study the impacts from diesel fire truck operations next sensitive receptors of the adjacent elementary school and senior community.

E. SIERRA CLUB V COUNTY OF SAN DIEGO

For reference and convenience the COURT OF APPEAL, FOURTH APPELLATE DISTRICT case SIERRA CLUB V COUNTY OF SAN DIEGO, [D064243 (Super. Ct. No. 37-2012-00101054- CU-TT-CTL)] is submitted as comment. [D064243.PDF \(ca.gov\)](#) . This case is herein incorporated into these comments by reference. This case shall be here after referred to as "Sierra Club v County".

F. STATE & FEDERALLY LISTED ENDANGERED & THREATENED California Flora & Fauna Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities [FileHandler.ashx \(ca.gov\)](#) is submitted The [San Diego NWR Threatened & Endangered Species | U.S. Fish & Wildlife Service \(fws.gov\)](#) is submitted.

III. CITY OF SAN DIEGO DOCUMENTS PUBLISHED AS PART OF THE SCOPING NOTICE FOR FAIRMOUNT AVENUE FIRE STATION S-14018

A. NOTICE OF PREPARATION FAIRMOUNT AVENUE FIRE STATION PROJECT FAIRMOUNT AVENUE FIRE STATION S-14018

The city published: Notice of Preparation Fairmount Avenue Fire Station Project Fairmount Avenue Fire Station S-14018 [ECP Notice of Preparation 1-12-24.pdf \(sandiego.gov\)](#) . That document, hereafter referred to as: NOTICE", is available on the internet and incorporated herein by reference..

B. SUPPLEMENTAL BOARDS PRESENTED ADDITIONAL INFORMATION, RATIONAL FINDINGS, AND THE BASIS FOR THE SELECTION OF THE SUBJECT: FAIRMOUNT AVENUE FIRE STATION S-14018.

The city supplemented that NOTICE with a series of detailed BOARDS, present to the area Community. These slides presented additional information, rational, findings, and the basis for the selection of the subject: Fairmount Avenue Fire Station S-14018. These supplemental notice boards, hereafter "BOARDS" are herein incorporated by reference and presented below:

1. BOARD 1. Benefits of Proposed Fire Station

Benefits of the Proposed Fire Station

- **Faster Help:** Quicker response during emergencies like fires or accidents.
- **Safer Community:** Improved safety for residents from help nearby.
- **More Firefighting Resources:** Additional stations mean more firefighters and equipment to handle multiple incidents.
- **Medical Assistance:** Provides quick emergency medical services, promoting public health.
- **Community Hub:** Engages with the community through services and collaborative efforts.
- **Preparedness for Disasters:** Plays an important role in wildfire and disaster preparedness, helping communities during natural disasters.

The new station is planned to reduce the current response time average from 8:10 to under the target response time of 7:30 (90% of the time).

REDUCING RESPONSE TIMES SAVES LIVES

Beneficios de la Estación de Bomberos Propuesta

- **Ayuda más rápida:** Respuesta más rápida durante emergencias como incendios o accidentes.
- **Comunidad más segura:** Mayor seguridad para los residentes gracias a la ayuda cercana.
- **Más recursos de extinción de incendios:** Estaciones adicionales significan más bomberos y equipos para manejar múltiples incidentes.
- **Asistencia Médica:** Brinda servicios médicos rápidos de emergencia, promoviendo la salud pública.
- **Centro comunitario:** Interactúa con la comunidad a través de servicios y esfuerzos de colaboración.
- **Preparación para desastres:** Desempeña un papel importante en la preparación para incendios forestales y desastres, ayudando a las comunidades durante los desastres naturales.

Se planea que la nueva estación reduzca el tiempo de respuesta promedio actual de 8:10 al tiempo de respuesta objetivo de 7:30 o menos (90% del tiempo).

REDUCIR LOS TIEMPOS DE RESPUESTA SALVA VIDAS

Engineering and Capital Projects Department
Fairmount Avenue Fire Station | Staffing Meeting

The City of
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2. BOARD 2 Why is Fire Station Planned for this Location?

Why is the Fire Station Planned for this Location?

- The station must be located within the service need area.
- Four other sites were considered. This one was selected because:
 - » The City was able to acquire the site.
 - » The site was large enough.
 - » The soil of the site did not require toxic remediation.
 - » The street frontage has limited traffic, which allows trucks to pull out easily in emergencies.
 - » Power lines and flood risk are not a concern.
- Please Note: Sirens will only be sounded as is reasonably necessary as a warning to other drivers and pedestrians.

¿Por qué se planea la estación de bomberos en esta ubicación?

- La estación debe estar ubicada dentro del área de necesidad de servicio.
- Se consideraron otros cuatro sitios. Este fue seleccionado porque:
 - » La Ciudad pudo adquirir el sitio.
 - » El sitio era lo suficientemente grande.
 - » El suelo del sitio no requirió remediación tóxica.
 - » El frente de la calle tiene tráfico limitado, lo que permite que los camiones salgan fácilmente en caso de emergencia.
 - » El sitio no tiene riesgo de líneas eléctricas o de inundación.
- Tenga en cuenta: Las sirenas solo sonarán cuando sea razonablemente necesario como advertencia a otros conductores y peatones.

Engineering and Capital Projects Department
Fairmount Avenue Fire Station | Staffing Meeting

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3. BOARD 3. Map of Service Area

Map of the Service Area | Mapa del Área de Servicio

Project Site

Sitio del Proyecto

A service area is a geographic area that the fire station is responsible for serving and responding to in emergencies. Every location of a service area should be reached within 7 minutes and 30 seconds.

Un área de servicio es un área geográfica que la estación de bomberos es responsable de atender y responder en caso de emergencia. Se debe llegar a cada ubicación de un área de servicio en 7 minutos y 30 segundos.



Engineering and Public Works Department
Fairmount Avenue Fire Station | Scoping Meeting

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4. BOARD 4. Project Description

Project Description

Project Components

- Construction of new fire station (22,400 sf, 4-story station).
- 15-stall parking lot.
- 1 garage and 2 apparatus bays (5,400 sf).
- Exercise room kitchen and 10 bunch rooms.
- Trash enclosure, emergency generator and fuel tank.
- Total construction activities will allow for disturbance of 0.7 acres.
- Project access would be one standard driveway off 47th Street.
- New domestic 2" water service and meter and a 2.5" reduced pressure backflow device.
- Irrigation with 2" water service and meter and 2.5" reduced pressure backflow device.
- Sewer service will be provided with 6" lateral and a clarifier.
- Offsite improvements include new 22" wide and 40" wide drive aprons, new crosswalk, curb cut, and power pole on 47th Street.

Descripción del Proyecto

Componentes del proyecto

- Construcción de una nueva estación de bomberos (estación de 22,400 pies cuadrados de área y de 4 pisos).
- 15 espacios de estacionamiento.
- 1 garage y 2 espacios para aparatos de bomberos (5,400 pies cuadrados).
- Sala de ejercicios, cocina y 10 cuartos para grupos.
- Espacio para basurero, generador de emergencia y tanque de combustible.
- Las actividades totales de construcción resultarán en una perturbación de 0.7 acres.
- El acceso al proyecto será un camino de entrada estándar desde la calle 47th Street.
- Nuevo medidor y servicio de agua doméstico de 2" y un dispositivo de refugio de presión reducida de 2.5".
- Riego con servicio y medidor de agua de 2" y dispositivo de refugio de presión reducida de 2.5".
- El servicio de alcantarillado contará con un lateral de 6" y un clarificador.
- Las mejoras fuera del sitio incluyen nuevas plataformas de acceso de 22" de ancho y 40" de ancho, un nuevo cruce de peatones, un corte en la acera y un poste de energía en la calle 47th Street.

Engineering and Public Works Department
Fairmount Avenue Fire Station | Scoping Meeting

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5. BOARD 5 Fairmount Avenue Fire Station

Fairmount Avenue Fire Station | Estación de Bomberos de Fairmount Avenue



North Elevation | Fachada Norte



South Elevation | Fachada Sur



East Elevation | Fachada Este



West Elevation | Fachada Oeste

6. BOARD 6 The Environmental Review Process

The Environmental Review Process

California Environmental Quality Act (CEQA)

- Informs the public and decision makers of potential significant environmental effects.
- Identifies measures and alternatives to reduce impacts, as feasible.
- Encourages public input on the environmental analysis.
- Note: The environmental document does not recommend project approval or denial.

El Proceso de Revisión Ambiental

Ley de Calidad Ambiental de California (CEQA por sus siglas en inglés)

- Informar al público y a las personas encargadas de tomar decisiones sobre posibles efectos ambientales significativos.
- Identifica medidas y alternativas para reducir los impactos en la medida de lo posible.
- Fomenta la opinión del público sobre el análisis ambiental.
- El documento ambiental no recomienda la aprobación o denegación del proyecto.



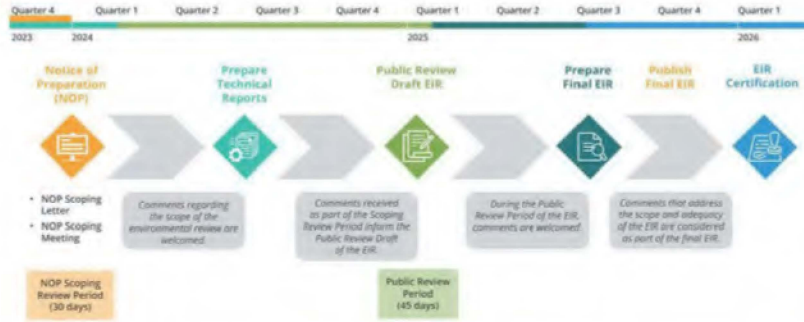
Engineering and Construction Department
Fairmount Avenue Fire Station | Scoping Meeting

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7. BOARD 7 EIR Process

EIR Process

Proceso de Análisis de Impacto Ambiental



Engineering and Capital Projects Department
Fairmount Avenue Fire Station | Scoping Meeting

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8. BOARD 8 Proceso de Análisis de Ambiental

Proceso de Análisis de Impacto Ambiental

EIR Process



Engineering and Capital Projects Department
Fairmount Avenue Fire Station | Scoping Meeting

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9. BOARD 9 What is an Environmental Impact Report (EIR)?

What is an Environmental Impact Report (EIR)?

- Prepared per 2023 CEQA Guidelines and Statutes and City's CEQA Significance Determination Thresholds.
- Provides a detailed project description and setting.
- Discloses any potentially significant environmental impacts from the project.
- Identifies measures to mitigate environmental impacts.
- Evaluates alternatives to reduce environmental impacts.



¿Qué es un Informe de Impacto Ambiental (EIR, por sus siglas en inglés)?

- Preparado según las pautas y estatutos de la CEQA de 2020 y los umbrales de determinación de importancia de CEQA de la ciudad.
- Proporciona una descripción detallada del proyecto y su configuración.
- Divulga los impactos ambientales potencialmente significativos del proyecto.
- Identifica medidas para mitigar los impactos ambientales.
- Proporciona Alternativas para reducir los impactos ambientales.

Engineering and Capital Projects Department
Fairmount Avenue Fire Station | Scoping Meeting

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10. BOARD 10 What does the EIR analyze?

What does the EIR analyze?

Potentially Significant Impacts

- Air Quality
- Biological Resources
- Energy
- Geologic Conditions
- Greenhouse Gas Emissions
- Health and Safety
- Historical Resources
- Hydrology
- Land Use
- Noise
- Paleontological Resources
- Public Services and Facilities
- Public Utilities
- Transportation/Circulation
- Tribal Cultural Resources
- Visual Quality and Neighborhood Character
- Water Quality
- Wildfire

Less Than Significant Impacts

- Agriculture and Forestry Resources
- Mineral Resources
- Population and Housing

¿Qué analiza el EIR?

Impactos potencialmente significativos

- Calidad del Aire
- Recursos Biológicos
- Energía
- Condiciones Geológicas
- Emisiones de Gases de Efecto Invernadero
- Salud y Seguridad
- Recursos Históricos
- Hidrología
- Uso del Suelo
- Ruido
- Recursos Paleontológicos
- Servicios e Instalaciones Públicas
- Utilidades Públicas
- Transporte/Circulación
- Recursos Culturales Tribales
- Calidad Visual y Carácter de las Zonas Alestadas
- Calidad del Agua
- Incendio Forestal

Impactos Menos que Significativos

- Recursos Agrícolas y Forestales
- Recursos Minerales
- Población y Vivienda

Engineering and Capital Projects Department
Fairmount Avenue Fire Station | Scoping Meeting

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11. BOARD 11 Notice of Preparation

Notice of Preparation

- Contains a brief description of the project, its location, and where related documents can be found.
- Notifies responsible agencies and other interested parties that an EIR will be prepared.
- Distributed for a 30-day public review period.
- Solicits input on environmental issues during the review period.
- Provides scoping meeting notice, as applicable.



Aviso de Preparación

- Contiene una breve descripción del proyecto, su ubicación y dónde se pueden encontrar los documentos relacionados.
- Notifica a las agencias responsables y otras partes interesadas que se preparará un EIR.
- Distribuido durante un período de revisión pública de 30 días.
- Solicita comentarios sobre cuestiones ambientales durante el período de revisión.
- Proporciona un aviso de reunión de alcance, según corresponda.

Engineering and Capital Projects Department
Fairmount Avenue Fire Station S-14018 | Scoping Meeting

The City of
SAN DIEGO

12. BOARD 12 How to Provide Comments

How to Provide Comments

- All comments must be received no later than February 12, 2024.
- Please include the project name and number, Fairmount Avenue Fire Station S-14018, in the email subject line.

Submit comments electronically to:
CIP-CEQA@sandiego.gov

Submit comments via mail to:
Nancy Graham, Program Manager
City of San Diego
Engineering and Capital Projects Department
525 B Street, MS 908A
San Diego, CA 92101

Cómo Proporcionar Comentarios

- Todos los comentarios deben recibirse a más tardar el 12 de febrero del 2024.
- Por favor, incluya el nombre y número del proyecto, Fairmount Avenue Fire Station S-14018, en el asunto del correo.

Envíe sus comentarios electrónicamente a:
CIP-CEQA@sandiego.gov

Envíe comentarios por correo a:
Nancy Graham, Program Manager
City of San Diego
Engineering and Capital Projects Department
525 B Street, MS 908A
San Diego, CA 92101

Website: <https://www.sandiego.gov/cip/projectinfo/FairmountAveFireStation>

Engineering and Capital Projects Department
Fairmount Avenue Fire Station S-14018 | Scoping Meeting

The City of
SAN DIEGO

IV. ADDITIONAL COMMENTS AND SUBJECTS FOR ANALYSIS

In addition, and to supplement the comments already submitted in "I. LIST OF COMMENTS AND SUBJECTS FOR ANALYSIS ALREADY SUBMITTED:", above (Additional Comments and Request for Expanded Environmental Review on Notice of Preparation Fairmount Avenue Fire Station Project Fairmount Avenue Fire Station S-14018, February 11, 2024, Pages 1-10); I supplement and add these comments.

1. The SCOPING NOTICE is flawed and should be reissued as it failed to include the unique and specialized information contained in the twelve BOARDS presented to a very limited audience. The SCOPING NOTICE should be republished for a new compliant period with the BOARDS included.
2. Following the republication publication of the NOTICE, a new SCOPING MEETING must be scheduled. The Tuesday, January 30, 2024 SCOPING MEETING was conducted in a flawed manner contrary to California Law and the laws and policies of the City of San Diego. Specific written and oral requests were made to have the meeting conducted so that disabled persons, sensitive senior citizens, and persons with sensitivities to COVID or other diseases that could be present in large un masked groups could participate by electronic video methods. The city organizers ignored these requests to provide for video participation for the January 30, 2024 meeting, at the electronically capable San Diego Unified School District's public Webster Elementary school. Further, the city organizers failed to announce a supplemental video participation opportunity when asked at the meeting and in writing. The city needs to make reasonable accommodations for sensitive persons, including senior citizens and the disabled; particularly since the closest most adjacent residential community, to the project is a senior restricted community - Leisure Land. The City routinely provides electronic participation at all of its official meetings and has the authority to require public health safety measures like masking.
3. The SCOPING MEETING NOTICE was published only in ENGLISH. This NOTICE needs to be republished in the language most common in the Fairmount Avenue Fire Station Project Fairmount Avenue Fire Station S-14018 service area – SEE **BOARD 3. Map of Service Area** on page 12 above. The City of San Diego has a common practice alternate language notice on its public meeting notices. I am informed and believe that the predominant languages spoken in the service area and surrounding neighborhoods are Spanish, [Tagalog language](#), and Arabic. The San Diego City Clerk should be consulted for guidance on this comment.
4. The SCOPING for this project must follow and meet and exceed both CEQA and federal NEPA standards and conduct. The proposed project has been delayed for nearly a decade because the City of San Diego lacked the sole local funds to acquire a site, design a facility, and construct and furnish it, including fire equipment and engines. SEE: comments already submitted in "I. LIST OF COMMENTS AND SUBJECTS FOR ANALYSIS ALREADY SUBMITTED: above (Additional Comments and Request for Expanded Environmental Review on Notice of Preparation Fairmount Avenue Fire Station Project Fairmount Avenue Fire Station S-14018, February 11, 2024, Pages 1-10);

5. The "PROJECT HISTORY:", presented on page 2, of the NOTICE is flawed and misleading. The "PROJECT HISTORY:" fails to inform the public of the prior failed and rejected attempt, by city staff, to accomplish this project with only a CEQA NEGATIVE DECLARATION of Environmental impacts. The community, the Sierra Club and others strongly objected to this minimum approach. - SEE **Two print media articles: "Cost of Fire station help opponents" and Opposition growing to new fire station proposed for semi-rural site in City Heights"** were included in my preliminary comments, of January 24, 2024" as referenced, again, on page 2, above. The "PROJECT HISTORY:" must be revised to include the flawed prior attempt and a reference and access to the comments received from this prior attempt. The comments submitted in response to that prior attempt must be included as comments on this expanded project in the same location and the same environmentally sensitive location.

6. The "PROJECT HISTORY:", presented on page 2, of the NOTICE is flawed and misleading. The "PROJECT HISTORY:" incorrectly locates the project in the community of "City Heights". . The project is not in the City Heights. It is not in the 92105 CITY HEIGHTS zip code. The project is in the Ridgeview Webster neighborhoods of zip code 92102 - [ZIP Code 92102 Map, Demographics, More for San Diego, CA \(unitedstateszipcodes.org\)](#). Correctly identifying the projects neighborhood is a very sensitive racial equity issue, as identification of the area with City Heights is a disgusting artifact of the racial segregation redlining from the pre sixties. Also Noticing the community that the project is in the wrong community and zip code continues the Noticing flaws discussed above, in numbers 1-5.

7. The "PROJECT LOCATION:", presented on page 2, of the NOTICE is flawed and misleading. The "PROJECT LOCATION" incorrectly locates the project as "northwest" of Chollas Creek. The Auburn Creek and the Northern Chollas Creek branches of the Chollas Creek watershed are both on the northern boundary of the project. This location adjacent to two very close water shed canyons is important as these watershed branches are connected and important parts of the sensitive habitats for this project. [Coastal California Gnatcatcher](#) *Polioptila californica californica* , [Least Bell's Vireo](#) *Vireo bellii pusillus* , and [Quino Checkerspot Butterfly](#) and California foxes have all been observed and using the habitats of these very close branches of the Chollas Creek watershed. The proposed project study must include the full flight, feeding/hunting, and reproductive nesting areas of the close branches of the Chollas Creek canyons.

8. The "PROJECT LOCATION:", presented on page 2 and 3 , of the NOTICE is flawed and misleading. The "PROJECT LOCATION" does not correctly describe that the directly adjacent residential uses are single family homes, including a restrict seniors only manufactured home village.

9. The "PROJECT LOCATION:", presented on page 3,, of the NOTICE is flawed and misleading. The "PROJECT LOCATION" incorrectly locates the "trucking company" at 260 feet southwest of the project. The driveway to a more distant trucking company is at 260 feet. The distance to actual industrial operations must be more correctly described. In the revised notice and documents.

10. The "PROJECT DESCRIPTION:", presented on page 3, of the NOTICE needs revision to be consistent with the illustrations on **BOARD 5 Fairmount**

Avenue Fire Station, presented on page 10 above. It is recommended that that BOARD be inserted with the narrative. In future documents.

