

Attachment 1
Notice of Preparation and
Responses

City of San Diego
Development Services Department
1222 First Avenue, Mail Station 501
San Diego, CA 92101
(619)446-5460

DATE: June 12, 2001

**NOTICE OF PREPARATION OF A
DRAFT ENVIRONMENTAL IMPACT REPORT (EIR)**

The City of San Diego will be the lead agency pursuant to the California Environmental Quality Act (CEQA) for the preparation of a Draft Environmental Impact Report (DEIR) for the following project:

PROJECT: Strategic Framework Element of the City's Progress Guide and General Plan : AMENDMENT of the CITY'S PROGRESS GUIDE AND GENERAL PLAN and APPROVAL of the STRATEGIC FRAMEWORK ELEMENT AND ACTION PLAN. The proposed Strategic Framework Element and Action Plan would provide a long- term strategy for accommodating the City's forecasted population growth and development needs, predominately through effective and innovative redevelopment and infill. The proposed element would replace the existing chapter, "Guidelines for Future Development" (adopted in 1990) within the City's General Plan. The growth and development strategy to be implemented by this proposed element has been termed "A City of Villages." The village design is intended to be pedestrian-friendly with elements to promote neighborhood or civic gatherings. The intent of the City of Villages proposal is to create subregional and more localized centers. These proposed centers range from subregional districts to urban centers to neighborhood centers. The proposed centers would include a mix of land uses which would incorporate significant public spaces and a variety of attached housing types at relatively higher densities. Efficient improved and/or expanded transit service is an essential component of the proposed village design. A full range of public facilities would be required as well for each community in which a village center is proposed. Existing and planned transit corridors would also be proposed for mixed use intensification. This strategy is designed to accommodate growth when and if it occurs. As growth does occur over the next 10, 20 or 50 years, the proposed village design concept would enable growth to be located in such a way that the quality of life for city residents, is as minimum maintained, if not improved. The proposed Strategic Framework Five-Year Action Plan would be the implementation program for updating the Progress Guide and General Plan to include the Strategic Framework Element and executing the "City of Villages" growth strategy. The Five-Year Action Plan would be a separate document that sets the City's growth strategy in motion following adoption of the Strategic Framework Element for City Council. Applicant: City of San Diego Planning Department

LDR No. 40-1027

Based on a CEQA Initial Study, it appears that the proposed project may result in significant environmental impacts in the following areas: land use, aircraft and motor vehicle noise, biological resources, historical resources (archaeology/architectural), air quality, traffic circulation, aesthetics/visual quality, hydrology/water quality, and public services/utilities. (See attached interdepartmental DEIR scoping memorandum for more details on environmental issues to be addressed.)

For more information on the scope and content of the forthcoming DEIR or the CEQA environmental review process, contact the following persons: Anne Lowry, Associate Planner, of the City's Development Services Department at (619) 446-5368 or John Kovac, Senior Planner, of the Planning

Department at (619)235-5207.

Written comments on the scope and content of the DEIR must be sent by no later than 30 days after the receipt of this notice to:

Anne Lowry
Environmental Analysis Section (EAS)
City Development Services Department
1222 First Avenue, MS 501
San Diego, CA 92101

Responsible agencies are requested to indicate their statutory responsibilities in connection with this proposed project when responding.

Attachments: NOP Distribution List
Project Description/Environmental Process
DEIR Scoping Memorandum
Figure: Generalized Draft Village Distribution

NOP DEIR LDR NO.40-1027 DISTRIBUTION LIST

FEDERAL GOVERNMENT: U.S.

Federal Aviation Administration
Attn: AWE-530

U.S. Dept. of Transportation
Federal Highway Admin. Region 9

General Services Admin-Public Bldg.
J. Scales, OPS Planning Dept.

Headquarters, 11th Naval District

US Nuclear Regulatory Commission
Attn Mr. Charles Gaskin

U.S. Dept. of Housing & Urban Development
Environmental Clearance Officer

José de Luna, Real Estate Division
Naval Facilities Engineering Command
San Diego Branch - Commanding Officer

Staff Judge Advocate
Naval Base Coronado

U.S. Coast Guard Commanding Officer
Marine Safety Office

Dan Muslin, Director
Environmental Planning Division
Naval Facilities
Engineering Command, Southwest Div.

US Army Corps of Engineers
Attn Dr Ronald F Lockmann
Environmental Planning Unit
Los Angeles District

Ms Rebecca Tuden
US Environmental Protection Agency

U.S. Dept. of Commerce
National Marine Fisheries Service
Southwest Region

National Park Service - Deleted

U.S. Border Patrol
William Pink
Patrol Agent In Charge

U.S. Dept. of the Interior
Fish and Wildlife Service
Ecological Service

MCAS Miramar Air Station
Commanding General
Attn: Lara Thomson

USDA Natural Resources Conservation Svcs
Attn: Mr Jason Jackson

US Army Corps of Engineers
Mr David Zoutendyk

National Science Foundation

Federal Communications Commission

Acting Resource Officer
Attn: Tom White

Bureau of Reclamation
Regional Director

STATE GOVERNMENT: California

CALTRANS
District 11 MS 65
Attn: Lu Salazar

Calif. Dept. of Fish and Game
Regional 5
Fred Worthley, Regional Manager

MR Bill Tippets
Calif Dept of Fish & Game
Waters of the US NCCP

State Department of Health Services
Attn Mr. David Wesley

Dept. of Food & Agriculture

Calif. Integrated Wast Mgmt. Board

Dept of Health Services
Division of Drinking Water 7
Environmental Mgmt

State Dept. of Health Services
Office of Noise Control

CAL EPA
Executive Office

Housing & Community Dev. Dept.

Dept. of Parks and Recreation
Office of Historic Preservation
Attn: Cherylyn Widell

Resources Agency
Nadell Gayou

Regional Water Quality Control Board
Region 9

Dept. of Water Resources
Nadell Gayou

State Clearinghouse

State Clearinghouse/Delicia Wynn

California Coastal Commission
San Diego District

California Coastal Commission

California Air Resources Board
Attn: EIR Regional Impact Div.

Office of Attorney General
Environmental Unit

California Dept. of Transportation
Division of Aeronautics

California Boating & Waterways

State Board of Equalization

California State Coastal Conservancy

California State Water Resources
Control Board

Native American Heritage Commission
Attn: Gail McNulty

Office of Planning and Research

California Highway Patrol

California Energy Commission

California Dept. of Conservation

Department of Conservation
Division of Mines and Geology
Mine Reclamation Program

Calif. State Lands Commission
Robert C. Hight, Ex. Officer
Div. of Environmental Plng. & Mgmt.

COUNTY GOVERNMENT: San Diego

Agriculture Department

Air Pollution Control District

Education Department

San Diego County Tax Assessor
James E. Jones
County Administration Center

Environmental Coordinator
Dept. of Planning and Land Use
Environmental Planning Section

Department of Park & Recreation

Department of Public Works
Environmental Services Unit
Attn: Anna Noah

County of San Diego, MS A-21
Noise Cont. Hearing Board
Dr. Peter Frank, Chairman

Department of Public Works
Robert Hoglen
Route Location Studies

County Water Authority
Mr Larry Purcell

Leann Williams
Environmental Health Services

Richard Haas, Acting Chief
Hazardous Materials Mgt. Division
Dept. Of Environmental Health

Chris Gonaver
Land & Water Quality Division
Department of Environmental Health

CITY GOVERNMENT: San Diego

Ann French
Transportation Development-DSD

Bob Negrete
Development Coordination-DSD

Fire and Life Safety Services

Bob Ferrier

Library Dept. - Gov. Documents

Plan Check Services for Noise
Werner Landry

Park & Recreation Board
Marcia McLatchy

Police Research & Analysis

Real Estate Assets Dept.
Bob Gerhardt

Eng & C P
Water & Wastewater Facilities Div.

Historical Site Board
Angeles Leira

Ed Firkins

Debbie Van Wanseele

Vince Marchetti

Tom Story, Sr. Policy Advisor
Mayor's Office

Wetland Advisory Board
c/o Robin Stribley

General Services

Park Development
Ken Prue/Lisa Wood
Environmental Services

CITY GOVERNMENT: Other

City of Chula Vista
Environmental Review Coordinator

City of Coronado
Director of Community Development

City of Del Mar
Planning Director

City of El Cajon
Planning Director

City of Escondido
Planning Division

City of Imperial Beach
Planning Director
825 Coronado Ave.
Imperial Beach, CA 91932

City of La Mesa
Planning Director

City of Lemon Grove
James R Butler
Community Development Director

City of National City
Environmental Planner

City of Poway
Director of Planning Services

City of Santee
Director of Planning and
Community Development

City of Solana Beach
Planning Department

OTHER GOVERNMENT UNITS

S. D. Association of Govt. (SANDAG)

Melissa A Mailander
Environmental Review Coordinator
San Diego Unified Port District

Local Agency Formation Commission

San Diego Transit Corporation
Rich Murphy, Planning

San Diego Gas & Electric Co.
Land Use Planning Section

Metropolitan Transit Dev. Brd.
Environmental Specialist

San Dieguito River Park

SCHOOL DISTRICTS

Chula Vista School District

Del Mar Union School District

Grossmont Union High School District

La Mesa-Spring Valley School District

Lemon Grove School District
Dr. J. Justeson

National City School District

Poway Unified School District
Planning Dept.

Tony Raso
Engineering Technician
San Diego Unified School District
Annex 2

San Dieguito Union High School District
Attn: Eric Hall

San Ysidro School District

Santee School District

Solana Beach School District

South Bay Unified School District
Ken Matsushi

Katy Wright, Planning Director
Sweetwater Union High School District

San Diego City Schools
Jan Hitzman, Planning Director

San Diego Community College District

SER ACQ ACQ DEPT LIB - UCSD

NEWSPAPERS

Daily Transcript
Rod Riggs, Mng. Editor

The Pomerado Newspaper Group

Escondido Times Advocate

San Diego Union
North County Office

Union-Tribune

(T. Wayne Mitchell, City Editor Tribune
Marcia McGuern, City Editor San Diego Union)

Metro News
Patty Morin

La Jolla Light

Tierrasanta Times
Deanna Spehn

Richard Kipling, City Editor
L.A. Times (S.D. County Edition)

Robert Sandler, Editor
Navy News

Liz Swain
Mira Mesa Star News

Mira Mesa/Scripps Ranch Sentinel

BUSINESS AND INDUSTRY ASSOCIATIONS

San Diego Apartment Association
Attn Ms. Nancy Robertson

CALPIRG - The Housing Project
Attn: Jeff Francis

San Diego Board of Realtors

San Diego Chamber of Commerce

Building Industry Federation

San Diego Convention & Visitors Bureau

S.D. County Bldg. & Const. Trade Council
Donald Guthrie

**ENVIRONMENTAL ORGANIZATIONS:
City Wide Interests**

Rancho Santa Ana Botanic Garden at Claremont

Back Country Against Dumps
Donna Tisdale, President

Cam Patterson, Biologists
c/o Recon

Environmental Law Society
D.S. Link, Pres.
Univ. of San Diego School of Law

Sierra Club, San Diego Chapter
Conservation Coordinator

Ms Carolyn Chase
San Diego Earth Times

S.D. Natural History Museum

San Diego Audubon Society

Airport Relocation Committee
Ardetta Steiner

Environmental Health Coalition

Calif. Native Plant Society
c/o Natural History Museum

Wetland Advisory Board
c/o Robin Stribley

Stuart Hurlbert
Department of Biology
San Diego State University

Community Resources Panel
Attn: Verna Quinn

San Diego Regulatory Alert*
Attn: Rene Kaprielian

Ellen Bauder

Center for Biological Diversity
Allison Rolfe

Center for Biological Diversity
Attn: David Hogan

San Diego Council of Divers, Inc.

KEA Environmental Inc.

Citizens Coordinate for Century III

Citizens Revolting Against Pollution
David Gomez

EC Allison Research Center
Dept. of Geological Sciences
San Diego State University

Endangered Habitats League
Michael Beck

Endangered Habitats League
Dan Silver

The Surfrider Foundation

Carmel Mountain Conservancy
Attn: Isabelle Kay

Vernal Pool Society
Aland Maryann Pentis

Torrey Pines Association

PARK & RECREATION BOARD

Katherine Kharas

Facilities Committee
Harold Sadler, Chairman

CIVIC/PLANNING GROUPS (City Wide, Special Interest)

Citizens Coordinate for Century III

American Institute of Architects
Donalee Deffenbach, Exec. Dir.

San Diego League of Women Voters

Chicano Federation
601 22nd Street

Community Planners Comm.

Urban League

Town Council Presidents Assoc.
June Sandford

Community Planners Council
Joe Bradley-Chairman

Executive Director
National City Chamber of Commerce

SENIOR CITIZENS

Downtown Senior Citizens

Gray Panthers
Arthur Deutsch

Episcopal Community Services
Coalition of Elders, Inc.

County Dept. of Human Services
Area Agency on Aging

Historical and Archaeological Associations

Dr. Florence Shipek

Dr. Lynne Christenson
SDSU South Coastal Info Center
Social Science Research Laboratory

San Diego Historical Society
Richard Crawford

San Diego Archaeological Center

San Diego Natural History Museum

Save Our Heritage Organisation

Ron Christman

Louie Guassac

Archaeological Institute of America
Attn: Dr. Howard Hawkes, Secretary
San Diego Chapter

San Diego County Archaeological
Society, Inc.
EIR Review Committee

National Trust for Historic Preservation
Western Region Office

Cabrillo Historical Association

La Jolla Historical Society

Native American Heritage Commission

Dr. Raymond Starr - Professor of History
S.D.S.U.

Acquisitions Dept. - University Library
S.D.S.U.

Kumeyaay Cultural Repatriation Committee

SOUTHERN DIEGUEÑO

Barona Group of Capitan Grande Band of
Mission Indians
Clifford LaChappa, Chairperson

Campo Band of Mission Indians
Ralph Goff, Chairperson

Cuyapaibe Band of Mission Indians
Tony J. Pinto, Chairperson

Inaja and Cosmit Band of Mission Indians
Rebecca M. Maxcy, Chairperson

Jamul Band of Mission Indians
Mr Kenneth Mesa Chairperson

La Posta Band of Mission Indians
Gwendolyn Parada, Chairperson

Manzanita Band of Mission Indians
Mr. Leroy Elliot Chairperson

Sycuan Band of Mission Indians
Georgia Tucker, Chairperson

Viejas Group of Capitan Grande Band
of Mission Indians
Anthony Pico, Chairperson

NORTHERN DIEGUEÑO

Mesa Grande Band of Mission Indians
Howard Maxcy, Chairperson

San Pasqual Band of Mission Indians
Allen E. Lawson, Jr., Chairperson

Santa Ysabel Band of Diegueño Indians
Ben Scerato, Spokesman

LUISEÑO / CUPEÑO

La Jolla Band of Mission Indians
Jack Musick, Chairperson

Pala Band of Mission Indians
Robert Smith, Chairperson

Pauma Band of Mission Indians
Christobal C. Devers, Chairperson

Pechanga Band of Mission Indians
Mr. Mark Macarro Chairperson

Rincon Band of Luiseno Mission Indians
Mr. John Currier Chairperson

CAHUILLA

Los Coyotes Band of Mission Indians
Ms Katherine Saubel Chairperson

BALBOA PARK

Balboa Club
Clyde Dearwester

BORDER AREA

(Otay Mesa, also see San Ysidro, Tia Juana Valley, Otay Nestor Plans)

BNB Environmental Consulting
Brian Biamonte

Otay Mesa/Nestor Community Plng. Grp
Ruth Schneider, Chairwoman

Calif. Dept. Parks & Rec
Tijuana River Nat'l Estuarine Reserve

Otay Mesa Development Council
c/o Piedmont Construction Co.
Attn: Allen Jaffe

Assemblyman Steve Peace

Otay Mesa Chamber of Commerce
Lauree Sahba, Executive Director

Michael A. Vogt

Janay Kruger

Citizens Revolting Against Pollution
David Gomez

Otay Mesa Planning Committee
John Jolliffe Chair
Casas International Customs Brokerage

Otay Mesa/Nestor Community Servc Center

CENTRE CITY/HARBOR AREA

Downtown San Diego Partnership

San Diego City College

Gaslamp Quarter Council
Theresa McTighe Exec. Off.

Melissa A Mailander
Environmental Review Coordinator
San Diego Unified Port District

Barrio Station Inc.
c/o Rachael Ortiz

BNB Environmental Consulting
Brian Biamonte

Cruz Rangel, Director
Harbor View Center

Al Ducheny
Harborview Community Council

CLAIREMONT MESA
(Clairemont Mesa Community Plan)

Clairemont Community Service Center
Clairemont TownSquare

Clairemont Mesa Planning Committee
David Potter, Chair

Clairemont Chamber of Commerce

San Diego Mesa College

University of San Diego
Alcala park

Clairemont Senior Citizens Club
Mrs. Lela Inman

Tecolote Canyon Citizens Adv. Comm.
Eloise Battle, Chairwoman

Friends of Tecolote Canyon
Sherlie Miller

Joe Marciano
Tecolote Canyon Rim
Owner's Protection Assn.

Clairemont Town Council

GOLDEN HILL

Mel Shapiro

Greater Golder Hill Planning Comm
Ms. Cindy Ireland Chair

Golden Hill Community News
Dacie Adams, Editor

Golden Hill Community Service Center

HILLCREST

Hillcrest Business District

KEARNY MESA
(Serra Mesa Community Plan,
also see Linda Vista)

Kearny Mesa Town Council
Ruby Zellman Krause, President

Serra Mesa Planning Group
Mary Johnson Chair

Mary Johnson

MCAS Miramar Air Station
Commanding General
Attn: Lara Thornton
COM Cap West

Serra Mesa Community Council
President

Kearny Mesa Comm. Planning Group
Mr. Matt Anderson Chair
C/O Solar Turbines Inc

Mission Village Homeowners Assn.
Doris Griffith

LINDA VISTA
(Kearny Vista Community Plan,
Morena Area Plan)

Linda Vista Community Planning Committee
Mr. Doug Beckham Chair

Marian Bear Rec. Council
c/o Walt Shaw, Chair

San Diego Mesa College
University of San Diego
Alcala park

LA JOLLA

La Jolla Shores Association
Attn Mr Rob Schwartz

La Jolla Town Council
Land Use Committee

La Jolla Historical Society

La Jolla Comm. Plng. Assn.

University of Calif., San Diego
Campus/Comm. Planning

External Affairs Commissioner
UCSD Associated Students

La Jolla Shores PDO Advisory Board
Susan Stone

La Jolla Light

La Jolla Shores PDO Advisory Board
Sara Moser

La Jollans for Responsible Planning

Patricia K. Miller

Isabelle Kay
UCSD Natural Reserve System

MID-CITY
(Mid-City Community Plan)

City Heights Business Improvement Assoc
(University Avenue)

The Boulevard
El Cajon Boulevard Business Improvement
Association

City Heights Area Plng.Comm.
Jim Vamadore, Chair

Rolando Community Council
Joan Rovenger, Pres.

Mid City Development Corporation
Attn Ms Polly Gillette Chair

Kensington Talmadge Planning Committee
Mr Jonathan Tibbitts Chair

Normal Heights Comm Plng Comm
Ms Risa Baron Chair
SDGE

Normal Heights Community Association
Judy Elliot, President

Normal Heights Comm. Center

Bay Ridge Homeowners Assn.
c/o Alan Hardtarfer

Mid City Branch Community Service Center

Mid-City Plan Update Committee
Ed Gergosian, Chair

Colina del Sol Senior Citizens
Center Director

Oak Park Community Council

Margo Leimbach, pres.

Oak Park Community Council

Mel Shapiro

Webster Community Council

Marshall Community Council
David R. W. Wadsworth

Floyd Melson
Chollas Lake Park Recreational Council

Damell Community Council
Attn: Bill Coylar

MIDWAY
(Midway Community Plan)

Midway Community Planning Advisory Comm
Mr Ron Mancil Chair

MIRAMAR RANCH NORTH
(See Scripps Miramar Ranch)

Los Penasquitos Canyon Preserve
Citizens Advisory Committee
Mr. Mark LeBree, Chair

MIRA MESA

Mira Mesa Comm Plng Group
Mr Ted Brengel Chair

Mira Mesa Town Council
Attn: Jeff Stevens

Ken Harper, Editor
Mira Mesa Journal

Friends of Penasquitos preserve, Inc.

MCAS Miramar Air Station
Commanding General
Attn Lara Thornton
COM Cap West

Mira Mesa Branch Library

Miramar College
President

MISSION BAY

Surfers Tired of Pollution
C/O Donna Frye

San Diego Bay Keeper

Mission Bay Park Committee
Mr John Leppert

Save Everyones Access
C/O Scott Andrews

League of Conservation Voters

Pat Gallagher

Mission Bay Lessees
Attn: Rosemary Starnes

Jim Peugh

Citizens Coordinate for Century III

Attn: Judy Swink

MISSION BEACH

Mission Beach Precise plng Comm
Alan Murray

Mission Beach Town Council

MISSION HILLS

Mission Hills Association
Mr Ted Garrett

MISSION VALLEY

Mission Valley Center Assn.
Scott Turcotte, Gen. Mgr.