11. The "PROJECT DESCRIPTION:", presented on page 3, of the NOTICE needs revision to describe solar panels consistent with the City's Climate Change goals. The "PROJECT DESCRIPTION:", presented on page 3, of the NOTICE needs revision to describe the heating and cooking appliance will be electrical only to eliminate the use of SDGE gas, consistent with the City's Greenhouse gas elimination policy.

12. The "PROJECT DESCRIPTION:", presented on page 3, of the NOTICE needs revision to more fully describe the "1,400 square foot" exercise room. This size is larger than most of the adjacent total family housing unit square footage. Apartments. 1,400 square feet is larger than the exercise rooms in area apartment building housing more resident families! The adjacent neighborhood has exercise parks and walking trails. Every square foot increase costs.

13. The "PROJECT DESCRIPTION:", presented on page 3, of the NOTICE needs revision to more fully describe the toxic substances that will be flushed into the City's Sanitary Sewer. The listing and description of these toxics or flushed materials should conform with the City's industrial waste permitting processes. A materials flushed will need to be reprocessed into human drinking water, under the PURE WATER project.

14. The "PROJECT DESCRIPTION:", presented on page 3, of the NOTICE needs revision to more fully describe the refuse and trash storage and handling facilities. Green waste facilities need to be provided for the significant large kitchen facilities being planned.

15. The "PROJECT DESCRIPTION:", presented on page 3, of the NOTICE needs revision to fully describe the rainwater collection and retention facilities for use on landscaping and for facility wash down.

16. The "PROJECT ACCESS:", presented on page 3, of the NOTICE is flawed and misleading. The "PROJECT ACCESS" incorrectly represents the number of driveways. The description should state that there will be TWO (2) separate driveways. The amount of linear clearance for driveways and safe visual clearance should be clearly and correctly stated according to city traffic standards.

17. The "PROJECT ACCESS:", presented on page 3, of the NOTICE is flawed and misleading. The "PROJECT ACCESS" introduces some troubling and impacting mobility and transportation issues. The description states that there are planned '15 passenger vehicle spaces'; but no pedestrian and bicycle parking spaces.

18. The "PROJECT ACCESS" description should clearly state that the project is adjacent to a bus stop and route. The number of parking spaces should be significantly reduced to reduce and eliminate private passenger vehicle trips; consistent with the City of San Diego's Climate Change and Green House Gas reduction goals. Provision of so many private passenger parking spaces defeats the goal of firepersons living and working in their service area and enables distant

commuting. A bicycle shed should be included in this and the Project description.

19. The "PROJECT ACCESS" description should clearly identify the firepersons are among the most physically fit persons in the city workforce; so they are the persons most able to walk or bicycle to work. Leadership by firepersons will go far in setting a climate change example.

20. The "PROJECT ACCESS" description should clearly identify the community services access and mobility spaces. Where are the access points for lost and surrendered children and other services?

21. The "PROJECT INFRASTRUCTURE" section should be revised to: eliminate the use of natural gas/cooling heating, cooking appliances and related.

22. The "PROJECT INFRASTRUCTURE" section should be revised to: include solar power generation and storage.

23. The "PROJECT INFRASTRUCTURE" section should be revised to: clearly list the substances that will be disposed of in the proposed sanitary sewer. The listing and toxic substance signage should be posted. This site may become a listed Government Code 65962.5 hazardous waste site, if proper provisions and operational procedures included in the EIR mitigation measures.

24. The "PROJECT INFRASTRUCTURE" section should be revised to describe specifically where the generator and its fuels will be located. This description should discuss why solar batteries are not sufficient and what type of alternate fuels will be used, considering the policy to become carbon free.

25. The "OFF-SITE" section should be revised to fully describe the size and width of the pedestrian sidewalk and provision for a bicycle and bus lane along Fairmount /47th street.

26. The "RECOMMENDED FINDINGS" section should be revised to fully describe the efforts to consider alternatives to this project, including a No Project Alternative; a use as an extension of the existing and zoned Open Space zoning (OP_2-1) or better – including formal dedication as park land, and/or School workforce or senior housing, with very little parking. Alternates must include the construction of a standard lower cost fire station, at another service area.

27. The "RECOMMENDED FINDINGS" section should be revised to perform the cost benefit analysis presented in my January 28, 2024, letter. That letter asked for completion of a cost comparison excel spread sheet as part of the alternative's comparison section of the Scoping for this project. similar to the spreadsheet presented on page 3, above. It seems to the commenter that a better location could have been found in the service area that would have only required a Negative Declaration CEQA document. Thus, a needed Southern Fairmount area Fire Station could have been completed at less cost.

28. The several pages of distribution names could be reformatted to save paper and reduce future costs.

29. The several pages of maps and diagrams should be replaced with the BOARDS used in the public meeting and presented above on pages 11-16. These were very good Boards – Thank you.

V. CONCLUSIONS

This project is hard to understand given all of the past comments and opposition to it. The approach to this scoping should either be *"Where is the most economical and effective place to site a second Fairmount Fire station?"* or *"What is the best and highest use for this site?"* A simple cost-benefit analysis demonstrates that this fire station is the wrong project. A new Fire Station can be better located along Federal Boulevard, perhaps on City land. This subject site can serve higher priorities for senior OR school workforce housing or extension of the Chollas Creek ecological remediation.

The environmental studies and documents must consider real alternatives, including no project. The studies must meet and exceed both CEQA and federal NEPA standards, because the project will likely require both federal and local funding.

Many persons in the project's service area are seriously disabled seniors. I request, on mine and their behalf, the ability to participate in all workshops, by video conference. I believe that making video participation is a reasonable accommodation and routine for the city.

These comments have been submitted by a coalition of community-based individuals and non-profits organizations.

I request acknowledgement of the timely receipt of these comments. I request a written response to all comments submitted.

I thank the city staff and Ms. Nancy Graham for the first draft of this work. The BOARDS were very well prepared and bilingual.

All the best,

/s/

John Stump, project community member, property owner, and nonprofit member

CEQA Portal Topic Paper

Alternatives

What Are Alternatives?

Alternatives, in the context of the California Environmental Quality Act (CEQA), are optional ways that the project proponent could achieve most of their objectives, while also reducing or eliminating the environmental impacts of the proposed project (California Public Resources Code [PRC] Section 21002; see also *Friends of the Old Trees v. Department of Forestry & Fire Protection* (1997)).

Alternatives typically involve changes to the location, scope, design, extent, intensity, or method of construction or operation of the proposed project. The Lead Agency is required to evaluate and compare the environmental impacts of alternatives to the proposed project in an Environmental Impact Report (EIR), though not at the same level of detail as the proposed project (CEQA Guidelines Section 15126.6(d)).

Why Are Project Alternatives Important?

A fundamental mandate of CEQA is that “public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of the project” (PRC Sections 21002, 21081). Therefore, as part of the decision making process for projects involving the preparation of an EIR, governmental agencies are required under CEQA to consider alternatives to proposed actions affecting the environment (PRC Section 21001(g)).

One of the purposes of an EIR is to identify alternatives to a proposed project and evaluate the comparative merits of feasible alternatives (CEQA Guidelines Section 15126.6(d)). By examining a range of alternatives, the Lead Agency can demonstrate that it has taken a “hard look” at the project objectives to select alternatives that allow for meaningful comparison (See *Residents Ad Hoc Stadium Committee v. Board of Trustees* (1979)).

Courts have overturned many EIRs due to an improper or incomplete analysis of alternatives (See *Cleveland National Forest Foundation v. San Diego Association of Governments* (2017); *North Coast Rivers Alliance v. Kawamura* (2015); *Habitat and Watershed Caretakers v. City of Santa Cruz* (2013); *Watsonville Pilots Association v. City of Watsonville* (2010)).

An EIR can also be overturned if it analyzes a range of alternatives, but fails to identify a preferred alternative as the project. A broad range of alternatives without a stable project presents the public with a moving target and an obstacle to informed participation. (See *Washoe Meadows Community v. Department of Parks & Recreation* (2017)).

Is an Analysis of Alternatives Required in an IS/MND?

No, the purpose of an alternative analysis is to look at ways to avoid or reduce the significant environmental impacts of a proposed project. Negative Declarations (NDs) or Mitigated Negative Declarations (MNDs) are only prepared for projects that are demonstrated not to have any significant environmental impacts, or where mitigation can be adopted to reduce all significant impacts to a less-than-significant level. Therefore, because projects supported by NDs or MNDs have been determined to have no significant environmental impacts, no analysis of alternatives is required in these documents.

However, although it is not required, a Lead Agency's consideration of alternatives in support of an ND is not prohibited. An exploration and analysis of alternatives to: a project; a specific aspect of a project with the most potential to result in environmental impacts; or methods or technologies used in project construction or operations (e.g., handling of contaminated sediments) may be useful to minimize the environmental impacts of a proposed project, even where such impacts are already less than significant. Such an exploration of alternatives to the proposed project may also be helpful to the Lead Agency in other ways, such as identifying alternative approaches, designs, or locations that would reduce environmental effects or are more efficient, effective, or cost effective.

Is an Analysis of Alternatives Required in an EIR?

Yes, an evaluation of alternatives is required in all EIRs. CEQA Guidelines Section 15126.6(a) states:

“An EIR shall 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. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decisionmaking and public participation. An EIR is not required to consider alternatives which are infeasible.”

What Alternatives are Required in an EIR?

An EIR must always evaluate a “No Project” alternative (CEQA Guidelines Section 15126.6(e)(1)). Evaluation of a No Project alternative compares impacts of the proposed project with impacts that would occur if the proposed project were not approved and implemented. Beyond evaluation of the No Project alternative, CEQA requires that a “reasonable range” of alternatives be evaluated in an EIR, but does not specify other alternatives that must be evaluated (CEQA Guidelines Section 15126.6(a)).

How Do I Develop A Reasonable Range of Alternatives?

What is a “Reasonable Range” of Alternatives?

The EIR must always evaluate the No Project alternative as well as a “reasonable range” of feasible “build” alternatives (CEQA Guidelines Section 15126.6(e)). Apart from the analysis of the No Project alternative however, there is no ironclad rule governing the nature or scope of the “reasonable range” of other alternatives to be discussed, other than the “rule of reason” (CEQA Guidelines Section 15126.6(a) & (f); see also *Citizens of Goleta Valley v. Board of Supervisors* (1990); *Laurel Heights Improvement Association v. Regents of the University of California* (1988)).

What constitutes a “reasonable range” of alternatives will vary with the facts of each project and should be guided only by the purpose of offering substantial environmental advantages over the project proposal which may be “feasibly accomplished in a successful manner” considering the economic, environmental, social and technological factors involved (See *Citizens of Goleta Valley v. Board of Supervisors* (1990) (citing PRC Sections 21002, 21061.1; CEQA Guidelines Section 15364)).

An EIR need not consider every conceivable alternative to a project (CEQA Guidelines Section 15126.6(a); *Mount Shasta Bioregional Ecology Center v. County of Siskiyou* (2012)). The alternatives considered may include alternative approaches, sites, or both (CEQA Guidelines Section 15126.6(a)).

Consistent with this rule of reason, it is generally uncommon (though not strictly prohibited) for an EIR to evaluate only the No Project alternative. In such a case, the Lead Agency has the relatively difficult legal burden of establishing that, given the circumstances at hand, no other feasible alternatives could satisfy the project objectives while resulting in fewer environmental impacts than the proposed project (See *Mount Shasta Bioregional Ecology Center v. County of Siskiyou* (2012)).

How Do I Develop Alternatives?

Because alternatives must meet most (though not all) of the project objectives, one should begin with reviewing the project objectives (CEQA Guidelines Section 15126.6(c); *In re: Bay-Delta etc.* (2008)). According to the CEQA Guidelines, “A clearly written statement of objectives will help the Lead Agency develop a reasonable range of alternatives to evaluate in the EIR” (CEQA Guidelines Section 15124(b)); see also Project Objectives Topic Paper).

Proper development and analysis of alternatives should also be tied closely to the known or likely significant environmental impacts of the proposed project, as the purpose of the alternatives is to reduce or eliminate these impacts. The project setting can also influence the choice of alternatives (e.g., infill vs. greenfield, site geotechnical constraints, slope, and presence of biological or cultural resources). When developing the alternatives:

- Identify the known or likely significant construction or operational impacts of the project;
- Focus on finding alternatives that avoid or minimize those significant impacts;
- Consider offsite locations, when possible;
- Consider alternative site plans on the proposed site;
- Consider reductions in project size or intensity of uses;
- Consider alternative construction methods or materials;
- Consider alternative project operations; and
- Confirm whether each alternative meets most of the basic project objectives.

How Do I Define The No Project Alternative?

The No Project alternative represents conditions in the study area in the absence of approval of the proposed project (CEQA Guidelines Section 15126.6(e)(1)). The No Project Alternative must discuss current conditions as well as reasonably foreseeable future conditions expected to occur if the project were not approved (CEQA Guidelines Section 15126.6(e)(2)).

However, the analysis of the No Project alternative should not be confused with comparison of the proposed project to Existing Conditions (the baseline for determining the project’s environmental impacts) (CEQA Guidelines Section 15126.6(e)(1)). The purpose of describing and analyzing a No Project alternative is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project (*Id.*). The analysis of the No Project alternative, as with the analysis of other alternatives, is usually a comparative or qualitative assessment (CEQA Guidelines Section 15126.6(d)(e)).

The first step in the process is to establish the existing uses on the project site. The No Project alternative often represents conditions on the project site at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced (CEQA Guidelines Section 15126.6(e)(2)).

If the proposed project is not expected to be completed and operating for many years, the next step is to determine what reasonably foreseeable changes to the project site and environs are likely to occur unrelated to the proposed project. This may include projects that have been approved, but not yet completed, projects that have been proposed but have not yet been approved, and infrastructure projects planned to be completed within the timeframe established for the evaluation (CEQA Guidelines Section 15126.6(e)(3)(C)).

The analysis of the impacts of the No Project alternative can be accomplished in two general ways, depending on the nature of the proposed project:

1. When the project involves the revision of an existing land use or regulatory plan, a policy, or ongoing operations, the No Project alternative will be defined as the continuation into the future of the existing plan, policy, or operation. The existing plan, policy, or operations should be assumed to continue and to apply to other projects implemented during the timeframe of the analysis. Thus, the projected impacts of the proposed plan or alternative plans would be compared to the impacts that would occur under the existing plan (CEQA Guidelines Section 15126.6(e)(3)(A)).

or,

2. If the project is a specific development project on identifiable property, the No Project alternative should be defined as the conditions that would occur if the proposed project were not implemented. The discussion should compare the environmental effects of the property remaining in its existing state against the environmental effects that would occur if the project were approved and implemented. If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, the consequences of these actions should be discussed as part of the environmental effects of the No Project alternative. In some circumstances, the failure to proceed with the proposed project would not result in the preservation of existing environmental conditions, but perhaps in another project being implemented; the analysis in that case should identify the practical result of the project's non-approval based on current plans and consistent with available infrastructure and community services. However, the Lead Agency is not required to speculate, or create and analyze a set of

artificial assumptions about what would occur in the future, if it cannot reasonably be known (CEQA Guidelines Section 15126.6(e)(3)(B)).

After defining the No Project alternative using one of these approaches, the Lead Agency should proceed to analyze the impacts of the No Project alternative by projecting what would reasonably be expected to occur in the foreseeable future if the project were not approved. This can often be done based on projections in the Lead Agency's local planning documents (e.g., a General Plan or applicable Specific Plan, and/or the CEQA documents prepared for those documents) (CEQA Guidelines Section 15126.6(e)(3)(C)).

Do I Need to Consider Offsite Alternatives?

Offsite alternatives should be considered. Zoning, environmental conditions, and availability are significant factors in evaluating an offsite alternative. To be analyzed in the EIR, the offsite alternative must be "feasible", and it must be possible for the project proponent to acquire the property. The proposed uses on the property should either be consistent with the applicable general plan designation for the property, or it should be reasonable to expect that a general plan amendment would be successful. There may be situations, however, where an offsite alternative is not feasible, for example, because the primary objective of the project is a modification of an existing facility. (*California Native Plant Society v. City of Santa Cruz* (2009)).

Do I Need to Consider Speculative Alternatives?

An EIR need not consider an alternative whose effects cannot be reasonably evaluated because insufficient detail regarding the alternative is available, and whose implementation is remote and speculative (CEQA Guidelines Sections 15126.6(f)(3), 15145; see also *Residents Ad Hoc Stadium Committee v. Board of Trustees* (1979); *Laurel Heights Improvement Association v. Regents of the University of California* (1993)).

Do I Need to Consider Alternatives Recommended by Others?

A Lead Agency should consider alternatives brought to its attention during the public scoping process (in a draft EIR), or during the public review period (in a final EIR), provided that the alternatives meet the above criteria (CEQA Guidelines Section 15126.6(c)). While not required, alternatives brought to the lead agency's attention after the public review period of an EIR may also be considered (PRC Section 21091(d)(1) & (2); CEQA Guidelines Section 15162(a)(3)(C); see also *Citizens of Goleta Valley v. Board of Supervisors* (1990)). In such circumstances, the lead agency may address the alternative by means of administrative findings (see *Citizens of Goleta Valley v. Board of Supervisors* (1990)).

However, Lead Agencies need not respond to late comments suggesting new alternatives (PRC Section 21091(d)(1); CEQA Guidelines Section 15207). Indeed, a Lead Agency may properly reject alternatives raised after the close of the public comment period; in such instances, the Lead Agency is not required to provide reasons for rejecting those alternatives (see *South County Citizens for Smart Growth v. County of Nevada* (2013)).

Are All Changes To A Project Considered Alternatives?

No, not all changes made to a project should be considered as separate alternatives. For example, minor changes in methods used (or rejected) in carrying out the project are typically not considered alternatives to the project (*Town of Atherton v. California High-Speed Rail Authority* (2014)). However, a number or group of such minor changes taken together, especially if they result in changes to the types or intensity of environmental impacts, may be considered an alternative.

May A Lead Agency Include Alternatives that Do Not Result in Reduced Environmental Impacts?

Yes. While the analysis of an alternative that does not result in the reduction or elimination of an environmental impact of the proposed project is allowable, it is not a substitute for the consideration of other alternatives that reduce or eliminate the project's impacts (CEQA Guidelines Section 15126.6(a); *Cleveland National Forest Foundation v. San Diego Association of Governments* (2017)).

What Must Be Included in an Analysis of Alternatives in an EIR?

Under CEQA, alternatives do not need to be described or analyzed at the same level of detail as the proposed project (CEQA Guidelines Section 15126.6(d)). However, they need to be described in enough detail to allow a comparative analysis of the alternatives against the proposed project (see *Residents Ad Hoc Stadium Committee v. Board of Trustees* (1979). That is, it must be in sufficient detail for the Lead Agency to differentiate the impacts between the alternatives and to select the Environmentally Preferred Alternative (see *Laurel Heights Improvement Association v. Regents of the University of California* (1988)).

The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency during the scoping process, but rejected as infeasible, and briefly explain the reasons why these alternatives were rejected (see *Alternatives Considered but Rejected* below for more detail). For an alternative suggested during the public comment period on the draft EIR, the final EIR should either analyze the suggested alternative at the appropriate level of detail, or explain that

the suggested alternative was considered but rejected from further analysis. Additional information explaining the choice of alternatives may be included in the administrative record (CEQA Guidelines Section 15126.6(c)).

The EIR may include a summary comparison table that lists each environmental resource analyzed, the relative environmental impacts of each alternative with respect to each resource, and how they compare to the impacts of the proposed project (CEQA Guidelines Section 15126.6(d)). The following are useful ways to compare alternatives:

- Describe if impacts are greater, lesser, similar to the proposed project and other alternatives;
- Summarize the overall environmental impacts of each alternative;
- Discuss the extent to which each alternative attains project objectives;
- Discuss any concerns with the feasibility of each alternative; and
- Most importantly, support any conclusions with evidence and include such evidence in the administrative record.

The following is an abbreviated example of a summary table.

Topic	Project	No Project	Alt 1	Alt 2
Air Quality	S	LTS	SUI	SUI
Noise	LTS	LTS	LTSM	LTS
Biology	LTSM	LTS	LTSM	LTS
Geology	LTSM	LTS	LTSM	LTSM

S=Significant Impact; SUI=Significant Unmitigated Impact; LTS=Less Than Significant Impact; LTSM=Less Than Significant Impact with Mitigation

Alternatives Considered but Rejected.