Hazard Center

Mary Johnson

Mission Valley Community Council
Nathan Cohen

Union Tribune News

Friends of the Mission Valley Preserve
Mike Kelly

Mission Valley Unified Plng. Org.
Patty Schreiber, Chair
Cal Mat Properties

Mr Gene Kemp General Manager
Fashion Valley

Brian Biamonte
BNB Environmental Consulting

River Valley Preservation Project

NAVAJO

Friends of Adobe Falls
Audrey Delahoussaye

Navajo Community Planners Inc
Mr Michael McSweeney President

Navajo Community Service Center

San Carlos Area Council

Del Gardens Senior Social Club
Lee Scuitto'

Santee Comm. Planning Group
E.T. Miller, Chairman

Mission Trails Regional Park
Citizens Advisory Committee
Walter Odenning, PhD

Ms. Chris Laidlaw

Barbara Massey

CARMEL MOUNTAIN RANCH

Carmel Mountain Ranch Community Council
Leanne Kenney, Chair

CARMEL VALLEY
***NORTH CITY WEST**

(North City West Community Plan, also see
Torrey Pines list)

Carmel Valley Comm. Service Center

Pardee Construction Company

City Attorney of Del Mar

Rancho Santa Fe Assn.
Jim Hare, Planning Director

Brian Biamonte
BNB Environmental Consulting

General Manager
22nd District Agricultural Assn.

Carmel Valley Comm. Plng. Board
Jan Fuchs, Chair

Carmel Valley Trail Riders Coalition
c/o John Northrup

Gary Hess
Facility Financing Section

Jan Hudson
Shaw Ridge Homeowners Assn.

Carmel Mountain Conservancy
Attn: Isabelle Kay

Pardee Construction Company
Chuck Corum / Beth Fisher

Arroyo Sorrento Homeowner's Assn.
Cecelia Kemper

City of Del Mar
Planning Department

Arroyo Sorrento Property Owners
Jill McCarty

Los Penasquitos Canyon Preserve Citizens
Advisory Committee
Mr Geoffrey Smith

Del Mar Mesa Community Planning Board
Jan Hudson

Opal Trueblood

NORTH PARK/UNIVERSITY HEIGHTS

Greater N. Park Planning Committee
Chris Milnes Chair

Burlingame Homeowners Assoc.

North Park Community Service Center

North Park Community Assn.

OCEAN BEACH
(Ocean Beach Community Plan Area)

Ocean Beach Planning Board
Ms Mindy Pellisier Chair

Ocean Beach Town Council, Inc.

Ocean Beach Merchants Assn.

OLD TOWN

(Old San Diego Community Plan)

Old Town Community Planning Committee
Mr Jack Borgos Chair

Old Town S.D. Chamber of Commerce
c/o Bob Doyle

OTAY

(See Border Area)

PACIFIC BEACH

Pacific Beach Town Council

Pacific Beach Comm Plng Comm
Mr Otto Emme Chair

Crown Point Assn.
Jennifer Ferris

Pacific Beach Historical Society

PARADISE HILLS

(See Skyline)

PENASQUITOS

(Penasquitos East Community Plan)

Rancho Penasquitos Community Council

Rancho Penasquitos Planning Board
Mr Dick Flanagan Chair

Gary Akin
San Diego Gas & Electric
Land Use Planning Section

Friends of Los Penasquitos Canyon Preserve,
Inc.

Rancho Penasquitos Town Council

Los Penasquitos Lagoon Foundation
Joan Jackson, President

Los Penasquitos Canyon Preserve
Citizens Advisory Committee
Chair Person

PENINSULA AREA

Brian Biamonte
BNB Environmental Consulting

Sunset Cliffs Natural Park Recreation Council
Anne Swanson, Chair

Peninsula Community Service Center
Naval Training Center Bldg 200

Peninsula Community Planning Board
Seth Leyton Chair

Peninsula Chamber of Commerce

Point Loma Nazarene College

Richard J. Lareau
Point Loma Village Assn.
C/O Richard J. Lareau & Associates

RANCHO BERNARDO

(Rancho Bernardo Community Plan)

Rancho Bernardo Comm.Council, Inc.
Chuck Spinks

Rancho Bernardo Comm. Service Ctr

Rancho Bernardo Comm. Plng. Board
Richard Belzer, Chair

Oaks North Homeowners, Inc.

Trails Architectural Review Comm.
Han Sauer, President

Bernardo Homeowners Corp.

The Bernardo Trails
Homeowners Association
c/o Property Mgmt. Consultant

Trails Architectural Review Comm.
c/o Property Management Consultant

SABRE SPRINGS

Sabre Spring Plng. Grp.
Rick Smith, Chair

Sabre Spring Comm. Planning Group
Mr Robert G Bohrer
Pardee Construction

SAN CARLOS

Jack Mones, President
San Carlos Area Council

SAN DIEGUITO RIVER VALLEY
(See also North City West
and Torrey Pines List)

Carmel Mountain Conservancy
Attn: Isabelle Kay

The San Dieguito Lagoon Committee
c/o Dr. Nahey Weare

Rancho Santa Fe Assn.
Peggy Gentry

General Manager
22nd District Agricultural Assn.
Del Mar Fairgrounds

San Dieguito Planning Group

City of Del Mar
Planning Difector

City of Solana Beach
Planning Department

San Dieguito River Park CAC
Project Review Committee
Jan Fuchs, Chair

Sun Valley Association
c/o Jack McGee

Rancho Del Mar Homeowner's
Association
Ms. Juanita Dalry

Friends of San Dieguito
River Valley
Alice Goodkind

County of San Diego
Dept. of Planning/Land Use

Friends of San Dieguito River Valley

San Dieguito River Valley
and Conservancy

RVR PARC
Attn: Janay Kruger

Fairbanks Ranch Association
David J. Abrams

Karen Berger

San Dieguito River Park JPA
Mrs Victoria Touchstone

SAN PASQUAL VALLEY
(San Pasqual Valley Plan)

San Pasqual / Lake Hodges Planning Group
Mr Mark Lindshield Chair

Del Dios Town Council
Gary Cohen, Chairman

State of California
Dept of Parks & Recreation
Southern Service Center

U.S. Soil Conservation Services

Susan Carter
SANDAG

San Dieguito River Park JPA
Mrs Victoria Touchstone

Charlie Jancic
Pinery Tree Farm

SAN YSIDRO
(San Ysidro Community Plan)

San Ysidro Planning And Development Group
Mr Michael R. Freedman Chair

United Border Comm. Town Council
Dolores Adame

San Ysidro Community Service Center

**SCRIPPS-MIRAMAR RANCH & MIRAMAR
RANCH NORTH**

(Scripps-Miramar Ranch Community Plan,
Miramar Ranch North Community Plan)

Beeler Canyon Conservancy
Attn Randolph Howell

Scripps Ranch Community Planning Group
Mr Robert Ilko Chair

United States International Univ.

Miramar Ranch North Planning Committee
Ms Peggy Shirey Chair

Scripps Ranch Civic Assoc
Mr Bob Dingeman Chair

Acuisitions
Walter library USIU

Scripps Ranch Community Service Center

SERRA MESA - See Keamy Mesa

SKYLINE/PARADISE HILLS/JAMACHA

Skyline/Paradise Hills Plng. Comm.
Guy Preuss, Chair

Jamacha Homeowners Assoc.
Cathy Alegria, Coordinator

SORRENTO HILLS

Sorrento Hills Community Planning Board
Ms Sara Isgur

Jim Dawe

Gary Hess
LR & Facilities Plng.,

Carmel Mountain Conservancy
Attn: Isabelle Kay

Opal Trueblood

SOUTHEAST SAN DIEGO

Southeast San Diego Organizing Project

Southeast Economic Dev. Corp.
Attn: Carolyn Smith

Southeastern San Diego Development
Committee
Mr Juan Ulloa Chair

Encanto Neighborhoods Community Planning
Group
Derryl Williams

Educational/Cultural Complex

Central Community Service Center

Market Street community Service Center

Kathleen Harmon, Chair
Central Imperial Redevelopment Project Area
Committee

Voice News & Viewpoint

Mt. Hope Residents Assn.

STATE UNIVERSITY - Montezuma
(College Area)

W. Anthony Fulton, Director
Facilities Plng. & Management

College Area Community Council
Ms Sandra Buehner Chair

Malcolm A. Love Library
Mrs. Barclay

V.P. Business & Financial Affairs

Editor
Daily Aztec

TIERRASANTA
(Elliott Community Plan, Tierrasanta Community
Plan)

Tierrasanta Community Service Center

MCAS Miramar Air Station
Commanding General
Attn Lara Thomson
COM CAP West

Tierrasanta Community Council
Mike Smiley, Chair

Murphy Canyon Community Council

Tierrasanta Community Council

Mission Trails Regional park
Citizens Advisory Committee
Mike Pent, Chair

Tierrasanta Recreation Council
Roger Krauel

East Elliott Plng. Advisory Comm.
Dr. Thomas Coad, Chair

Niall Fritz
City of Santee

TORREY PINES
(Torrey Pines Community Plan,
Del Mar Heights)

Del Mar Terrace Property Owners Assoc.

Mr Glenn Ables
GS Levine Insurance Services

Torrey Pines Community Planning Group
Mr Robert Gilleskie Chair

Torrey Pines Assoc.

Torrey Pines State Park
Mr Mike Wells

Crest Canyon Citizens Advisory Committee
Marty Gigler

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Opal Trueblood

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Campus Community Planning
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UNIVERSITY CITY

Gary Hess
LR & Facilities Plng.

University Community Planning Group
Ms Alice Tana Chair

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The Guardian
University of Calif at San Diego

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MCAS Miramar Air Station
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Attn Lara Thomson
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University City Library

Chamber of Commerce

UPTOWN

Hillcrest Association

Middletown Property Owner's Assoc.
Attn: R. H. Stowers, Chair

University Heights Community Association
Erick Naslund

Uptown Planners
Ian Epley Chair

UCSD Medical Center
Mr Tom Robinson Director

Hillside Protection Assoc.

Banker's Hill Canyon Assoc.
c/o Suzanne Richardson

Allen Canyon Committee

Milton Phegley
Campus Community Planner

STRATEGIC FRAMEWORK ELEMENT
of the
City of San Diego Progress Guide and General Plan

**Proposed Project Description and the
CEQA Environmental Review Process**

1. Proposed Strategic Framework Element

The "Strategic Framework Element" will replace the existing chapter "Guidelines for Future Development" (adopted in 1990) within the *City of San Diego General Plan and Progress Guide*. The Guidelines for Future Development mainly addressed how vacant land within the City was to be replaced by development. However, less than ten percent of the City's 331 square miles is currently available for new development, which now renders this existing General Plan chapter obsolete. The Strategic Framework Element is presently being formulated to provide a long-term strategy for accommodating the City's forecasted population growth and development needs, predominately through effective and innovative redevelopment and infill.

Overall, the Strategic Framework Element is designed to guide the update of the entire 1979 Progress Guide and General Plan and the City's 43 community plans through 2020. These subsequent updates will provide for the necessary zoning changes and other legal requirements to implement a new growth and development strategy outlined in this Element. Based on an extensive outreach program initiated by the City during the past two years, the preferred growth and development strategy to be implemented by this Element has been termed "A City of Villages."

The City of Villages strategy will embrace a loosely defined term "village" as a place where residential, commercial, employment and civic/education uses are connected to create a cohesive whole. Downtown San Diego, the Centre City, would remain the regional center with its transit hub, major cultural and institutional facilities, convention and visitor attractions, retail and entertainment opportunities, and prominent public and civic space. Opportunities to further increase employment intensities and residential densities in the Centre City to take advantage of its many amenities, would be considered. The village design is intended to be pedestrian-friendly with elements to promote neighborhood or civic gatherings. The intent of the City of Villages proposal is to create subregional and more localized centers. These proposed centers range from subregional districts to urban centers to neighborhood centers. The proposed centers would include a mix of land uses which would incorporate significant public spaces and a variety of attached housing types at relatively higher densities. Efficient improved and/or expanded transit service is an essential component of the proposed village design. The proposed village design and center location would consider the concurrent strategic transit effort by the Metropolitan Transit Development Board, the Transit First project. The proposal would apply the Transit Oriented Development (TOD) guidelines as an overlay for each proposed center location as an interim measure until community plans can be amended with associated design standards to implement the plan. A full range of public facilities

would be required as well for each community in which a village center is envisioned. Existing and planned transit corridors would also be proposed for mixed use intensification. This strategy is designed to focus growth when and if it occurs. As growth does occur over the next 10, 20 or 50 years, the proposed village design concept would enable growth to be located in such a way that the quality of life for city residents, is as a minimum maintained, if not improved.

2. **A Comprehensive Approach**

The proposed City of Villages Strategy represents a comprehensive approach to growth and development. Seven interrelated issues were identified. These issues, and the strategies described to implement them, and the following accompanying policies would guide the subsequent comprehensive General Plan and associated phased, individual community plan amendments and the current development of a proposed Strategic Framework Five-Year Action Plan.

Urban Form and the Environment - Subsequent new development/redevelopment will respect the City's natural features and open spaces. Natural and built linkages will be enhanced to connect neighborhood and urban centers throughout the City, define neighborhood edges, and provide strong ties to our natural environment.

Neighborhood Quality - Proposed neighborhood and urban centers will include public gathering places, walkable tree-lined streets, affordable housing, opportunities for art and culture, and quality education facilities. Joint use planning will be encouraged to maximize proposed public infrastructure improvements. Greater attention to neighborhood safety and balanced street design will also be addressed.

Economic Prosperity - Proposed subregional districts and urban centers will provide the land area, zoning regulations, and infrastructure needed to support business development which offers a variety of employment opportunities. Economic prosperity policies include those which promote business expansion, middle-income jobs, and efficient use of employment.

Infrastructure/Public Facilities - The provision of adequate infrastructure and public facilities is a linchpin for the entire proposed growth strategy. New funding sources, reallocation of existing resources, and adjustments to certain facilities standards are all part of the proposed strategy for accommodating new growth and remedying existing deficiencies.

Mobility - The goal is to create a world class transit system which is competitive in ease of use, comfort, and travel times with personal automobile use. Increased transit accessibility also relies upon improving walkability and bicycle-friendliness within the proposed villages.

Sustainability and Conservation -The proposed strategy will be subsequently applied in a manner which will support a stable, diverse and equitable economy; protect/enhance the quality of the air, water, land and other natural resources; conserve native vegetation and wildlife habitat.

Regionalism - The proposed "City of Villages" strategy is intended to complement and support growth management in effect elsewhere throughout the greater San Diego region. The City continues to work closely with regional planning agencies including San Diego association of Governments (SANDAG), Metropolitan Transit Development Board (MTDB), and the San Diego Unified Port District. The City's proposed strategy of encouraging growth near transit nodes and corridors, and increasing residential and employment concentrations in areas with the best transit connections to major activity centers throughout the City as well as the region, should continue to support SANDAG's regional planning goals.

3. **Proposed Strategic Framework Five-Year Action Plan**

The Strategic Framework Five-Year Action Plan is the implementation program for updating the Progress Guide and General Plan to include the Strategic Framework Element and executing the "City of Villages" growth strategy. The Five-Year Action Plan is a separate document that sets the City's growth strategy in motion following adoption of the Strategic Framework Element by the City Council. Overall, the Action Plan identifies the following:

ACTIONS to be taken;

TIME FRAME in which these actions will occur;

AVAILABILITY OF RESOURCES to implement these actions, and;

AGENCIES responsible for ensuring that these actions are successfully carried out.

A draft Strategic Framework Action List was formulated in October, 2000 and consists of a comprehensive, but specific, listing of actions to implement the new Strategic Framework Element and related updates of the General Plan and Community Plans.

Draft Strategic Framework Action List

The Strategic Framework Action List is a working, evolving outline of the Action Plan and is comprised of six major components, including Overall Actions, Urban Form and Environment, Economic Prosperity, Neighborhood Quality, Infrastructure, and Sustainability. Below is a brief summary of highlights proposed for each component:

Overall Actions - Promote the application of the urban village overlay zone; initiate city-sponsored pilot projects to aggressively pursue new forms of mobility; implement pedestrian enhancement projects and enhance the overall personal experience of the community; assign priority for public expenditures to Neighborhood Activity Center pilot projects; concentrate future residential increases in density in the downtown core, subregional districts, and urban and neighborhood centers; streamline development regulations to expedite processing to projects which meet regulations.

Urban Form and Environment - Develop a "Community Identity Element" for each Community Plan that incorporated these urban form and environmental values of the proposed village design and associated actions; create community walking maps; promote streetscape, urban trails, paths, and pedestrian connection projects and retrofits to promote pedestrian orientation; develop alternative park standards for urban and built-out communities to recognize available land constraints and opportunities for integrating public/social space with recreation space; develop a citywide park master plan, addressing deficiencies and remedies; complete a comprehensive needs assessment to determine the communities where immediate environmental and design improvements are required and determine ways to raise funds (including joint public-private sector efforts).

Economic Prosperity - Adopt an "Economic Prosperity Element" to the General Plan which contains coordinated and comprehensive economic prosperity goals, objectives and implementation measures; prepare implementation plans to reduce incompatible land uses in already impacted neighborhoods; prepare economic and fiscal impact statements for major development projects for use in the decision making process; review, and if necessary, amend the Land Development Code to increase the types of permitted mixed use development; promote development of infill industrial sites and establish incentives to support industrial uses in existing urban areas; continue and expand the utilization of Redevelopment Areas and Enterprise Zones and adopt Living Wage legislation; intensify employment uses in subregional districts and urban centers with planned transit service improvement by increasing FAR/Coverage maximums in the applicable zones; intensify underutilized employment lands that are served by transit and/or are not significantly impacted by traffic.

Neighborhood Quality - Prepare urban design guidelines to address the placement of buildings in relation to streets and public/semi-public spaces; establish new street/trail connections in communities where the existing street layout is dysfunctional for pedestrian and bicyclists; use traffic calming to slow or deter traffic through neighborhoods, promote an active commercial streetscape with parking located to the side or rear of a building; revise the City's street design policies/standards to ensure that street design is comfortable, convenient, and attractive to pedestrians; promote an active residential streetscape with front doors, porches, and windows facing the street; and examine regulations that influence density (i.e. parking, FAR, and height). Also, to create incentives for higher density, pedestrian-oriented developments through flexible zoning and loan programs; undergrounding utilities should be a major focus of

public policy; balance the distribution of affordable housing among communities; revise inclusionary housing regulations to increase in-lieu fees and place time limits on providing alternatives to developing affordable housing units; reduce parking standards for each affordable housing unit; and use a portion of the Transient Occupancy Tax for affordable housing.

Infrastructure - Develop a program to fund needed public facilities and infrastructure. Establish criteria by which needed infrastructure is phased concurrently with the proposed intensified development of a village design center.

Sustainability and Conservation - Develop a program to preserve and enhance the quality of life for all San Diegans with continued population growth. Targeted resources include air, water, energy, wildlife, and open space.

4. **Environmental Review Process**

Adoption of the proposed Strategic Framework Element for inclusion in the City's *Progress Guide and General Plan* and the Strategic Framework Five-Year Action Plan by the City Council, will require environmental review pursuant to the California Environmental Quality Act (CEQA). The public hearing at City Council will occur following a recommendation made by the City's Planning Commission, to approve or deny adoption of the proposed project.

A Programmatic Environmental Impact Report (EIR) would be prepared for this initial phase of the City of Villages project, the adoption of the General Plan Element and the Action Plan and the placement of the TOD overlay over the potential village centers, in accordance with CEQA. The analysis contained in this initial environmental document would be directed towards the regional or citywide environmental effects of the resultant proposed land use intensifications. In addition, this Programmatic EIR would adequately address alternatives and growth inducement, and would identify effects found not to be significant and unavoidable and irreversible significant environmental effects caused by the project. This initial document would allow the selection of several specific pilot village locations for further design refinements, and sets up the basis for subsequent, more site-specific environmental review.

Upon selection of several specific pilot village locations, a subsequent Master Environmental Impact Report (EIR) could be prepared for this project in accordance with CEQA Section 21157 (a)(1) which states, "A master environmental impact report may be prepared for any one of the following projects: A general plan, element, general plan amendment, or specific plan." This MEIR would rely on by reference, the regional, citywide analysis addressed in the previous Programmatic EIR including all CEQA-required analysis within an EIR. All subsequent implementing actions of the previously adopted Strategic Framework Element and Five-Year Action Plan, would require some

form of additional "action-specific" or "community/site-specific" environmental review as they occur. These subsequent actions may also require varying types of discretionary permits or approvals, and permits from other state and federal agencies as they occur. If the City, as lead agency, determines that a proposed subsequent project would have no additional significant effects on the environment than what was identified in the MEIR (and the referenced previous, initial Programmatic EIR) and that no new or additional mitigation measures or alternatives would be required, the lead agency would make a written finding that the project is within the scope of the MEIR. The previously certified MEIR and its referenced Programmatic EIR is intended to relieve the need for a third level EIR for subsequent actions and/or development implementing the proposed City of Villages and strives to minimize the extent of the subsequent environmental review needed for the ultimate implementation.

A. Draft Programmatic Environmental Impact Report (LDR EIR No.40-1027)

The Draft Programmatic EIR will approach this project on both a city-wide and region-wide basis. As related to the region-wide condition, this subject EIR for the proposed Strategic Framework Element and Five-Year Action Plan, would include environmental analysis of additional 50,000 to 75,000 dwelling units needed to support the projected City of San Diego population growth based upon regional population projections for the year 2020. This increase in dwelling units for the City would affect a range of environmental issues on a region-wide basis including traffic/circulation, air quality, water supply, sewerage, solid waste and schools. This analysis will require coordination with SANDAG, the Metropolitan Transportation Development Board (MTDB), the County Water Authority (CWA), the California Department of Transportation (CALTRANS), the Air Pollution Control District (APCD), and others.

B. Content of the DEIR

Overall, the content of the DEIR will include a project description, environmental setting, environmental analysis, analysis of cumulative impacts, growth inducement, effects found not to be significant, unavoidable and irreversible significant environmental effects caused by the project, and project alternatives. Project alternatives will potentially address other options for managing growth and development within the city, instead of, or in combination with the "City of Villages" concept, including that of the "No Project" alternative. The No Project alternative will result in utilization of the existing General Plan with its existing Elements; in addition, the DEIR would also analyze existing development.

CITY OF SAN DIEGO
M E M O R A N D U M

DATE: June 4, 2001

TO: Coleen Clementson, Strategic Planning Program Manager
Planning Department

FROM:  Lawrence C. Monserrate, Environmental Review Manager
Development Services Department

Subject: Scope of Work for the Draft Environmental Impact Report (DEIR)
for the Strategic Framework Element of the City of San Diego Progress Guide
and General Plan (LDR No.40-1027)

The Environmental Analysis Section (EAS) of the Development Services Department has conducted a preliminary assessment for the above referenced project.

Based upon the results of this assessment, it has been determined that the proposed project would have a significant effect on the environment. The preparation of a DEIR would be required.

The purpose of this memorandum is to provide you with a draft scope of work for the forthcoming DEIR for the above referenced project. The issues to be addressed are discussed below. A Notice of Preparation will be distributed to responsible agencies and others who may have an interest in this project. Consequently, further changes or additions to this scope of work may be required as a result of input received in response to the Notice of Preparation.

I. PROJECT DESCRIPTION

Please see the attached draft Project Description.

II. ENVIRONMENTAL ISSUES

1. Land Use

1. Will the proposal result in a land use which is inconsistent with the adopted community plan land use designation for the site?
2. Will the proposal result in a conflict with the goals, objectives and recommendations of the community plan in which it is located?

3. Will the proposal affect existing housing in the community, or create a demand for additional housing?

Identify potential areas for urban villages and/or underutilized Transit-Oriented Development (TOD) corridors for proposed density increase. Provide comparison of existing built environment, potential development per existing plan and zone, and envisioned optimum density/intensity. Consider the planned construction of new schools in areas targeted for urban villages and/or underutilized TOD corridors for density increases; analyze the potential net effect on housing yield due to loss of residential units and potential planned/proposed units due to school sitings.

4. Will the proposal result in land uses which are not compatible with aircraft accident potential as defined by a SANDAG Airport Land Use Plan (ALUP)?

Identify proposed areas of higher residential densities or with existing higher density within the 60 CNEL aircraft noise contours or within airport influence areas. Areas to be analyzed include those residentially designated areas near Miramar MCAS, Lindbergh Field, Brown Field, Montgomery Field, and Rodriguez Airport.

5. Will the proposal result in a conflict with adopted environmental plans for the area?

Identify proposed areas of higher residential densities adjoining areas of open space designated in community plans and/or placed within the Multi-Habitat Planning Area (MHPA) of the City's adopted Multiple Species Conservation Program (MSCP). Analyze potential indirect effects of proposed higher densities in terms of compliance with adopted MSCP Subarea Plan Adjacency Guidelines.

2. Neighborhood Character/Aesthetics

1. Will the proposal result in project bulk, scale, materials, or style which will be incompatible with surrounding development?
2. Will the proposal result in the creation of a negative aesthetic site or project?
3. Will the proposal result in substantial alteration to the existing character of the area?

Identify potential areas for urban villages and/or underutilized TOD corridors for density increase. Provide comparison of potential resultant bulk and scale of the proposed density/intensity, with existing adjoining development. Where appropriate identify, transitional use, buffers, or any other viable method to avoid or lessen a negative effect and promote compatibility, especially, with adjoining detached single-family neighborhoods.

4. Will the proposal result in the obstruction of any vista or scenic view from a public viewing area?

Provide comparison of potential resultant bulk and scale of the proposed density/intensity, with any existing plan-designated view corridors or other public views.

5. Will the proposal result in the loss of any distinctive or landmark tree(s), or a stand of mature trees?

Identify potential areas for urban villages and/or underutilized TOD corridors for density increase where mature street landscape exist. Analyze any adverse effect of proposed infill/redevelopment may have on existing mature street trees. Where appropriate, identify method/project features to retain mature street landscape.

3. Public Services

Will the proposal have an effect upon, or result in need for new or altered governmental services in any of the following areas:

1. Parks or other recreational facilities?

Will the proposal result in an impact upon the quality or quantity of existing recreational opportunities?

Identify potential areas for urban villages and/or underutilized TOD corridors for density increase in community planning areas with known deficiency of parks and open space. Identify any project features which would result in open space/parkland acquisition or improvements in existing recreational facilities.

2. Fire protection/Police protection?

Identify potential areas for urban villages and/or underutilized TOD corridors for density increase in community planning areas with known deficiency of police and/or fire protection. Identify any project features which would result in new fire and police stations where necessary or expansion of facilities where viable.

4. Schools?

Consider the new school siting plan for San Diego City Schools as well as other school districts serving the City. Analyze the compatibility of the proposed project with existing adopted school facility plans.

Consider the planned construction of new schools in areas targeted for urban villages and/or underutilized TOD corridors for density increases; analyze the potential net effect on housing yield due to loss of residential units and potential planned/proposed units due to school sitings.

5. Maintenance of public facilities, including roads?

6. Other municipal services?

4. **Utilities**

Will the proposal result in a need for new systems, or require substantial alterations to existing utilities, including:

1. Water Resources (Conservation)?

Address the regional water availability and delivery system necessary to serve the City of San Diego with the addition of the density/ intensity of proposed urban villages and/or underutilized TOD corridors. Compare the population forecast used in regional water plan with the proposed SANDAG 2020 forecast as it relates to water availability. Address the impact on water resources with the addition of 50K to 75K units above the yield envisioned in the current adopted community plans within the City of San Diego. Address the proposal in terms of the City's adopted Strategic Water Plan.

- a. Will the proposal result in the use of excessive amounts of water?
- b. Will the proposal result in landscaping which is predominantly non-drought resistant vegetation?

Address the potential effect on water resources due to potential increased use of reclaimed water available from the City's existing North City Water Reclamation Plant (NCWRP) and the South Bay WRP currently under construction. Discuss the potential service area from these City plants and identify any public landscaped areas or larger private development within the areas targeted for increased densities which could use reclaimed water for irrigation. In addition, identify water use intensive industrial/commercial developments which could use high quality reclaimed water for production processes. The NCWRP serves the northern portion of the City of San Diego as

well as Poway; reclaimed water from the SBWRP is proposed to be distributed by the Otay Water District which serves Otay Mesa, Chula Vista, and Imperial Beach. Identify other existing City programs which may effect future water resources(per capita use trend) and lessen regional dependance on imported water. Address the need for sited water reclamation plants in Mission Valley and Otay Valley as a resultant of the 2020 forecast.

2. Sewer?

Address the potential effect of the proposed expected addition of 50K to 75K dwelling units of the expected increased density/intensity of proposed urban villages and/or underutilized TOD corridors within the City of San Diego as well as expected densities within the Metro service area which includes Chula Vista, National City, Lemon Grove, La Mesa, El Cajon, and the eastern unincorporated areas. Compare the growth forecast used to develop the 1990 Clean Water Program with the proposed SANDAG 2020 forecast as it relates to sewer treatment capacity. Address any accelerated need for sited treatment plants in Mission Valley and Otay Valley as a resultant of the 2020 forecast.

3. Storm water drainage?

Address the potential runoff potential of the expected increased density/intensity of proposed urban villages and/or underutilized TOD corridors. Identify whether stormwater runoff from these targeted areas are conveyed via pipes to an outfall or to surface drainages within urban canyon or directly to bodies of water. Analyze how the expected development as well as the City of San Diego, in general, would comply with stricter stormwater control required by the state-mandated, municipal permit. Discuss viable control methods to adequately handle urban runoff and minimize water quality effects on drainages, streams, lagoons, and bays.

4. Solid waste disposal?

Address the potential effect of additional solid waste generation resulting from the proposed expected addition of 50K to 75K dwelling units of the expected increased density/intensity of proposed urban villages and/or underutilized TOD corridors within the City of San Diego. Discuss any effect on the capacity and/or expected life of the landfills within the City, the City's Miramar landfill and the privately operated Sycamore landfill. Address the progress of mandated waste stream reduction as it affects landfill capacity/life.

Address the potential of the disposal demolition materials associated with the proposed infill/redevelopment of existing development within underutilized targeted areas. Discuss methods to reduce waste stream from demolition.

5. Electrical (Solar) Power?

Will the proposal result in the use of excessive amounts of fuel or energy?

Will the proposal result in substantial light, glare, or shading of other properties?

Address the potential conflict of the resultant bulk and scale of the proposed density/intensity, with any existing energy plans. Analyze the resultant bulk and scale in terms of substantial light, glare, or shading of other properties, which may hinder the use of passive solar energy or result in increase use of energy for lighting and heating. Discuss any expected net energy savings associated with higher density/intensity.

6. Natural gas?

5. Transportation/Circulation

1. Will the proposal result in a substantial impact upon existing or planned private and public, regional multi-modal transportation systems?

Address the regional transportation system (freeways and prime arterials) and its ability to adequately handle the additional traffic from the population increase of SANDAG 2020 forecast.

2. Will the proposal result in roadway traffic generation in excess of specific/community plan allocation?
3. Will the proposal result in an increase in projected traffic which is substantial in relation to the capacity of the street system?
4. Will the proposal result in alterations to present circulation movements including effects on existing public access to beaches, parks, or other open space areas?

Address the other circulation element system and its ability to adequately handle the additional traffic within the community plan/subregional level, from the expected increased density/intensity of proposed urban villages and/or underutilized TOD corridors within the City of San Diego. Identify affected roadways with less than acceptable level of service (LOS D) near or servicing the targeted areas.

Address the potential effects of the proposal on the "Transit First" plan of the Metropolitan Transit Development Board. Analyze the availability of transit corridors (whose served by fixed rail or frequent transit buses) in the targeted areas.

Address the progress of providing regional bicycle routes and facilities to serve the targeted areas.

5. Will the proposal result in an increased demand for off-site parking?
6. Will the proposal result in effects on existing parking?

Address the need for parking presented by the expected increased density/ intensity of proposed urban villages and/or underutilized TOD corridors. Discuss the desired effect of the type of development proposed, on conventional parking requirements.

6. Water Quality

1. Will the proposal result in discharge into surface or ground waters, or in any alteration of surface or groundwater quality, including, but not limited to temperature, dissolved oxygen or turbidity?
2. Discharge into surface or ground waters, significant amounts of pesticides, herbicides, fertilizers, gas, oil, or other noxious chemicals?
3. Will the proposal result in changes in absorption rates, drainage patterns, or the rate and amount of surface runoff?
4. Change in deposition or erosion of beach sands, or changes in siltation, deposition or erosion which may modify the channel of a river or stream or the bed of the ocean or any bay, inlet or lake?

Address the runoff potential of the expected increased density/intensity of proposed urban villages and/or underutilized TOD corridors. Identify whether stormwater runoff from these targeted areas are conveyed via pipes to outfall or to surface drainages within urban canyon or directly to bodies of water. Address the resultant increased runoff effects into urban canyons; especially, those which have been placed in the MHPA. Discuss the effect of potential increased opportunity for urban canyons to support riparian vegetation due to increased urban runoff. Analyze the effects of resultant riparian areas, either naturally occurring or manually enhanced, in providing water quality controls. Discuss on-going riparian mitigation efforts in urban canyons; identify potential drainages which may benefit from riparian enhancement, in terms of passive water quality control. Identify urban canyons containing old and potentially failing water/sewer lines.

Analyze how the expected development as well as the City of San Diego, in general, would comply with stricter stormwater control required by a municipal permit. Discuss viable control

methods to adequately handle urban runoff and minimize water quality effects on drainages, streams, lagoons, and bays.

7. Hydrology

1. Will the proposal result in changes in currents, or the course or direction of water movements, in either marine or fresh waters?
2. Will the proposal result in alterations to the course or flow of flood waters?
3. Exposure of people or property to water related hazards such as flooding?

Identify areas targeted for increased density/intensity, which are subject to flooding or potentially could result in contributing to downstream flooding.

8. Air Quality.

1. Will the proposal result in air emissions which would substantially deteriorate ambient air quality?

Address the regional ozone pollution problem in terms of the potential incremental effect caused by the increased population yield of SANDAG 2020 forecast within the San Diego Air Basin. Compare the population/ employment forecast used in the 1994 State Implementation Plan (SIP) and the proposed SANDAG 2020 forecast. Analyze the projected mobile, point, and non-point source pollutant emissions of the 2020 forecast with the 1999 baseline emissions limit in the 1994 SIP.

Since the SDAB is not in attainment of the state and federal ozone ambient air quality standard, analyze the proposal to determine if it may potential cause a additional violations or prevent or interfere with the attainment or maintenance of any state or national ambient air quality standard. Discuss consistency of the proposal with the regional air quality strategy (planning) to healthy clean air quality.

2. Will the proposal result in the exposure of sensitive receptors to substantial pollutant concentrations?

Address the potential, localized carbon monoxide (CO) hotspot which could result due to or near the targeted areas for increased density/intensity development.

9. Biology

1. Will the proposal result in a reduction in the number of any unique, rare, endangered, sensitive, or fully protected species of plants or animals?
2. Will the proposal result in a substantial change in the diversity of any species of animals or plants?
3. Will the proposal result in an impact on a sensitive habitat, including, but not limited to streamside vegetation, oak woodland, vernal pools, coastal salt marsh, lagoon, wetland, or coastal sage scrub or chaparral?
4. Will the proposal result in the deterioration of existing fish or wildlife habitat?
5. Will the proposal result in the introduction of invasive species of plants into the area?
6. Will the proposal result in the interference with the movement of any resident or migratory fish or wildlife species?

Identify proposed areas of higher residential densities adjoining areas of open space designated in community plans and/or placed within the Multi-Habitat Planning Area (MHPA) of the City's adopted Multiple Species Conservation Program (MSCP). Analyze potential indirect effects of proposed higher densities in terms of compliance with adopted MSCP Subarea Plan Adjacency Guidelines.

Address the progress of the City of San Diego in preserving its biological resources through the implementation of the MHPA. Identify key areas within the MHPA which still need to be acquired to assemble the City's planned portion of preserve. Discuss potential measures proposed with the new development which would assist in this regional preservation effort. Discuss the combined efforts of San Diego, Chula Vista, and the County of San Diego in implementing the subregional preserve plan.

Address the effects of allowed biological mitigation outside the MHPA on the assembling of the preserve and on the proposed residential yield. Identify enhancement opportunities of urban canyons for wildlife as well as community open space benefits.

10. Noise

1. Will the proposal result in a significant increase in the existing ambient noise levels?

2. Will the proposal result in exposure of people to noise levels which exceed the City's adopted noise ordinance?
3. Will the proposal result in exposure of people to current or future transportation noise levels which exceed standards established in the Transportation Element of the General Plan?

Identify roadways near targeted areas of increased residential densities for noise levels exceeding City's exterior standard of 65 CNEL and interior standard of 45 CNEL.

Identify proposed areas of higher residential densities or with existing higher density within the 60 CNEL aircraft noise contours or within airport influence areas. Areas to be analyzed include those residentially designated areas near Miramar MCAS, Lindbergh Field, Brown Field, Montgomery Field, and Rodriguez Airport.

11. Geologic Hazards

1. Will the proposal result in exposure of people or property to geologic hazards such as earthquakes, landslides, mudslides, ground failure, or similar hazards?
2. Will the proposal result in any increase in wind or water erosion of soils, either on or off the site?

Identify proposed targeted areas of increased residential densities and/or land use intensifications which may be subject to geologic hazard constraints such as the active Rose Canyon fault zone, landslide and liquefaction. Identify potential corrective measures to assure that resultant development would not be significantly impacted by known geologic hazards.

12. Cultural Resources.

1. Will the proposal result in the alteration of or the destruction of a prehistoric or historic archaeological site?
2. Will the proposal result in an adverse physical or aesthetic effects to a prehistoric or historic building, structure, object, or site?
3. Will the proposal result in an adverse physical or aesthetic effects to an architecturally significant building, structure, or object?

Identify areas/neighborhoods which has high potential of remaining older structures which may be significant historic resources and which may be either removed or indirectly impacted by the proposed increased densities/intensity. For older areas targeted for increased densities/intensity where examples of historic development exists, discuss the availability type localities, the retained examples of sequential development. Where applicable, use existing inventories of historic structures.

13. Paleontological Resources

Will the proposal result in the loss of paleontological resources?

Identify targeted areas for proposed increased density/intensity which are underlain by fossiliferous formation which if excavated, could yield significant fossil resources. Discuss the need of subsurface levels to achieve desired density and/or intensity of subsequent development.

14. Human Health/Public Safety

1. Will the proposal result in the creation of any health hazard or potential health hazard (excluding mental health)?
2. Will the proposal result in the exposure of people to potential health hazards?

Identify known hazardous material sites at or near areas targeted for increased density/intensity. Discuss any remedial plans for these sites or site potential remediation.

III. MANDATORY DISCUSSION AREAS

Does the project have the potential to achieve short-term, to the disadvantage of long-term, environmental goals? (A short-term impact on the environment is one which occurs in a relatively brief, definitive period of time while long-term impacts will endure well into the future.)

III. CUMULATIVE IMPACTS

Does the project have impacts which are individually limited, but cumulatively considerable? (A project may impact on two or more separate resources where the impact on each resource is relatively small, but where the effect of the total of those impacts on the environment is significant.)

IV. ALTERNATIVES

The EIR should place major attention on reasonable alternatives which avoid or mitigate the project's significant impacts. These alternatives should be identified and discussed in detail, and should be conducted in sufficient graphic and narrative detail to clearly assess the relative level of impacts and feasibility. Preceding the detailed alternatives analysis should be section entitled "Alternatives considered but rejected." This section should include a discussion of preliminary alternatives which were considered but not in detail. The reason for rejection should be explained.

As a minimum the following alternatives should be considered.

A. No Project

This alternative should address the impacts associated with development permitted pursuant to the existing adopted plan as well as those associated with existing development.

B. Other Alternatives

General Residential Intensification Alternative - This alternative should address an equal allocation of 50,000 units based upon community plan acreage.

Reduced Residential and Employment Growth Policies Alternative - This alternative should address policies and tools which would not accommodate the existing projected population growth and would instead limit residential growth to the national average growth rate of approximately 1% per year, compared to this region's current rate of 2% per year.

If, through the environmental analysis process, other alternatives become apparent which would mitigate potential impacts, these should be discussed with EAS staff prior to including them in the DEIR. It is important to emphasize that the alternatives section of the DEIR should constitute a major part of the report. The timely processing of the environmental review would likely be dependent on the thoroughness of effort exhibited in the alternatives analysis.

Please feel free to contact Anne Lowry at 446-5368 of this office, if you have any questions regarding this memorandum, the attached draft project description, or the City's CEQA environmental review process.

Responses from the Notice of Preparation of the DEIR

1. California Regional Water Quality Control Board	June 20, 2001
2. City of Chula Vista	July 25, 2001
3. County of San Diego Department of Planning and Land Use	July 27, 2001
4. Friends of San Diego	July 24, 2001
5. Robert Green	June 12, 2001
6. Herbert Handy, UCPG Member	July 28, 2001
7. Herbert Handy, UCPG Member	August 22, 2001
8. Kearny Mesa Planning Group	July 23, 2001
9. Richard Lawrence	July 27, 2001
10. Mt. Hope/Helix Heights/Residents Association	July 25, 2001
11. Native American Heritage Commission	July 5, 2001
12. Port of San Diego	July 5, 2001
13. Paul Ross	July 12, 2001
14. San Diego Audubon Society	July 30, 2001
15. San Diego County Archaeological Society	June 23, 2001
16. San Diego Regional Energy Office	August 23, 2001
17. San Dieguito River Valley Regional Open Space Park	July 26, 2001
18. Serra Mesa Planning Group	July 28, 2001
19. Melvin Shapiro	July 24, 2001
20. State Department of Fish and Game	July 16, 2001
21. State Department of Transportation, District 11	August 22, 2001
22. Southeastern Economic Development Corporation	July 27, 2001
23. United States Marine Corps	July 20, 2001
24. Unsigned	June 12, 2001
25. Unsigned	July 24, 2001
26. Unsigned	July 28, 2001

California Regional Water Quality Control Board

San Diego Region

Internet Address: <http://www.swrcb.ca.gov/~rwqcb9/>
9771 Clairemont Mesa Boulevard, Suite A, San Diego, California 92124-1324
Phone (858) 467-2952 • FAX (858) 571-6972

June 20, 2001

City of San Diego
1222 First Avenue, MS-501
San Diego, CA 92101

ATTN: Anne Lowry

Subject: **Strategic Framework Element**

Dear Ms. Lowry,

We have received the subject documents and offer the following comments. We are also providing some additional information regarding the possible regulatory requirements for the subject project since this information has not been selected to be project-specific. Some of the information might not apply to this project.