An analysis of alternatives in an EIR should include a list of alternatives considered but rejected, and include an explanation of why alternatives were rejected. (If this discussion is not included in an EIR, it must exist elsewhere in the administrative record). The Lead Agency may, as part of the scoping process, make an initial determination as to which alternatives are potentially feasible and merit in-depth consideration, and which do not. (CEQA Guidelines Section 15126.6(c)).

As noted above, remote or speculative alternatives need not be considered and may be rejected from further evaluation.

What Factors May be Considered in Determining the Feasibility of Alternatives?

As statutorily defined, “‘Feasible’ means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors.” (PRC Section 21061.1; see also CEQA Guidelines, Section 15364 [same definition but with addition of “legal” factors].) “[F]easibility’ under CEQA encompasses ‘desirability’ to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, and technological factors.” (*City of Del Mar v. City of San Diego* (1982); *Sequoyah Hills Homeowners Association. v. City of Oakland* (1993)).

The issue of whether an alternative is feasible arises at two different points in the CEQA process: first, in the assessment of alternatives in the EIR; and second, during the Lead Agency’s consideration of whether to approve the project. The standard for determining whether an alternative should be analyzed in an EIR is whether the alternative is *potentially* feasible. Subsequently, the Lead Agency must determine whether the alternatives included in the EIR are actually feasible, based on the analysis in the EIR as well as factors external to the environmental analysis, e.g., social or economic concerns (see *California Native Plant Society v. City of Santa Cruz* (2009)).

While there is no bright line between these two assessments, generally the EIR should refrain from reaching conclusions regarding *actual* feasibility and should focus the analysis on whether an alternative is *potentially* feasible, and then undertake the comparison of the environmental effects of the project and alternatives.

Screening criteria may be developed to determine the feasibility of potential alternatives. Among the factors that may be taken into account when addressing the feasibility of alternatives are:

- Site suitability for the proposed use(s);
- Economic viability;
- Availability of infrastructure to serve the site;
- General plan consistency, other plans or regulatory limitations;
- Jurisdictional boundaries (projects with a regionally significant impact should consider the regional context); and

- Whether the proponent can reasonably acquire, control or otherwise have access to an alternative site (or the site is already owned by the proponent)

(CEQA Guidelines Section 15126.6(f)(1); see also *Citizens of Goleta Valley v. Board of Supervisors* (1990); *Save Our Residential Environment v. City of West Hollywood* (1992)).

By applying the criteria to each potential alternative, infeasible alternatives can be screened out, and a reasonable range of feasible alternatives that meet most of the project objectives and substantially avoid or lessen the proposed project's significant environmental effects will result (see *In re: Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings* (2008)).

Under CEQA, an alternative may be eliminated for any of the following reasons:

- The alternative fails to meet most of the basic project objectives;
- The alternative is infeasible;
- The alternative does not avoid significant environmental impacts; or
- Implementation of the alternative is remote and speculative and the effects cannot be reasonably ascertained.

(CEQA Guidelines Section 15126.6(f)).

Alternatives may not be rejected merely because they are beyond an agency's authority, would require new legislation, or would be too expensive (CEQA Guidelines Section 15126.6(f)(2)).

When economics is used as a factor to support a finding of infeasibility, the fact that an alternative may be more expensive than the project does not necessarily make it infeasible (see *Citizens of Goleta Valley v. Board of Supervisors* (1988); *Association of Irrigated Residents v. County of Madera* (2003)). The Lead Agency must support the finding with specific data that shows the additional cost or lost profits are great enough to make it impractical to proceed with the project (see *Citizens of Goleta Valley v. Board of Supervisors* (1988)); *Foundation for San Francisco's Architectural Heritage v. City and County of San Francisco* (1980); *San Franciscans Upholding the Downtown Plan v. City and County of San Francisco* (2002)).

Identification of Environmentally Superior Alternative.

CEQA requires that EIRs identify the Environmentally Superior Alternative, and discuss the facts that support that selection. (See PRC Section 21081.5; CEQA Guidelines Sections 15091, 15126.6(e)(2)). The Lead Agency is not, however, obligated to select the Environmentally Superior Alternative for implementation if

it would not accomplish the basic project objectives and/or is infeasible (see State CEQA Guidelines Section 15126.6(a), (c) & (f)).

Selection of the Environmentally Superior Alternative may be difficult, especially when the differences between the impacts of the alternatives involve trade-offs between types of impacts (e.g., between impacts on traffic and impacts on cultural resources, or between impacts on one species or habitat and impacts on other species or habitats). As with other aspects of CEQA, an explanation of the decision is often more important than the decision itself; as long as the explanation in an EIR is supported with substantial evidence in the administrative record, decisions by Lead Agencies are afforded deference by reviewing courts (CEQA Guidelines Sections 15151, 15384).

In many cases, the No Project alternative would have the fewest or least intense impacts. However, the State CEQA Guidelines Section 15126.6(e)(2) states that “If the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives”.

Should the Lead Agency change its determination of the Environmentally Superior Alternative after circulation of the draft EIR but before the EIR’s certification by the Lead Agency, and that newly identified Environmentally Superior Alternative is not adopted as the proposed project, revisions to the draft EIR and recirculation of same are likely required (CEQA Guidelines Section 15088.5(a)(3); *South County Citizens for Smart Growth v. County of Nevada* (2013)). Arguably, recirculation is warranted even if the project proponent accepts the newly identified Environmentally Superior Alternative, in order to afford effective public comment on the Lead Agency’s determinations (PRC Section 21092.1; CEQA Guidelines Section 15088.5(a)(4); see also *Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova* (2007)).

If the Lead Agency’s determination of the Environmentally Superior Alternative changes after certification of the EIR, but before approval of the project, the proposed project likely requires CEQA to be re-opened and a subsequent or supplemental EIR to be prepared (CEQA Guidelines Sections 15162(a)(3)(C), 15163(a)(1)). Any subsequent EIR shall again be subject to the same public notice and review provisions (CEQA Guidelines Sections 15162(d), 15072)). However, “[o]nce a project has been approved, the Lead Agency’s role in the project approval is completed, unless further discretionary approval on that project is required” (CEQA Guidelines Section 15162(c)). Therefore, if the Lead Agency’s determination of the Environmentally Superior Alternative changes after the approval of the project, no additional CEQA review is required unless the project is subject to additional discretionary approvals (CEQA Guidelines Section 15162(c)). In this case, the Lead Agency with jurisdiction over the next discretionary approval shall conduct any additional CEQA review required.

Analysis of Alternatives Under NEPA

While Lead Agencies under CEQA are not required to evaluate the environmental impacts of alternatives to the same level of detail as the proposed project (CEQA Guidelines Section 15126.6(d)), the National Environmental Policy Act (“NEPA”) requires a “co-equal” analysis of the alternatives (see 40 Code of Federal Regulations (“C.F.R.”) Section 1502.14(b)). Stated differently, under NEPA, the analysis of the impacts of alternatives must be at the same level of detail as the analysis of impacts of the proposed action (NEPA’s term for the proposed project).

This usually means that each alternative must be defined at a comparable level of detail. Section 1502.14 of the Council on Environmental Quality (CEQ) Guidelines states that in the “Alternatives” section of an Environmental Impact Statement (EIS), agencies shall “[d]evote substantial treatment to each alternative considered in detail including the proposed action so that reviewers may evaluate their comparative merits.”

Whereas an analysis of alternatives is not required in an Initial Study under CEQA, an alternatives analysis is required in initial Environmental Assessments (EAs) . However, alternatives analyses in EAs are typically less rigorous than those contained in EISs (Federal Highway Administration *Alternatives Analysis White Paper*).

CEQ and the California Governor’s Office of Planning and Research (OPR) have jointly prepared the February 2014 guidance document NEPA and CEQA: Integrating Federal and State Environmental Reviews (CEQA/NEPA Handbook). The handbook provides practitioners with an overview of NEPA and CEQA as well as suggestions for developing a single environmental review process that can meet the requirements of both statutes.

Table 1 summarizes the requirements for the analysis of alternatives under each type of environmental document under both CEQA and NEPA.

Table 1 – Alternatives Required In Each Type of Environmental Document

Document Type	Alternatives Required
CEQA	
Categorical Exemption	None
Initial Study	None
Environmental Impact Report	Reasonable range of alternatives, including those achieve would attain most of the basic project objectives while avoiding

	or reducing the environmental effects of the project. No-build must be considered. Comparative analysis. Analysis at same level of detail as proposed project not required.
NEPA	
Categorical Exclusion	None
Environmental Assessment	One build alternative is allowable, but for a complex or controversial project, more than one alternative is advised. No-Action alternative must be considered.
Environmental Impact Statement	All reasonable alternatives including No-Action Alternative. Each alternative must be considered and discussed at an equal level of detail.

Alternatives in Joint CEQA/NEPA Documents

The typical rule when preparing a joint CEQA/NEPA document is that when there is a difference between the requirements of the two laws, the Lead Agencies should prepare the document using the more stringent requirements (see *CEQA/NEPA Handbook* at 2, 20, 48). Because NEPA requires a more detailed alternatives analysis, joint EIR/EIS documents should be developed in a manner which satisfies NEPA requirements (40 C.F.R. Section 1502.14(b)).

Areas of Controversy Regarding Alternatives

Legal standards concerning alternatives analysis is one of the more settled areas of CEQA law. The two key issues in most CEQA decisions considering the adequacy of an EIR's analysis of alternatives are whether the EIR included a "reasonable range" of alternatives, including for example an alternative project site, and whether the level of detail of the alternatives analysis is sufficient. There is not "bright-line" rule for either of these issues, and the results tend to be fact-driven. It is critically important to not short-change the alternatives analysis in the EIR, however, either in terms of the number of alternative considered or the depth of analysis. The ultimate determination whether an alternative is actually feasible should be made by the decision-making body as part of its findings rather than in the EIR itself, which should present the information regarding alternatives in a clear and impartial way.

Alternatives in the CEQA Statute

Alternatives are described in many, sections of CEQA (PRC Sections 21000 *et seq.*), including, but not limited to the following:

- § 21001(g) - Requires governmental agencies to consider alternatives to proposed actions affecting the environment.
- § 21002 - Public agencies should not approve projects, as proposed, if there are feasible alternatives or mitigation measures available that would substantially lessen the significant environmental impacts. Further states that projects that have significant impacts on the environment may be approved if alternatives are found to be infeasible.
- § 21002.1(a) - The purpose of an EIR is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided
- § 21002.1(e) - EIRs shall focus on the project's potentially significant effects on the environment.
- § 21003.1(a) - Public comments on environmental documents should be made as soon as possible to assist the Lead Agency in identifying potential significant effects of a project, alternatives, and mitigation measures which would substantially reduce the effects.
- § 21061 - The purpose of an EIR is to provide public agencies and the public in general with detailed information about the effect which a proposed project is likely to have on the environment; to list ways in which the significant effects of such a project might be minimized; and to indicate alternatives to such a project.
- § 21080.1(b) - The Lead Agency shall, upon the request of a potential applicant, provide for consultation prior to the filing of the application regarding the range of actions, potential alternatives, mitigation measures, and any potential and significant effects on the environment of the project.
- § 21080.5(d)(2)(A) - Requires that an activity not be approved or adopted pursuant to a certified regulatory program if there are feasible alternatives or mitigation measures that would substantially lessen environmental effects.
- § 21080.5(d)(3) - Requires environmental documents prepared pursuant to a certified regulatory program to include a description of alternatives to the proposed activity.
- § 21081 – In making findings regarding an EIR where more or more significant environmental impacts were identified, the Lead Agency may

include information as to why alternatives to the project are infeasible.

- § 21081.5 - In making findings regarding an EIR, including where alternatives are determined to be feasible, the Lead Agency must base its conclusions on substantial evidence in the record.
- § 21083.8.1 - Pertains to EIRs for military base reuse plans, including subsections regarding the analysis of alternatives.
- § 21091(d)(1) – The Lead Agency shall respond to comments received on a CEQA document if those comments are received during the public review period.
- § 21094 - Pertains to tiered EIRs and initial studies, including the analysis of alternatives in these documents.
- § 21100(b)(4) - Requires that EIRs contain an analysis of alternatives to the proposed project.
- § 21104(a) - Requires State Lead Agencies to provide for early consultation while preparing an EIR to, among other things, identify alternatives to the proposed project.
- § 21153 - Requires local Lead Agencies to consult with responsible and trustee agencies prior to completing an EIR to, among other things, identify alternatives to the proposed project.
- § 21154 - When local agencies prepare an EIR for a project required pursuant to an order from a state agency, the alternatives to be analyzed in the EIR shall not include those that are in conflict with the order.

Alternatives in the CEQA Guidelines

Alternatives are described in many, sections of the CEQA Guidelines, including, but not limited to the following:

- § 15002(a)(3) - Provides that one of the basic purposes of CEQA is the prevention or avoidance of avoidable significant damage to the environment by requiring changes in projects through the use of feasible alternatives or mitigation measures.

- § 15002(f) - Defines the EIR as the document by which a governmental agency analyzes the effects of a proposed project and identifies alternatives to the proposed project.
- § 15002(h)(4) - Identifies the selection of an alternative as a means of protecting the environment.
- § 15004(b) - Prohibits the Lead Agency from taking actions that would, among other things, limit the choice of alternatives, prior to completing CEQA compliance.
- § 15021 - Prohibits a Lead Agency from approving a project when a feasible alternative or mitigation measures exist that would lessen significant environmental effects.
- § 15041(c) – For projects that include housing development, a Lead or Responsible Agency shall not mitigate for significant environmental effects by reducing the number of units, unless no feasible alternatives exists that would provide comparable reductions in effects.
- § 15060.5 – The Lead Agency shall consult with the project sponsor prior to the filing of a formal application to, among other things, identify potential alternatives.
- § 15065(c)(2) - When making findings regarding an EIR, where significant environmental effects remain after the adoption of mitigation measures, the Lead Agency must make detailed findings, based on substantial evidence, regarding the feasibility of alternatives that would avoid or substantially lessen the effects.
- § 15082(b)(1)(A) - In preparing responses to a Notice of Preparation for an EIR, Responsible and Trustee Agencies and OPR shall provide the Lead Agency with information, including reasonable alternatives that should be analyzed in the EIR.
- § 15083(a) - Suggests that scoping prior to preparation of an EIR can assist Lead Agencies in identifying alternatives.
- § 15088.5(a) - Defines the presence of new information that may require recirculation of an EIR prior to certification, to include the identification of a new feasible alternative.
- § 15091(a)(3) - In making findings regarding an EIR where one or more significant environmental impacts were identified, the Lead Agency may

include information as to why alternatives to the project are infeasible.

- § 15091(c) - Where it shares jurisdiction with another agency for an alternative, the Lead Agency shall provide the specific reasons for rejecting mitigation measures or alternatives in their findings.
- § 15096(d) - Comments of Responsible Agencies on EIRs should focus their comments on, among other things, alternatives that the EIRs should include.
- § 15096(g) - Responsible Agencies shall not approve a project if they find that a feasible alternative is available that would avoid or substantially lessen a significant environmental effect.
- § 15124(b) - Defines the relationship between alternatives and the project objectives.
- § 15126.6 - Defines the general requirements of CEQA with regard to the analysis of alternatives.
- § 15126.6(f)(2) - Alternatives may not be rejected merely because they are beyond an agency's authority, would require new legislation, or would be too expensive.
- § 15145 - If the Lead Agency determines that an impact is too speculative, it should indicate this and need not analyze that impact further.
- § 15151 - In evaluating the adequacy of an EIR, the courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure.
- § 15162(a)(3)(C) - Subsequent CEQA documentation may be required if, after an EIR has been certified or an ND adopted for a project, alternatives previously found to be infeasible, are subsequently found to be feasible.
- § 15163(a)(1) – The Lead Agency or Responsible Agency may choose to prepare a supplemental EIR if any of the conditions described in Section 15162 would require the preparation of a subsequent EIR.
- § 15207 – The Lead Agency need not respond to late comments (including suggested alternatives), but may do so.
- § 15364 - Defines the term “feasible” within CEQA.

- § 15384 - Defines the term “substantial evidence” within CEQA.

Important Cases

The following are important published cases involving issues related to alternatives:

***Los Angeles Conservancy v. City of West Hollywood* (2017) 18 Cal.App.5th 1031:** Court held that EIR’s analysis of the conservation alternative was detailed enough to permit informed decision making and public participation. Court found that City was not required to prepare a “conceptual design” for the alternative. Finally, Court stated that “[a]n agency’s finding of infeasibility . . . is ‘entitled to great deference’ and ‘presumed correct’” in determining whether Lead Agency’s findings that an alternative is infeasible is supported by substantial evidence.

***Cleveland National Forest Foundation v. San Diego Association of Governments* (2017) 17 Cal.App.5th 413:** EIR that included analysis of project alternatives focused primarily on congestion relief was inadequate because it failed to analyze an alternative that could significantly reduce total vehicle miles.

***Washoe Meadows Community v. Department of Parks & Recreation* (2017) 17 Cal.App.5th 277:** Court found that the presentation of five very different alternative projects in the EIR without a stable project description was an obstacle to informed public participation, noting that a broad range of possible projects presents the public with a moving target and requires a commenter to offer input on a wide range of alternatives.

***Pesticide Action Network America v. Department of Pesticide Regulation* (2017) 15 Cal.App.5th 478:** Court held that Department “glaringly” failed to address any feasible alternative to registering proposed new uses for two pesticides as required by PRC Section 21001(g).

***Banning Ranch Conservancy v. City of Newport Beach* (2017) 2 Cal.5th 918:** EIR did not describe a range of reasonable alternatives where it failed to include analysis of the Coastal Act’s environmentally sensitive habitat area (ESHA) requirements, including consideration of which project areas might qualify as ESHA or potential impacts on ESHAs for a project in the coastal zone.

***Bay Area Citizens v. Association of Bay Area Governments* (2016) 248 Cal.App.4th 966:** Court held that the “No Project” alternative appropriately captured the continuation of existing regional policy. Court found that because the plaintiff’s proposed alternative double-counted statewide emissions mandates, it was not feasible in light of the emission reduction requirements of SB 375.

North Coast Rivers Alliance v. Kawamura (2015) 243 Cal.App.4th 647: EIR failed to analyze a control program as an alternative to eradication of light brown apple moth. “Last-minute” adoption of a control program instead of eradication did not cure errors in alternatives analysis, which did not include analysis of the control program based on stated project objective to eradicate light brown apple moth.

Town of Atherton v. California High-Speed Rail Authority (2014) 228 Cal.App.4th 314: Authority properly rejected alternatives proposed during public review process because substantial evidence showed proposed alternatives were substantially similar to alternatives considered in program EIR.

California Clean Energy Committee v. City of Woodland (2014) 225 Cal.App.4th 173: City’s findings that an alternative was environmentally inferior to proposed project were not supported by analysis in EIR, which rejected the alternative based on economic feasibility.

Habitat and Watershed Caretakers v. City of Santa Cruz (2013) 213 Cal.App.4th 1277: EIR failed to discuss any feasible alternative, such as a “limited-water alternative,” which would “partially meet the project’s objectives,” and EIR lacked analysis supporting agencies’ conclusion that the alternative would not lessen or substantially avoid the significant impacts from the project.

South County Citizens for Smart Growth v. County of Nevada (2013) 221 Cal.App.4th 316: When EIR includes a reasonable range of alternatives, but Lead Agency’s staff suggests an additional alternative after release of the final EIR and Lead Agency chooses not to recirculate the EIR with the staff alternative, the agency is not required to make an express finding that the staff alternative is infeasible before it can approve the revised project.

Mount Shasta Bioregional Ecology Center v. County of Siskiyou (2012) 210 Cal.App.4th 184: Court upheld EIR’s analysis of alternatives, where infeasible alternatives were dismissed during scoping phase, finding challengers of EIR failed to identify any potentially feasible alternative that could satisfy the project objectives, and finding the EIR considered a “reasonable range” of alternatives given the circumstances presented, despite the fact that the only alternative considered in depth in the Draft EIR was the “No Project” alternative.

Watsonville Pilots Association v. City of Watsonville (2010) 183 Cal.App.4th 1059: EIR for update of City’s General Plan should have considered a “reduced development alternative.” City’s argument that it was not required to consider a “reduced development alternative” because such an alternative did not meet each of the 12 project objectives is contrary to requirement in CEQA Guidelines Section 15126.6(b) that a feasible alternative be considered even if it “would impede to some degree the attainment of project objectives.” Further, City’s

argument that the “No Project” alternative was in essence a “reduced development alternative” was rejected since the “No Project” alternative achieved none of the basic project objectives, and the fundamental role of the alternatives analysis is to identify alternatives that achieve most of the project objectives while also reducing the project’s significant environmental effects.

Jones v. Regents of the University of California (2010) 183 Cal.App.4th 818: EIR for long-range plan for the Lawrence Berkeley National Laboratory included a reasonable range of alternatives, including a “partial off-site alternative,” and did not need to consider a “full off-site alternative” where such alternative was properly rejected because it failed to achieve a fundamental project objective.

California Native Plant Society v. City of Santa Cruz (2009) 177 Cal.App.4th 947: EIR’s alternatives analysis satisfied CEQA’s informational mandates and City’s decisions concerning which alternatives to analyze were supported by evidence in the administrative record. The alternatives selected need not satisfy every key objective of the project, and ranking the relative importance of the various objectives of the project is a policy decision entrusted to the city council. When assessing feasibility in connection with the alternatives analysis in the EIR, the question is whether the alternative is potentially feasible. When deciding on project approval, the question is whether the alternatives are actually feasible. Further, CEQA does not require an EIR to explore offsite project alternatives every case. The requirement that an EIR describe alternatives to the proposed project applies only to the project as a whole, not to the various facets of the projects, such as grading and access road.

Finally, the court held that City’s rejection of Environmentally Superior alternatives as infeasible based on policy considerations – here, the City’s interest in promoting transportation alternatives as well as access to its open space for persons with disabilities - was permissible under PRC Section 21081(a)(3).

In re: Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings (2008) 43 Cal.4th 1143: Finding Program EIS/R discussed a reasonable range of alternatives to expansion of water storage facilities by dam construction. Failure to include a reduced exports alternative was not an abuse of discretion because CALFED properly applied the rule of reason when it decided to consider in the PEIS/R only alternatives that had the potential to both achieve ecosystem restoration goals and meet current and projected water export demands, and that would provide balanced progress in all four of the program areas.

Association of Irrigated Residents v. County of Madera (2003) 107 Cal.App.4th 1383: Agency properly rejected reduced-herd size alternative as

infeasible where substantial evidence demonstrated alternative was economically infeasible and would not achieve the basic objective of the project.

San Franciscans Upholding the Downtown Plan v. City and County of San Francisco (2002) 102 Cal.App.4th 656: Appellants contention that EIR needed to include analysis of economic feasibility of alternatives was found to be without merit because it is the public agency, not the EIR, that bears responsibility for making "findings" as to whether "[s]pecific economic, legal, social, technological, or other considerations . . . make infeasible the mitigation measures or alternatives identified in the [EIR]," or whether there are "specific overriding economic, legal, social, technological, or other benefits of the project" that "outweigh the significant effects on the environment."

Friends of the Old Trees v. Department of Forestry & Fire Protection (1997) 52 Cal.App.4th 1383: Defining alternative for the purposes of CEQA as "a description of another activity of project that responds to the major environmental issues identified during the planning process." Finding that Lead Agency's review of timber harvest plan (THP) pursuant to certified regulatory program is required to include analysis of alternatives, and inclusion of mitigation could not substitute for discussing project alternatives.

Laurel Heights Improvement Association v. Regents of the University of California (1993) 6 Cal.4th 1112: Upholding Final EIR conclusion that potential cumulative impacts from toxic air emissions were too "speculative" for evaluation. Final EIR's response to comment expanding on discussion of the possible environmental consequences of an alternative did not trigger recirculation because substantial evidence supported Lead Agency's decision that there was no new adverse environmental effect or new feasible alternative that was not implemented by the project proponent.

Sequoyah Hills Homeowners Association. v. City of Oakland (1993) 23 Cal.App.4th 704: EIR that did not examine additional "decreased density alternatives" satisfied the information goal of CEQA because the analysis of the additional alternatives would not have eliminated the significant visual impacts from the project. Further, City did not violate CEQA in concluding that a decreased density alternative would be legally infeasible because it would be prohibited by Government Code Section 65589.5(j), which prohibits a local agency from requiring as a condition of approval that the project be developed at a lower density unless the project would have a specific, adverse impact upon the public health or safety that cannot be mitigated without lowering the density.

Save Our Residential Environment v. City of West Hollywood (1992) 9 Cal.App.4th 1745: Finding the extent to which alternatives must be considered in an EIR is governed by a rule of reason, the ultimate objective being whether a discussion of alternatives fosters informed decision-making and informed public

participation. Because EIR stated that no other site was available for proposed senior citizen housing development, and gave reasons for this conclusion, Court held EIR was adequate. The purpose of CEQA was not to generate paperwork, and EIR is not required to discuss infeasible alternatives.

Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553:

Finding EIR discussed a legally acceptable range of alternatives, that only reasonable alternatives need be examined in EIR, and that the administrative record substantially supported the conclusion that none of the additional sites represented a feasible project alternative or merited extended discussion in EIR. Although the alternatives were not barred from consideration simply because they were submitted by the citizens' group after the expiration of the comment period for EIR, the court held that the timing issue did justify the board's decision to address the alternative sites by means of administrative findings, rather than by commissioning yet another supplemental EIR.

The court held that the board properly relied on a local coastal program for analysis and conclusions in determining the feasibility of additional sites, finding no abuse of discretion in Lead Agency's finding of certain alternatives to be infeasible, based upon inconsistent land-use designations. Lead Agency could properly consider the fact that an alternative site was outside of that Lead Agency's jurisdiction and whether or not a site was owned by the project proponent, in making an assessment of feasibility.

Citizens of Goleta Valley v. Board of Supervisors (1988) 197 Cal.App.3d

1167: Court held that the record failed to provide substantial evidence to support a finding that a scaled-down project alternative was economically infeasible. The fact that an alternative may be more expensive or less profitable is not sufficient to show that the alternative is financially infeasible. What is required is evidence that the additional costs or lost profitability are sufficiently severe as to render it impractical to proceed with the project.

Laurel Heights Improvement Association v. Regents of the University of California (1988) 47 Cal.3d 376: Under CEQA an EIR must include a meaningful discussion of both project alternatives and mitigation measures. The range of alternatives needing to be analyzed is subject to a rule of reason. Equal level of detail not required in the analysis of alternatives, but is not prohibited. No purpose can be served by requiring EIR to engage in sheer speculation as to future environmental consequences.

Finding discussion of alternatives inadequate, where it identified three types of alternatives (no project anywhere, alternative sites at the university's existing campus, and alternative sites off-campus) but provided only one and one-half pages of textual analysis. The discussion of project alternatives must contain analysis sufficient to allow informed decision-making; conclusory comments in

support of environmental conclusions are generally insufficient. Lead Agency's responsibility to discuss alternatives was not dependent upon a showing by opponents of the relocation that feasible alternatives existed.

City of Del Mar v. City of San Diego (1982) 133 Cal.App.3d 401: Court held that City properly rejected project alternatives as infeasible, explaining that the Lead Agency may reasonably rely on various "economic, environmental, social, and technological" factors in evaluating the feasibility of project alternatives. "Feasibility" under CEQA encompasses "desirability" to the extent that desirability is based on a reasonable balancing of such factors.

Foundation for San Francisco's Architectural Heritage v. City and County of San Francisco (1980) 106 Cal.App.3d 893: Court held that Lead Agency made adequate findings that project alternatives were infeasible given their increased construction costs under PRC Section 21081.

Residents Ad Hoc Stadium Committee v. Board of Trustees (1979) 89 Cal.App.3d 274: Discussion of alternatives need not be exhaustive, and is subject to a construction of reasonableness. It requires the production of information sufficient to permit a reasonable choice of alternatives so far as environmental effects are concerned. Alternatives discussion should support Lead Agency's "hard look" at environmental consequences in recognition of the factors described in CEQA.

There is no need for an extended discussion of speculative alternatives. Lead Agency need not devote itself to an extended discussion of the environmental impact of alternatives remote from reality such as those which are of speculative feasibility or could only be implemented after significant changes in governmental policy or legislation.

County of Inyo v. City of Los Angeles (1977) 71 Cal.App.3d 185: EIR that lacks a genuine "No Project" alternative or alternatives tied to a reasonably conceived project fails to comply with CEQA's demand for meaningful alternatives.

Related CEQA Portal Topics

- Project Purpose and Objectives (In process)
- Project Description
- Findings (To come)

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Date Updated: 10/18/18



JOHN STUMP

February 12, 2024

Nancy Graham, Program Manager and Carrie Purcell, Deputy Director City of San Diego Engineering & Capital Projects Department, 525 B St., MS 908A, San Diego, CA 92101.
CIP-CEQA@sandiego.gov.

RE: **SUPPLEMENTAL** Additional Comments and Request for Expanded Environmental Review Fairmount Avenue Fire Station S-14018

"**Two sides to every story**" Joe Walsh <https://youtu.be/3M-jMFZLOm4?si=2BRpXnYLrXN-3Nwu>

Dear Ms. Graham and City of San Diego Environmental Review Department,

Thank you for today's email acknowledging receipt of my February 11, 2024 comments on Fairmount Avenue Fire Station S-14018.

Joe Walsh's classic song "**Two sides to every story**" is presented as an example of a position, you as a professional CEQA /NEPA analyst is not in. The CEQA/NEPA process is not designed as a platform to advocate for a project or prove that one side is right and the other wrong. That is not the purpose or approach to be used in CEQA.

This subject of ALTERNATIVES was not considered in the prior attempt a a project Negative Declaration and this approach led to community controversy, project delay, and significant increases in cost.

The role of the professional is different than that of a Fire Department Developer or a Community leader resident. The professional is held to an objective unbiased standard, and she must avoid even the appearance of bias. I believe that you and your colleagues are such professionals.

Community concerns have been raised because of the past decision to place a fire station in a sensitive location, without initial community consultation, from the very residents that are going to be served by expansion of needed public safety services in a large service area. The Community has a historic feeling of racial inequity and disempowerment by outsiders who do things to them rather than with them.



I. What are “ALTERNATIVES”



CEQA Portal Topic Paper

Alternatives

What Are Alternatives?

Alternatives, in the context of the California Environmental Quality Act (CEQA), are optional ways that the project proponent could achieve most of their objectives, while also reducing or eliminating the environmental impacts of the proposed project (California Public Resources Code [PRC] Section 21002; see also *Friends of the Old Trees v. Department of Forestry & Fire Protection* (1997)).

Alternatives typically involve changes to the location, scope, design, extent, intensity, or method of construction or operation of the proposed project. The Lead Agency is required to evaluate and compare the environmental impacts of alternatives to the proposed project in an Environmental Impact Report (EIR), though not at the same level of detail as the proposed project (CEQA Guidelines Section 15126.6(d)).

Why Are Project Alternatives Important?

A fundamental mandate of CEQA is that “public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of the project” (PRC Sections 21002, 21081). Therefore, as part of the decision making process for projects involving the preparation of an EIR, governmental agencies are required under CEQA to consider alternatives to proposed actions affecting the environment (PRC Section 21001(g)).

One of the purposes of an EIR is to identify alternatives to a proposed project and evaluate the comparative merits of feasible alternatives (CEQA Guidelines Section 15126.6(d)). By examining a range of alternatives, the Lead Agency can demonstrate that it has taken a “hard look” at the project objectives to select alternatives that allow for meaningful comparison (See *Residents Ad Hoc Stadium Committee v. Board of Trustees* (1979)).

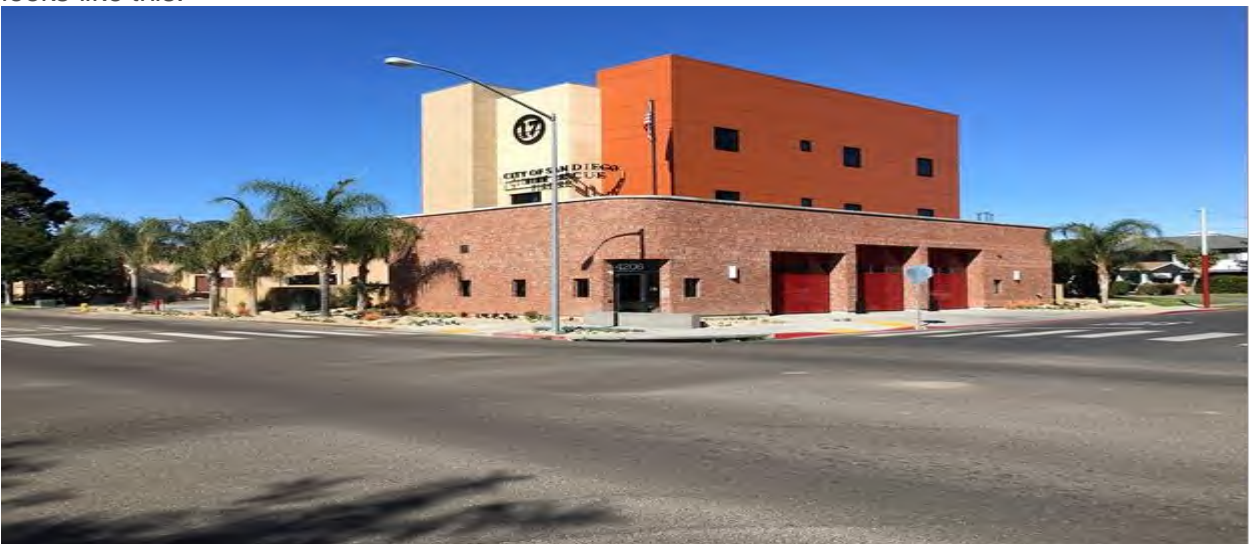
Courts have overturned many EIRs due to an improper or incomplete analysis of alternatives (See *Cleveland National Forest Foundation v. San Diego Association of Governments* (2017); *North Coast Rivers Alliance v. Kawamura* (2015); *Habitat and Watershed Caretakers v. City of Santa Cruz* (2013); *Watsonville Pilots Association v. City of Watsonville* (2010)).

The entire article copied and quoted above is attached for the benefit of the public and incorporated into my comments on this proposed project by reference.

Two print media articles: “Cost of Fire station help opponents” and *Opposition growing to new fire station proposed for semi-rural site in City Heights*” were included in my preliminary comments, of January 24, 2024. These articles layout and present specific CEQA concerns that must be addressed in the new scoping studies. The picture of the proposed designed to fit new fire station illustrated why this new fire station was likely to be the most expensive in San Diego’s history! The architect’s illustration of the proposed specialized fire station, built to fit the sloped and environmentally sensitive location, has been described as a ***Billionaire’s Chollas Rural Retreat or a Trump Towers Fire Station.***



. A normal City of San Diego fire station, recently built for the Northern Fairmount area looks like this:



See [Fire Station 17 | City of San Diego Official Website](#)

The above picture of the rapidly and economically built Fire Station 17 for the Northern Fairmount Area illustrates how and why a site that would qualify for a minimum CEQA Negative Declaration should be considered for the proposed Southern Fairmount Area Fire Station. My January 28, 2024, letter asked for completion of a cost comparison excel spread sheet as part of the alternative's comparison section of the Scoping for this project.

ROW	FIRE STATION COST COMPARISONS	South AREA Station	E/A	North AREA Station	E/A	DELTA	%
1	Initial Proposal Development						
2							
3	Detailed Proposal for Costing						
4							
5	CEQA Scoping and Report						
6							
7	CEQA Negative Determination						
8							
9	Land Acquisition, Commissions, & costs						
10							
11	Site Demolition and Preparation						
12							
13	CEQA Scoping and Report						
14							
15	CEQA Studies & Report Preparation						
16							
17	CEQA Approvals and Litigation						
18							
19	Revised Detailed Construction Plans						
20							
21	Site Demolition and Preparation						
22							
23	CEQA and Community Mitigation						
24							
25	Fees, Permits, Licenses, Inspections						
26							
27	Construction						
28							
29	Furnishings						
30							
31							
32							
33	TOTAL STATION COSTS:						

Only a cost comparison analysis will provide the public and policy makers with a factual basis to compare the subject proposed station with less costly alternatives.at different sites.

The early detailed design and description presentations for only a to be studied Fairmount Avenue Fire Station S-14018 [Former HOME AVENUE FIRE STATION] raised even more concerns that unbiased objectivity was no longer present. SEE City BORDS below:

BOARD 4. Project Description

<h3>Project Description</h3> <p>Project Components</p> <ul style="list-style-type: none"> • Construction of new fire station (22,400 sf, 4-story station). • 15-stall parking lot. • 1 garage and 2 apparatus bays (5,400 sf). • Exercise room kitchen and 10 bunch rooms. • Trash enclosure, emergency generator and fuel tank. • Total construction activities will allow for disturbance of 0.7 acres. • Project access would be one standard driveway off 47th Street. • New domestic 2" water service and meter and a 2.5" reduce pressure backflow device. • Irrigation with 2" water service and meter and 2.5" reduced pressure backflow device. • Sewer service will be provided with 6" lateral and a clarifier. • Offsite improvements include new 22' wide and 40' wide drive aprons, new crosswalk, curb cut, and power pole on 47th Street. 	<h3>Descripción del Proyecto</h3> <p>Componentes del proyecto</p> <ul style="list-style-type: none"> • Construcción de una nueva estación de bomberos (estación de 22,400 pies cuadrados de área y de 4 pisos) • 15 espacios de estacionamiento • 1 garaje y 2 espacios para aparatos de bomberos (5,400 pies cuadrados) • Sala de ejercicios, cocina y 10 cuartos para grupos • Espacio para basurero, generador de emergencia y tanque de combustible • Las actividades totales de construcción resultarán en una perturbación de 0.7 acres • El acceso al proyecto sería un camino de entrada estándar desde la calle 47th Street. • Nuevo medidor y servicio de agua doméstico de 2" y un dispositivo de reflujo de presión reducida de 2.5" • Riego con servicio y medidor de agua de 2" y dispositivo de reflujo de presión reducida de 2.5" • El servicio de alcantarillado contará con un lateral de 6" y un clarificador • Las mejoras fuera del sitio incluyen nuevas plataformas de acceso de 22' de ancho y 40' de ancho, un nuevo cruce de peatones, un corte en la acera y un poste de energía en la calle 47th Street.
<p>Engineering and Capital Projects Department Fairmount Avenue Fire Station Scoping Meeting</p>	<p>The City of SAN DIEGO</p>

BOARD 5 Fairmount Avenue Fire Station

Fairmount Avenue Fire Station | Estación de Bomberos de Fairmount Avenue



North Elevation | Fachada Norte



South Elevation | Fachada Sur



East Elevation | Fachada Este



West Elevation | Fachada Oeste

II. SUPPLEMENTAL COMMENTS AND SUBJECTS FOR ANALYSIS

In addition, and to supplement the comments already submitted since the January 12, 2024 publication; I supplement and add these comments.

1. I concur with the expressions and conclusions of Ms. Elida Chavez, below:

February 2, 2024

Nancy Graham, AICP
Program Manager, Entitlements & CEQA Compliance
City of San Diego
Engineering & Capital Projects Department

RE: Fairmount Avenue Fire Station S-14018

Ms. Graham,

I am Elida Chavez, 4th District community resident, one of the last persons that spoke to you regarding my concerns on the set up of the Notice of Preparation of an EIR and Scoping Meeting for project: Fairmount-Avenue Fire Station S-14018. The City of San Diego's Engineering & Capital Projects Department developed a very professional panel presentation on the project. Great team work.

I am addressing the following concerns that I hope you take serious consideration in acknowledging what transpired at the January 30th meeting at Webster Elementary.

1.

The City of San Diego, as our public agency, is required to engage all communities on projects that are funded by tax payers, State of California and Federal funds. If the City of San Diego allows the City of San Diego's Engineering & Capital Projects Department to only engage our communities in City projects as stated **on (your email to Joni-January**

31) (We offered the meeting as a courtesy to the community if they wanted to submit comments to staff in person instead of online. We will continue to accept online comments through February 12, 2024. Also, you stated on the same email (I understand that the meeting's purpose to collect comments was not what you hoped. I just wanted to communicate that the City is legally required to provide opportunities for scoping under the California Environmental Quality Act. In other words, we should be grateful that this meeting took place because the City of San Diego did not have to engage our community on this project? Ms. Graham, this is Not acceptable.