We would like to see the following questions/concerns addressed in your Environmental Impact Report regarding the subject project:

- a) Would the proposed project create a potentially significant adverse environmental impact to drainage patterns or the rate, or quantity of surface water and runoff?
- b) Would the proposed project result in discharges into surface waters during or following construction, or in any way lead to a significant alteration of surface water quality including, but not limited to temperature, dissolved oxygen, turbidity or other typical urban storm water pollutants (e.g., metals, pathogens, synthetics, organics, sediment, nutrients, oxygen demanding substances.)?
- c) Would the proposed project have a potentially significant adverse impact to groundwater flow though the alteration of pressure head (water table level) within the aquifer or though the interception of groundwater flow via cuts or excavation?
- d) Would the proposed project result in the loss or degradation of any beneficial uses that have been designated for the water bodies that will be directly or indirectly affected by the project?
- e) What mitigation measures are being proposed to eliminate or compensate for the adverse effects identified in (a) through (d) above?

California Environmental Protection Agency

Recycled Paper



Permits

There are six potential permits or approvals that might be needed from the Regional Quality Control Board during the life of a project. Additional information on these permits is provided to assist you in determining the permits that may be required for the proposed project; as well as to encourage project design modifications that may assist in obtaining all needed permits from the RWQCB or SWRCB.

During the construction and development phases of a project, the project could be subject to any one or more of four types of RWQCB permits or approvals. These include; (1) the Statewide National Pollutant Discharge Elimination System (NPDES) General Construction Activity Storm Water Permit, (2) the Clean Water Act 401 water quality Certification, (3) General Dewatering Permit, and (4) Dredging Permit. Upon completion of construction, and throughout the project's operational life, the project may be also subject to one or both of the following two types of RWQCB permits: (1) NPDES permit for any point source discharge of wastes to surface waters; and (2) State Waste Discharge Requirements (WDRs) for any waste discharge to land. Examples of discharges to land requiring WDRs include landfills, reclaimed water discharges from sewage treatment plants for irrigation purposes, sand and gravel operations, and animal confinement facilities.

Water quality degradation is regulated by the Federal National Pollutant Discharge Elimination System (NPDES) Program, established by the Clean Water Act, which controls and reduces pollutants to water bodies from point and non-point discharges. In California, the program is administered by the California Regional Water Quality Control Boards. The Regional Board issues NPDES permits for discharges to water bodies in the San Diego area, including Municipal (area- or county-wide) Storm Water Discharge Permits.

Construction SWPPP

Projects disturbing more than five acres of land during construction must be covered under the State NPDES General Permit for Discharges of Storm Water Associated with Construction Activity. This can be accomplished by filing a Notice of Intent (NOI). The project sponsor must propose and implement control measures that are consistent with this State Construction Storm Water General Permit, and with recommendations and policies of the local agency and the RWQCB.

Industrial SWPPP

Projects that include facilities with discharges of Storm Water Associated with Industrial Activity must be covered under the State NPDES General Permit for Discharges of Storm Water Associated with Industrial Activity. This may be accomplished by filing a Notice of Intent. The project sponsor must propose control measures that are consistent with this, and with recommendations and policies of the local agency and the RWQCB. In a few cases, the project sponsor may apply for (or the RWQCB may require) issuance of an individual (industry- or facility-specific) permit.

Municipal SWPPP

The RWQCB's San Diego Urban Runoff Municipal Permit requires San Diego area municipalities to develop and implement Storm Water Management Plans (SWMPs) The SWMPs must include a program for implementing new development and construction site storm water quality controls. The objective of this component is to ensure that appropriate measures to control pollutants from new development are: considered during the planning phase, before construction begins; implemented during the construction phase; and maintained after construction, throughout the life of the project.

Water Quality Certification

The RWQCB must certify that any permit issued by the U.S. Army Corps of Engineers pursuant to Section 404 of the Clean Water Act (covering, dredging, or filling of wetlands) complies with state water quality standards. Section 401 Water Quality Certification, or waiver, is necessary for all 404 Nationwide Permits, reporting and non-reporting, as well as individual permits.

Wetlands enhance water quality through such natural functions as flood and erosion control, stream bank stabilization, and filtration and purification of contaminants. Wetlands also provide critical habitats for hundreds of species of fish, birds, and other wildlife; offer open space; and provide many recreational opportunities. Adverse Water quality impacts can occur in wetlands from construction of structures in waterways, dredging, filling, and, otherwise altering the drainage to wetlands.

All projects must be evaluated for the presence of jurisdictional wetlands. Destruction or impact to wetlands should be avoided. Water quality certification may be denied based on significant adverse impacts to "Waters of the State." The goals of the California Wetlands Conservation Policy, include ensuring "no overall net loss and achieving a long-term net gain in the quantity, quality, and permanence of wetlands acreage and values." In the event wetland loss is unavoidable, mitigation will be preferably in-kind and on-site, with no net destruction of habitat value. Mitigation will preferably be completed prior to, or at least simultaneous to, the filling or other loss of existing wetlands.

Successful mitigation projects are complex tasks and difficult to achieve. This issue will be strongly considered during agency review of any proposed wetland fill. Wetland features or ponds created as mitigation for the loss of existing "jurisdictional wetlands" or "waters of the United States" cannot be used as storm water treatment controls.

CEQA requires monitoring of all mitigation efforts as a condition of project approval. Although monitoring programs are not required to be included in environmental documents, it is helpful to know what sort of mitigation monitoring the applicant intends to implement, and who will be accountable for seeing that any proposed mitigation's are successfully executed.

Project/ Site Planning

Evidence of filing for a NOI and development of a SWPPP should be a condition of development plan approval by all municipalities. Implementation of the SWPPP should be enforced during

construction via appropriate options such as citations, stop work orders, or withholding occupancy permits. Impacts identified should be avoided and minimized by developing and implementing the following.

The project should minimize impacts from project development by incorporating appropriate site planning concepts. This should be accomplished by designing and proposing site planning options as early in the project planning phases as possible. Appropriate site planning concepts to include, but are not limited to the following:

- Phase construction to limit areas and periods of impact.
- Minimize directly connected impervious areas.
- Preserve natural topography, existing drainage courses and existing vegetation.
- Locate construction and structures as far as possible from streams, wetlands, drainage areas, etc.
- Reduce paved area through cluster development, narrower streets, use of porous pavement and/or retaining natural surfaces.
- Minimize the use of gutters and curbs that concentrate and direct runoff to impermeable surfaces.
- Use existing vegetation and create new vegetated areas to promote infiltration.
- Design and lay out communities to reduce reliance on cars.
- Include, green areas for people to, walk their pets, thereby reducing build-up of bacteria, worms, viruses, nutrients, etc. in impermeable areas, or institute ordinances requiring owners to collect pets' excrement.
- Incorporate low-maintenance landscaping.
- Design and lay out streets and storm drain systems to facilitate easy maintenance and cleaning.
- Consider the need for runoff collection and treatment systems.
- Label storm drains to discourage dumping of pollutants into them.

Construction- Phase Management

Erosion Prevention

The project should minimize erosion and control sediment during and after construction. This should be done by developing and implementing an erosion control plan, or equivalent plan. This plan should be included in the SWPPP. The plan should specify all control measures that will be used or which are anticipated to be used, including, but not limited to, the following:

- Limit access routes and stabilize access points.
- Stabilize denuded areas as soon as possible with seeding, mulching, or other effective methods.
- Protect adjacent properties with vegetative buffer strips, sediment barriers, or other effective methods.
- Delineate clearing limits, easements, setbacks, sensitive areas, vegetation and drainage courses by marking them in the field.
- Stabilize and prevent erosion from temporary conveyance channels and outlets.
- Use sediment controls and filtration to remove sediment from water generated by dewatering or collected on-site during construction. For large sites, stormwater settling basins will often be necessary.
- Schedule grading for the dry season (May-Sept.)

Chemical and Waste Management

The project should minimize impacts from chemicals and wastes used or generated during construction. This should be done by developing and implementing a plan or set of control measures. The plan or control measures should be included in the Storm Water Pollution Prevention Plan. The plan should specify all control measures that will be used or which are anticipated to be used, including, but not limited to, the following:

- Designate specific areas of the site, away from streams or storm drain inlets, for storage, preparation, and disposal of building materials, chemical products, and wastes.
- Store stockpiled materials and wastes under a roof or plastic sheeting.
- Store containers of paint, chemicals, solvents, and other hazardous materials stored in containers under cover during rainy periods.
- Berm around storage areas to prevent contact with runoff.
- Cover open Dumpsters securely with plastic sheeting, a tarp, or other cover during rainy periods.
- Designate specific areas of the site, away from streams or storm drain inlets, for auto and equipment parking and for routine vehicle and equipment maintenance.
- Routinely maintain all vehicles and heavy equipment to avoid leaks.



Winston H. Hickox
*Secretary for
Environmental
Protection*



Gray Davis
Governor

- Perform major maintenance, repair, and vehicle and equipment washing off-site, or in designated and controlled areas on-site.
- Collect used motor oil, radiator coolant or other fluids with drip pans or drop cloths. Store and label spent fluids carefully prior to recycling or proper disposal.
- Sweep up spilled dry materials (cement, mortar, fertilizers, etc.) immediately—do not use water to wash them away.
- Clean up liquid spills on paved or impermeable surfaces using “dry” cleanup methods (e.g., absorbent materials, cat litter, rags) and dispose of cleanup materials properly.
- Clean up spills on dirt areas by digging up and properly disposing of the soil.
- Keep paint removal wastes, fresh concrete, cement mortars, cleared vegetation, and demolition wastes out of gutters, streams, and storm drains by using proper containment and disposal.

We appreciate the opportunity to comment on the subject environmental document and look forward to your response. If you have any questions regarding our concerns or questions, please do not hesitate to contact me at (858) 467-2705 or at lemop@rb9.swrcb.ca.gov.

Sincerely,

A handwritten signature in black ink that reads "Paul Lemons".

Paul Lemons



CITY OF
CHULA VISTA

PLANNING AND BUILDING DEPARTMENT

July 25, 2001

Ms. Anne Lowry
Environmental Analysis Section (EAS)
City Development Services Department
1221 First Avenue, MS 501
San Diego, CA 92101

**SUBJECT: NOTICE OF PREPARATION FOR A DRAFT ENVIRONMENTAL
IMPACT REPORT ON CITY OF SAN DIEGO STRATEGIC
FRAMEWORK ELEMENT AND ACTION PLAN (LDR NO. 40-
1027)**

Dear Ms. Lowry:

Thank you for providing the Notice of Preparation (NOP) referenced above to the City of Chula Vista. In addition to being a directly adjacent city with numerous transportation, public facility and service, economic, environmental and other links to San Diego, Chula Vista has a particular interest in the proposed General Plan Amendment and Environmental Impact Report (EIR) because both cities are in the midst of major general plan revisions. The region, and especially the South Bay area, offers outstanding opportunities for mutually supportive efforts on projects and initiatives that cross jurisdictional lines.

Where applicable, our comments are referenced by page number and topical heading in the NOP and attachments furnished.

Utilities (Memorandum, Pages 4-6)

Among the topical areas with potential regional implications that are of specific interest to the City of Chula Vista are water resources, the sewer system, storm water drainage, solid waste disposal and energy. We encourage use of the regional analysis of water resources being prepared by the San Diego County Water Authority in conjunction with the San Diego Association of Governments, and any other associated regional studies, to the extent applicable information becomes available in a timely manner. We are also interested in identification of any major public facilities that would need to be sited or expanded in or adjacent to Chula Vista to accommodate growth envisioned in the Strategic Framework Element.

Ms. Anne Lowry
July 25, 2001
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Transportation/Circulation (Memorandum, Pages 6-7)

The proposed EIR scope would appropriately address impacts on the regional transportation system. Please include any potentially significant effects on the Chula Vista transportation network, based upon our city's adopted standards. We would be pleased to provide information on these standards if needed.

Hydrology, Air Quality, Biology, and Noise (Memorandum, Pages 8-10)

These topics likewise have potential regional impacts that extend beyond local boundaries and are therefore of specific interest to Chula Vista. We appreciate the acknowledgement of Chula Vista's role in regional habitat planning and management.

Alternatives (Memorandum, Page 12)

The City of Villages strategy will be an important bellwether of "smart growth" concepts in the San Diego Region. By looking at the contrast with the existing General Plan in addition to the change from existing baseline conditions, the environmental analysis should prove instructive in addressing such questions as:

- What the comparative effects of infill, land use intensification, mixed use and higher residential densities tied to enhanced transit alternatives would be relative to more dispersed, auto-oriented development patterns, including implications for per capita facility and service demand factors;
- What assumptions might reasonably be made regarding changes in travel patterns and modal choices when more compact development patterns and alternative transportation modes are available;
- How implementing the Strategic Framework will be manifested through public facility and service needs – for instance, how to provide adequate school sites and facilities in areas developed at increased densities – through increasing site development intensity and adding capacity; adding new sites through adaptive reuse, or other approaches; and
- How to address the infrastructure improvements needed to support the strategy in already developed areas.

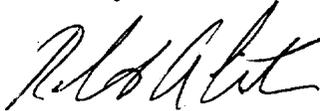
To the extent that the existing General Plan may not accommodate anticipated growth, we encourage that the EIR alternatives analysis assess the impacts of the projected level of growth based upon more dispersed development patterns.

We look forward to subsequent review and interaction opportunities as the EIR is prepared and processed. We likewise look forward to working with the City of San Diego

Ms. Anne Lowry
July 25, 2001
Page 3

as other actions to implement the Regional Framework are carried out, and particularly any updated community, corridor or other more specific plans are prepared for areas in the Chula Vista vicinity. If you have any questions or need additional information from the City of Chula Vista, please contact me at (619) 691-5104, or General Plan Project Manager Mark Stephens at (619) 409-5959.

Sincerely,



Robert A. Leiter
Director of Planning and Building

cc: George Krempl, Assistant City Manager
Chris Salomone, Director of Community Development
John Lippitt, Director of Public Works
Marilyn Pongeggi, Environmental Review Coordinator
Mark Stephens, General Plan Project Manager

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GARY L. PRYOR
DIRECTOR
(858) 694-2962

County of San Diego

DEPARTMENT OF PLANNING AND LAND USE

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EL CAJON, CA 92020-3912
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July 27, 2001

Anne Lowry
Environmental Analysis Section (EAS)
City Development Services Department
1222 First Avenue, MS 501
San Diego, California 92101

STRATEGIC FRAMEWORK ELEMENT: NOTICE OF PREPARATION FOR DRAFT ENVIRONMENTAL IMPACT REPORT

Dear Ms. Lowry,

Thank you for providing us with an opportunity to review the *Notice of Preparation of a Draft Environmental Impact Report (DEIR) for the Strategic Framework Element of the City's Progress Guide and General Plan*, dated June 12, 2001. County Department of Planning and Land Use (DPLU) staff has completed its review and has the following comments regarding the content of the forthcoming DEIR:

GENERAL COMMENTS:

DPLU requests the continued cooperation with the City of San Diego in the preparation of the County's General Plan 2020. It is imperative that the respective jurisdictions coordinate their efforts for the San Diego Region. Please forward any questions or concerns General Plan 2020 directly to Ivan Holler, General Plan 2020 Project Manager, at (858) 694-3789.

ENVIRONMENTAL ISSUES TO BE DISCUSSED:

The project proposes an additional 50,000 to 75,000 dwelling units within the City of San Diego. The NOP recognizes that the increase in dwelling units for the City would affect a range of environmental issues on a region-wide basis. Such issues include impacts to biological resources, traffic/circulation, hydrology/water quality, and air quality. The DEIR should identify the project's impacts on unincorporated lands of San Diego County and other resources (such as parks) under the jurisdiction, and how these will be mitigated.

- The DEIR should fully evaluate potential direct and indirect impacts to biological resources especially for areas near the City/County jurisdictional boundaries. Specifically, the project should address the indirect effects of proposed higher densities in terms of compliance with the County's adopted MSCP preserve system. If you have any questions or concerns regarding the County's MSCP preserve system, we encourage you to contact Bob Asher, Chief of the DPLU MSCP Division, at (858) 694-3722.
- City staff should coordinate with the County's Department of Public Works (DPW) and SANDAG in the development of the traffic forecast analysis that will be prepared for the Strategic Framework Element and Action Plan. The City and the County should strive to be as consistent as possible in the long-range assumptions that will be used for both projects, especially for areas near the City/County jurisdictional boundaries. Nick Ortiz, (858) 495-5488, of the DPW Land Development Division, should be contacted for information related to the General Plan 2020 update traffic forecast analysis.
- City, County, SANDAG, and LAFCO staff should coordinate on all issues related to the City's Sphere of Influence areas within the unincorporated area. Similar to the above listed item, the long-range analysis/plan for these areas of overlapping interest to both jurisdictions should be as consistent as possible.
- Increases in runoff and sedimentation from future development could have significant adverse impacts to wetland habitat within the unincorporated lands of the County of San Diego. The DEIR should address the potential impacts from increased siltation and urban pollutants to any County jurisdictional drainage basins. Due to the adverse effects of increased siltation, it is essential that the DEIR include a thorough analysis of both direct and cumulative impacts to water quality within the County jurisdictional watersheds. Additionally, mitigation measures that would avoid both short and long term water quality impacts should be identified. These measures should be specific and viable. A simple reference to "Best Management Practices" is not adequate.
- The DPLU would like to see a more detailed description of the project's potential sources of air pollution, such as toxic air contaminants and particulates. The San Diego Air Basin is currently not in attainment of the state and federal ozone ambient air quality standard. The DEIR should discuss the regional ozone pollution problem in terms of the potential growth inducement of the proposed project. Additionally, the DEIR should discuss the consistency of the proposal with the regional air quality standards.

The County of San Diego appreciates the opportunity to continue to participate in the City's environmental review process for this project. We look forward to receiving the DEIR for review or providing additional assistance at your request. If you have any questions regarding these comments, please contact me at (858) 694-2962.

Sincerely,

A handwritten signature in black ink, appearing to read "G. L. Pryor". The signature is fluid and cursive, with a large initial "G" and "P".

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

GLP:JEG:CM



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

4019 Goldfinch Street #230
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Tel/Fax: 858 860-6401 X5393
email: friendsofSD@aol.com

7/24/01

**COMMENTS ON SCOPE OF WORK for
CITY OF SAN DIEGO DRAFT EIR
for the STRATEGIC FRAMEWORK ELEMENT**

SUMMARY OF COMMENTS: The Project Description for the Strategic Framework Element contains fundamental inconsistencies and flawed assumptions. The beneficial aspects of the Project are in danger of being overridden by fallacious and nonessential elements.

- The entire Project strategy grew from a SANDAG forecast of a million people coming to our region within 20 years. The recent 2000 census data revealed that the baseline for the population forecast was 100,000 too high, which lends support to a conclusion that the region's existing planned capacities may be sufficient for projected growth.
- The SANDAG forecast was accompanied by warnings that the region had no control over the rate or amount of growth, and the best we could do is direct it. Whether this is true at a regional level is highly debatable. It is certainly not true at the city and community level, where there are many examples of achieving stability.¹
- "This strategy is designed to focus growth when and if it occurs." This cannot be reconciled with the obvious link between more intense zoning and higher levels of population and employment activity. The project is clearly growth inducing. This may be appropriate in a specific community that needs redevelopment and lacks a vibrant community center, and thus can benefit from intensification. However, growth inducement at a citywide level makes no sense.
- The Project was also promoted as a component of SANDAG's REGION 2020 plan to alter the trend toward suburban and rural sprawl. Yet no linkage has been made. Rural preservation or continued sprawl will mostly be determined by the County Supervisors. With the high demand to move to our region, we could very likely get sprawl and densification simultaneously. It may make sense to densify for specific benefits, but not as a tradeoff for rural preservation that may or may not occur.

¹ See section below showing that many of our region's cities, and many communities in the City of San Diego have already achieved stable populations.

- The strategy has so far ignored that many existing community plans contain excess capacity that was added without much analysis.
- The City of San Diego should not ignore the trend away from growth accommodation. Many other cities in our region are not subscribing to the doctrine of continuous revision of general plans. It's not good planning, and not a sustainable approach.
- The City of San Diego has not kept pace with past infrastructure needs, and will face a huge hurdle in providing infrastructure as existing community capacities are developed. Adding even more capacity will create an impossible financial burden and declining quality of life.
- The focus on growth accommodation is totally unnecessary. Communities can plan walkable, livable, vibrant villages without any obligation to accommodate specific numbers. Urban planning should not be done by quota. **Keep the villages and quality of life goals— drop the numerical targets and the focus on growth accommodation.**

COMMENTS ON THE PROJECT DESCRIPTION AND EIR SCOPE

1. GROWTH INDUCEMENT.

With the DEIR address the potential of the Project (SFE) to induce growth?

a. How much commercial and industrial space would be needed to accommodate 450,000 more City residents. What would the impacts be?

b. **The literature for the SFE states that the purpose is not to encourage growth, but to accommodate growth when and if it occurs. How will this purpose be reconciled with the obvious fact that intensification will induce population growth in a community? And that intensification in many communities will collectively induce population growth in the City?**

c. In the Project Description, the paragraph on Sustainability and Conservation should be revised to be consistent with the previous sections. It currently gives the impression that "continued population growth" is a goal of the Project. It would be more consistent to state: "Develop a program to preserve and enhance the quality of life for all San Diegans *if and when population growth occurs*".

2. DEVELOPMENT BY COMMUNITY

a. How can the DEIR be completed before targets are available for each community showing the amount of residential, commercial and industrial development proposed under the Project? Wouldn't the impacts depend on where the intensification occurred?

3. FINANCING OF INFRASTRUCTURE, FACILITIES, SERVICES and ENVIRONMENTAL IMPACTS

a. How can the DEIR be completed before a study is available on the financial implications of accommodating 450,000 more residents? This would have to include the projected costs, revenues, and potential shortfall.

b. Will financing projections be based on existing tax structures or predicated on desired changes in state property tax allocations?

b. Will the DEIR address existing infrastructure deficits?

c. Will the DEIR address regional infrastructure requirements or just local requirements? Aren't both types of infrastructure necessary for maintaining or improving quality of life?

"The residents of the San Diego region depend on a variety of region-serving public facilities... Without them the region would not be able to function; and if not adequately funded the region's quality of life will suffer".²

d. Will the projected costs be limited to capital costs or also include operations and maintenance?

4. CONCURRENCY.

The Project Description states a goal that needed infrastructure is phased concurrently with the proposed intensified development.

a. Since the City currently has no mechanism to provide infrastructure concurrency in urbanized areas, will a new concurrency plan or APFO (Adequate Public Facilities Ordinance) be outlined prior to the DEIR completion?

b. Or will the DEIR merely assume that infrastructure can and will be provided concurrently?

5. SFE CAPACITY IN ADDITION TO EXISTING PLAN CAPACITY

a. Where the Project proposes more capacity for dwellings, commercial or industrial development than the existing community plans, it is essential that the DEIR examine the impacts of all development that would occur if community plans were amended to conform to the project, rather than examine just the additional development proposed under the Project.

The impacts from the additional portion cannot be assessed in a meaningful way without considering the total development capacity.

It may become evident that development which would occur under the existing capacity could not be accommodated without large unmitigated impacts and diminished quality of life. Certainly this finding would affect the assessment of expanding development capacity and population beyond the existing capacity.

² Regional infrastructure and facilities are described in the SANDAG Regional Public Facilities Financing Plan, June 1993. The regional facilities include those for water supply, sewerage, solid waste disposal, energy, hazardous waste disposal, transportation, courts and jails, regional parks/ open space, libraries, animal control, social services, and fire communications.

6. COMMUNITY PLANS WITH EXCESSIVE CAPACITY

a. Will the DEIR address community plans with existing capacities which may be excessive, and examine the reduction of capacity in these plans? The reduced capacity could be shifted to other communities, or just eliminated.

For example, the following community plans have population capacities substantially above their 2000 Census population: ³

Greater North Park	8,861 more people	19% increase
Mira Mesa	17,846 more people	25% increase
Peninsula	9,337 more people	25% increase
Southeast San Diego	26,986 more people	26% increase
Serra Mesa	5,764 more people	30% increase
Uptown	16,062 more people	45% increase
Centre City	34,487 more people	197% increase

As a clarification, the increased population capacities above are based on existing community plans (as of 1998), and do not include any additional population growth that would occur as a result of the SFE. ⁴

7. EXISTING GENERAL PLAN.

a. The existing Guidelines for Future Development are described as "obsolete" in the Proposed Project Description, because they "mainly address how vacant land within the City was to be replaced by development". Does our City Charter require the City to upzone existing urbanized areas as vacant suburban land becomes fully developed? Does the City wish to establish a precedent of continuous intensification?

8. DISPLACEMENT

a. Will the DEIR examine the impact of displacing residents and businesses in the proposed redevelopment areas?

³ See attachment, "Capacity of Existing Community Plans compared to 2000 Population".

⁴ The existing community plans in the City of San Diego have a capacity for 1,530,501 people according to the Oct. 1998 SANDAG 2020 Cities/ County Forecast. The current population of the City is 1,223,400 according to the 2000 Census. Therefore, there is existing capacity for 307,000 more residents, a 25% increase over the current population. This is enough capacity to accommodate a 1.3% average annual growth rate, which is higher than the City's average annual growth rate of 1.0% from 1990 to 2000.

9. QUALITY OF LIFE

The Project Description states a goal that quality of life will be maintained or improved.

- a. What standards will be used to measure quality of life?
- b. Will the proposed "adjustments to certain facility standards" maintain or improve quality of life?
- c. If the DEIR finds that the Project would cause unmitigated impacts, what alternatives will be recommended that would avoid unmitigated impacts?

10. TARGET COMMUNITIES & INTERIM PLAN

- a. Why does the map of Draft Village Distribution concentrate intensification in the older, already dense urbanized areas which are facility deficient, rather than the newer, less dense suburban areas which have more adequate existing facilities?
- b. Is it proposed that Project concepts, such as TOD and inclusionary housing, will be applied when reviewing new master planned development projects in the City?
- c. Will the DEIR consider the need for a moratorium or Interim Development Ordinance to ensure that larger projects that might be approved during the next 1-2 years will not work contrary to the Project goals?

11. SPRAWL and RURAL PRESERVATION

- a. Previous discussions of the SFE have included the goal of preventing sprawl and preserving rural areas. Yet the Project Description and Scope of Work do not mention these goals. Why?
- b. Will the purpose of the Project still be met if other jurisdictions in the region do not enact effective measures to curb sprawl and preserve rural areas? In other words, is the rationale for the project to slow down sprawl or to design more livable communities?

12. FORECAST ACCURACY AND ARBITRARY ALLOCATIONS.

The Project Description refers to "accommodating the City's forecasted population growth and development needs". Yet there is no City population forecast. There is a regionwide forecast, which has been used to assign a proportional share to the City of San Diego. However, other cities are questioning whether the forecast could be merely a self-fulfilling prophecy, and whether pro-rata quotas make sense for their cities. The City of San Diego would benefit from such an analysis before marching to the drum of forecast accommodation.

- f) The report should quote the Dept of Devel Service telling why its Negative Declarations say that demolitions do not affect existing housing and do not create a demand for additional housing. The Dept. should explain why its Neg Decs say that loss of housing has no cumulative effect. For comparison, the report should cite the EIRs issued by the School District which admit their demolitions have an unmitigated effect on the supply of housing.
- g) the report should discuss rezoning residential land to industrial in the face of a housing shortage-example:Coca-Cola. The report should say why staff recommended approval of this rezoning.

Section 5-Transportation

Analyze the rent increase caused expulsion of lower wage employees from the inner city and how this affects traffic problems. How far do the employees have to travel to get to their job? Compare the cost of construction of mass transit compared to the cost of subsidizing workforce housing closer to employment centers.

Section 10-Noise-

Analyze noise impacts on housing in transportation corridors and how this is mitigated.

Alternatives:

"Reduced Residential and Employment Growth"-

The report should give the economic impacts of reducing employment growth and encouraging smaller families. I'm told that EIRs don't deal with economic impacts but it would be impossible to analyze this Alternative unless economic impacts are analyzed.

. The cost of this alternative should be compared to the estimated \$2.5 billion cost for the City of Villages. The report should cite the sources of the necessary funding and the economic impact on these sources. See page 40 of "Draft Strategic Framework Element" dated July 10.

The report should compare quality of life under this Alternative to quality of life with City of Villages. The report should compare time frame of implementing this alternative with the time frame of City of Villages. I suggest that the report list Real Income(constant dollars) in the City over the last decade. The report should state how much the City has spent on economic development over the last decade and how this has affected Real Income. SANDAG has the figures on Real Income.

Staff should contact Californians for Population Stabilization-805-564-6626, e mail-caps@cap-s.org

13. ALTERNATIVES

a. The Scope states that “the alternatives section of the DEIR should constitute a major part of the report”. In this perspective the alternatives outlined in the Scope are inadequate.

i. The “General Intensification” (in which dwelling units are allocated based on community plan acreage) cannot be considered seriously, for obvious reasons. Still, it might lead to an interesting comparison of urban vs. suburban San Diego (see 10a above).

ii. The Reduced Growth Policies do warrant serious consideration, but the stated target is outdated. The recent 2000 census figures show that our regional and City growth had already slowed down to the national rate during the 1990’s.⁵ In view of the past infrastructure deficits and deteriorated quality of life resulting from growth below the national rate, it appears unlikely that that the City could maintain quality of life while matching the national rate of growth. Our air quality patterns, limited park land, water supply, stormwater runoff constraints, scarcity of developable land, and precarious status of threatened species may require us to grow at considerably less than the national rate to maintain quality of life.

b. “No Project” should be examined citywide, and also for specific communities. It should be noted that many communities are built-out or nearly built-out according to their existing Community Plan. These communities have already achieved stable or near stable populations, and can reasonably be expected to retain stable populations in the absence of large-scale zoning changes. Furthermore, many communities are not in need of redevelopment or intensification. These two factors and other community characteristics, when combined, lead to the conclusion that resources should be focused on communities which can benefit from intensification. Communities without the need should not be included in the Project.

c. “No Project” should be examined in the perspective of the ten cities in the region that have achieved stable or near stable population.

- From 1990 to 2000, the following cities had population increase under 2%: Del Mar, Solana Beach, Santee, Imperial Beach.
- The following cities had population increase between 2% and 7.5%: La Mesa, Lemon Grove, Coronado, El Cajon, National City, Encinitas.
- For comparison, the City of San Diego increased by 10.2%.

⁵ According to Census figures, 1990-2000 population growth rates were as follows: U.S. 13.2%. San Diego County 12.6%, City of San Diego 10.2%. The region’s growth rate was, of course, higher in the second half of the decade than in the first half.

d. Specifically, the DEIR should examine evidence that cities and communities with stable general plans and stable zoning policies tend toward stable populations, in contrast to cities with ample vacant land or large scale upzoning policies.

e. We propose a new alternative: Proceed with the City of Villages design concepts while keeping the overall population capacity no higher than the total of existing community plans. In other words, we can keep the goal of creating or enhancing walkable, vibrant, transit oriented villages, in appropriate communities, while abandoning the illusionary "responsibility" to meet specific targets for population or dwelling units.

This alternative would involve moving existing capacity from less appropriate areas of a community to more appropriate areas, and from communities with excess capacity to communities which would benefit from redevelopment and intensification.

14. LONG TERM IMPACTS

a. Will the DEIR consider the impacts of a growth accommodation and densification strategy beyond 2020?

b. Is the Project based on an assumption that the only possible policy is "forecast/ accommodate/ densify"?

c. In other words, as long as there is demand or forecast demand from businesses or individuals to relocate to San Diego, is the City government responsible for continual intensification to accommodate this demand?⁶

15. SUMMARY RECOMMENDATION

Keep the City of Villages and quality of life goals. Eliminate the overall capacity increase and the focus on growth accommodation.

SFE-DEIR-B.doc

⁶ There is considerable evidence that newcomers would be the primary beneficiaries of large-scale accommodation efforts. In this context, the forecasted "natural increase" of 60% is much misunderstood. It includes births to people who are not current residents. Also, the "our kids" mantra that has followed from the forecast ignores the high mobility into and out of our region. When both of these factors are taken into account, the percentage of future housing needs due to the children of current residents is closer to 20%. These needs can be met from existing housing stock. Of course, our children will have to compete for jobs and homes with potential newcomers who may desire to move to our region, but this is true with or without large-scale construction of new homes. A quality education system will be the best preparation for our children to compete successfully.

Ms. Anne Lowry,
Environmental Analysis Section (EAS),
City Development Services Department
1222 First Avenue, MS 501
San Diego Ca 92101

June 12, 2001

Re; Comments, Notice Of Preparation of the Draft EIR for the City of San Diego Strategic Framework Element.

Dear Ms. Lowry,

This letter is in response to the above Notice Of Preparation which I received on June 14, 2001. I have the following comments and concerns:

1. The project description is vague, misleading, prejudicial and inaccurate. Generalized statements were used so that it was impossible to determine what the project is.
 - Which "project" is being analyzed?
The Draft Framework Action List notes that specific areas are targeted for "future residential increases in density". At the June 19, 2001 Community Planning Group Chair meeting commitments were made by the Planning Director that "City of Villages Map" was not finalized and that there would be further public meetings in August 2001 before finalizing the map. The details of the proposed densifications do not seem to be finalized and environmental review (however general) should be delayed until the extent of the project is known. What legislative status does this "City of Villages Map" have?
 - The project description contained in the Notice of Preparation was so vague and unspecific as to be meaningless. The following summarizing statement was used in the Project Description: "the proposed village design concept would enable growth to be located in such a way that the quality of life for city residents, is as a minimum maintained if not improved".
Maintaining the "quality of life" should be defined in relation to CEQA. Does maintaining the "quality of life" mean that the project would have no significant effect on the environment?
If the statement is a measure of environmental impact it is inaccurate. cursory examination of just one issue i.e. traffic, shows that congestion and diminished L.O.S. caused by proposed densities of up to 145 units/ acre will have a significantly adverse environmental effect on surrounding communities.
Again, if the statement is a measure of environmental impact it is also prejudicial. Predetermining that there will be no effect on the "quality of life for city residents", is pre-judging the environmental impacts prior to analysis. The EIR process is designed to analyze potential environmental impacts not predetermine that the impacts would be.
Conversely, if the statement is not relevant to the environmental review why is it in the document at all?

The above summary does not specify which "city residents" are being referred to. Under the current plan less significantly adverse impacts may be sustained by La Jolla residents (who are being asked to absorb no density increases than Mid City Residents where huge density increases are proposed). Major adverse impacts on the quality of life of some residents will result from the sweeping proposals contained in the Strategic Framework Element (which include accomodating thousands of new residents). To claim otherwise is, to put it mildly, misguided.

- The term "City of Villages" is used to describe the proposals. Webster's dictionary defines a village as "a community smaller than a town". As noted above, the Strategic Framework Element proposes densities of up to 145 units/ acre. These "villages" are also described as "subregional districts", and "urban centers". Contrary to the term "village", high intensity urban environments are proposed. I therefore feel that the description in the Notice of Preparation is misleading and inaccurate.

Robert Green 3571 28th Street, San Diego Ca 92104 619 220 8368 H

2. The proposed growth projections are outdated. The project description contemplates a "long-term", "50" year plan horizon for accommodating the City's forecasted population growth and development needs, however, references are made throughout to the SANDAG 2020 growth projection (Utilities [water resources], Sewer Sections).

SANDAG 2030 growth projections are due to be released in a few weeks. It is premature to produce an amendment to the General Plan based on growth figures which may soon be superceded. Additionally the accuracy of the SANDAG figures is not questioned. Environmental review should be conducted on plans which are based on the latest and most accurate growth projections not outdated figures.

3. The proposed infrastructure analysis is inadequate. The description notes that the City will "work closely with regional planning agencies" including SANDAG, MTDB and the Port District and discusses location of growth in relation to transit. This skirts a key environmental issue.

The cumulative impacts on the entire regional infrastructure are not discussed, but they are the major prerequisite of the ability of the City to grow. Without adequate water, sewers, garbage dumps etc there can be no growth, yet the regional impacts of these factors are not discussed in the "Strategy" and the environmental impacts are not proposed to be analyzed. Communities throughout the region are being requested to accommodate the growth projected in the SANDAG 2020 (and 2030) reports. Cumulatively impacts on regional infrastructure and the environment may result. It is premature to move forward with a growth "Strategy" without discussing whether the growth regionally can be serviced.

To select a few examples:

Traffic

\$32 Billion is required to maintain current regional level of service. What will be the regional environmental impacts on traffic of the San Diego Strategic Framework Element coupled with projected growth in other communities if the infrastructure cannot be funded?

Water

What will be the regionwide impacts on water supply of Strategic Framework Element coupled with growth in other communities? Will the "toilets to tap" project need to be revived? Will large scale desalination be necessary? Will other sources be required? What would be the energy/environmental impacts of such projects? Only City of San Diego impacts are currently discussed.

Solid waste.

How will the cumulative regionwide growth be accommodated? What would be the energy/environmental impacts? Again, only City of San Diego impacts are currently discussed.

There should be a comprehensive discussion of these issues and all other regionwide infrastructure issues in the Project Description and EIR.

4. The Project Description notes that "a full range of public facilities would be required as well for each community in which a village center is envisioned". Massive infrastructure funding will be necessary for this program of density increases. The current project description merely hints at some vague "new funding sources, reallocation of existing sources, and adjustments to certain facilities standards". What specifically are the policies and what subsequently will be the environmental impacts of the various funding policies?
5. The environmental impacts of potentially discriminatory public spending policy are not proposed to be analyzed. The "Overall Actions" section states that a policy will be to "assign priority for public expenditures to Neighborhood and Activity Center pilot projects". What will be the City policy for infrastructure improvements in communities not targeted as "Neighborhood and Activity Center pilot projects"? Will neglect of infrastructure in non-"Village" areas lead to significantly adverse environmental impacts?

6. Incomplete analysis of traffic impacts is being undertaken. The Planning Department has stated that the current level of analysis is limited to freeways and major arterials and ignores impacts on other streets. If this is correct, the analysis is deficient. Major traffic impacts are likely to result from these proposals on other streets in addition to freeways and arterial streets. By deferring environmental analysis of the major part of the traffic impacts to a later time the City is ignoring a major environmental issue which could shape the entire General Plan amendment. This is irresponsible public policy preparation. Detailed environmental analysis should be performed on traffic now before the adoption of any General Plan amendment (definitely before the preparation of specific density maps). All traffic impacts should be analyzed at the Program EIR level to give the decision makers a true appreciation of the full impact of the proposal.
The environmental impacts of increased traffic (increased trip generation) should be analyzed for the proposed amendment and surrounding areas at the build-out levels permitted by current and proposed zoning and community plan designations. What effects will the Strategic Framework Element have on the Circulation Element of the General Plan and what environmental impacts will result?
7. The cumulative environmental impacts of density increases from neighborhood to neighborhood should be analyzed. For instance, large scale density increases are proposed along University Avenue and El Cajon Blvd. What effects will this have on traffic in surrounding communities?
8. The "concentration of growth" on "existing... transit" corridors which are planned for "mixed use intensification" is proposed. Are existing transit corridors the optimum transit corridors? Do they provide residents with the best options? What would be the environmental impacts of other locations for transit corridors and therefore density? What exactly is meant by "mixed use intensification" ?
9. The "Draft Framework Action List (Overall Actions)" notes that one action will be to "streamline development regulations to expedite projects which meet regulations".
What type of "streamlining" is being considered? What does "expedite" mean? What "regulations" would have to be met? The environmental impacts of any special processing would have to be evaluated, however, it is unclear as to exactly what type of "streamlining" is proposed.
9. The "Draft Framework Action List (Economic Prosperity Actions)" notes that "FAR/ Coverage maximums in the applicable zones" will be increased. What levels of increase are proposed? Where are the "applicable zones". What will be the environmental impacts of increasing FAR in these zones?
10. Only partial analysis is proposed. "The Neighborhood Character and Aesthetics" section indicates that a "comparison of potential resultant bulk and scale of the proposed density/intensity, with existing adjoining development" will be provided. The environmental impacts of the proposed amendment and surrounding areas at the build-out levels permitted by current and proposed zoning and community plan designations should be analyzed to obtain the true picture of environmental impacts. Many other urban design components than merely bulk and scale contribute to neighborhood character and aesthetics. A full assessment of these items must be undertaken.
11. Additionally the proposed density increases are on the fringe of areas containing existing and proposed historic resources. The effect of the proposal on the character of these resources should also be analyzed.
12. The type of Environmental Review proposed is inappropriate. The proposed "Environmental Review Process" envisions that first a Programmatic EIR would be prepared for "the initial City of Villages project, the adoption of the General Plan Element and the Action Plan and the placement of the TOD overlay over the potential village centers." This section further notes that "upon selection of several specific pilot village locations, a subsequent Master EIR could be prepared"...."this MEIR would rely on by reference, the regional, citywide analysis addressed in the previous Programmatic EIR". This section explains that later environmental review would be undertaken of "subsequent more site specific" proposals.

Ms. Anne Lowry,
Page 4
June 12, 2001

The "Strategic Framework Element" however also includes the selection of "Neighborhood and Activity Center pilot projects" (see item 5 Above); the "Overall Actions" section states that "City sponsored pilot projects" are to be "initiated" ... "to aggressively pursue new forms of mobility" and the Strategy would include an "Action Plan";

TOD overlays (which are not explained) are also to be applied "as an interim measure until community plans can be amended with associated design standards to implement the plan". The proposed "City of Villages Map" also includes site specific proposals.

These statements are confusing since a mixture of not only General Plan policy but site specific projects and implementation (including selection of "Villages") seems to be proposed in the "Strategic Framework Element". The type of Environmental review proposed for the "Strategic Framework Plan" (Programmatic EIR) is intended for the analysis of policy documents only, yet the "Strategic Framework Element" seems to contain site specific proposals and implementation measures.