Additionally, the meeting notification as stated on the official document states:

Thereby, this Notice of Preparation of an EIR and Scoping Meeting is publicly noticed and distributed on January 12, 2024. This notice was published in the SAN DIEGO DAILY TRANSCRIPT and placed on the City of San Diego CEQA website at <https://www.sandiego.gov/ceqa> under the "Notice of Preparation and Scoping Meetings" tab.

PUBLIC NOTICE OF SCOPING MEETING: Consistent with Section 21083.9 of the CEQA Statutes and Section 15082 of the CEQA Guidelines, **a public scoping meeting will be held to solicit comments regarding the scope and analysis of the EIR.** The meeting will be held by the City of San Diego's Engineering & Capital Projects Department on Tuesday, January 30, 2024, from 6:00 to 8:00 p.m. in the auditorium at Webster Elementary School located at 4801 Elm St., San Diego, CA, 92102. Please note that depending on the number of attendees, the meeting could end earlier than 8:00 p.m. **Written comments** regarding the scope and alternatives of the proposed EIR will be accepted at the meeting. Requests for translation services to offer public comment may be made by contacting CIP-CEQA@sandiego.gov at least two business days prior to the meeting date. The City is committed to addressing language translation requests swiftly in order to maximize public participation.

2.

Ms. Graham, I our community does not subscribe to the San Diego Daily Transcript and many residents do not have computers to look up the CEQA website either. Most probably do not even know or heard of CEQA. **What other means of public outreach did City of San Diego's Engineering & Capital Projects Department use to inform our community residents of this meeting?** I received notice from Eastern Area Communities Planning Committee, Webster Community Council, Oak Park Community Council and Groundwork San Diego. These community groups ensured that residents were informed of this meeting so that everyone had an opportunity to voice their public comments. The attendance as you know was great, yet many persons and especially about ten young adults from the Green Team were not given the opportunity to publicly voice their opinions, concerns or recommendations on the project. They wanted to speak publicly. Also, some of our elders have different health problems that make it hard to write, or use computers and drive at night to these meetings. The form provided was a problem for many of us. Again, public vocal participation would have been the best so everyone would hear our communities' voices. The City of San Diego could have provided a microphone for this meeting or better yet you could have asked us to provide one too.

3.

Also, I was not surprised that you did not come to the table where our community leaders gathered hoping that you would come to talk to them on this presentation. It was an opportunity missed where everyone took time to meet in person to support our community residents and also view your presentation. SD Park & Recreation Commissioner Daniel Laman, Ms. Lynn Edwards, President, Eastern Area Communities Planning Committee, Steve Lamprides, President, Webster Community Council, Ms. Kristen Hurst-Webster Community Council, Derryl Williams-President, Groundwork San Diego Chollas Creek and Webster Community Council, and Richard Diaz, President, Oak Park Community Council, and some from Leisure Land were present. No acknowledgement of our community leaders that provide hundreds of hours of volunteer service to both the City of San Diego and District 4 residents. Another missed opportunity to engage with community leaders so you could establish a positive relationship as a representative of the City of San Diego's Engineering & Capital Projects Department. We are open to working with all city employees when you all understand that we must

Review of Ms. RR

all work together. Community Engagement makes our City stronger. I hope that the next time you reach out to us, that you do it in a more sincere way expressing concern for our community. I have no doubt that you have kindness in your heart. I will say that the Engineering Team on this project are much more community sensitive.

4. Ignoring Mr. Ramon Uribe, Community Engagement Manager, Groundwork San Diego, Chollas Creek and the Greet Team. Again, a missed opportunity to engage our youth.

5. We honor, appreciate and respect our first responders Firewomen and Firemen. This was a great opportunity for you to introduce the City of San Diego Fire person who was at the meeting. Ms. Graham if he was Fire Chief Colin Stowell, we would have liked to talk with him about our community concerns and how we could all collaborate on seeking the appropriate site for this fire station. Our community has never met him. I do not know him and many asked me if he was a police officer. Then again, maybe he was not Mr. Stowell.

6. This open space including the proposed site is part of the sacred Kumeyaay land this is left. Keep in mind that this is a good time for Reparation for our native relatives. Keep the open space and this parcel open.

Ms. Graham, there many other City of San Diego departments that underestimate our communities of concern, especially in Southeastern San Diego. It is sad that many departments still do not consider us as important residents that we have concerns regarding projects that are not best suited for our community. If employees that work for the City of San Diego do not live in District 4, 8, 9 and that have never experienced our neglected communities and the issues affecting us, it is obvious that they do not understand our concerns as long as they are doing their job and getting paid. Let's keep in mind that we are tax payers and pay for every city employee's salary. The disrespect to everyone who took their time to come to this meeting expecting to be publicly heard were dismissed and instead given a form that they did not know how or want to fill out for many reasons. One, fear of not expressing their concerns from the heart.

I am requesting a copy of all the forms that were provided by residents expressing their opinions and concerns regarding this project. It is public information. We should all receive a copy of the entire meeting public comments that should be included on the meeting report for the Fairmount Avenue Fire Station S-14018 EIR. I look forward to getting a copy of the completed report.

The City of San Diego's Engineering & Capital Projects Department team have done an excellent job of developing the board/panel presentation. Let's work on collaboration when you address us again.

Stay safe, share KINDNESS with all.

Thank you,

Elida Chavez

[REDACTED]

1. *Continued* Review of Ms. Elida Chavez's letter and my prior comments, again makes me comment that: The SCOPING NOTICE is flawed and should be reissued as it

failed to include the unique and specialized information contained in the twelve BOARDS presented to an extremely limited audience. The SCOPING NOTICE should be republished for a new compliant period with the BOARDS included.

1. *Continued* Following the republication publication of the NOTICE, a new SCOPING MEETING must be scheduled. The Tuesday, January 30, 2024 SCOPING MEETING was conducted in a flawed manner contrary to California Law and the laws and policies of the City of San Diego. Specific written and oral requests were made to have the meeting conducted so that disabled persons, sensitive senior citizens, and persons with sensitivities to COVID or other diseases that could be present in large unmasked groups could participate by electronic video methods. The city organizers ignored these requests to provide for video participation for the January 30, 2024, meeting, at the electronically capable San Diego Unified School District's public Webster Elementary school. Further, the city organizers failed to announce a supplemental video participation opportunity when asked at the meeting and in writing. The city needs to make reasonable accommodations for sensitive persons, including senior citizens and the disabled; particularly since the closest most adjacent residential community, to the project is a senior restricted community -Leisure Land. The City routinely provides electronic participation at all of its official meetings and has the authority to require public health safety measures like masking.
1. *Continued* The SCOPING MEETING NOTICE was published only in ENGLISH. This NOTICE needs to be republished in the language most common in the Fairmount Avenue Fire Station Project Fairmount Avenue Fire Station S-14018 service area – SEE **BOARD 3. Map of Service Area** on page 12 above. The City of San Diego has a common practice alternate language notice on its public meeting notices. I am informed and believe that the predominant languages spoken in the service area and surrounding neighborhoods are Spanish, Tagalog language, and Arabic. The San Diego City Clerk should be consulted for guidance on this comment.
1. *Continued* The SCOPING for this project must follow and meet and exceed both CEQA and federal NEPA standards and conduct. The proposed project has been delayed for nearly a decade because the City of San Diego lacked the sole local funds to acquire a site, design a facility, and construct and furnish it, including fire equipment and engines. SEE: comments already submitted in **"I. LIST OF COMMENTS AND SUBJECTS FOR ANALYSIS ALREADY SUBMITTED: above (Additional Comments and Request for Expanded Environmental Review on Notice of Preparation Fairmount Avenue Fire Station Project Fairmount Avenue Fire Station S-14018, February 11, 2024, Pages 1-10);**
1. *Continued* The SCOPING for this project must follow and meet and exceed both CEQA and federal NEPA standards and conduct. The proposed project has been delayed for nearly a decade because the City of San Diego lacked the sole local funds to acquire a site, design a facility, and construct and furnish it, including fire equipment and engines. SEE: comments already submitted in **"I. LIST OF COMMENTS AND SUBJECTS FOR ANALYSIS ALREADY SUBMITTED: above (Additional Comments and Request for Expanded Environmental Review on Notice of Preparation Fairmount Avenue Fire Station Project Fairmount Avenue Fire Station S-14018, February 11, 2024, Pages 1-10);**

1. *Continued* The “**PROJECT HISTORY:**”, presented on page 2, of the NOTICE is flawed and misleading. The “**PROJECT HISTORY:**” fails to inform the public of the prior failed and rejected attempt, by city staff, to accomplish this project with only a CEQA NEGATIVE DECLARATION of Environmental impacts. The community, the Sierra Club and others strongly objected to this minimum approach. - SEE “**Two print media articles: “Cost of Fire station help opponents” and Opposition growing to new fire station proposed for semi-rural site in City Heights**” were included in my preliminary comments, of January 24, 2024” as referenced, again, on page 2, above. The “**PROJECT HISTORY:**” must be revised to include the flawed prior attempt and a reference and access to the comments received from this prior attempt. The comments submitted in response to that prior attempt must be included as comments on this expanded project in the same location and the same environmentally sensitive location.

Continued The “**PROJECT HISTORY:**”, presented on page 2, of the NOTICE is flawed and misleading. The “**PROJECT HISTORY:**” incorrectly locates the project in the community of “City Heights”. . The project is not in the City Heights. It is not in the 92105 CITY HEIGHTS zip code. The project is in the Ridgeview Webster neighborhoods of zip code 92102 - [ZIP Code 92102 Map, Demographics, More for San Diego, CA \(unitedstateszipcodes.org\)](https://www.zipcode.com/zip/92102). Correctly identifying the projects neighborhood is a very sensitive racial equity issue, as identification of the area with City Heights is a disgusting artifact of the racial segregation redlining from the pre sixties. Also Noticing the community that the project is in the wrong community and zip code continues the Noticing flaws discussed above, in numbers 1-5.

2. The “**PROJECT DESCRIPTION:**”, presented on page 3, of the NOTICE needs revision to describe more fully the “5,850 square foot” **bunk room**, for 10 persons. This size is larger than most of the adjacent total family housing units. I know of only one home in the service area that approaches 5,850 square feet- the family home mansion of Archie Moore. I think that the square footage of “**bunk rooms**” needs to be detailed. As a standard, the square footage, of the City of San Diego Single Room Occupancy (SRO) units should be used, excluding space for cooking, as a **kitchen** is planned. I think that separate SROs may be appropriate to provide for our equal opportunity policy for female, male, and transgender fire fighters.

3. The “**PROJECT ACCESS:**”, presented on page 3, of the NOTICE needs to be revised to clearly describe and show the amount of curb that will be signed for ADA Blue Zones, No Parking, and limited time parking. The description should state that there will be TWO (2) separate driveways. The amount of linear clearance for driveways and safe visual clearance should be clearly and correctly stated. according to city traffic standards.

4. The “**PROJECT INFRASTRUCTURE**” section should be revised to anticipate the level of electrical service needed to provide for the future charging of an all-electric City fleet and visitors’ vehicles. The section should be revised to include solar power generation and storage.

5. The “**OFF-SITE IMPROVEMENTS**” section should be revised to exclude the installation of “a new power pole on 47th STREET”. City policy is to underground utilities and the construction of any new city fire station should not

increase above ground less reliable power lines and poles The construction of new city fire stations should enhance a neighborhood not push it back into Edison's 19th century.

6. The “**CONSTRUCTION AND PHASING**” section should be revised to acknowledge that construction must be phased to mitigate impacts to the sensitive environmental setting. Construction should be probably limited to those portions of the year that will not interfere with flora and fauna reproduction and nesting.

7. The “**AVAILABILITY IN ALTERNATE FORMAT**” section should be revised to state this section in the alternate formats and languages that are available. This section should be moved to the first part of the document and follow the guidance and methods used by the San Diego City Clerk.

III. CONCLUSIONS

This project is hard to understand given all of the past comments and opposition to it. The approach to this scoping should either be ***"Where is the most economical and effective place to site a second Fairmount Fire station?"*** or ***"What is the best and highest use for this site?"*** A simple cost-benefit analysis demonstrates that this fire station. is the wrong project. A new Fire Station can be better located along Federal Boulevard, perhaps on City land. This subject site can serve higher priorities for senior OR school workforce housing or extension of the Chollas Creek ecological remediation.

The environmental studies and documents must consider real alternatives, including **no project**. The studies must meet and exceed both CEQA and federal NEPA standards, because the project will likely require both federal and local funding.

Many persons in the project's service area are seriously disabled seniors. I request, on mine and their behalf, the ability to participate in all workshops, by video conference. I believe that making video participation is a reasonable accommodation and routine for the city.

These comments have been submitted by a coalition of community-based individuals and non-profits organizations.

I request acknowledgement of the timely receipt of these comments. I request a written response to all comments submitted.

I thank the city staff and Ms. Nancy Graham for the first draft of this work. The BOARDs were very well prepared and bilingual.

All the best,
/s/

John Stump, project community member, property owner, and nonprofit member

ATTACHMENT: CEQA Portal: Alternatives *Updated 10/18/18* [Craig Stevens, Stevens Consulting - craig@cdstevens.com](mailto:craig@cdstevens.com)

From: [REDACTED]
To: [Graham, Nancy; CIP CEQA Document Process](#)
Cc: [REDACTED]
Subject: [EXTERNAL] Comment relates to Fire Avenue Fire Station S-14018
Date: Thursday, February 15, 2024 5:49:42 AM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Comment relates to Fire Avenue Fire Station S-14018

Climate efforts to face closer scrutiny

S.D. settles lawsuits, paving way for new construction in city

By David Garrick

San Diego's progress reducing greenhouse gas emissions will face significantly more scrutiny under a deal the city reached this week to settle lawsuits with environmental organizations. City officials said the settlement shows the city's commitment to fighting climate change and clears the way for construction projects to move forward across the city, particularly in Mira Mesa.

The settlement requires San Diego to disclose its progress on reducing greenhouse gas emissions annually, instead of being allowed to wait until 2030. And if an annual review shows it has fallen significantly short of any targets, the city must immediately adopt more aggressive policies.

Without the settlement, the public and environmental groups would have been unaware of struggles the city might be having with meeting its commitment to get to net-zero emissions by 2035. And they would have had less opportunity to demand changes.

"This is an important step forward because it creates the transparency and accountability we've been asking for," said Nicole Capretz, chief executive of Climate Action Campaign. Capretz said the increased scrutiny the settlement requires of San Diego goes beyond commitments made by any other California city.

"It's a brand-new approach," Capretz said. "We hope it will be a statewide precedent." The settlement clears the way for development projects because it ends two lawsuits that both claim the city violated the state's strict environmental law, the California Environmental Quality Act.

A suit filed by Climate Action Campaign accused the city of violating CEQA with its 2022 update of its 2015 climate action plan. And a suit filed by the Coastal Environmental Rights Foundation said that law was also violated by a new growth blueprint approved for Mira Mesa in 2022, which tied its environmental review to the revised climate action plan.

Both lawsuits contended the city had failed to include mechanisms to ensure the revised climate action plan would meet its goals of reducing emissions at least 40 percent by 2030 and to zero by 2035.

City officials said uncertainty about how those lawsuits would turn out has slowed

development efforts, particularly in Mira Mesa.

“The litigation has caused significant delays in development and would continue to delay projects through appeal,” city officials said this week.

Mayor Todd Gloria characterized the settlement as a win-win situation for San Diego. It puts the city on the leading edge of climate action efforts while also clearing the way for development, he said.

“This agreement reinforces the city’s commitment to fully implementing the Climate Action Plan transparently and collaboratively, while also eliminating uncertainty over the status of the CAP and development plans that rely on its mitigation measures,” Gloria said by email.

“Confronting the climate crisis is crucial to protecting our quality of life and economic vitality.” Former City Councilmember Chris Cate, who now serves as chair of the Mira Mesa Community Planning Group, said the settlement is great news for his neighborhood.

“Thankfully this lawsuit is now behind us,” Cate said. “We can now focus on executing the plan we have spent years developing that sets the future of Mira Mesa.”

The new neighborhood growth blueprint would increase the area’s population from 78,000 to 143,000 over the next 30 years, break up car-centric superblocks and allow high-rise housing along major roads.

The settlement, which the City Council unanimously approved Tuesday, pays the environmental groups \$120,000 total, including attorney fees. It also stipulates they won’t challenge other projects that rely on the revised climate plan.

Sara Ochoa, programs director for the Coastal Environmental Rights Foundation, said the settlement is an opportunity for collaboration between the city, community and local industry.

“We commend city officials for their efforts thus far, but it is clear that more ambitious and transformative measures are needed to achieve our 2035 net-zero emissions goal,” Ochoa said. “We need to invest in reducing emissions and increasing our communities’ resilience to climate impacts, such as flooding and storm damage, to reduce social and economic costs.”

While city officials praised the settlement, they also downplayed its impact on city efforts.

“The items and terms in the Agreement include many of the requirements for CAP monitoring adopted by the City Council and planned for by the Sustainability and Mobility Department as part of, and since the adoption of, the 2022 CAP,” says a staff report prepared by City Attorney Mara Elliott’s office. “The agreed upon commitments generally reflect already planned items in the Sustainability and Mobility Department’s Work Plan.”

Capretz, the Climate Action Campaign official, said it made sense for the environmental groups to settle instead of continue to pursue their litigation.

“A settlement is inherently a compromise, but we thought this was still really good for the community,” she said. “We had no benchmark before. Now they must disclose and course-correct.”

The settlement requires policy changes if the city is more than 12.5 percent short of incremental goals on any particular element of the climate action plan, such as efforts to convert the city’s vehicle fleet to all-electric, shifting from gas appliances to electric and shifting commuters away from cars toward bikes and transit.

Capretz said the city's first progress report will likely come in spring 2025.

[REDACTED]

From: [REDACTED]
To: [Graham, Nancy](#); [CIP CEQA Document Process](#)
Cc: [CLK City Clerk](#); [REDACTED]
Subject: [EXTERNAL] Community Meeting Information and Notice of Preparation Fairmount Avenue Fire Station Project ECP Notice of Preparation 1-12-24.pdf (sandiego.gov) Cost Benefit Chart comparing two Area Projects
Date: Sunday, January 28, 2024 9:29:03 PM
Attachments: [Outlook-n10qx34f.png](#)

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

JOHN STUMP

[REDACTED]

January 28, 2024

Nancy Graham, Program Manager and Carrie Purcell, Deputy Director City of San Diego Engineering & Capital Projects Department, 525 B St., MS 908A, San Diego, CA 92101. CIP-CEQA@sandiego.gov.

RE: Community Meeting Information and Notice of Preparation Fairmount Avenue Fire Station Project [ECP Notice of Preparation 1-12-24.pdf \(sandiego.gov\)](#) Cost Benefit Chart comparing two Area Projects

Dear Ms. Graham and City of San Diego Environmental Review Department,

I have prepared an Excel Spreadsheet to allow a fair and easy comparison of the steps, costs of two (2) needed Fire Station Capital improvement projects. Both projects are in the Fairmount Area- Fire Station 17 Completed and the South Area Station now under restart and restudy.

The Total Actual Costs for the North Area Station 17 are known and actual. The North Area Station 17 was accomplished on an existing site, with a CEQA Negative Declaration, and for those reasons had lesser costs. It took less time to complete this public safety project because Fire Station 17 was not built in an unusually environmentally sensitive area and did not require significant modification of basic fire station designs to be built on a flat site.

However, the South Area fire Station started with the early first acquisition of a challenging sloped site in an environmentally sensitive zone. After acquisition CEQA documents and preliminary architectural plans identified that this Chollas Creek site would be costly. Two print media articles – **“Cost overruns on Fairmont fire station help opponents”** and **“Opposition growing to new fire station proposed for semi-rural site in City Heights”**, submitted to you in my ***Notice of Preparation Fairmount Avenue Fire Station Project [ECP Notice of Preparation 1-12-24.pdf \(sandiego.gov\)](#) Preliminary Comments***, letter of January 24, 2024, identified many of the additional costs the South area Station will incur. [Please incorporate that ten (10) page letter into this comment by reference.)