The type of Environmental review is therefore inappropriate and should therefore be changed to one which addresses the specific nature of the implementation plans which are being proposed, or the Project Description (and the Strategic Framework Plan) should be modified to include purely policy measures and eliminate all implementation measures.

As also noted above the proposed Programmatic EIR seems to be inadequate in several areas including the contemplated analysis of regional environmental issues. Any subsequent Master EIRs which rely on a flawed original Programmatic EIR would be called into question.

I should appreciate a written response to my comments. Additionally, I would be grateful if you would notify me of any actions on this and subsequent EIRs and of any future meetings on this subject. Thank you.

Sincerely,



Robert Green.

CC: Toni Atkins, Council Member
Gail Goldberg, Planning Director
Colleen Clementson, Project Manager, Strategic Framework Plan
Dave Potter, Chairman, Community Planning Group Chairpersons
Chris Milnes, Chairman, North Park Community Planning Group

RESPONSE TO THE DRAFT EIR FOR THE CITY OF VILLAGES

To: Environmental Analysis Section
City Development and Services Departments
1222 First Avenue MS -501
San Diego, CA 92101

July 28, 2001

Attention: Anne Lowry, Associate Planner

Subject: Draft Environmental Impact Report (EIR) on the Strategic Framework Element of City of Villages.

Note: Comments in this response to the EIR only address the University City Neighborhood Village Center #55102 shopping center located on the southeast corner of the Governor Drive/Genesee Avenue intersection.

ISSUES

1.0 Land Use

The Governor/Genesee location is already built up; it contains a large Von's Grocery store, a Rite Aid Pharmacy, three banks, several restaurants, a Carl's Jr, a Baskin Robins, plus numerous small business enterprises including a real estate office and barbershop. In addition a public library plus associated parking areas for the library and shopping center are located within the "village" area.

If this property is redeveloped it should retain the same facilities listed above. Redevelopment should be accomplished in a manner that enhances the predominately low-density residential quality of South University City.

2.0 Recommendations

Insure that new infill structures reflect the scale, masonry, height and form of surrounding (existing) development. Any new infill project should enhance the surrounding complex. Additional parking facilities must be provided to satisfy the requirements of new infill structures and retain the existing parking facilities in number and convenience. No street parking should be allowed. Parking facilities must be landscaped according to the ordinance cited in the University City plan.

Insure that the Regents Road Bridge across Rose Canyon is built in order to relieve excessive Genesee Ave. traffic and congestion at the Governor Drive/Genesee intersection. Also insure that traffic ingress and egress from the new infill structure does not contribute to congestion at the intersection.

The Vons Market was recently extensively remodeled; a new Rite Aid drugstore was opened in the recent past. A fine library lies within the area of concern, which provides service to students from the nearby high school, middle school and elementary schools as well as seniors and other residents from South UC and other areas. Community groups hold meetings in the library conference room. A competent and helpful library staff is readily available to provide expert professional assistance. The library and shopping facilities should either be upgraded or left intact.

3.0 Fire, police and emergency medical protection

No fire, police or emergency medical stations are located in South UC. If higher density housing were constructed in the area it would be imperative that fire, police and emergency medical sites be located in South UC. Fire trucks presently must come from Eastgate Mall or Clairemont to service South UC. Since Genesee Avenue, SR-52, I-805 and I-5 are usually grid locked during morning and evening rush hours it is obvious that Regents Road needs to provide North/South traffic access through South UC as well as that presently provided by Genesee.

Annal Summary
7/28/01

Anne Lowry, Senior Planner:

I request that my following guest editorial in the "Golden Triangle News" be included with my remarks on the DEIR. Thanks.

Dear Editor:

It was a surprise to all that the Vons shopping center in South University City had recently been proposed by the City as a "Neighborhood Village Center." I think we should ask the City to reconsider because that designation would increase density at this shopping area by a minimum of eighteen dwelling units per acre. (source: Strategic Framework, Alternative Growth Strategies, Density Distribution).

Most of us love the Vons Shopping center (also known as University Square). Right now It is in effect a mixed use "Neighborhood Village Center." An enhancement upgrade already occurred when Vons and Rite Aid completely remodeled their interiors,

There is a large area which the City owns off the eastern part of Governor Drive across Governor from The First Baptist Church. To satisfy the City's need for more residential units this site among others can be checked for feasibility and appropriate densities.

South University City has done its part to increase density already. Plans for University City Village have been approved by the UCPG and passed by the City to more than double its density.

Another related issue is the intersection of Governor and Genesee, which is next to the Vons Shopping Center. At the University City Planning Group meeting in June many University City residents felt that something should be done about excessive traffic at that intersection. Some people encouraged the early construction of the proposed Regents Road Bridge to share the traffic from North University City. Some spoke against the widening of South Genesee Avenue.

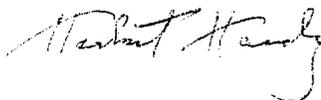
The 1997 San Diego City Street Design Manual had specified a design speed of 55 miles per hour for a six lane major or primary arterial, which has been the City's plan for South Genesee. The speed limit on South Genesee now is 45 miles per hour. Widening with a road designed for 55 miles per hour must be unacceptable to us, especially for the safety of the many school children and senior citizens who frequently use the area.

At the last UCPG meeting Myra Goodwin, President of Regency Villas large senior complex which is close to the Genesee-Governor intersection, spoke of injuries to seniors while crossing Genesee to do their shopping at the Vons Shopping Center. She emphasized the sheer madness of increasing density in this Vons Shopping Center area. She stressed the need for a pedestrian friendly intersection nearby.

I feel we should look for sites other than the Vons Shopping Center for an increase in residential units, while accepting the idea that it could include a small community office location.

The excessive traffic on South Genesee at the Genesee-Governor intersection can be alleviated by construction of the Regents Road Bridge. A pedestrian friendly intersection, not the widening of Genesee, should be our goal.

Herbert Handy, University City Planning Group Residential Board Member



Anne Lowry, Senior Planner
Environmental Analysis Section
City Development Services Department
1222 First Avenue, MS 501
San Diego, CA 92101

Dear Anne:

I appreciate the time and effort which has gone into the plan to accommodate natural growth and inflow of population to San Diego by utilizing the "City of Villages" concepts.

On an idealistic level the Strategic Element Framework contains many good ideas. We will seek to implement the suggested goals. I would appreciate your response to my comments, and will be working with the City and the University City Planning Group toward a more responsible approach to South University City problems.

There are some bothersome assumptions being made in the draft environmental Impact Report. First, the population increase projected by Sandag is for the County as a whole, not the City. This has led to overestimation of the problem.

Second, we seem to assume that numerical targets and growth accommodation are suitable goals to achieve. Sensible density limits, transit, and traffic patterns compatible with planned "Villages" should first be considered. Scott Peters has suggested that we look at transit and street design first.

Overall, the scope and content of the DEIR appear adequate, but I take University City as an example of how problems can arise when we superimpose the new plan on the current Community Plan.

Refusal to address the Regents Road Bridge as an expedient way to share the traffic with South Genesee Avenue from excessive residential density to the west of the Coste Verde shopping area means that the traffic pattern now existing will sabotage all your well meaning efforts toward a well balanced South University.

The recent designation of the South University City Vons shopping center as a "Neighborhood Village Center" illustrates how mistakes can be made. No consideration was given to the need for the Regents Road Bridge before any expansion takes place in South UC. No consideration was given for the fact that there is no room in the Vons area for residential expansion. Worst of all, no consideration was given to the Genesee/Governor intersection, where the safety of children and seniors must take priority before any density increases are proposed.

Bill Levin, chief planner for University City, states in the July 25 "Golden Triangle News" that residences will be given assurances before building that the new development would not "overload the communities" with traffic. He goes on to say "if we get a lot of input that this is a bad idea or that if there is another area that would be better, the map could be changed."

The designation of the South University City Vons shopping center as a "Neighborhood Village Center" is an illustration of what Mr. Levin is talking about. No consideration was given to the need for the Regents Road Bridge to share the traffic with Genesee, or the safety considerations in the area of Governor/Genesee intersection if more density is added. People now take their lives in their hands when they cross the Genesee and Governor intersection, or when they exit the Vons shopping center onto Governor Drive during commute hours.

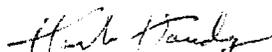
There is a more suitable area at the intersection of Governor and Regents Road. On the northwest corner of Governor and Regents there is a small shopping area which could be considered. In addition, there is an area across Governor Drive from the First Baptist Church, which Bill Levin mentioned in Tanya Kurland's article in the July 25 "Golden Triangle News."

I ask the City to reconsider the recent designation of the Vons Shopping Center as a "Neighborhood Village Center." Please read the comments of Bill Levin and my recent Guest editorial in the July 25 "Golden Triangle News." I add the text of my editorial below.

We in South University City want the single residential nature of our community to be preserved. North University City has in effect been assigned as the area for high density in University City.

Thank you for your consideration of this general outline regarding the general adequacy of the DEIR for scope and content. At the same time it is important for us to question our assumptions and concentrate on density limits instead of numerical targets and growth accommodation.

Respectfully, Herb Handy, UCPG residential Board Member



Anne Lowry, Senior Planner
Environmental Analysis Section
City Development Services Department
1222 First Avenue, MS 501
San Diego, CA 92101

Dear Ms. Lowry:

Thank you for formalizing my objections to the Vons Shopping Center designation as part of my comments on the draft environmental impact report. As Senior Planner, you can be of special help to us in your view of what can be done regarding densities proposed for the Villages, which appear increasingly the main objections, citywide.

Based on Mr. Lattimer's figures in his memo to the Board, the UCPG now appears to reject the "Villages" concept and the current City's Strategic Framework Plan as it applies to University City.

North University City is 95% built out and we have unacceptable street design to accommodate the commercial or residential development that is there now. In his memo to the UCPG Mr. Lattimer says that University City has an incomplete circulation system. I would like to add that the high density west of Coste Verde has no way to drain south. The proposed Regents Road Bridge may be needed earlier than 2005 when construction is supposed to begin.

In our vision for the future I feel South University City wants to preserve its unique character and environment, which is single family residential. However, In using the "corridor concept" the strategic framework would have us residentially build to a density of 30 to 45 dwelling units per acre within and outside proposed "Neighborhood Village Centers," according to Mr. Lattimer's numbers. I submit this would destroy the "unique character and environment" of South UC.

The limits we would accept in South UC might be up to 12 dwelling units per acre along the Governor corridor. This should be made very clear to the City and Planning Department. From experience we know that arbitrary high multifamily rezoning can lead to higher crime and a lower quality of life. We in South University City would prefer to leave the high densities to North University City in areas west of Coste Verde, which seem to be designed to accept higher densities to help UCSD in its future housing needs.

Business centers such as the two shopping centers in South UC could add a story or two, as appropriate, and any density limit suggested would probably envision that Village Centers might be treated separately according to size, traffic constraints, age, condition, and state of renovation in the Center.

For example, in the Vons Center Rite Aide, Vons, and the Washington Mutual Bank have just been recently remodeled. Also, with relatively small size, and with safety concerns for children and senior citizens at a nearby intersection, its recent selection for Village Center was a poor choice for residential increase.

I would like to include these remarks in my final submission of comments on the DEIR. I request this letter be made part of my comments on the DEIR.

SUGGESTIONS FOR CONSTRUCTIVE CHANGE

A needed change in the way the Strategic Framework is written would be the establishment of local panels to impose sensible density limits on the "Villages" A panel with a mix of half City experts and half local interests would work. We should not be blinded by market ideology. In spite of the fact that there is more demand for housing than supply in San Diego, restraints on density must order our residential expansion.

Please consider the idea of appointing panels for each Village, which would be required to make recommendations to the local Planning Board on projects within each Village. Its purpose would be to establish local criteria for density following an investigation of the factors involved. The developer would be required to present only the density aspect of his proposed development in a brief summary before the panel.

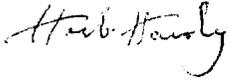
For example, the Chair of the panel would be a local Planning Group Chair. There would be two City experts from Development Services (Environmental) department. There would be two City experts from the City transportation department. The City would serve to supply these specialists in the proposed area of the Village center, according to the requisite size and time of the project. Larger projects might require more than one meeting of the panel. .

There would be Planning Group representatives who would equally represent business and residential interests in the Planning Group District the Village was in. The size of the project would be a standard for forming the panel in a timely manner.

The establishment of sensible density limits would be the mandatory objective of the whole panel. Planning Boards throughout the City would have greater say in the quality of life in their communities.

Let me know your thinking on this and we can proceed from there. I am sending a copy of this to honorable Mayor Murphy, Scott Peters, Mike Williams, Bill Levin, Chair Alice Tanya, and all UCPG executive Board members for their serious consideration. The panel would give more control to the local community through the use of City structures now in place, the Community Planning Groups.

Herb Handy, UCPG Residential Executive Representative, UCPG, District 1

A handwritten signature in cursive script that reads "Herb Handy".

JUL-26-2001 19:08

GIBBS FLYING SERVICE

P.01

KEARNY MESA PLANNING GROUP

c/o Gibbs Flying Service, Inc.
8906 Aero Drive
San Diego, CA 92123
858-277-0162 FAX 858-277-0854

July 23, 2001

VIA FAX 619-533-5951, ORIGINAL VIA MAIL

Anne Lowry
Environmental Analysis Section (EAS)
City Development Services Department
1222 First Street, MS 501
San Diego, CA 92101

Re: LDR No. 40-1027 - Notice of Preparation of a Draft Environmental Impact Report
Strategic Framework Element of the City's Progress Guide and General Plan

Dear Ms. Lowry,

The Kearny Mesa Planning Group has reviewed the subject Notice of Preparation of the DEIR and Scope of Work Memorandum from Lawrence Monserrate. The group has discussed the Strategic Framework Element proposal in depth including the use of a Programmatic EIR. The Scope of Work issues are well thought out, complete and have our concurrence. The following comments and questions are a summation of the Kearny Mesa Planning Group's members additional comments to the Notice of Preparation document.

1. The Strategic Framework Element focuses on providing the strategy and implementation requirements to accommodate the future growth of the City's residential population through 2020. There will need to be a similar strategy to provide for employment opportunities for these new residents. Other than a generic "provide for intensification of industrial land" we saw no real focus on quantifying the requirement for or providing for new employment (industrial) sites. It is our understanding that vacant industrial land or existing sites with redevelopment potential are just as scarce as vacant residential sites. The Draft EIR should include an analysis of the needed employment land requirements to allow for job creation for these new residents that the Strategic Framework Element is accommodating. Both future needs, housing and jobs, are linked and cannot be considered separately.
2. The Strategic Framework Element supports higher density uses within "Villages" so that future residential units and jobs can be in close proximity. We agree with the concept, however detailed "constraint conditions" must be developed so that future residential units are not placed in close proximity to industrial uses that are incompatible. Specifically the Strategic Framework Element provides for high density residential uses as an "option" in the primarily industrial areas of Kearny Mesa, Mira Mesa and Sorrento Valley. Many of the existing industrial sites, especially those that actually manufacture hard goods in factory type settings instead of intellectual property or services in multi-tenant office settings, could be incompatible to adjacent residential units due to extended work hours, noise, chemical uses,

JUL-26-2001 19:09

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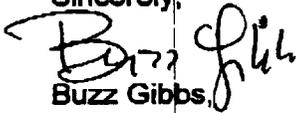
P.03

Kearny Mesa Planning Group
July 23, 2001
Page 3

6. One of the initial guidelines of the Strategic Framework Element was the prohibition of any sort of density upgrades or redevelopment of single family areas. This may be politically correct but severely limits the potential of the Village concept. There are numerous older, rundown, non-owner occupied areas that could benefit from a planned redevelopment to higher density owner occupied townhome or other residential product. Is there sufficient non-single family land that potentially could be redeveloped in the time frame selected to accommodate these new residents? From the initial selected sites for Urban Villages in Kearny Mesa (18401, 18402, 18403 and 18404) only a portion of one, in our opinion, Spectrum, may develop into a "Village", mainly because residential uses are planned there now. The remainder of Spectrum, the eastern portion, is very new office and industrial buildings and most likely will not be redeveloped for forty years. The McGrath Center and Family Fun Center (18401), K-Mart and Dixieline (18402) and Albertsons Center (18403) all appear to be viable business areas with little redevelopment potential over the next twenty years. If these four selected "Villages" are typical of the Citywide selection process, the "Village" potential may be grossly overstated. The EIR should analyze the real economic redevelopment potential of the initially selected properties over the defined time period to assure that the goals of the Strategic Framework Element can really be met.

Thank you very much for the opportunity to comment on the Preparation of the Draft EIR for the Strategic Framework Element and your consideration of our views.

Sincerely,


Buzz Gibbs
Chairman

Anne Lowry, EAS
City Development Services Department
1222 First Avenue, MS 501
San Diego, CA 92101.

Ms. Lowry:

I have been asked by the HOPE's Coalition to respond to the proposed Draft EIR for the Strategic Framework—a task which is new and difficult for me.

The reference in the proposed Strategic Framework to the concept of “a City of Villages” strikes a very positive note with us, however, because of the well-known line made famous by the Children's Defense Fund: “It takes a village to raise a child.”

From the perspective of what it takes to establish villages capable of raising our children, we would offer the following in response to the Draft EIR.

1. Land Use:
How will we begin to focus growth on the value of increasing the “number of eyes on the street” as a key to personal safety and capacity of a village to protect its children?
How do we plan to provide housing for low-, very low and extremely low income families?
Is an Inclusionary Zoning Ordinance an absolute necessity to assure diversity of incomes and ethnic groups in the villages within the City?
2. Public Services:
How will school sites and designs be controlled to assure that existing housing supply is not adversely affected—especially low- and very-low income housing units?
Can we incorporate in this plan assurances that public facilities are designed for multi-purpose uses to provide maximum efficiencies in use of space? (For example, school buildings and campuses open to as wide an array of uses as possible: public meetings, police sub-stations/community service centers and recreational uses.)
3. Utilities:
How can we encourage a broader program of reclamation of renewal resources and recycling as a key element of responsible land and resource use in creating a livable village?
How do we encourage village-based solar and other energy generation cooperative projects?
4. Transportation:
Does Transit Oriented Development require higher densities to ensure more “eyes on the street” and a positive reorientation of our definition of public safety?
How can provision be made for flexible complements to fixed rail and buses to provide shuttles and electric carts to move non-walkers and reduce the need for automobiles?
5. Water:
Do we need to plan for localized sources of our own water supply?

Thank you for your attention.

Richard Lawrence
Richard Lawrence

1951 47th Street
San Diego, CA 92102.

cc. *Councilor Donna Frye*
FAX: 236-6529

Mt. Hope/Helix Heights/Residents Assoc.
C/O 509-41st. St.
San Diego, Ca. 92102

25 July, 2,001

To:

Ms. Ann Lowery, Analyst
Development Services Dept.
City of San Diego
1222 First Ave.
San Diego, Ca. 92101

Dear Ms. Lowery:

Subject: Strategic Framework Element of The City's Progress
Guide and General Plan, LDR No. 40-1027

Notice of Preparation Of A Draft Environmental Impact
Report (E.I.R.)

The following Comments, questions, Recommendations, are made on
the above stated subject, and on General Population Growth Areas,
Neighborhoods, that are not being considered for "Villages" that
may have the same "like" issues.

Page 1 of Cover Letter, 1st. paragraph, first sentence:

Add to sentence, increase of noise, and traffic noise, and
impact financial resources.

Strategic Framework Element

Page 1: 3rd paragraph, first sentence, 2nd line:

Add to sentence, after "civic/education" Parks, Recreation
Centers, Libraries, and other Public Facilities as needed.

Page 1: 3rd paragraph, last sentence, 2nd line:

The term "overlay" needs to be clarified, as to be done, in
development, to current zoning standards, or will it freeze
the land area cover by "overlay" until the Zoning is changed,
or amended. The parameters for "overlay" need to be clear,
on where it is applied, with the potential positive, and
negative impacts.

Page 2: 1st paragraph, at the bottom.

If a "Village Concept" can not improve a given area, after a
through analysis, it should not be done, or forced on any given
area.

Page 2: "Economic Prosperity" paragraph, 3rd line:

Need to add after "employment opportunities" insert paying living wages.

Page 2: "Infrastructure Facilites" paragraph, 3rd line:

reallocation of existing resources, is questioned, especially in the older neighborhoods, are behind in needed infrastructure, public facilites, parks, recreation centers, any consideration on transferring funds. that will delay even further into the unknown future, which would compound deficient above mention areas, is not acceptable.

Page 4: "Neighborhood Quality" paragraph:

School facilites need to be added to this paragraph.

Page 5: "Infrastructure" paragraph:

add to the end of paragraph, and there is no movement forward, until the funding sources are committed. and in place for implementation for needed items of the project phase.

Page 5: "Environmental Review Process" paragraph:

There needs to be a "Master Financial Plan, and identified funding sources, to go with Master E.I.R. and following projects, general plan, element, general plan, admentments, or specific plan. The Master Financial Plan, must be realistic in being done, and applied, and not allowed to escape for lack of action, or fortitude.

Memorandum, dated 4 June, 2,001:

Page 3 or 12: Item No. 5:

There needs to be a City wide Master Tree Plan Ordinance, that will emphasis the care, and preservation of existing trees, and if need to be removed, how will the removed trees be replaced., a long with types of tree that are to be allowed in the given neighborhoods.

Page 5 of 12: Item No. 3: "Storm Water Drainage":

Address the need, to complv with Calif. State Clean Water Act, for street storm water drains, on site storm water drains, or water run off from irrigations, on commercial, and industiral sites, in the older neighborhoods, that contribute to pollution problems, in Creeks, such as "Chollas Creek", which flow into San Diego Bay, or other water run off that flow into San Diego Bav. Mission Bay, or into the ocean. Funding sources need to identified, along with a time frame, for compliance with the Standards of Clean Water Act.

Page 7 of 12: "Water Quality" Item 4:

Refer to page 2, of this letter, responding to Page 5, Storm Water Drainage, item no. 3:

Page 8 of 12: "Air Quality"

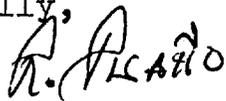
Need to address the air flow patterns, "breeze" on how development can block the air current pattern, especially the effect, in the summer, when residents keep open windows for cooling effect, which contributes to saving electrical energy from the operation of fans, or air conditioners.

Page 9 of 12: "Noise"

In the older neighborhoods of the City, where the older homes do not have noise mitigation in their construction, and are now impacted by traffic noise, from street, freeways, commercial centers, industrial sites, how will this be mitigated, with the increase population growth?

Who says, that the absorption of population growth, is the responsibility of existing neighborhoods, which are now deficient as to funds, for infrastructure, public facilities, schools, parks, recreation centers, and health treatment centers, resulting in being unknown years behind?

Respectfully,



Reynaldo PISAÑO, Chrm.

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-4082
(916) 657-5390 - Fax



July 5, 2001

Anne Lowry
City of San Diego
1222 First Avenue, MS-501
San Diego, CA 92101

RE: SCH# 2001061069 – Strategic Framework Element

Dear Ms. Lowry:

The Native American Heritage Commission has reviewed the above mentioned NOP. To adequately assess the project-related impact on archaeological resources, the Commission recommends the following actions be required:

- ✓ Contact the appropriate Information Center for a records search. The record search will determine:
 - Whether a part or all of the project area has been previously surveyed for cultural resources.
 - Whether any known cultural resources have already been recorded on or adjacent to the project area.
 - Whether the probability is low, moderate, or high that cultural resources are located within the project area.
 - Whether a survey is required to determine whether previously unrecorded cultural resources are present.
- ✓ If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - The report containing site significance and mitigation measures should be submitted immediately to the planning department.
 - The site forms and final written report should be submitted within 3 months after work has been completed to the Information Center.
- ✓ Contact the Native American Heritage Commission for:
 - A Sacred Lands File Check.
 - A list of appropriate Native American Contacts for consultation concerning the project site and assist in the mitigation measures.
- ✓ Provisions for accidental discovery of archeological resources:
 - Lack of surface evidence of archeological resources does not preclude the existence of archeological resources. Lead agencies should include provisions for accidentally discovered archeological resources during construction per California Environmental Quality Act (CEQA) §15064.5 (f).
- ✓ Provisions for discovery of Native American human remains
 - Health and Safety Code §7050.5, CEQA §15064.5 (e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery and should be included in all environmental documents.

If you have any questions, please contact me at (916) 653-4040.

Sincerely,

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

Rob Wood
Associate Governmental Program Analyst

CC: State Clearinghouse



Port of San Diego

and Lindbergh Field Air Terminal

(619) 686-6200 • P.O. Box 120488, San Diego, California 92112-0488
www.portofsandiego.org

July 5, 2001

Anne Lowry
Environmental Analysis Section (EAS)
City Development Services Department
1222 First Avenue MS 501
San Diego, CA 92101

Subject: NOP OF A DEIR FOR "A CITY OF VILLAGES"

Dear Ms. Lowry,

The Port of San Diego received the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for "A City of Villages." The Port District maintains all land-use authority over the San Diego Bay Tidelands as established in the San Diego Unified Port District Act. The San Diego Bay Tidelands shall remain under the Port's jurisdiction in connection with the proposed project. We look forward to reviewing the "City of Villages" DEIR when it is published for public review. Please send a copy of the DEIR to the attention of Melissa Mailander, Environmental Review Coordinator.

Sincerely,

A handwritten signature in black ink that reads "Bill Chopyk".

Bill Chopyk
Manager, Land Use Planning
Port of San Diego

cc: Melissa Mailander, UPD
Andrea Nelson

Anne Lowry
City of San Diego
Development Services Department, EAS
1222 First Avenue MS 501
San Diego, Ca 92101

July 12, 2001

RE: NOP for Strategic Framework Element DEIR

Dear Ms. Lowry:

I would like to comment on the nature and scope of the less obvious studies which I believe are necessary for your DEIR in order to legitimately analyze the Strategic Framework Element project as outlined in your June 12 NOP. The remarks are broken up into topics aligned with some of the Initial Study issue areas.

Land Use

The redensification of major portions of the City, especially the linear corridors would have profound impacts on the fabric of the existing communities. The demographics of who would live in the existing community vs the high rise "villages" needs to be stated. Then the data needs to be examined for a "fit" with the population you are striving to "accommodate." That data also needs to filter down into the examination of impacts on public services, like schools and transit-users.

Mixed use is a technique which needs to be demonstrated as viable in the proposed circumstances. A study of other jurisdictions which have attempted this scale of policy initiative needs to be presented, disclosing the advantages and pitfalls of creating convenient vs un-rentable commercial space. What are the consequences of attempting to balance population and employment within each Village and no significant employers step in? Demonstrate by example that the concept is viable at this scale and distribution.

The impacts on adjacent jurisdictions will need to be analyzed in order to forecast the prospects of spill-over effects of populations seeking to live where there is less traffic delay and land use intensity.

The alternatives examined need to include not accommodating the allocated population in-migration. Also focusing the intensification on new nodes of developable land rather than relying so heavily on the linear corridors. This might include an examination of lifting Prop A limitations in the north city, by a vote of the public.

Aesthetics

The village scheme of the redevelopment program needs to account for the period of +/-20 years of blighted conditions which will evolve during the time when "owner preference" to redevelop their land, lags behind due to slow markets or other personal financial reasons. During the lag, how much of the property maintenance will be deferred and the aesthetics of the community suffer?

The other aesthetic/land use/public service issue is the deficiency of recreational

opportunities. The City can't meet current park space to population ratios. How will they be met in the new order?

Public Services

Infrastructure costs are one of the keys to the success or failure of the intensification proposed. A full disclosure of the up-grade costs must be delivered with the plan and not deferred to a project-by-project analysis as implied in the "economic prosperity" discussion of the Project Description.

Facility costs examined should include sewer, water, fire, schools, roads, transit drainage, police, fire, EMS, libraries, hospitals, energy. Someone should even think about where the sand, gravel and rocks will come from.

The costs in human lives could use some discussion in order to disclose how imperative it will be to maintain adequate levels of certain public safety services, including the mobility of emergency services.

The fiscal/economic impact studies should disclose how much the public will have to hold in reserve to maintain their existing quality of public services for existing residents vs what it will cost them to subsidize accommodating new neighbors.

Traffic

The second most critical aspect of the feasibility of successfully implementing the Strategic Framework Element is the prospects of getting Southern Californians out of their cars and into transit. The analysis needs to ratify that this is possible by citing example and legitimate trends that fit the situations anticipated.

The type and cost of the transit systems needed to make the plan work needs to be presented. What do the current origin/destination studies show for the populations in the affected corridors? Can a transit system be devised to get them to work? Or are the residents primarily expected to stay in their niche?

In conclusion, the sum of all of the financial costs of implementing the plan needs to be stated. Perhaps a massive number is untenable as a measure. The analysis should state it in terms of comparison to what % of the municipal budgets are devoted now to these expenses vs what it would be under the proposed plan. Perhaps the costs could be stated in terms of the % of the gross domestic product or some such yardstick.

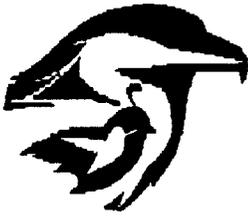
Many difficult issues need to be examined and disclosed by your studies before an informed decision can be made and the overriding findings considered.

Thank you for the opportunity to comment.

Sincerely,



Paul Ross
1015 Archer Street
San Diego, CA 92109



SAN DIEGO AUDUBON SOCIETY
2321 Morena Boulevard, Suite D • San Diego CA 92110 • 619/275-0557

July 30, 2001

VIA FACSIMILE (619-446-5499)

Ms. Anne Lowry
Environmental Analysis Section
City of San Diego
1222 First Avenue, MS 501
San Diego, California 92101

Dear Ms Lowry:

Subject: NOP for Strategic Framework Plan

The Proposed Project includes many features that the San Diego Audubon Society strongly supports. We particularly support that land use plans minimize urban sprawl, protect open space, and expand opportunities for residents to satisfy their logistic needs within their neighborhoods without using automobiles. We also strongly support that the pursuit of sustainability and the conservation of natural resources be inherent elements in the planning process. The Proposed Project appears to address these issues. However, we have concerns about how well these issues will be implemented, whether the plan will be inherently growth inducing, and what compromises in implementation may weaken the protection of natural resources to unacceptable levels. We also are concerned with how the environmental impacts will be addressed in the NOP considering the uncertainty about how implementation will occur and how well it will be funded. We urge that the EIR specifically address the following issues.

IS THIS PLAN INHERENTLY GROWTH INDUCING? Depending on implementation, the Proposed Plan could allow the City to better accommodate natural growth, or it could be an element in a growth promotion plan. Since the latter is quite possible, the EIR should address the cumulative impacts of the growth that can reasonably be assumed will be induced by the Proposed Project. However we strongly urge that the EIR also identify and evaluate mitigation measures that would prevent the Project from inducing growth.

WILL THE CITY CONTINUE TO ACCOMMODATE SPRAWL AS IT ALSO IMPLEMENTS THE WISER GROWTH PATTERN OF THE PROPOSED PLAN IN SOME REGIONS? If the City implements the City of Villages concept and discourages sprawl type development, the environmental impacts of the Proposed Project will be minimized. Unfortunately, there is a reasonable possibility that the City will continue to allow and facilitate sprawl type development while simultaneously implementing the City of Villages concepts in certain areas. This situation would eliminate much of the anticipated benefits of the City of Villages concept, leaving only its disadvantages. It is important that the EIR identify the impacts of both of these alternatives and identify the cumulative impacts that would occur from both types of development together. These impacts would especially include loss of open space, wildlife habitat, watershed values, water quality, air quality, traffic, recreation, and quality of life.

WILL THE CITY PROVIDE INFRASTRUCTURE UP-FRONT FOR THE MORE INTENSE DEVELOPMENT IN THE VILLAGES? The environmental impact, the effectiveness, and the popularity of the City of Villages concept will depend heavily on whether the essential infrastructure is provided before, during, or after the intensification occurs. The EIR should address that the impact could vary broadly as a function of the adequacy and the timing of the infrastructure. Easy examples are that water pollution will be worse if intensification occurs before stormdrains are upgraded to prevent pollution, and traffic will be worse if intensification occurs before mass transit and resident-serving services (stores, cleaners, etc.). Appropriate timing could be presented as a mitigation measure to minimize impacts.

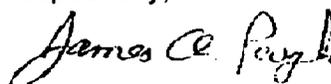
WILL RESIDENTS ACTUALLY CONCENTRATE THEIR ACTIVITIES WITHIN THEIR VILLAGE? The impacts of intensification will be considerably less if residents use the jobs, stores, services, parks, etc. that are within walking distance. Timing of the residential development with the other amenities could make a large difference. The EIR should address this range of likely impacts.

WILL THE CITY CONTINUE TO PROVIDE THE SPRAWL-ORIENTED INFRASTRUCTURE THAT TENDS TO UNDERMINE THE VILLAGE CONCEPT? If the City continues to provide expensive infrastructure and services to sprawl developments, like Rancho Encantata, there may well not be financial resources to adequately provide for the needs of the City of Villages developments. We urge the EIR to identify and evaluate this potential resource allocation conflict.

WILL THE CITY PROTECT NATURAL RESOURCES AS COMMUNITY ASSETS FOR THE VILLAGES? Some recent efforts to intensify development have come at the expense of canyons, floodplains, steams, and other areas with high environmental, scenic, and passive recreation value. The loss of these natural resources will reduce the livability and attractiveness of the community as well as water quality, flood security, and wildlife support value. These resources need not be MHPA or other legally protected resources to be important to a community. The EIR should define what measures will be taken to better protect these community resources from the increased development pressures of the Project and identify the environmental impacts if they are not well protected.

If there are questions on these issues please contact the undersigned at 619-224-4591 or peugh@home.com.

Respectfully,



James A. Peugh
Coastal and Wetlands Conservation Chair



San Diego County Archaeological Society

Environmental Review Committee

23 June 2001

To: Ms. Anne Lowry, Associate Planner
Development Services Department
City of San Diego
1222 First Avenue, Mail Station 501
San Diego, California 92101

Subject: Notice of Preparation of a Draft Environmental Impact Report
Strategic Framework Element of the City's Progress Guide and General Plan

Dear Ms. Lowry:

Thank you for the subject Notice of Preparation for the subject project, which was received by this Society last month.

We are pleased that cultural resources have been included in the list of subject areas to be addressed in the DEIR. However, pages 10-11 of the memorandum included in the NOP package we received are deficient in their treatment of cultural resources. The paragraph at the top of page 11 addresses only the possibility of impacts to "older" and historic structures. Historic resources, in the context of CEQA, include prehistoric and historic archaeological resources and historic landscapes. Significant resources of these types are likely to remain in already-developed portions of the City. The scope of the present project needs be expanded to encompass all types of cultural resources.

In order to permit us to review the cultural resources aspects of the project, please include us in the distribution of the DEIR when it becomes available for public review. Also, in order to facilitate our review, we would appreciate being provided with one copy of the cultural resources technical report(s) along with the DEIR.

SDCAS appreciates being included in the environmental review process for this important project.

Sincerely,


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

cc: SDCAS President
File

San Diego
REGIONAL
ENERGY
OFFICE

August 23, 2001

Anne Lowry
City of San Diego- Developmental Services Dept.
202 C Street
San Diego, CA 92101-3864

Dear Ms. Lowry:

As the City of San Diego prepares the Draft Environmental Impact Report for the Strategic Framework Element of the City's Progress Guide and General Plan, the San Diego Regional Energy Office (SDREO) is pleased to submit comments. We appreciate the opportunity to be part of the process to update the City's General Plan.

The San Diego Regional Energy Office is a private, non-profit corporation that functions in three main areas; energy policy and planning , managing public-interest energy programs and providing vital energy information to the region. SDREO is currently conducting the Regional Infrastructure Study and is working with local jurisdictions in their General Plan updates. Attached is the San Diego Regional Energy Strategy 2001 as was adopted by SANDAG in June 2001, as the interim energy strategy to provide a regional planning framework for a secure energy future.

As correctly stated in the proposal, adequate infrastructure and public facilities are the key for the entire proposed growth strategy and it has significant environmental effects. In order to represent a truly comprehensive approach to growth and development we believe it is important to include energy issues in the scope of work. SDREO recommends that in Section II. Environmental Issues, energy be considered a major issue.

Issues to consider:

- Will the Proposed Strategic Framework Element result in an impact upon the quality or quantity of power?
- Will the proposal identify the need for increased infrastructure to accommodate demand?

- Will the proposal challenge energy sufficiency consistent with a high degree of environmental quality?

SDREO is available to participate further as a stakeholder in the General Plan process. Please let us know how we may be involved and what we can do next.

Sincerely,



Kurt Kammerer
Executive Director
San Diego Regional Energy Office

cc. Paul Fiske, Gail Goldberg



The San Diego Regional Energy Strategy 2001

-An Interim Strategy to Promote Sound Energy Alternatives and a Regional Planning Framework for a More Secure Energy Future for the San Diego Region-

Background

The San Diego region is projected to spend approximately \$5 billion more in 2001 for electricity and natural gas than it spent in 1999. While electricity demand in San Diego increased by over 29% between 1990 and 2000, the growth in supply has lagged significantly with a 5% growth in generation and a 14% growth in transmission.

Energy is truly the lifeblood of the region's economy. When energy is plentiful and inexpensive, economies thrive and prosper, but shortages and dysfunctional markets can drive significant economic dislocation and loss of jobs.

Much has changed since the region developed and adopted the last Regional Energy Plan in the early 1990's. At that time, California and San Diego enjoyed an excess of energy supply, relatively low prices, high reliability and a predictable regulatory environment. The state's attempt to restructure the electric industry with the enactment of AB 1890 in 1998, triggering a series of regulatory and market changes that have resulted in the current energy crisis.

Other western states are facing similar shortages, resulting in a scarcity of resources to import. So San Diego must strive to balance:

- Energy requirements of the region
- Environmental impacts of in-area generation and energy consumption
- Consequences of over reliance on import of out of state generation
- Increased supply versus decreased consumption
- Increased reliance on natural gas versus diversifying through the use of alternatives, such as renewables

Regional Energy Strategy Goal

The interim San Diego Regional Energy Strategy (RES) is a short-term, interim strategy that provides a sound planning process and a framework that can achieve consensus about how to meet our region's energy needs over the next two decades and beyond. It will establish the foundation for the update of the longer-term Regional Energy Strategy (RES) that will be completed by early 2002. The Strategy will outline a series of short, medium and long-term measures necessary to secure San Diego's future prosperity through cost effective measures that ensure energy sufficiency consistent with our high degree of environmental quality.

Objectives

The objectives of the RES support achieving the overall desired goal of achieving energy sufficiency. These objectives are as follows:

- To achieve energy security and minimize the negative impacts of shortages on consumers, businesses, governments and the economy now and in the future.
- To increase the diversity of the region's energy resources, particularly high-efficiency combined heat and power distributed generation and renewable resources.

- To significantly increase energy efficiency in the region through both immediate and sustained energy efficiency measures.
- To minimize the adverse environmental impacts of the region's energy use.
- To increase public awareness of energy-related issues in the region so consumers can play a more active role in future energy planning and decision-making.

Guiding Principles

1. The region's energy needs should be met with a diverse portfolio of resources.
2. The region should develop indigenous resources to the greatest extent possible to protect from over reliance on resources from outside the region.
3. Improving energy efficiency and reducing peak demand can help to reduce dependence on imported energy and is generally less expensive and more expedient than building new power supply infrastructure.
4. The cost effectiveness of all alternatives should be evaluated and when evaluating options, all costs and impacts should be considered.
5. Efficient energy supply, distribution, and use should be factored into all facets of land-use planning and development decisions.
6. Local public agencies should take a lead role in implementing cost-effective energy efficiency and energy supply measures in public facilities.
7. Public awareness and education is an important mechanism to empower consumer choice and widespread implementation of energy efficiency.

Proposed Interim Energy Strategies

Legislative and Regulatory

1. Adopt a set of legislative and regulatory Guiding Principles that protect the interests of the region.
2. Engage in the appropriate legislative and regulatory processes to ensure the interests of the region are met as outlined in the Guiding Principles and the Regional Energy Strategy.

Supply: Electricity

3. A high priority should be placed on the deployment of small-scale, environmentally friendly self-generation technology applications, in particular high-efficiency combined heat and power and renewables that can be placed on line as soon as possible.
4. The regional and state transmission infrastructure should be upgraded to eliminate constraints in the system that limit the development of robust markets and distort market behavior like the proposed Valley-Rainbow Transmission and expanded transmission capability to Baja, California.
5. Strongly encourage owners of existing power plants to expedite repowering (e.g., South Bay and Encina Power Plants) to increase output of in-region generation capacity, reduce their environmental impacts, and create emission offsets to provide the means to develop other generation projects throughout the region.
6. Local public agencies should evaluate the feasibility and benefit of public power purchasing strategies; in particular, partnerships with generation developers to overcome barriers to development, aggregation of consumers and securing long-term contracts for reasonably priced electricity and natural gas.

7. Support the building of new power plants throughout the region that highest levels of emission control and other mitigation for environmental impacts.
8. Evaluate the use and cost effectiveness of technologies to increase the efficiency and utilization of existing transmission and distribution infrastructure.

Supply: Natural Gas

9. Expand pipeline capacity into the region to achieve and maintain adequate supply margins to eliminate the possibility of gas curtailments.
10. Evaluate the potential benefits of natural gas storage and liquefied natural gas infrastructure to insulate the region from future supply disruptions.

Demand: Electricity and Natural Gas

11. Place a high priority on the retrofit of all existing buildings to the current standards of efficiency as called for in California Title 24 (Energy Code).
12. Place a high priority on encouraging the purchase energy efficiency appliances and to permanently remove older, inefficient appliances from service (rather than move them to alternative uses).
13. Place a high priority on efficient site and building design and construction to ensure that all new buildings incorporate the highest levels of efficiency as practical.
14. Place a high priority on the deployment of interval (real-time) meters to allow consumers to modify usage in response to market conditions.
15. Adopt policies that support the use of energy efficient practices, such as casual dress code in all business environments.
16. Place a high priority on the development of programs to reduce the demand of natural gas, such as the use of high-efficiency on-demand water heating systems, and the deployment of solar hot water heating for domestic hot water and pool heating.
17. Place a high priority on incorporating into General Plans land-use plans that reduce urban heat island effects and reduce energy consumption, such as optimizing building orientations, increased urban vegetation, narrower street widths, light-colored surfaces.