The Southern Area project is hard to understand given all of the past comments and opposition to it. The approach to this scoping should either be “Where is the most economical and effective place to site a second Fairmount Fire station?” or “What is the best and highest use for this site?” A simple cost-benefit analysis demonstrates that this fire station is the wrong project. A new Fire Station can be better located along Federal Boulevard, perhaps on City land. This site can serve higher priorities for senior school workforce housing or extension of the Chollas Creek ecological remediation.

Please complete the **“Comparision of Two Fairmount Area Fire Station Projects – Cost, Impacts, and Time to Complete”** excel spreadsheet as part of your scoping study. The excel sheet provides many blank rows to insert

detailed cost comparisons between the completed Northern Fire Station 17 project and the new Southern Area Station. I think it will become obvious that another different site will get the Southern Station completed faster and at considerable savings. The Columns "A/E" are for you to designate whether costs are Actuals or Estimates.

Please provide me with the reasonable accommodation to attend the community meeting by video

Please forward this letter to the City Planners responsible for revision to the Mid City Plan, the City Attorney, the City Auditor, and the City Ethics Commission.

All the best,
/s/ John Stump



Proposed South Fairmount Area Station Completed North Area Fire Station 17

Comparison of Two Fairmount Area Fire Station Projects – Cost, Impacts, and Time to Complete

ROW	FIRE STATION COST COMPARISONS	South AREA Station	E/A	North AREA Station	E/A	DELTA	%
1	Initial Proposal Development						
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27	Construction						
28							
29	Furnishings						
30							
31							
32							
	TOTAL STATION COSTS:						

From: [REDACTED]
To: [CIP CEQA Document Process](#); [REDACTED]
Cc: [REDACTED]
Subject: [EXTERNAL] Fairmount Area Fire Station Comments and Request for reasonable accommodations for video participation
Date: Thursday, January 25, 2024 1:13:55 PM

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READER

Cost overruns on Fairmont fire station help opponents

From \$12 million to over \$25 million already

Author
David Paul

June 20, 2022

David Cohen

City Heights

San Diego

4 of 10



The 120-acre site at 8502 47th Street is a steep slope above Chula Vista. On Wednesday, June 16 the city of San Diego's audit committee will have discussed a new 18-page report on infrastructure projects that estimate what some have said is along about the proposed Fairmont Fire Station.

It was a project in need of a plan.

The audit's main finding about the [\\$12 million](#) for capital improvements projects is that the city has spent more than through previously, which likely contributed to significant project cost overruns and much longer project timelines.

All of that applies to the plan to build a 14,273 square foot [\\$12 million](#) City Heights on the corner of 47th Street and Fairmount Avenue, opponents say.

Sponsors

It's the poster child of "some writing, cost overruns, and mismanagement of the CIP process," states a letter to the audit committee from City Heights resident John Shump, who says it may become the most expensive fire station in San Diego history.

The 120-acre site at 8502 47th Street is a steep slope above and adjacent to the already imperiled Chula Vista and its western. Environmental advocates say the parcel, which has within a multi-habitat planning area, should be closed for an open space.

At the time the city bought the land in 2007, no studies had been done to find out if it was even suitable to build a fire station there. The city said it was essential to meet the fire department's operational needs and response times for the growing Mid-City City Heights community.

Fast back to 2006, when a new \$12 million fire station was proposed on Home Avenue, another area of City Heights with a fire services gap. But in 2008, plans shifted to the current site, acquired by the city in 2007. The project was renamed Fairmont Fire Station – a misnomer, critics said, because the facility joined on 47th Street is a world away from bustling Fairmount Avenue.

Two years later, an environmental consultant's report identified numerous "sensitive resources" on the site. According to city records, the station would sit on an designated, multi-habitat planning area and multiple species conservation plan lands.

The high cost to build on 47th Street was obvious. By then, it was projected to be at least \$18 million. Opponents said the site at this point should have been abandoned in favor of one of those already proposed for Home Avenue. Capital improvement projects don't always require a full environmental impact report, and the city chose a less stringent review known as a mitigated negative declaration.

A letter to the city from the Sierra Club calls the proposal an "on-again, off-again Capital Improvement Project with a preordained Mitigated Negative Declaration decision."

Advocates, who included Chula Vista Coalition, Audubon San Diego Conservancy and others fought for a full environmental impact report. In 2020 the city agreed, later providing a timeline of 18-24 months to complete.

In the city's FY22 budget adopted last June, the Fire-Rescue portion states the location of the fire for the Fairmont station is one of the Fire-Rescue Department's Capital Improvement Project goals for FY2023. The projected cost was over \$23 million.

Today, its total cost is estimated to be [over \\$25 million](#). Only partially funded, the design phase isn't expected to be finished until 2026. Currently, planning, design and construction are on hold pending the identification of a funding source and approval of an Environmental Impact Report.

According to the audit, projects that were poorly planned when first approved on average, cost 153 percent more than their initial estimates and took four years longer to complete. But the average difference for the facilities is \$62,548,000 and the difference in years to completion is almost a decade.

In the end, watershed advocates believe the long-awaited report will prove the fire station should be relocated.

6 of 10

[POLITICS](#)

Opposition growing to new fire station proposed
for semi-rural site in City Heights



Rendering of the proposed fire station.
(Courtesy city of San Diego)

Community leaders, environmentalists say city picked
wrong site, despite large coverage gap in area

BY [DAVID GARRICK](#)

AUG. 1, 2021 7:19 AM PT

- [Opposition growing to new fire station proposed for semi-rural site in City Heights - The San Diego Union-Tribune \(sandiegouniontribune.com\)](#)

SAN DIEGO —

San Diego's six-year effort to fill its most glaring fire coverage gap with a new station in City Heights is facing steadily increasing opposition from community leaders and environmental groups.

Critics don't dispute San Diego badly needs a new fire station to shrink response times in the area, but they say city officials chose the wrong site in 2015 and have continued to pursue building there despite mounting challenges.

The site, on 47th Street in a semi-rural residential area between Fairmount and Euclid avenues, is next to environmentally sensitive land, features steep slopes and has a relatively narrow entrance-and-exit route.

Partly because of those challenges, the cost estimate for the new station is \$7 million to \$8 million higher than what the city typically spends on new fire stations.

While the city usually spends about \$15 million, the latest cost estimate for the new City Heights station is \$22.3 million, which would make it one of the most expensive fire stations San Diego has ever built.

Fire Chief Colin Stowell deferred technical questions about the site to the city's Engineering & Capital Projects Department, but he stressed in an email this week that studies have shown it's crucial to build a new station in that area.

An outside consultant that analyzed San Diego's coverage gaps in 2010 and 2017 found both times that the area near Home and Fairmount avenues was among the city's top 10 gaps. In the 2017 survey, it was listed as the No. 1 gap.

"San Diego's growth as well as various geographical challenges i.e., railroad tracks, freeway access, etc., indicate that the communities surrounding the Fairmount and 47th Street location would be better served by a station at that site," Stowell said.

Critics say San Diego should either find another nearby site or possibly revive three sites city officials considered but rejected six years ago. They are a site at Home and Fairmount; one on Home just south of Gateway; and a site at Beech and 38th streets.

If the city continues to pursue building on the chosen site, critics are calling for a comprehensive environmental impact report to analyze the new fire station's effect on

birds, plants, traffic, noise and other items. City officials have indicated they instead plan to conduct a less rigorous environmental review called a mitigated negative declaration.

The San Diego chapter of the Sierra Club wrote a letter urging city officials to take the more rigorous approach.

“Sierra Club finds it deplorable that planning staff cannot reach a decision to require an Environmental Impact Report due to the strong potential for serious and irrevocable environmental impacts to this area,” the club’s letter said. “This does not suggest any staff incompetence. What it does illustrate is management’s reluctance to publicly evaluate a city of San Diego capital improvement project with an EIR.”

The Webster Community Council, a neighborhood group representing communities just south of the fire station site, says the project conflicts with a community growth blueprint for the area that prioritizes preserving the environment.

“We believe it stands as a direct conflict to the city’s plan to protect and maintain our natural habitats,” said Margarite Hickman, a leader of the council. “Other locations must be considered and eventually pursued.”

There is also opposition from an alliance of community organizations that support efforts to upgrade the Chollas Creek Watershed, a large swath of southeastern San Diego that Mayor Todd Gloria says he plans to designate the city’s newest regional park.

Because the site of the proposed new station is within the watershed, the alliance — the Chollas Creek Coalition — has joined calls for a comprehensive EIR. The coalition says the site could become parkland or a trailhead.

“The importance of open canyon spaces and our work toward restoration of the Chollas Creek Watershed highlight the intrinsic public value of these natural resources,” Leslie Reynolds, one of the coalition’s leaders, said in a letter to the city.

The new station site is also opposed by Leisureland, a 187-space mobile home park with about 300 residents that is near the site.

City documents indicate officials plan to break ground on the 1.3-acre site in January, with construction expected to take about two years.

The city's Engineering & Capital Projects Department declined to answer a long list of questions submitted this week by the Union-Tribune about the site and the decision to to conduct an EIR.

The two City Council members whose districts border the site, Monica Montgomery Steppe and Sean Elo-Rivera, declined requests for interviews

[Opposition growing to new fire station proposed for semi-rural site in City Heights - The San Diego Union-Tribune \(sandiegouniontribune.com\)](http://sandiegouniontribune.com)

I am reviewing the full details of the initial publication for this scoping. I am concerned that the description of the project continues to attempt to promote the Fairmount site over all of the other alternatives. I think the characterization of the surrounding businesses and watershed uses, like the freight transfer facility misrepresents its operational location versus its entrance drive. The draft notice needs more careful review to ensure that there is no promotion or salesmanship of this site over available alternatives

Please forward this letter to the City Planners responsible for revision to the Mid City Plan, the City Attorney, the City Auditor and the City Ethics Commission.

All the very best,
/s/ John Stump

From: [REDACTED]
To: [Graham, Nancy; CIP CEQA Document Process](#)
Subject: [EXTERNAL] Organic Waste for Facilities for 10 Residence must be provided Fairmount Avenue Fire Station S-14018,
Date: Monday, February 19, 2024 4:45:53 AM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

California struggling with food recycling targets

Deadline for making scraps into compost likely won't be met

By Amy Taxin

Two years after California launched an effort to keep organic waste out of landfills, the state is so far behind on getting food recycling programs up and running that it's widely accepted next year's ambitious waste-reduction targets won't be met.

Over time, food scraps and other organic materials like yard waste emit methane, a gas more potent and damaging in the short-term than carbon emissions from fossil fuels. California's goal is to keep that waste from piling up in landfills, instead turning it into compost or biogas. Everything from banana peels and used coffee grounds to yard waste and soiled paper products like pizza boxes counts as organic waste. Households and businesses are now supposed to sort that material into a different bin.

But it has been hard to change people's behavior in such a short period of time and cities were delayed setting up contracts to haul organic waste due to the pandemic. In Southern California, the nation's largest facility to convert food waste into biogas has filed for bankruptcy because it's not getting enough of the organic material.

"We're way behind on implementation," said Coby Skye, the recently retired deputy director for environmental services at Los Angeles County Public Works. "In America, for better or worse, we want convenience, and it's very difficult to spend a lot of time and effort educating people about separation."

Meanwhile, some communities that ramped up collection now have more compost than they know what to do with, a sign that more challenges are yet to come as the state plows ahead with its recycling plans.

Only a handful of states mandate organics recycling, and none are running a program as large as California's, which seeks to slash by 75 percent the amount of organic waste it sends to landfills by 2025 from 2014 levels.

Reaching that goal within a year would be a stretch, experts said.

About three-quarters of communities are currently collecting organic waste from homes, said Rachel Machi Wagoner, CalRecycle's director. While some places are lagging, her aim isn't to punish them but to help them get started, adding that every bit helps the state move toward its goal of reducing emissions.

“My goal is about figuring out where the challenges are and getting us as quickly as possible to success,” she said.

“I don’t know when we will reach our 75 percent goal, but we will reach it,” she added.

CalRecycle hasn’t tallied data yet on how much organic waste was diverted from landfills in 2023. Jurisdictions reported diverting 11.2 million tons of organics at the end of 2022, up from 9.9 million tons the prior year, Wagoner said.

Some challenges include getting residents on board with sorting their trash into a third bin and knowing what goes where. Others concern what to do with the nutrient-rich compost once it’s been created from collected grass clippings, tree branches and food scraps.

At the Otay Landfill in Chula Vista, workers pick through heaps of branches and leaves to pull out plastic bits before the material is placed under tarps. The site processes 200 tons of organic waste daily and hopes to double that amount as more cities ramp up collection, said Gabe Gonzales, the landfill’s operations manager.

Once the compost is made, California’s law requires cities to use much of it. But many say they don’t have enough space to lay it all out.

Chula Vista is supposed to use 14,000 tons of compost a year but uses a few thousand at best, said Manuel Medrano, the city’s environmental services manager. Some is doled out in free compost giveaways for residents, while heaps of the material are stored in a fenced area of a local park.

“To transport it is really expensive, to spread it is really expensive,” Medrano said. “We’re nowhere near meeting that requirement.”

Communities with more open space might fare better. Cody Cain, head of marketing and sales for compost-maker Agromin, said his company has developed a plan to link cities struggling to meet these requirements with farmers who need the material for their soil.

“We basically are matchmakers. Call us the ‘Tinder’ of compost, and we’ll bring the farmer together with the city,” Cain said.

Food waste also can be converted into biogas to fuel vehicles or industrial operations. But a massive facility built three years ago in Rialto now finds itself facing bankruptcy after Los Angeles was slow to ramp up collection, leaving the plant with insufficient waste, said Yaniv Scherson, chief operating officer for Anaergia Inc.

“It’s because the cities didn’t enforce on time the market is struggling,” he said. “If it doesn’t get feedstock this year, there is a chance it shuts down completely.”

L.A. Sanitation & Environment, which handles trash and recycling for the city of nearly 4 million people, had no immediate comment.

Heidi Sanborn, founding director of the environmental National Stewardship Action Council, said she supports the state’s law but wants more done to keep plastics out of compost and to develop alternative energy solutions. Some of California’s challenges stem from the fact the state is trying to build a system on a scale the country hasn’t seen, she said.

“We’re trying to fix incredibly tough problems. We’re not going to find the perfect solution out of the gate,” she said.

But, Sanborn added, “we’re on our way.”

Taxin writes for The Associated Press.

JOHN STUMP

Telephone: [REDACTED]

Email: [REDACTED]

January 28, 2024

Nancy Graham, Program Manager and Carrie Purcell, Deputy Director City of San Diego Engineering & Capital Projects Department, 525 B St., MS 908A, San Diego, CA 92101. CIP-CEQA@sanidiego.gov.

RE: Community Meeting Information and Notice of Preparation Fairmount Avenue Fire Station Project [ECP Notice of Preparation 1-12-24.pdf \(sanidiego.gov\)](#) Preliminary Comments

Dear Ms. Graham and City of San Diego Environmental Review Department,

I have prepared an Excel Spreadsheet to allow a fair and easy comparison of the steps, costs of two (2) needed Fire Station Capital improvement projects. Both projects are in the Fairmount Area- Fire Station 17 Completed and the South Area Station now under restart and restudy.

The Total Actual Costs for the North Area Station 17 are known and actual. The North Area Station 17 was accomplished on an existing site, with a CEQA Negative Declaration, and for those reasons had lesser costs. It took less time to complete this public safety project because Fire Station 17 was not built in an unusually environmentally sensitive area and did not require significant modification of basic fire station designs to be built on a flat site.

On the other hand, the South Area fire Station started with the early first acquisition of a very challenged sloped site in an environmentally sensitive zone. After acquisition CEQA documents and preliminary architectural plans identified that this Chollas Creek site would be costly. Two print media articles – **“Cost overruns on Fairmont fire station help opponents”** and **“Opposition growing to new fire station proposed for semi-rural site in City Heights”**, submitted to you in my **Notice of Preparation Fairmount Avenue Fire Station Project** [ECP Notice of Preparation 1-12-24.pdf \(sanidiego.gov\)](#) **Preliminary Comments**, letter of January 24, 2024, identified many of the additional costs the South area Station will incur. [Please incorporate that ten (10) page letter into this comment by reference.]

Southern Area project is hard to understand given all of the past comments and opposition to it. The approach to this scoping should either be “Where is the most economical and effective place to site a second Fairmount Fire station?” or “What is the best and highest use for this site?” A simple cost-benefit analysis demonstrates that this fire station is the wrong project. A new Fire Station can be better located along Federal Boulevard, perhaps on City land. This site can serve higher priorities for senior school workforce housing or extension of the Chollas Creek ecological remediation.

Please complete the **“Comparison of Two Fairmount Area Fire Station Projects – Cost, Impacts, and Time to Complete”** excel spreadsheet as part of your scoping study. The excel sheet provides many blank rows to insert detailed cost comparisons between the completed Northern Fire Station 17 project and the new Southern Area Station. I think it will become obvious that another different site will get the Southern Station completed faster and at considerable savings.

Please provide me with the reasonable accommodation to attend the community meeting by video

Please forward this letter to the City Planners responsible for revision to the Mid City Plan, the City Attorney, the City Auditor, and the City Ethics Commission.

All the best,
/s/ John Stump



Proposed South Fairmount Area Station



Completed North Area Fire Station 17



Proposed South Fairmount Area Station



Completed North Area Fire Station 17

Comparison of Two Fairmount Area Fire Station Projects – Cost, Impacts, and Time to Complete

ROW	FIRE STATION COST COMPARISONS	South AREA Station	E/A	North AREA Station	E/A	DELTA	%
1	Initial Proposal Development						
2							
3	Detailed Proposal for Costing						
4							
5	CEQA Scoping and Report						
6							
7	CEQA Negative Determination						
8							
9	Land Aquisition, Commissions, & costs						
10							
11	Site Demolition and Preparation						
12							
13	CEQA Scoping and Report						
14							
15	CEQA Studies & Report Preparation						
16							
17	CEQA Approvals and Litigation						
18							
19	Revised Detailed Construction Plans						
20							
21	Site Demolition and Preparation						
22							
23	CEQA and Community Mitigation						
24							
25	Fees, Permits, Licenses, Inspections						
26							
27	Construction						
28							
29	Furnishings						
30							
31							
32							
	TOTAL STATION COSTS:						

SCOPING MEETING COMMENT CARDS



PUBLIC SCOPING MEETING / OPEN HOUSE
FAIRMOUNT FIRE STATION PROJECT
January 30, 2024 6:00 p.m.

NAME: Carlos Alvarez

ADDRESS: [REDACTED] CITY: [REDACTED] ZIP: [REDACTED]

EMAIL ADDRESS: [REDACTED]

REPRESENTING: Webster

Do you wish to be added to the project mailing list? ☒ YES ☐ NO

Please drop comments in the Comment Box or mail them to:

Nancy Graham, Program Manager,
City of San Diego Engineering & Capital Projects Department,
525 B St., MS 908A, San Diego, CA 92101.

CIP-CEQA@sanidiego.gov

The purpose of this comment card is to solicit input regarding the scope and content of the Environmental Impact Report (EIR). Please submit comments for the record that pertain to the *environmental issues* to be addressed in the EIR (please print).

Terrible location. The old police shooting range that
is not being used seems to be the perfect fit
for this project. This current location will
disturb all animal and eco systems located
in that canyon. "Leisner land" 55+ community
would also suffer the consequences of loud
activity from this station.

Written comments must be submitted to the City of San Diego by
Monday, February 12, 2024 at 5:00 p.m.



PUBLIC SCOPING MEETING / OPEN HOUSE
FAIRMOUNT FIRE STATION PROJECT
January 30, 2024 6:00 p.m.

NAME: Jessica Arrequin

ADDRESS: [REDACTED]

CITY: [REDACTED]

ZIP: [REDACTED]

EMAIL ADDRESS: [REDACTED]

REPRESENTING: Affected Community members/residents

Do you wish to be added to the project mailing list? ☒ YES ☐ NO

Please drop comments in the Comment Box or mail them to:

Nancy Graham, Program Manager,
City of San Diego Engineering & Capital Projects Department,
525 B St., MS 908A, San Diego, CA 92101.

CIP-CEQA@sanidiego.gov

The purpose of this comment card is to solicit input regarding the scope and content of the Environmental Impact Report (EIR). Please submit comments for the record that pertain to the environmental issues to be addressed in the EIR (please print).