Economic Development and Other

18. The region should place a high priority on fostering the development of energy technologies, products and services as an important job creating and economic development opportunity.
19. Public agencies should take the lead on developing and implementing aggressive energy action plans that encourage the support of the goals and objectives of the RES throughout their respective communities.
20. Pursue an aggressive education and outreach program to better inform consumers and business on the benefits of more efficient energy use.

For More Information

For more information on the RES, please see the SDREO website at <http://www.sdenergy.org>, email at sdreo@sdenergy.org or call (619) 595-5630.



San Dieguito River Valley
Regional Open Space Park
18372 Sycamore Creek Road
Escondido, CA 92025
(858) 674-2270 Fax (858) 674-2280
www.sdrp.org

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Citizens Advisory Committee

Dick Bobertz
Executive Director

July 26, 2001

Ms. Anne Lowry
Environmental Analysis Section
City Development Services Dept.
1222 First Ave.
San Diego, CA 92101

**Subject: Notice of Preparation of Draft EIR
Strategic Framework Element and Action Plan
City Progress Guide and General Plan Update**

Dear Ms. Lowry:

Thank you for providing the San Dieguito River Park Joint Powers Authority (JPA) staff the opportunity to review and comment on the Notice of Preparation (NOP) for the Strategic Framework Element Draft EIR. The city appears to be going in a positive direction by concentrating future growth along transportation corridors instead of continuing the urban sprawl pattern of development that has dominated in the past 20 years.

The Draft EIR should include a meaningful analysis using GIS analytical techniques that quantifies and maps how future population growth under this plan will be distributed geographically and at what intensities/densities and then compare those scenarios to the city's remaining open land. We would like to see the Draft EIR address the following issues with respect to the impact of the General Plan Update on conservation efforts and the natural environment:

- Evaluate the potential impact of future build-out scenarios on the MHPA. The EIR should include an analysis that overlays the currently preserved MSCP land and future preserve areas on the future land use plan. Will growth and intensity be guided away from the MHPA? Edge effects of future development on biological resources should also be analyzed.
- Address where natural resources will be affected by future growth and what policy improvements can be made to ensure the long-term ecological viability of a connected open space system.
- Identify ridgeline development and the impact of future growth resulting from build-out of the General Plan on the city's ridgelines.

Post-It® Fax Note 7671		Date 7/26/01	# of pages 2
To Anne Lowry	From [Signature]	Co.	
Co./Dept.		Phone #	
Phone #		Fax #	
Fax # 619-446-5499			

Ms. Lowry
City Development Services Dept.
Page 2

- Identify measures that the city will implement to minimize sedimentation into the city's rivers and streams and erosion from future development.
- Evaluate future growth and the 2020 transportation network on wildlife corridors in the region and identify areas of potential fragmentation or edge impacts. Ensure that future growth maintains and furthers connectivity of these corridors and linkages rather than fractures them.
- Evaluate the consistency of the General Plan with other adopted planning documents such as the San Dieguito River Park Concept Plan (1994). Will future build-out, transportation networks, and increased development intensities conflict with the policies of these plans? How does future growth in the city impact the ability to preserve sensitive lands remaining in the county?
- Evaluate the conservation level of San Pasqual Valley. How will the General Plan Update ensure the future preservation of this Agricultural Preserve and the viability of farming in the valley? What General Plan and zoning mechanisms will be put in place to ensure that the agriculture is preserved in perpetuity?
- Evaluate the demand of future growth on recreational resources in natural areas (e.g., trails, campsites, etc.). Identify and discuss what specific policies, programs, and funds the city will implement to provide adequate recreational resources and access to them.

Thank you again for the opportunity to provide our comments. We look forward to receiving the Draft EIR for review.

Sincerely,



Shawna C. Anderson, AICP
Environmental Planner

Serra Mesa Planning Group

2505 Mammoth Drive
San Diego, CA 92123

July 28, 2001

Lawrence Monserrate, Environmental Review Manager
Development Services Department
1222 First Avenue, Mail Station 501
San Diego, CA 92101

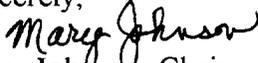
Dear Mr. Monserrate:

At this time, we cannot recommend supporting this Draft Environmental Impact Report for the Strategic Framework Element of the San Diego General Plan. The proposed areas of increased densities are inconsistent with our Community Plan's land use designations and are in conflict with our goals and objectives.

The Serra Mesa Planning Group reviewed the Draft Environmental Impact Report for the Strategic Framework on July 19, 2001. We will be having committee workshops to further analyze the effects on our community. We feel that we need more information from the Planning Department before we can support or recommend any increase in densities in our community.

We request that the city provide traffic and circulation studies for each of the proposed density changes. Following that, we would like to know if MTDB plan (Transit First) is coordinated with the Strategic Framework. Additionally, we need to know how the proposed changes impact local schools and community facilities. What companion plan will be put in place to accommodate these changes? What is the response and input provided by the SDUSD? What sources have been identified to fund the infrastructure changes? Please quantify the costs and sources for paying the associated costs. Before the Planning Group can support density increase at the new and existing neighborhood village centers, we need to know what formula will be used for retail based on the population. What methods and programs will be employed to keep services at the centers?

The Mayor and Planning Department have been making community presentations for many months on the value of the Strategic Framework as a guide for future growth. We feel, it could be a valuable guide and has many good ideas and merits if followed. But, the Planning Department has to be committed to it and have the ability to enforce it. Unfortunately, we are seeing a Planning Department that is recommending growth in our community but not requiring the amenities needed to keep our quality of life.

Sincerely,

Mary Johnson, Chair

cc: Mayor, Dick Murphy
Councilperson, Donna Frye

7/24/01

Melvin Shapiro
3930 Centre St. #103
San Diego, Ca 92103
619-294-9403 phone and fax
melsd@home.com

Comments on DEIR-Strategic Framework-LDR 40-1027

.Faxed to Anne Lowry

Comment on
Land use-#3-

"Will the proposal affect existing housing in the community, or create a demand for additional housing?"

- a) Cite state law on housing elements which is to provide for all economic segments of the population and state how this will be done. Particularly, state what housing will be available for families earning below 30% of median income. This is a HUD category called "extremely low income."
- b) List the number of multi-family housing units that have been and will be demolished by redevelopment, by the School District, by CALTRANS and by businesses, such as Coca-Cola. List the number that will be replaced. Cite the impact on rents—compare rents for replacement housing with rents on the demolished units. Compare rents to renter incomes. State the economic impact on the renter population. Is mitigation needed?
- c) List the number of rental units that have been converted to condominiums and tell the economic impact on the renters evicted. Mitigation?
- d) List the changes in rents and vacancy rates over the last 5 years. Cite the economic impact on the renter population. Forecast rents and economic impact for future years.
- e) The EIR should explain why the City issues demolition permits ministerially and has no policy on demolition or conversion. The Development Service Dept and the Planning Dept should explain why they advise against having a policy on demolition. These departments should explain why they approve of condominium conversions which reduce the supply of rental housing. Cite Municipal Code 129.0506 and explain how businesses, such as Coca-Cola, are allowed to evade this law.

nt by: CITY OF SAN DIEGO

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MELSHAPIRO

PAGE 05

f) The report should quote the Dept of Devel Service telling why its Negative Declarations say that demolitions do not affect existing housing and do not create a demand for additional housing. The Dept. should explain why its Neg Decs say that loss of housing has no cumulative effect. For comparison, the report should cite the EIRs issued by the School District which admit their demolitions have an unmitigated effect on the supply of housing.
g) the report should discuss rezoning residential land to industrial in the face of a housing shortage-example: Coca-Cola. The report should say why staff recommended approval of this rezoning.

Section 5-Transportation

Analyze the rent increase caused expulsion of lower wage employees from the inner city and how this affects traffic problems. How far do the employees have to travel to get to their job? Compare the cost of construction of mass transit compared to the cost of subsidizing workforce housing closer to employment centers.

Section 10-Noise-

Analyze noise impacts on housing in transportation corridors and how this is mitigated.

Alternatives:

"Reduced Residential and Employment Growth"-

The report should give the economic impacts of reducing employment growth and encouraging smaller families. I'm told that EIRs don't deal with economic impacts but it would be impossible to analyze this Alternative unless economic impacts are analyzed.

The cost of this alternative should be compared to the estimated \$2.5 billion cost for the City of Villages. The report should cite the sources of the necessary funding and the economic impact on these sources. See page 40 of "Draft Strategic Framework Element" dated July 10.

The report should compare quality of life under this Alternative to quality of life with City of Villages. The report should compare time frame of suggest that the report list Real Income (constant dollars) in the City over the last decade. The report should state how much the City has spent on economic development over the last decade and how this has affected Real Income. SANDAG has the figures on Real Income.

Staff should contact Californians for Population Stabilization-805-564-6626, e mail-caps@cap-s.org

Melvin Shapiro

DEPARTMENT OF FISH AND GAME

South Coast Region
4949 Viewridge Avenue
San Diego, California 92123
(858) 467-4201
FAX (858) 467-4235



July 16, 2001

Anne Lowry
Land Development and Review Division
Planning and Development Review Department
1222 First Avenue, Fifth Floor MS 501
San Diego CA 92101

**Comments on the Notice of Preparation of a Draft Environmental Impact Report
for the Strategic Framework Element (SCH# 2001061069)**

Dear Ms. Lowry:

The California Department of Fish and Game (Department) has reviewed the above-referenced document for a proposed project in the City of San Diego, County of San Diego. The City of San Diego has an approved Subarea Plan and Implementing Agreement under the Natural Community Conservation Planning (NCCP) program. In preparing the environmental documentation for the proposed project, the Draft Environmental Impact Report (DEIR) must ensure and verify that all requirements and conditions of the Subarea Plan and Implementing Agreement are met. Biological issues that are not addressed in the Subarea Plan and Implementing Agreement, such as specific impacts on and mitigation requirements for wetlands or sensitive species and habitats that are not covered by the Subarea Plan and Implementing Agreement, also will need to be addressed.

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

Page 7 of the June 4, 2001, interdepartmental memorandum on the Scope of Work for the DEIR indicates that the DEIR should address the effects of increased runoff on urban canyons, "discuss the effect of potential increased opportunity for urban canyons to support riparian vegetation due to increased runoff," and "analyze the effects of resultant riparian areas, either naturally occurring or manually enhanced, in providing water quality controls." The Department is concerned about the implications of these statements. Specifically, we are concerned about the potential development-related effects from changes in natural hydrologic regimes. Changes in the velocity, volume, duration, frequency of surface flows can damage the morphology of streams, canyon drainages and slopes, and their associated biological resources. We are concerned about type changes such as converting intermittent streams/canyon drainages to

Anne Lowry
July 16, 2001
Page 2

ephemeral or even perennial water bodies. The DEIR should address the potential for this to occur and propose measures to avoid it. In addition, it is inappropriate to rely on natural water bodies to provide water quality control. The DEIR should discuss the use of on-site best management practices to fully mitigate for development-related contaminants in runoff prior to its discharge to canyons and water bodies.

Thank you for the opportunity to comment. Please contact Libby Lucas at (858) 467-4230 if you need to discuss this response.

Sincerely,



Donald R. Chadwick
Environmental Specialist Supervisor

cc: Department of Fish and Game
San Diego

U.S. Fish and Wildlife Service
Carlsbad

DEPARTMENT OF TRANSPORTATION

DISTRICT 11, P.O. BOX 85406, MAIL STATION 50, SAN DIEGO, 92186-5406
Telephone: (619) 688-6954
Fax: (619) 688-4299



RECEIVED

AUG 24 2001

PLANNING DIRECTOR

August 22, 2001

Ms. Anne Lowry
Environmental Analysis Section (EAS)
City of San Diego Development Services Dept.
1222 First Ave., MS-501
San Diego, CA 92101

RE: Notice of Preparation (NOP) of a Draft Environmental Impact Report (EIR) for the Strategic Framework Element of the City of San Diego's Progress Guide and General Plan (dated 6/12/01)

Dear Ms. Lowry:

The Department of Transportation appreciates the opportunity to comment on the NOP of a Draft EIR for the Strategic Framework Element of the City's Progress Guide and General Plan. The Department recognizes that there is a strong link between transportation and land use. Growth and development can have a significant impact on traffic and congestion on State transportation facilities. In particular, the pattern of land use can affect both total vehicle miles traveled and the number of trips per household. The challenge is to improve the mobility of San Diegans while at the same time enhancing the quality of life in communities and neighborhoods.

In lieu of reliance on the automobile for every trip, the Department supports the concept of neighborhoods which are mixed-use and local streets which are pedestrian-, bicycle-, and transit- friendly in order to enable residents to choose multiple modes of transportation. The manner in which land is developed can have a profound effect on the feasibility and accommodation of alternative transportation options. In order to create a more efficient and livable environment, bicycle, pedestrian, and transit planning should be integrated into long-term comprehensive land use planning efforts in San Diego. The Department encourages the City to ensure the General Plan Strategic Framework update is consistent with SANDAG's Region 2020 concept, MTDB's TransitWorks, and the City's own Transit Oriented Development Design Guidelines.

The Department supports the "City of Villages" concept which includes compact, mixed-use centers designed at a human (pedestrian / bicycle) scale which enable residents and visitors to achieve a high level of mobility. Within the context of good urban design and smart growth principles, a "City of Villages" can help to increase mobility and reduce traffic and congestion on State transportation facilities by providing functional alternatives to the automobile. The Department of Transportation supports the City of San Diego's leadership role in the region in the identification, creation, and/or redevelopment of villages which support smart growth objectives.

Sincerely,

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

BILL FIGGE, Chief
Development Review and Public Transportation Branch

cc: Gail Goldberg - City of San Diego Planning Dept.
Larry Van Wey - Caltrans / City of San Diego liaison
Brent McDonald - Caltrans Community Planning



Southeastern
Economic
Development
Corporation

July 27, 2001

Via Facsimile and Hand Delivered

T 619.527.7345
F 619.263.6912

Ms. Anne Lowry
Environmental Analysis Section
City Development Services Department
1222 First Avenue, MS 501
San Diego, CA 92101

Subject: Notice of Preparation of an EIR for the Strategic Framework Element of the City's Progress Guide and General Plan

Dear Ms. Lowry:

Thank you for the opportunity to comment on the Notice of Preparation (NOP) for the above-referenced Environmental Impact Report (EIR). The Southeastern Economic Development Corporation (SEDC) is neither a responsible agency nor a trustee agency as defined by Sections 15381 or 15386 of the State CEQA Guidelines. SEDC is a public corporation formed by the Redevelopment Agency of the City of San Diego to facilitate redevelopment activities within the community of Southeastern San Diego. The Redevelopment Agency has adopted the following redevelopment project areas for the community of southeastern San Diego: Central Imperial, Southcrest, Mount Hope, and Gateway Center West. The area known as Dells/Imperial is in SEDC's are of Influence but remains a study area. Each of the adopted redevelopment projects should be considered in the EIR analysis. The following comments address the questions and concerns as they relate to the redevelopment process.

Proposed Project Description

The project description should define the new funding sources, the reallocation of existing resources and adjustments to certain facility standards that are mentioned in Item 2, A Comprehensive Approach. Such standards affect the feasibility of implementing existing redevelopment projects.

Traffic Impacts and Mitigation

One particular area of concern is traffic. Many of the major streets in the community of southeastern San Diego operate at Level of Service (LOS) D or worse. SEDC believes that intersection operation is the primary factor affecting traffic. We believe the EIR should use the LOS parameter to screen street segments, tied to a threshold which would trigger impact analysis of intersections. The level of operation at intersections determines the motorist's experience of street operations. Changes in LOS on street segments alone should not result in significant traffic impacts that require streets to be widened. This appears to be consistent with the Neighborhood Quality discussion on Page 4.

With regard to mobility, SEDC is concerned that this EIR should not rely upon transit as the mitigation to resolve all traffic congestion. The EIR should quantify impacts to the extent feasible at this time. Mitigation measures need to be developed and reviewed for feasibility, specifically as related to the impact on future housing costs and development in general. In order to do this, fair share will need to be assigned. If such costs are excessive, the appropriate findings and statement of overriding consideration should be adopted with this programmatic EIR to facilitate future redevelopment projects.

Storm Water Runoff Mitigation

SEDC is also very concerned about the effect storm water runoff mitigation measures may have on the feasibility of future redevelopment activities. Stormwater pollution is an existing problem that should be only marginally increased with new development or redevelopment. The marginal effect of redevelopment on storm water should be fully explored in the programmatic EIR to ensure redevelopment does not pay an unfair share of the cost of reducing storm water pollution.

Plan to Plan Analysis

With regard to the EIR, it must include an analysis of plan to plan effects as well as plan to ground effects. It does not appear that issues such as obstruction of vistas, the loss of any distinctive landmark tree(s), and light/glare are issues that are ready for analysis at this time.

With regard to public services, the EIR should identify existing deficiencies and address how public services would be affected both with and without the proposed Strategic Framework Plan. Fire, police, and other City services that are on budget should be addressed as such at this time. It should not be left to future projects to individually address and mitigate any impacts to such services. Storm water drainage is already discussed above. Natural gas supplies are becoming increasingly scarce, and so project-related effects should be addressed.

Air Quality Analysis

The air quality analysis should include consideration of toxic hot spots in addition to addressing carbon monoxide (CO) hotspots.

Biological Resource Mitigation

Although very little of the Multi Habitat Planning Area (MHPA) is located in the southeastern community, the City has been applying Multi Species Conservation Program (MSCP) impact and mitigation criteria to projects in the southeastern area redevelopment project. This has resulted in an undue burden on redevelopment activities that affect such lower tier habitats as non-native grassland. The southeastern community has objected to the use of redevelopment funds to create and/or preserve mitigation habitat outside the community. To the extent that the proposed "City of Villages" plan proposes to increase residential densities at a number of locations in the southeastern community, the EIR should identify a mitigation program to be undertaken by the City to provide for the increased burden of habitat mitigation without imposing further mitigation requirements on the redevelopment projects.

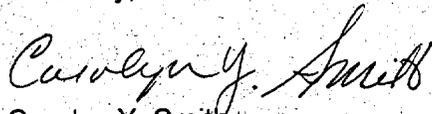
Ms. Anne Lowry
July 27, 2001
Page 3

Aesthetics and Urban Design

The Redevelopment Plans and the Southeast Planned District Ordinance (PDO) provide design guidelines for new development and redevelopment in the southeastern community. In addition, SEDC has adopted the Commercial Corridor Urban Design Guide and the Multi-Family Development Guidelines to guide the siting, design and character of redevelopment. These ordinances and guidelines should be the standard of review for the EIR to evaluate the aesthetic and urban design impacts of implementing the Strategic Framework Plan in the southeastern redevelopment project areas.

This letter provides SEDC's preliminary response to issues that should be addressed in the Strategic Framework Plan EIR. We look forward to reviewing the Draft EIR upon its completion. If you have any questions or need any assistance regarding information or your impact and mitigation analysis as it pertains to the SEDC's Redevelopment Project areas, please contact Derrick Johnson of my staff at (619) 527-7345.

Sincerely,



Carolyn Y. Smith
President

CYS:kk

c: Gail Goldberg, Director, Planning Department
Coleen Clementson, Program Manager-Strategic Framework
John Kovac, Sr. Planner



UNITED STATES MARINE CORPS
MARINE CORPS AIR BASES WESTERN AREA MIRAMAR
P.O. BOX 452001
SAN DIEGO, CA 92145-2001

11011.10D
G-5/40-1027
July 20, 2001

CITY OF SAN DIEGO
ENVIRONMENTAL ANALYSIS SECTION
ATTN ANNE LOWERY
1222 FIRST AVENUE MS 501
SAN DIEGO CA 92101

RE: SAN DIEGO GENERAL PLAN AND PROGRESS GUIDE; NOTICE OF
PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)
FOR STRATEGIC FRAMEWORK ELEMENT, AMENDMENTS AND ACTION
PLAN, LDR NO. 40-1027

Dear Ms. Lowery,

This is in response to the proposed "City of Villages" which addresses the infill and redevelopment of neighboring communities throughout the City of San Diego. As a member of this community, we share your concerns on all quality of life issues. This proposal has substantial merit in as much as the region is in a perpetual state of declining resources.

Any location examined for proposed redevelopment within the Miramar Airport Environs Overlay Zone should be included within the analysis. This analysis should address both the noise and safety impacts of densification for areas affected by Miramar operations. Further, established procedural requirements for development review would benefit by additional coordination with Marine Corps Air Station Miramar to preclude concerns on ministerial actions. This procedural review should include the Community Noise Equivalent Level (CNEL) noise contours, Accident Potential Zones and Horizontal Planes and Transitional Surface Areas for Miramar operations as adopted for land use planning purposes.

Thank you for the opportunity to review this land use proposal. If we may be of any further assistance, please contact Ms. C. Laura Thornton at (858)577-6603.

Sincerely,

A handwritten signature in black ink, appearing to read "G. L. Goodman".

G. L. GOODMAN
Colonel, U.S. Marine Corps
Assistant Chief of Staff
Community Plans and Liaison