The proposed Fire station will be
destroying a large piece of open space.
This space is home to native plants
& animals. These habitats will be
destroyed by the construction of the
Fire station. This area is watershed
for Chollas creek & should
be protected. Residents are also

Written comments must be submitted to the City of San Diego by
Monday, February 12, 2024 at 5:00 p.m.

Concerned about the impact
of increased traffic & noise
on the environment.



PUBLIC SCOPING MEETING / OPEN HOUSE
FAIRMOUNT FIRE STATION PROJECT
January 30, 2024 6:00 p.m.

NAME: Morales I. Aurora
ADDRESS: [REDACTED] CITY: [REDACTED] ZIP: [REDACTED]
EMAIL ADDRESS: [REDACTED]
REPRESENTING: GroundWork San Diego / Green team
Do you wish to be added to the project mailing list? ☐ YES ☒ NO

Please drop comments in the Comment Box or mail them to:

Nancy Graham, Program Manager,
City of San Diego Engineering & Capital Projects Department,
525 B St., MS 908A, San Diego, CA 92101.

CIP-CEQA@san Diego.gov

The purpose of this comment card is to solicit input regarding the scope and content of the Environmental Impact Report (EIR). Please submit comments for the record that pertain to the *environmental issues* to be addressed in the EIR (please print).

1) I have nothing against ~~the~~ ^{the} ~~two~~ ~~say~~ ~~about~~ building of the new fire station, due to our Chollas Creek community needing one. The only complaint I have is the area chosen to build it at. The space chosen would be better if we used it for more green infrastructure (a park) around the area as it would help prevent any heat island the cement of the new building! ^{may case} It could provide more area for our wild life also it wouldn't affect our

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Monday, February 12, 2024 at 5:00 p.m.

problem with pollution.

2) A better area that could be used for this new project would be around ~~the~~ Federal blv. and home av. That space is currently being unused and just sitting there going to waste. / understand that it may be unavailable for us ATM as it's part of the police department, but if were capable of coming to an agreement I'm sure we can use that area for our new Fire Station Building.



PUBLIC SCOPING MEETING / OPEN HOUSE
FAIRMOUNT FIRE STATION PROJECT
January 30, 2024 6:00 p.m.

NAME: Elida Chavez

ADDRESS: [REDACTED] CITY: [REDACTED] ZIP: [REDACTED]

EMAIL ADDRESS: [REDACTED]

REPRESENTING: Oak Park Community Council - Friends of the
Oak Park Library

Do you wish to be added to the project mailing list? ☒ YES ☐ NO

Please drop comments in the Comment Box or mail them to:

Nancy Graham, Program Manager,
City of San Diego Engineering & Capital Projects Department,
525 B St., MS 908A, San Diego, CA 92101.

CIP-CEQA@sanidiego.gov

The purpose of this comment card is to solicit input regarding the scope and content of the Environmental Impact Report (EIR). Please submit comments for the record that pertain to the *environmental issues* to be addressed in the EIR (please print).

- Parcel very unsafe - in + out - very dangerous
- Four Story Bldg - Blocks - View of traffic on 47th - Very distracting - Will not be part of sacred open space
- Sacred Kumeyaay Land - Open Space will be blocked - trails - disrupt - creeks - environmentally
- Multi Habitat - Planning area - CEIS - Open Space.
- Sensitive Vegetation - Native plants - Sage
- Very High Fire Hazard Severity Zone

Written comments must be submitted to the City of San Diego by
Monday, February 12, 2024 at 5:00 p.m.

nee

- Will affect the elementary school - children can be traumatized
- Air quality will be unsafe - due to fire vehicles - pumps
- Very unsafe for Helixine Land - mobile home park
- Parcel is in a flood zone - keep in mind January 22nd!
- Build - Fire station - BOPD - Firing Range on Federal
- DO NOT Build - on this parcel

NO Presentation - Very - unfair
wanted - to voice my concerns
publicly Not on paper.

Nothing - Recorded - ^{By} public -



PUBLIC SCOPING MEETING / OPEN HOUSE
FAIRMOUNT FIRE STATION PROJECT
January 30, 2024 6:00 p.m.

NAME: VICKIE CHURCH
ADDRESS: [REDACTED] CITY: [REDACTED] ZIP: [REDACTED]
EMAIL ADDRESS: [REDACTED]
REPRESENTING: Citizen
Do you wish to be added to the project mailing list? ☒ YES ☐ NO

Please drop comments in the Comment Box or mail them to:

Nancy Graham, Program Manager,
City of San Diego Engineering & Capital Projects Department,
525 B St., MS 908A, San Diego, CA 92101.

CIP-CEQA@san Diego.gov

The purpose of this comment card is to solicit input regarding the scope and content of the Environmental Impact Report (EIR). Please submit comments for the record that pertain to the *environmental issues* to be addressed in the EIR (please print).

- ① Watershed and habitat preservation is essential for Chollas Creek.
 - ② 22,400 sq. ft. facility will ^{restrict} ~~generate~~ soil absorption of rainfall. What will you do with almost 14,000 gallons of a one inch rain.
 - ③ Fire stations are good. This is not the right location.
 - ④ Drive aprons and other impervious surface will impact runoff.
- Written comments must be submitted to the City of San Diego by
Monday, February 12, 2024 at 5:00 p.m.



PUBLIC SCOPING MEETING / OPEN HOUSE
FAIRMOUNT FIRE STATION PROJECT
January 30, 2024 6:00 p.m.

NAME: Pedro Cortez

ADDRESS: [REDACTED] CITY: [REDACTED] ZIP: [REDACTED]

EMAIL ADDRESS: [REDACTED]

REPRESENTING: _____

Do you wish to be added to the project mailing list? ☒ YES ☐ NO

Please drop comments in the Comment Box or mail them to:

Nancy Graham, Program Manager,
City of San Diego Engineering & Capital Projects Department,
525 B St., MS 908A, San Diego, CA 92101.

CIP-CEQA@san Diego.gov

The purpose of this comment card is to solicit input regarding the scope and content of the Environmental Impact Report (EIR). Please submit comments for the record that pertain to the *environmental issues* to be addressed in the EIR (please print).

- create quiet zones to address noise from fire engines

- or -

- relocate site near police maintenance facility
on federal.

Written comments must be submitted to the City of San Diego by
Monday, February 12, 2024 at 5:00 p.m.



PUBLIC SCOPING MEETING / OPEN HOUSE
FAIRMOUNT FIRE STATION PROJECT
January 30, 2024 6:00 p.m.

NAME: Daniel & Patricia Crump
ADDRESS: [REDACTED] CITY: [REDACTED] ZIP: [REDACTED]
EMAIL ADDRESS: none
REPRESENTING: [REDACTED] (Liesureland Mobile Villa)
Do you wish to be added to the project mailing list? ☒ YES ☐ NO

Please drop comments in the Comment Box or mail them to:

Nancy Graham, Program Manager,
City of San Diego Engineering & Capital Projects Department,
525 B St., MS 908A, San Diego, CA 92101.

CIP-CEQA@sandiego.gov

The purpose of this comment card is to solicit input regarding the scope and content of the Environmental Impact Report (EIR). Please submit comments for the record that pertain to the *environmental issues* to be addressed in the EIR (please print).

Beside the crazy idea of filling in a large area
of wetland, does emergency services have a plan in
place to reach people who need help when the road
in & out of the park has three feet of water
on top of it?



PUBLIC SCOPING MEETING / OPEN HOUSE
FAIRMOUNT FIRE STATION PROJECT
January 30, 2024 6:00 p.m.

NAME: Yolanda Davlin

ADDRESS: [REDACTED] CITY: [REDACTED] ZIP: [REDACTED]

EMAIL ADDRESS: [REDACTED]

REPRESENTING: I'm a resident at Leisureland.

Do you wish to be added to the project mailing list? ☒ YES ☐ NO

Please drop comments in the Comment Box or mail them to:

Nancy Graham, Program Manager,
City of San Diego Engineering & Capital Projects Department,
525 B St., MS 908A, San Diego, CA 92101.

CIP-CEQA@san Diego.gov

The purpose of this comment card is to solicit input regarding the scope and content of the Environmental Impact Report (EIR). Please submit comments for the record that pertain to the *environmental issues* to be addressed in the EIR (please print).

Have you considered the Big Lot site
now that it's vacant?

Backing up ~~at~~ onto 47th is VERY BAD!

We go in and out of our entrance on 47th
all day long. When I'm rushing to an
appt. I can't afford to be waiting for the firetruck
to be backing in and out to get into the driveway.

P.S. I love and support our firemen!

Written comments must be submitted to the City of San Diego by
Monday, February 12, 2024 at 5:00 p.m.



PUBLIC SCOPING MEETING / OPEN HOUSE
FAIRMOUNT FIRE STATION PROJECT
January 30, 2024 6:00 p.m.

NAME: Johnnie - Mae Dubose

ADDRESS: [REDACTED] CITY: [REDACTED] ZIP: [REDACTED]

EMAIL ADDRESS: _____

REPRESENTING: Groundworks - Green Team Intern

Do you wish to be added to the project mailing list? ☐ YES ☒ NO

Please drop comments in the Comment Box or mail them to:

Nancy Graham, Program Manager,
City of San Diego Engineering & Capital Projects Department,
525 B St., MS 908A, San Diego, CA 92101.

CIP-CEQA@san Diego.gov

The purpose of this comment card is to solicit input regarding the scope and content of the Environmental Impact Report (EIR). Please submit comments for the record that pertain to the *environmental issues* to be addressed in the EIR (please print).

Do not build on my beautiful green land please.
I love looking at the canyon and that building
would block my perfect view. Think about wildlife
and how you're taking away their homes. There's
also so much native plant life in the area that'll
just be wiped out. Not to mention, that area
~~can~~ can be used for trailheads. All the concrete
can make heat islands and pollute the wildlife

Written comments must be submitted to the City of San Diego by
Monday, February 12, 2024 at 5:00 p.m.

around the fire station. The ~~money~~ tax payer dollars are going to waste just trying to make the land buildable on and that's before they even start construction. You guys can just build near the police station, just ask permission. You also only have access to one neighborhood so it's ~~not~~ preferable to build there.



PUBLIC SCOPING MEETING / OPEN HOUSE
FAIRMOUNT FIRE STATION PROJECT
January 30, 2024 6:00 p.m.

NAME: Lynn Edwards
ADDRESS: [REDACTED] CITY: [REDACTED] ZIP: [REDACTED]
EMAIL ADDRESS: [REDACTED]
REPRESENTING: Chollas Creek Coalition
Do you wish to be added to the project mailing list? ☒ YES ☐ NO

Please drop comments in the Comment Box or mail them to:

Nancy Graham, Program Manager,
City of San Diego Engineering & Capital Projects Department,
525 B St., MS 908A, San Diego, CA 92101.

CIP-CEQA@san Diego.gov

The purpose of this comment card is to solicit input regarding the scope and content of the Environmental Impact Report (EIR). Please submit comments for the record that pertain to the *environmental issues* to be addressed in the EIR (please print).

① Please ~~review~~ review pp. 58, 61-62, & 72 of the Mid-City Community Plan update and explain in the EIR, how the proposed Fire Station doesn't contradict the ^{environmental} recommendations of the plan.

② ~~Notice~~ Notice City Heights?



PUBLIC SCOPING MEETING / OPEN HOUSE
FAIRMOUNT FIRE STATION PROJECT
January 30, 2024 6:00 p.m.

NAME: Brian Flaigmore

ADDRESS: [REDACTED] CITY: [REDACTED] ZIP: [REDACTED]

EMAIL ADDRESS: [REDACTED]

REPRESENTING: Groundwork San Diego / The Chollas Creek Neighborhood
+ My Kids

Do you wish to be added to the project mailing list? ☒ YES ☐ NO

Please drop comments in the Comment Box or mail them to:

Nancy Graham, Program Manager,
City of San Diego Engineering & Capital Projects Department,
525 B St., MS 908A, San Diego, CA 92101.

CIP-CEQA@san Diego.gov

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With the addition of Crest Bottling facility and the MTS yard, the
neighborhood is subjected to increased diesel fumes, which will probably
increase with fire trucks going up the hill near Webster Elementary
which is already built on a toxic dump. Also in light of the recent
floods I do not think it is wise to develop in our undeveloped
spaces in the Chollas Creek Watershed. We need as much
permeable ground as possible. Our community needs open space.
Please ~~develop~~ build on developed land.

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Monday, February 12, 2024 at 5:00 p.m.



PUBLIC SCOPING MEETING / OPEN HOUSE
FAIRMOUNT FIRE STATION PROJECT
January 30, 2024 6:00 p.m.

NAME: Judy Glicker
ADDRESS: _____ CITY: _____ ZIP: [REDACTED]
EMAIL ADDRESS: [REDACTED]
REPRESENTING: Myself
Do you wish to be added to the project mailing list? ☐ YES ☒ NO

Please drop comments in the Comment Box or mail them to:

Nancy Graham, Program Manager,
City of San Diego Engineering & Capital Projects Department,
525 B St., MS 908A, San Diego, CA 92101.

CIP-CEQA@sanidiego.gov

The purpose of this comment card is to solicit input regarding the scope and content of the Environmental Impact Report (EIR). Please submit comments for the record that pertain to the *environmental issues* to be addressed in the EIR (please print).

- If the selected location is currently protected, how is it possible to get approval to build anything on it?
- just because there is a piece of open land doesn't mean anything should be built on it. Stop building in SD!
- If a station is built there, why won't it service the residents of Leisureland right down the street?
- What are the environmental benefits of building at that already-protected area? Building any type of →

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structure always negatively impacts the environment.

- In what ways would the building environmentally-benefit that location & the surrounding area?
- What will happen to the animals that currently live in that area? They will be forced to migrate which will negatively affect their lives & their homes & would force them into more densely populated areas & traffic.
- Please leave that area alone & build somewhere else!

Thank you.



PUBLIC SCOPING MEETING / OPEN HOUSE
FAIRMOUNT FIRE STATION PROJECT
January 30, 2024 6:00 p.m.

NAME: VIDAL HERRERA
ADDRESS: [REDACTED] CITY: [REDACTED] ZIP: [REDACTED]
EMAIL ADDRESS: [REDACTED]
REPRESENTING: COMMUNITY
Do you wish to be added to the project mailing list? ☒ YES ☐ NO

Please drop comments in the Comment Box or mail them to:

Nancy Graham, Program Manager,
City of San Diego Engineering & Capital Projects Department,
525 B St., MS 908A, San Diego, CA 92101.

CIP-CEQA@san Diego.gov

The purpose of this comment card is to solicit input regarding the scope and content of the Environmental Impact Report (EIR). Please submit comments for the record that pertain to the *environmental issues* to be addressed in the EIR (please print).

WILDLIFE AND NATIVE VEGETATION
TO OUR OPEN-DEDICATED LAND SHOULD
BE SIGNIFICANT IMPACTS TO AN
"ENVIRONMENT IMPACT REVIEW". ENDANGERED
SPECIES ARE IGNORED IN YOUR "EIR".
"LAND USE" IS A POTENTIAL SIGNIFICANT
IMPACT, BUT YET THE LAND USE OF
THIS FIRE STATION IS "DEDICATED OPEN

Written comments must be submitted to the City of San Diego by
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PUBLIC SCOPING MEETING / OPEN HOUSE
FAIRMOUNT FIRE STATION PROJECT
January 30, 2024 6:00 p.m.

NAME: VISDAL HERRERA
ADDRESS: [REDACTED] CITY: [REDACTED] ZIP: [REDACTED]
EMAIL ADDRESS: [REDACTED]
REPRESENTING: COMMUNITY
Do you wish to be added to the project mailing list? ☒ YES ☐ NO

Please drop comments in the Comment Box or mail them to:

Nancy Graham, Program Manager,
City of San Diego Engineering & Capital Projects Department,
525 B St., MS 908A, San Diego, CA 92101.

CIP-CEQA@sanidiego.gov

The purpose of this comment card is to solicit input regarding the scope and content of the Environmental Impact Report (EIR). Please submit comments for the record that pertain to the *environmental issues* to be addressed in the EIR (please print).

SPACE". THE CITY OF SAN DIEGO
DESIGNATED THIS AREA FOR OPEN SPACE
AND SHALL HONOR THE ENVIRONMENT.
ON HOME AVE & FEDERAL BLVD, THERE
IS PLENTY OF SPACE FOR A FIRE STATION.

THIS AREA CAN PROVIDE MORE BENEFITS
THEN PROPOSED BENEFITS FROM 47TH ST.

THE OLD SHOOTING RANGE SHOULD BE CLEANED UP
FOR A FIRE STATION.

Written comments must be submitted to the City of San Diego by
Monday, February 12, 2024 at 5:00 p.m.

AS A CITIZEN/RESIDENT OF SAN
DIEGO, WE HAVE HIGHER CONCERNS
FOR OUR COMMUNITIES. FOR EXAMPLE
THE CITY STORM WATER INFRASTRUCTURE
IS OUT-DATED AND NOT MAINTAINED.
CAUSING MAJOR DAMAGES TO OUR
COMMUNITIES, CAUSING PEOPLE TO
BE HOMELESS. A FAR GROWING ISSUE
OF CA. MONEY SHOULD BE SPENT FOR
THE SAFETY & HEALTH OF THE PEOPLE
WHO LIVE IN THE COMMUNITY.



PUBLIC SCOPING MEETING / OPEN HOUSE
FAIRMOUNT FIRE STATION PROJECT
January 30, 2024 6:00 p.m.

NAME: JACQUELINE JACKSON

ADDRESS: [REDACTED] CITY: [REDACTED] ZIP: [REDACTED]

EMAIL ADDRESS: [REDACTED]

REPRESENTING: _____

Do you wish to be added to the project mailing list? ☒ YES ☐ NO

Please drop comments in the Comment Box or mail them to:

Nancy Graham, Program Manager,
City of San Diego Engineering & Capital Projects Department,
525 B St., MS 908A, San Diego, CA 92101.

CIP-CEQA@sandiego.gov

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- WONDERFUL, THOUGH PRESENTATION
- I AM BLIND, I WAS GIVEN WONDERFUL REASONABLE ACCOMMODATIONS BY NICK FENNSTONE
- I AM LOOKING FORWARD TO THE NEXT PHASE OF THIS PROJECT
- I BELIEVE THIS PROJECT WILL IMPROVE THE QUALITY OF EMERGENCY SERVICES FOR THIS COMMUNITY

Written comments must be submitted to the City of San Diego by
Monday, February 12, 2024 at 5:00 p.m.



PUBLIC SCOPING MEETING / OPEN HOUSE
FAIRMOUNT FIRE STATION PROJECT
January 30, 2024 6:00 p.m.

NAME: Charlene S. Jones

ADDRESS: [REDACTED] CITY: [REDACTED] ZIP: [REDACTED]

EMAIL ADDRESS: [REDACTED]

REPRESENTING: _____

Do you wish to be added to the project mailing list? ☒ YES ☐ NO

Please drop comments in the Comment Box or mail them to:

Nancy Graham, Program Manager,
City of San Diego Engineering & Capital Projects Department,
525 B St., MS 908A, San Diego, CA 92101.

CIP-CEQA@sanidiego.gov

The purpose of this comment card is to solicit input regarding the scope and content of the Environmental Impact Report (EIR). Please submit comments for the record that pertain to the *environmental issues* to be addressed in the EIR (please print).

_____ (typed comments attached)

Written comments must be submitted to the City of San Diego by
Monday, February 12, 2024 at 5:00 p.m.

Public Scoping Meeting / Open House
Fairmount Fire Station Project
January 30, 2024
Comments

Nature:

It's my understanding the Chollas Creek area has been designated a "regional park" by the mayor. Also that a previous study has found both sensitive habitat and animals in our area of the creek that should be preserved and protected from further development.

I find it hard to believe we should add more structure to this sensitive environment.

Access:

The portion of 47th street where the fire station will be located is fairly steep, narrow and winding. I think the added traffic will be a constant problem.

We currently do not have a complete sidewalk up 47th to the bus stop. This is a senior community so some residents no longer drive and walk up the hill to the bus stop or grocery. Adding the fire station with all their large vehicles will make this walk even more unsafe.

I'm also concerned the street itself cannot holdup to all the additional heavy vehicle traffic.

Noise:

Noise travels in the canyon! Even though it is stated sirens will be used only when essential, there remains noise from large vehicles entering and exiting the fire station at all times of the day and night. Peace and quiet was a part of my decision to locate here in Leisureland and I suspect most residents feel the same.

Creek as a water shed area:

Currently the creek bed area is not kept cleared of debris and the drainage channels dumping into it are not being maintained; cracks in the concrete walls, even trees growing out of those cracks, debris, etc. in the channel. A portion of the channel actually broke causing damage and flooding several streets in Leisureland during January 22, 2024 storm.

It seems the fire station will be adding to drainage into the creek, possibly causing even more flooding in the future.

- I do appreciate the San Diego Fire Department and all they do for not only our community, but our entire county. However, I do not feel this is a good location for a new station.

055



PUBLIC SCOPING MEETING / OPEN HOUSE
FAIRMOUNT FIRE STATION PROJECT
January 30, 2024 6:00 p.m.

NAME: Nabeelah Khan
ADDRESS: [REDACTED] CITY: [REDACTED] ZIP: [REDACTED]
EMAIL ADDRESS: [REDACTED]
REPRESENTING: Community
Do you wish to be added to the project mailing list? ☒ YES ☐ NO

Please drop comments in the Comment Box or mail them to:

Nancy Graham, Program Manager,
City of San Diego Engineering & Capital Projects Department,
525 B St., MS 908A, San Diego, CA 92101.

CIP-CEQA@san Diego.gov

The purpose of this comment card is to solicit input regarding the scope and content of the Environmental Impact Report (EIR). Please submit comments for the record that pertain to the *environmental issues* to be addressed in the EIR (please print).

The issue with this fire station is not the service itself
rather the location. The impact on local vegetation, water
use + drainage, noise + access for this community in
particular to a natural canyon is concerning. Capital
works need to occur, impact on any level is inevitable -
we need to think critically + carefully about whether
this location is where we want to use our impact
capital for a fire station.

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Monday, February 12, 2024 at 5:00 p.m.

We could have done this at home!



PUBLIC SCOPING MEETING / OPEN HOUSE
FAIRMOUNT FIRE STATION PROJECT
January 30, 2024 6:00 p.m.

Why NOT
a presentation
and a conversation!

NAME: Daniele Laman

ADDRESS: [REDACTED] CITY: [REDACTED] ZIP: [REDACTED]

EMAIL ADDRESS: [REDACTED]

REPRESENTING: SD Park & Rec Board

Do you wish to be added to the project mailing list? ☒ YES ☐ NO

Please drop comments in the Comment Box or mail them to:

Nancy Graham, Program Manager,
City of San Diego Engineering & Capital Projects Department,
525 B St., MS 908A, San Diego, CA 92101.

CIP-CEQA@san Diego.gov

The purpose of this comment card is to solicit input regarding the scope and content of the Environmental Impact Report (EIR). Please submit comments for the record that pertain to the *environmental issues* to be addressed in the EIR (please print).

Bring the optional sites to the fore front!

- ① Next to dedicated open space & park why is this parcel only designated? It's in the MHPA Sensitive vegetation, special Flood Hazardous area Brush management Native / Natural Veg.
- ② It's in a Very, High, Fire Hazard, Severity Zone It's proposed in the wrong place - put it on Federal west side near Police Bldgs.

Written comments must be submitted to the City of San Diego by
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PUBLIC SCOPING MEETING / OPEN HOUSE
FAIRMOUNT FIRE STATION PROJECT
January 30, 2024 6:00 p.m.

NAME: Jordana Lauterbaugh - Jordana Lauterbaugh

ADDRESS: [REDACTED] CITY: [REDACTED] ZIP: [REDACTED]

EMAIL ADDRESS: [REDACTED]

REPRESENTING: The Lauterbaugh Family.

Do you wish to be added to the project mailing list? ☒ YES ☐ NO

Please drop comments in the Comment Box or mail them to:

Nancy Graham, Program Manager,
City of San Diego Engineering & Capital Projects Department,
525 B St., MS 908A, San Diego, CA 92101.

CIP-CEQA@sandiego.gov

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Building a Fire Station that would be perched on a
hillside overlooking Challas Creek would impact that valley
negatively by a 24/7 noise ^{and traffic} disruption. I personally
would be negatively impacted by the building of the
firestation as there is only a 2-lane road with
two blind curves that lead into and out of
Leisureland Mobile Villa, where I live. We recently had
extensive flooding and the roadway was flooded as well as

Written comments must be submitted to the City of San Diego by

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homes in the Leisureland-which affected our egress/ingress. Please find a better location



PUBLIC SCOPING MEETING / OPEN HOUSE
FAIRMOUNT FIRE STATION PROJECT
January 30, 2024 6:00 p.m.

NAME: MILES MCNIFF

ADDRESS: [REDACTED] CITY: [REDACTED] ZIP: [REDACTED]

EMAIL ADDRESS: [REDACTED]

REPRESENTING: myself

Do you wish to be added to the project mailing list? ☒ YES ☐ NO

Please drop comments in the Comment Box or mail them to:

Nancy Graham, Program Manager,
City of San Diego Engineering & Capital Projects Department,
525 B St., MS 908A, San Diego, CA 92101.

CIP-CEQA@sandiego.gov

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TWO POTENTIAL ALTERNATIVES FOR LOCATION:

1. THE BASEBALL PARK / OR POLICE SHOOTING RANGE
ON FEDERAL BLVD AND 47TH, NEAR 94
2. THE BIG LOTS LOT NEAR EUCLID. BUSINESS SOLD,

~~I DEEPLY WANT~~ ALTHOUGH I AGREE THAT IT MAY
DECREASE EMERGENCY RESPONSE TIMES IN MY
NEIGHBORHOOD, A PROJECT SUCH AS THIS
WOULD SEVERELY DAMAGE ~~THE~~ ~~WILDLIFE~~ ~~AND~~
WILDLIFE AND PLANTLIFE HABITATS UP AND
DOWN THE STREAM. I WANT A SAFE
NEIGHBORHOOD BUT NOT AT THE COST OF ~~THE~~
MY IMMEDIATE ENVIRONMENT

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Monday, February 12, 2024 at 5:00 p.m.



PUBLIC SCOPING MEETING / OPEN HOUSE
FAIRMOUNT FIRE STATION PROJECT
January 30, 2024 6:00 p.m.

NAME: HENRY MOORE
ADDRESS: [REDACTED] CITY: [REDACTED] ZIP: [REDACTED]
EMAIL ADDRESS: _____
REPRESENTING: _____
Do you wish to be added to the project mailing list? ☐ YES ☐ NO

Please drop comments in the Comment Box or mail them to:

Nancy Graham, Program Manager,
City of San Diego Engineering & Capital Projects Department,
525 B St., MS 908A, San Diego, CA 92101.

CIP-CEQA@san Diego.gov

The purpose of this comment card is to solicit input regarding the scope and content of the Environmental Impact Report (EIR). Please submit comments for the record that pertain to the *environmental issues* to be addressed in the EIR (please print).

I Think this is Great!!
Fire Insurance should be Lower?
I know there is a cost,
what are cost if we do nothing?
Basically How much is a life worth?

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Monday, February 12, 2024 at 5:00 p.m.



PUBLIC SCOPING MEETING / OPEN HOUSE
FAIRMOUNT FIRE STATION PROJECT
January 30, 2024 6:00 p.m.

NAME: MARTIN L. MUMERT

ADDRESS: [REDACTED] CITY: [REDACTED] ZIP: [REDACTED]

EMAIL ADDRESS: above

REPRESENTING: myself

Do you wish to be added to the project mailing list? ☐ YES ☒ NO

Please drop comments in the Comment Box or mail them to:

Nancy Graham, Program Manager,
City of San Diego Engineering & Capital Projects Department,
525 B St., MS 908A, San Diego, CA 92101.

CIP-CEQA@sandiego.gov

The purpose of this comment card is to solicit input regarding the scope and content of the Environmental Impact Report (EIR). Please submit comments for the record that pertain to the *environmental issues* to be addressed in the EIR (please print).

The proposed site is directly on or adjacent
to, a known earthquake fault shown on various
city maps at the Real Estate Management Dept.

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PUBLIC SCOPING MEETING / OPEN HOUSE
FAIRMOUNT FIRE STATION PROJECT
January 30, 2024 6:00 p.m.

NAME: Leo Penalosa
ADDRESS: [REDACTED] CITY: [REDACTED] ZIP: [REDACTED]
EMAIL ADDRESS: [REDACTED]
REPRESENTING: Green Team/Groundwork San Diego
Do you wish to be added to the project mailing list? ☐ YES ☒ NO

Please drop comments in the Comment Box or mail them to:

Nancy Graham, Program Manager,
City of San Diego Engineering & Capital Projects Department,
525 B St., MS 908A, San Diego, CA 92101.

CIP-CEQA@san Diego.gov

The purpose of this comment card is to solicit input regarding the scope and content of the Environmental Impact Report (EIR). Please submit comments for the record that pertain to the *environmental issues* to be addressed in the EIR (please print).

One comment I have is that the fire station is planned to
be built where a trail is supposed to be so something that
Green Team was talking about is trying to move the
Fire station Project down by the Police Station on
Federal Blvd

Written comments must be submitted to the City of San Diego by
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PUBLIC SCOPING MEETING / OPEN HOUSE
FAIRMOUNT FIRE STATION PROJECT
January 30, 2024 6:00 p.m.

NAME: Bethina Rausa

ADDRESS: [REDACTED] CITY: [REDACTED] ZIP: [REDACTED]

EMAIL ADDRESS: [REDACTED]

REPRESENTING: Chollas Creek Coalition + self as concerned resident

Do you wish to be added to the project mailing list? ☒ YES ☐ NO

Please drop comments in the Comment Box or mail them to:

Nancy Graham, Program Manager,
City of San Diego Engineering & Capital Projects Department,
525 B St., MS 908A, San Diego, CA 92101.

CIP-CEQA@san Diego.gov

The purpose of this comment card is to solicit input regarding the scope and content of the Environmental Impact Report (EIR). Please submit comments for the record that pertain to the *environmental issues* to be addressed in the EIR (please print).

I strongly urge the City NOT to build the fire station in
the currently proposed area for the following reasons:
Firstly, it will cause unnecessary environmental damage
in a currently natural space that is already part
of the Chollas Creek Master Plan.
There are several other areas ~~that~~ that a fire
station should be built that would much
better serve residents: ① Federal Blvd = Quicker

Written comments must be submitted to the City of San Diego by
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access to Golden Hill, South Park, Grant Hill, and
Stockton + City Heights. Access would also be
quicker to Fairmount Park from Home Ave to
Gateway Dr. Other areas include Azalea Park,
West Hollywood Park.

Putting a fire station in an undeveloped area,
causing unnecessary environmental damage
seems utterly ridiculous. Especially when
building it in the area previously suggested
by me would provide quicker access to
denser communities THAT NEED A FIRE STATION.



PUBLIC SCOPING MEETING / OPEN HOUSE

FAIRMOUNT FIRE STATION PROJECT

January 30, 2024 6:00 p.m. *WBS 5-14018*

NAME: THOMAS RICHARDS

ADDRESS: [REDACTED] CITY: [REDACTED] ZIP: [REDACTED]

EMAIL ADDRESS: DONT HAVE ONE

REPRESENTING: LEISURELAND MORILE VILLA

Do you wish to be added to the project mailing list? ☐ YES ☒ NO

Please drop comments in the Comment Box or mail them to:

Nancy Graham, Program Manager,
City of San Diego Engineering & Capital Projects Department,
525 B St., MS 908A, San Diego, CA 92101.

CIP-CEQA@sanidiego.gov

The purpose of this comment card is to solicit input regarding the scope and content of the Environmental Impact Report (EIR). Please submit comments for the record that pertain to the *environmental issues* to be addressed in the EIR (please print).

I AM AN 84 YEAR OLD DISABLED MAN. I DO NOT DRIVE.
I USE THE 41ST STREET HILL OUT OF THE PARK TO GET TO THE
BUS STOP. THE ONLY CURRENT SIDEWALK IS ASPHALT. IT IS
IN BAD CONDITION. BARELY USEABLE FOR FOOT TRAFFIC.
I HAVE A SCOOTER, BUT CANT USE IT ON THAT SIDEWALK.
I HAVE TO GO IN THE STREET. HAVING A FIRE STATION
ON THAT STREET WOULD BE VERY DANGEROUS FOR ME
ALSO I MOVED HERE FOR THE PEACE AND QUIET OF THE

Written comments must be submitted to the City of San Diego by
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(over)

AREA AND TO ENJOY THE CANYON WITH ITS FOLiage AND WILDLIFE. THE MAIN FEATURE OF THIS PARK TO ME IS ITS SECLUSION FROM THE REST OF THE CITY. HAVING A FIRE STATION WITH ALL THE TRAFFIC WILL DISRUPT THAT WE WERE TOLD THERE WOULD BE VISITORS TO THE STATION AND THAT WOULD ALSO CAUSE PARKING PROBLEMS FOR OUR NARROW STREET.

SOUND IS INTENSIFIED IN OUR CANYON. WE CAN HEAR THE NOISE FROM THE POLICE FIRING RANGE ON HOME AVE. EVEN WITHOUT SIRENS, THE COMING AND GOING OF THE FIRE ENGINE IS GOING TO BE VERY LOUD.

I HOPE YOU WOULD FIND ANOTHER LOCATION AND PRESERVE OUR RIGHT TO ENJOY WHAT WE HAVE INVESTED IN TO LIVE HERE IN A PEACEFUL AND ENJOYABLE ENVIRONMENT.



PUBLIC SCOPING MEETING / OPEN HOUSE
FAIRMOUNT FIRE STATION PROJECT
January 30, 2024 6:00 p.m.

NAME: Mary Right Citizen
ADDRESS: Everywhere CITY: _____ ZIP: _____
EMAIL ADDRESS: _____
REPRESENTING: The rights of an ordinary citizen
Do you wish to be added to the project mailing list? ☐ YES ☐ NO

Please drop comments in the Comment Box or mail them to:

Nancy Graham, Program Manager,
City of San Diego Engineering & Capital Projects Department,
525 B St., MS 908A, San Diego, CA 92101.

CIP-CEQA@san Diego.gov

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This is not a meaningful public
forum for discussion. You divide
and conquer to suppress active
discussion of real issues.

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Monday, February 12, 2024 at 5:00 p.m.



PUBLIC SCOPING MEETING / OPEN HOUSE
FAIRMOUNT FIRE STATION PROJECT
January 30, 2024 6:00 p.m.

NAME: Charles Killi

ADDRESS: [REDACTED] CITY: [REDACTED] ZIP: [REDACTED]

EMAIL ADDRESS: [REDACTED]

REPRESENTING: Sierra Club

Do you wish to be added to the project mailing list? ☒ YES ☐ NO

Please drop comments in the Comment Box or mail them to:

Nancy Graham, Program Manager,
City of San Diego Engineering & Capital Projects Department,
525 B St., MS 908A, San Diego, CA 92101.

CIP-CEQA@sanidiego.gov

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- 1) The ~~proposed~~ fire station is being planned in a steep canyon in environmentally sensitive area.
- 2) Serious impacts to wildlife & habitats in environmentally sensitive/protected space. Including new lighting, ^{vulnerable to nocturnal/speci} ~~space~~ ~~more~~
- 3) Chollas Creek watershed has not ~~or~~ history of being used as toxic waste dump. SD Regional water control Board for decades has been documenting substantial toxic pollution. Do not add additional pollution/waste to a critical watershed/canyon that is environmentally sensitive.

Written comments must be submitted to the City of San Diego by
Monday, February 12, 2024 at 5:00 p.m.



PUBLIC SCOPING MEETING / OPEN HOUSE
FAIRMOUNT FIRE STATION PROJECT
January 30, 2024 6:00 p.m.

NAME: CHASE SECREST

ADDRESS: [REDACTED] CITY: [REDACTED] ZIP: [REDACTED]

EMAIL ADDRESS: [REDACTED]

REPRESENTING: WEBSTER NEIGHBORHOOD

Do you wish to be added to the project mailing list? ☐ YES ☒ NO

Please drop comments in the Comment Box or mail them to:

Nancy Graham, Program Manager,
City of San Diego Engineering & Capital Projects Department,
525 B St., MS 908A, San Diego, CA 92101.

CIP-CEQA@sanidiego.gov

The purpose of this comment card is to solicit input regarding the scope and content of the Environmental Impact Report (EIR). Please submit comments for the record that pertain to the *environmental issues* to be addressed in the EIR (please print).

THE SOCIAL WATER SHED IS A VERY DELICATE PART OF
THE ECOSYSTEM. THIS PROJECT WILL CHANGE THE "PATH OF FLOW"
THAT THE NATURAL ECOSYSTEM HAS IN PLACE. WHAT IS
THE CITY GOING TO DO TO KEEP THE WATERWAYS SAFE
AN REDUCE THE ENVIRONMENTAL IMPACTS OF THIS PLAN?
WITH THE HIGH LEVELS OF LEAD FROM THE POLICE RANGE
THIS COULD IMPACT US AS A CITY VERY NEGATIVE WAY.



PUBLIC SCOPING MEETING / OPEN HOUSE
FAIRMOUNT FIRE STATION PROJECT
January 30, 2024 6:00 p.m.

NAME: Marc (Catalina) Valadez
ADDRESS: [REDACTED] CITY: [REDACTED] ZIP: [REDACTED]
EMAIL ADDRESS: [REDACTED]
REPRESENTING: Groundwork San Diego / Green team
Do you wish to be added to the project mailing list? ☐ YES ☒ NO

Please drop comments in the Comment Box or mail them to:

Nancy Graham, Program Manager,
City of San Diego Engineering & Capital Projects Department,
525 B St., MS 908A, San Diego, CA 92101.

CIP-CEQA@sanidiego.gov

The purpose of this comment card is to solicit input regarding the scope and content of the Environmental Impact Report (EIR). Please submit comments for the record that pertain to the *environmental issues* to be addressed in the EIR (please print).

The issues in this fire station being built is taking up land, that contains native plants. But also think of the kids at the school whom have to breathe in the fumes & woodchips. But trail heads are super important. But to end it all with all the contrate it will lead to hot island & pollute the area around it. So it will not only cause issues to the environment

Written comments must be submitted to the City of San Diego by
Monday, February 12, 2024 at 5:00 p.m.

but also in the School. One thing I don't
understand is how the Fire Station can't
not be build within the Police Station.
HS something that puzzles me.



PUBLIC SCOPING MEETING / OPEN HOUSE
FAIRMOUNT FIRE STATION PROJECT
January 30, 2024 6:00 p.m.

NAME: Lee Wright
ADDRESS: [REDACTED] CITY: [REDACTED] ZIP: [REDACTED]
EMAIL ADDRESS: _____
REPRESENTING: community
Do you wish to be added to the project mailing list? ☐ YES ☐ NO

Please drop comments in the Comment Box or mail them to:

Nancy Graham, Program Manager,
City of San Diego Engineering & Capital Projects Department,
525 B St., MS 908A, San Diego, CA 92101.

CIP-CEQA@san Diego.gov

The purpose of this comment card is to solicit input regarding the scope and content of the Environmental Impact Report (EIR). Please submit comments for the record that pertain to the *environmental issues* to be addressed in the EIR (please print).

In Favor of Fire Station.
critical need for the
community.

Written comments must be submitted to the City of San Diego by
Monday, February 12, 2024 at 5:00 p.m.



PUBLIC SCOPING MEETING / OPEN HOUSE
FAIRMOUNT FIRE STATION PROJECT
January 30, 2024 6:00 p.m.

NAME: Joseph Gorty
ADDRESS: [REDACTED] CITY: [REDACTED] ZIP: [REDACTED]
EMAIL ADDRESS: [REDACTED]
REPRESENTING: _____
Do you wish to be added to the project mailing list? ☒ YES ☐ NO

Please drop comments in the Comment Box or mail them to:

Nancy Graham, Program Manager,
City of San Diego Engineering & Capital Projects Department,
525 B St., MS 908A, San Diego, CA 92101.

CIP-CEQA@san diego.gov

The purpose of this comment card is to solicit input regarding the scope and content of the Environmental Impact Report (EIR). Please submit comments for the record that pertain to the *environmental issues* to be addressed in the EIR (please print).

Very concerned about the impact of
sensitive lands and wildlife on
Chollas Creek. Seems to make
sense to me that there must be
a number of other possible sites in
the immediate region. That site
should stay protected and wild.

Written comments must be submitted to the City of San Diego by
Monday, February 12, 2024 at 5:00 p.m.